

**IN THE COURT OF COMMON PLEAS OF FRANKLIN COUNTY, OHIO
CIVIL DIVISION**

JULIE LOVE
2268 Deewood Drive
Columbus, Ohio 43229

Plaintiff,

vs.

BLACK BRONCO CONSTRUCTION, LLC
c/o Firas I. Mahmood, Statutory Agent
6770 Laufer Road
Columbus, Ohio 43231

and

JOHN DOE
Name Unknown
Address Unknown

Defendants.

**COMPLAINT WITH JURY DEMAND
ENDORSED HEREON**

COMPLAINT

CAUSE OF ACTION - NEGLIGENCE

1. On or about October 10, 2024, in Columbus, Franklin County, Ohio, Defendant John Doe, whose name and address could not be discovered, negligently operated a motor vehicle by failing to assure a clear distance ahead and/or operating his motor vehicle at an improper and/or unsafe speed.
2. At all times pertinent to the foregoing, Defendant Black Bronco Construction, LLC negligently entrusted the vehicle to Defendant John Doe.
3. At all times pertinent to the foregoing, Defendant John Doe was operating the motor vehicle within the authorized course and scope of his employment and/or agency with Defendant Black Bronco Construction, LLC, thereby imputing Defendant John Doe's negligence to Defendant Black Bronco Construction, LLC.

4. As a direct and proximate result of Defendants' negligence, the vehicle operated by Defendant John Doe collided with the vehicle lawfully operated by Plaintiff Julie Love near the intersection of Community Park Drive and Cleveland Avenue.
5. As a direct and proximate result of Defendants' negligence, Plaintiff Julie Love suffered permanent injuries and damages to her body, including but not limited to her head, neck, back, hip, knee, ankle and other parts of her body, causing physical pain, suffering, discomfort, emotional and mental distress, loss of enjoyment of life, physical impairment and inability to perform ordinary activities, all of which and will continue to cause her to endure substantial pain and suffering.
6. As a direct and proximate result of Defendants' negligence, Plaintiff Julie Love has incurred bills for necessary services in an amount undetermined at present and expects to incur additional such expenses into the indefinite future.
7. As a direct and proximate result of Defendants' negligence, Plaintiff Julie Love has lost income and will lose income into the indefinite future.

WHEREFORE, Plaintiff requests judgment against Defendants as follows:

- I. Judgment against Defendants, jointly and severally, in an amount to be determined in excess of Twenty-Five Thousand Dollars \$25,000.00;
- II. Interest (pre- and post-judgment), costs and attorney fees;
- III. For any and all other such relief to which Plaintiff may be entitled at equity or in law.

Respectfully Submitted,

/s/ Jordan D. Thomas, Esq.

Jordan D. Thomas (0103155)

Paul W. Steele (0081043)

Dittmer, Wagoner & Steele, LLC

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Counsel for Plaintiff

JURY DEMAND

Now comes Plaintiff, by and through counsel, and demand trial of the within cause to a jury of eight (8) persons.

/s/ Jordan D. Thomas, Esq.
Jordan D. Thomas (0103155)
Paul W. Steele (0081043)
Counsel for Plaintiff