



The Plaintiffs, by and through counsel, allege as follows:

**FIRST CAUSE OF ACTION**

For the first claim of relief against the Defendants, the Plaintiff state:

1. The Plaintiff is a resident of Toledo, Lucas County, Ohio.
2. The Plaintiff was the passenger in a vehicle owned by Vernon Hornbeck.
3. Defendant State Farm Insurance Company is an insurance company licensed to sell insurance in the State of Ohio, which issued a policy to Vernon Hornbeck that would cover the injuries sustained by Deloris Hunt as a result of the automobile accident addressed in more detail below. The policy is not attached because it is not in the Plaintiffs' possession.
4. On or about September 12, 2006, Vernon Hornbeck was traveling westbound on Dorr Street in Toledo, Lucas County, Ohio, when he was rear-ended by a vehicle driven by Jeremy Bowers.
5. Permanent General Insurance Company, which insured Jeremy Bowers, already settled with the Plaintiff as a result of Jeremy Bower's negligence. The Defendants consented to the Plaintiffs' acceptance of the policy limits of Permanent General Insurance Company.
6. Jeremy Bower's negligent conduct injured Plaintiff Deloris Hunt.
7. As a direct and proximate cause of Jeremy Bower's negligence, Plaintiff Deloris Hunt sustained serious permanent personal injuries to her neck, back, shoulders, and entire body. Plaintiff Deloris Hunt was required to undergo hospital and medical care; incurred hospital and medical care costs; incurred great pain, suffering, severe mental anguish, and emotional distress.

Further, the Plaintiff believes that these injuries are permanent in nature and will require future medical care; future medical care costs and she will continue to endure great pain, suffering, mental anguish, and emotional distress.

8. Plaintiff Deloris Hunt additionally suffered a loss of wages.

### **SECOND CAUSE OF ACTION**

For the second claim of relief against the Defendants, the Plaintiffs state:

9. The Plaintiffs incorporate by reference all of the above paragraphs as though fully restated herein.
10. Plaintiff Deloris Hunt was covered by a policy of insurance issued by State Farm Insurance Company that provided for uninsured and underinsured motorist coverage as well as medical payments coverage.
11. As a direct and proximate result of this accident, Plaintiff Deloris Hunt suffered serious personal injuries and the Plaintiffs have incurred numerous medical expenses.

**WHEREFORE**, Plaintiffs pray that judgment be entered against the Defendants as follows:

1. On Causes of Action One and Two a judgment against Defendant in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00) together with interest, costs and reasonable attorney fees associated herewith. Additionally, a declaratory judgment to determine the Plaintiffs' rights and the Defendant State Farm Insurance Company's responsibility under the

uninsured/underinsured motorist coverage and medical payments,  
together with interest, costs and reasonable attorney fees associated  
with this action.

Respectfully submitted,

---

Charles E. Boyk  
Attorney for Plaintiff

**JURY DEMAND**

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

By \_\_\_\_\_  
Charles E. Boyk  
Attorney for Plaintiff