



Now come the Plaintiffs, by and through counsel, and for their Complaint state as follows:

**FIRST CAUSE OF ACTION**

1. Plaintiffs, are residents of Sylvania, Lucas County, Ohio.
2. Defendant, is a resident of Sylvania, Lucas County, Ohio.
3. On or about June 26, 2006, Plaintiff, Helen Reed was traveling southbound on Holland-Sylvania Road preparing to make a left hand turn in Sylvania, Lucas County, Ohio, when Defendant, Benjamin Dougherty, traveling northbound on same road, failed to obey the red traffic signal, causing a collision.
4. Defendant, is under a duty to operate his vehicle in a safe and prudent manner.
5. Defendant breached that duty of care by operating his vehicle in a negligent manner and colliding into the Plaintiff's vehicle while entering an intersection.
6. Defendant has the duty of care to Plaintiff to operate his vehicle in such a way so as not to harm the Plaintiff.
7. Defendant breached that duty of care by operating a motor vehicle in a dangerous and negligent way so as to injure the Plaintiff.

8. As a direct and proximate result of the negligence of Defendant, the Plaintiff sustained serious permanent personal injuries.
9. As a direct result of the Defendant's negligence, the Plaintiff, Helen Reed sustained injury to her head, neck, shoulders and back, as well as other body parts. The Plaintiff was required to undergo medical care, incurred medical care costs; suffered great pain and suffering, and severe mental anguish and emotional distress, as well as lost wages. Further, the Plaintiff believes that her injuries are permanent in nature and will require future medical care; future medical care costs future lost wages, and she will continue to endure great pain, suffering, mental anguish and emotional distress.

### **SECOND CAUSE OF ACTION**

- For the second claim of relief against the Defendant, the Plaintiffs state:
10. Plaintiffs incorporate by reference the allegations contained in paragraphs one through nine as though fully restated herein.
  11. At all times relevant herein, Plaintiff Richard Reed has been the husband of Plaintiff Helen Reed.
  12. As a direct and proximate result of the negligence of Defendant as set forth above, Richard Reed has lost the services, society, companionship, comfort, sexual relations, love and solace of Plaintiff, Helen Reed, and will

continue to lose same in the future due to the permanent nature of her injuries.

**WHEREFORE**, Plaintiffs respectfully requests judgment in an amount in excess of twenty-five thousand dollars (\$25,000.00) together with costs, interest and reasonable attorney's fees;

Respectfully submitted,

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Michael A. Bruno  
Attorney for Plaintiffs

**JURY DEMAND**

Now come the plaintiffs by and through counsel and hereby demand a jury trial on all issues triable by right herein.

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Michael A. Bruno  
Attorney for Plaintiffs