

IN THE CIRCUIT COURT OF PLATTE COUNTY, MISSOURI

MEGAN [REDACTED]
[REDACTED],

Plaintiff,

v.

SCOTT [REDACTED],
Serve at:
[REDACTED]
Kansas City, MO 64112,

Defendant.

Case No. _____

Division _____

PETITION

Plaintiff Megan [REDACTED] alleges as follows in support of her action against Defendant Scott [REDACTED]:

1. Plaintiff [REDACTED] is a resident of Olathe, Johnson County, Kansas.
2. Upon information and belief, Defendant [REDACTED] is a resident of Johnson County, Kansas, and works in Jackson County, Missouri, where he can be served at [REDACTED], Kansas City, MO 64112.
3. This Court has subject matter jurisdiction over this action pursuant to Article V, Section 14 of the Missouri Constitution.

4. This Court has personal jurisdiction over Defendant because Defendant can be served in the State of Missouri.

5. Venue properly lies in this Court pursuant to Mo. Rev. Stat. § 508.010 because Plaintiff's injury occurred in Platte County, Missouri.

THE INCIDENT

6. On June 4, 2014, at approximately 10:40 p.m., Plaintiff was lawfully operating her 2000 Honda Civic within a parking garage at Kansas City International Airport in Platte County, Missouri.

7. At about the same time, Defendant drove his 2012 Acura SUV up the ramp in the same parking garage, negligently failed to yield to Plaintiff, who had the right of way, and crashed into Plaintiff's vehicle.

8. Plaintiff was injured in the accident, continues to suffer from her injuries today and will suffer from her injuries in the future.

9. The accident was so forceful as to cause Plaintiff's vehicle to be undriveable. It had to be towed from the parking garage.

COUNT I: NEGLIGENCE

10. All previous paragraphs are hereby incorporated as if fully set forth herein.

11. Without limiting a general allegation of negligence on the part of Defendant, Plaintiff alleges her injuries were the direct and proximate result of

Defendant's negligence and failure to exercise ordinary care, in the following particulars:

- a. Defendant failed to yield to Plaintiff, who had the right of way, in the parking garage;
- b. Defendant failed to maintain his vehicle under proper control;
- c. Defendant failed to keep a proper lookout;
- d. Defendant failed to give full time and attention to the operation of his vehicle;
- e. Defendant failed to operate his vehicle in a careful and prudent manner and in so doing violated Mo. Rev. Stat. 304.012; and
- f. Defendant failed to take the steps necessary to avoid an accident.

12. As a result of Defendant's negligence and carelessness, Plaintiff has sustained damages for pain and suffering, mental anguish, temporary and permanent disability, medical expenses, and other losses, and will in the future sustain further damages for additional pain and suffering, mental anguish, temporary and permanent disability, medical expenses, and other losses.

WHEREFORE, Plaintiff prays for judgment in her favor and against Defendant for a reasonable sum of money damages in excess of \$25,000.00, costs of this action, and for such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby requests a trial by jury on all claims so triable.

Dated: August 8, 2018

Respectfully submitted,

[REDACTED]

By: 

Tim J. Riemann, MO Bar 61757

[REDACTED]

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