

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI

YLONDA WOULARD

PLAINTIFF

VS.

CIVIL ACTION NO.: 2017-00137(1)

GREENWOOD MOTOR LINES, INC.
d/b/a R+L CARRIERS; and
CURTIS HARRIS, JR.

DEFENDANTS

SUMMONS

STATE OF MISSISSIPPI
COUNTY OF JACKSON

TO THE SHERIFF OR ANY PROCESS SERVER OF THE STATE OF MISSISSIPPI

TO: Greenwood Motor Lines, Inc. d/b/a R+L Carriers
C/O Karen Edge (Registered Agent) of Evilsizor Process Servers, LLC (BOC3)
405 W. College Street, Booneville, MS 38829

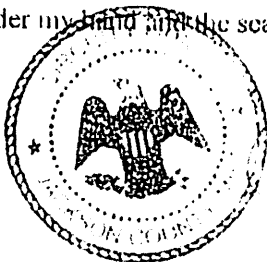
NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of the written Answer to the Complaint and Responses to Discovery to **John N. Satcher, II / Satcher Law Firm, PLLC, Attorneys for the Plaintiff, whose address and telephone number is Post Office Box 12369, Jackson, MS, 39236; (601) 355-4878.** Your Answer to the Complaint must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. Your Response to Discovery must be mailed or delivered within forty-five (45) days from the date of delivery of this summons.

Issued under my hand and the seal of said Court, this the 27th day of JULY, 2017.

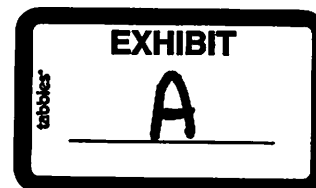
(SEAL)



CIRCUIT CLERK OF JACKSON COUNTY,
MISSISSIPPI

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IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI

FILED

YLONDA WOULARD

JUL 25 2017

PLAINTIFF

VS.

BY RANLY CARNEY CLERK ACTION NO.: 2017-00,137(1)
D.C.

GREENWOOD MOTOR LINES, INC.
d/b/a R+L CARRIERS; and
CURTIS HARRIS, JR.

DEFENDANTS

COMPLAINT
{JURY TRIAL}

COMES NOW the Plaintiff, Ylonda Woulard, and files this her Complaint against the Defendants Greenwood Motor Lines, Inc. d/b/a R+L Carriers; and Curtis Harris, Jr., and for cause would show unto the Court the following facts, to-wit:

1.

The Plaintiff, Ylonda Woulard (hereinafter "Plaintiff"), is an adult resident citizen of the State of Mississippi who at the time of the accident resided at 896 Woulard Bend River Road, State Line, Mississippi 39362.

2.

The Defendant, Greenwood Motor Lines, Inc. d/b/a R+L Carriers (hereinafter "R+L Carriers") is a foreign corporation organized and existing under the laws of the State of Ohio with a principal office located at 600 Gillam Road, Wilmington, Ohio 45177. R+L Carriers conducts business in interstate commerce trucking transportation including the State of Mississippi. Pursuant to the Federal Motor Carrier Safety Administration requirements, R+L Carriers has designated a local process agent and blanket company who may be served with service of process: Karen Edge, Evilisizer Process Servers, LLC, located at 405 W. College Street, Booneville, Mississippi 38829.

3.

Defendant, Curtis Harris, Jr., (hereinafter sometimes referred to as "Harris") was the driver for R+L Carriers involved in the accident. Defendant Harris is an adult resident citizen of Louisiana, who at the time of the accident resided at 732 Plymouth Drive, LaPlace, Louisiana 70068. Defendant may be served with process at his residence or wherever else he may be found.

4.

At all relevant times the Defendant Harris was acting in the course and scope of his employment as a driver for R+L Carriers. R+L Carriers is liable for the actions and/or omissions of Defendant Harris and any and all negligence committed by Defendant Harris may be imputed to R+L Carriers.

5.

The accident which forms the subject matter of this litigation occurred on Interstate 10 near Gautier, Mississippi within the confines of Jackson County. Venue is proper in Jackson County Mississippi pursuant to Miss. Code Ann. § 11-11-3 as the accident which forms this litigation occurred and damages accrued in Jackson County, Mississippi. Jurisdiction is proper in the Circuit Court of Jackson County, Mississippi.

6.

That on November 5, 2015 at approximately midnight, the Plaintiff was traveling east on Interstate 10. Simultaneously therewith, Defendant Harris was driving the R+L Carriers 18-wheeler traveling east on Interstate 10 directly behind the Plaintiff. As Defendants' 18-wheeler approached the Plaintiff, Defendant failed to slow down, failed to yield to the vehicle in front of it and rear ended the Plaintiff. Plaintiff did not have time to avoid the accident and Defendants' vehicle collided with

Plaintiff causing serious bodily injury and a total loss to Plaintiff's vehicle. Without good reason R+L Carriers's driver Harris did not slow down, was not aware of other vehicles lawfully traveling on I-10 and caused the accident in question. Defendants did negligently fail to keep their vehicle under reasonable control and rear ended the Plaintiff causing the collision aforementioned.

7.

The Defendants are guilty of the following additional acts of negligence which proximately caused or proximately contributed to the collision herein and the injuries sustained by the Plaintiff without any negligence on the part of the Plaintiff contributing thereto, to-wit:

- a. Failure to exercise ordinary and reasonable care to keep a proper lookout and alert for other vehicles lawfully traveling on the same roadway, including that of the Plaintiff;
- b. Failure to keep the commercial motor vehicle under such control as a reasonable, prudent and skilled transportation driver would have done;
- c. Negligently rear ending the Plaintiff in her lane of travel; and
- d. Such other negligence as may be shown at the trial of this matter.

8.

As direct and proximate result of the negligence of the Defendants aforesaid without any negligence on the part of the Plaintiff, there was a violent collision and the Plaintiff suffered trauma. Plaintiff was caused to suffer bulging and herniated discs to her cervical and lumbar spine; required surgical repair for herniated disc; and had various other injuries, including but not limited to other injuries as identified in her medical records; and general overall soreness and stiffness. The Plaintiff required physician treatment, diagnostic tests and had to secure the services of specialist including a neurosurgeon, physical therapist and rehabilitation, and other medical care providers to treat her. The Plaintiff has been caused to suffer great and excruciating physical pain and mental anguish and Plaintiff will continue to suffer the effects of her injuries, surgeries and impairment to her body as

a whole in the future. The Plaintiff may require future medical care and treatment for the injuries described above and as documented in her medical records and she will continue to incur expenses for such. Plaintiff has suffered in the past and will suffer in the future a loss of vitality and the capacity to enjoy life.

9.

As a result of the accident, injuries sustained, resulting surgeries and rehabilitation time, Plaintiff has been unable to be gainfully employed since the date of the accident and Plaintiff will suffer a loss of future wages for her permanent impairment, restrictions and disability. The full effect of Plaintiff's loss of wage claim has not been realized at the time of the filing of this Complaint due to Plaintiff's ongoing medical treatment, rehabilitation and future impairment rating based upon the extent of her ongoing recovery.

WHEREFORE, PREMISES CONSIDERED, the Plaintiff Ylonda Woulard demands judgment of, from and against the Defendants Greenwood Motor Lines, Inc. d/b/a R+L Carriers; and Curtis Harris, Jr. for her economic and non-economic damages in an amount to be determined by a jury.

RESPECTFULLY SUBMITTED,

YLONDA WOULARD, Plaintiff

BY: SATCHER LAW FIRM, PLLC
Her Attorneys

BY: 
JOHN N. SATCHER, II

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