

IN THE COMMON PLEAS COURT OF LUCAS COUNTY, OHIO

ALFREDA RAYFORD
Individually and as legal guardian of the
minor, Timothy Harris II
926 Hamilton Street
Toledo, OH 43607

Plaintiffs

vs.

WILLIAM KEATON
3104 Carskadon #203
Toledo, OH 43606

Defendant

) Case No.:
)
) Judge
)
) **COMPLAINT WITH JURY DEMAND**
) **AND ATTACHED DISCOVERY**
) **REQUESTS**
)
) Charles E. Boyk (0000494)
) *Charles E. Boyk Law Offices, LLC*
) 405 Madison Avenue
) Suite 1200
) Toledo, Ohio 43604
) Telephone: (419) 241-1395
) Facsimile: (419) 241-8731
) email: boykdiscovery@gmail.com
)
) Attorney for Plaintiffs
)
)

Now come the Plaintiffs, by and through counsel and alleges as follows:

FIRST CAUSE OF ACTION

For the first claim of relief against the Defendant, the Plaintiffs state:

1. The Plaintiffs are residents of Toledo Lucas County, Ohio.
2. Plaintiff Alfreda Rayford is the guardian and next friend of Timothy Harris II, a minor.

3. Defendant William Keaton is a resident of Toledo, Lucas County, Ohio.
4. On or about November 28, 2007, Timothy Harris II, a minor, was a pedestrian crossing the street in front of his stopped school bus on Nebraska Avenue in order to reach the sidewalk on the other side of the road when Defendant William Keaton struck him with his vehicle.
5. The accident occurred in Toledo, Lucas County, Ohio.
6. Defendant William Keaton owed a duty of care to Timothy Harris II not to operate a vehicle in such a manner that may cause injury to him.
7. Defendant William Keaton breached that duty of care by operating his vehicle in a dangerous and negligent way so as to injure Timothy Harris II.
8. As a direct and proximate result of Defendant William Keaton's negligence, Timothy Harris II sustained serious permanent personal injuries.
9. As a direct result of Defendant William Keaton's negligence, Timothy Harris II sustained serious personal injuries to his entire left leg, left knee, and entire body. Timothy Harris II was required to undergo hospital and medical care; incurred hospital and medical care costs; incurred great pain, suffering, and severe mental anguish and emotional distress. Further, Timothy Harris II believes that his injuries are permanent in nature and will require future medical care; future medical care costs and he 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. The Plaintiffs incorporate by reference all of the above paragraphs as though fully restated herein.
11. Plaintiff Alfreda Rayford is the mother of Timothy Harris II, a minor.
12. Plaintiff Alfreda Rayford states that as a result of the negligence of the Defendant, she has been deprived of the love, affection, services, and consortium and society of her son, Timothy Harris II, and that the enjoyment and quality of life and her ability to carry on the normal activities of her daily life with her son has been impaired.

WHEREFORE, the Plaintiffs pray for a judgment against the Defendant in the following matter:

1. On the FIRST CAUSE of action a judgment against Defendants in an amount in excess of Two Hundred Thousand Dollars (\$200,000.00) together with interest, costs and reasonable attorney fees associated herewith.
2. On the SECOND cause of action a judgment against Defendants in an amount in excess of Two Hundred Thousand Dollars (\$200,000.00) together with interest, costs and reasonable attorney fees associated herewith.

Respectfully submitted,

Charles E. Boyk
Attorney for Plaintiffs

JURY DEMAND

The Plaintiffs demand a trial by jury on all issues triable by right.

By _____
Charles E. Boyk
Attorney for Plaintiff