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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

[REDACTED], as Parent/Legal  
Guardian of [REDACTED] a minor child,

NO. 19-2-31603-9 KNT

Plaintiffs,

COMPLAINT FOR DAMAGES

vs.

RENEE E. TYLER and RUSSELL L.  
TYLER, individually and the marital  
community composed thereof; SALLY  
TUCKER and MERTON TUCKER,  
individually and the marital community  
composed thereof; and BOYS & GIRLS  
CLUBS OF KING COUNTY, a Washington  
corporation.

Defendants.

COME NOW Plaintiffs against the above-named Defendants, and states and alleges  
as follows:

**I. PARTIES & JURISDICTION**







1           5.3     Defendant Boys & Girls Club failed to act reasonably and otherwise exercise  
2 ordinary care by, among other things, taking a group of children out for a run on city streets in  
3 poor visibility weather conditions.

4           5.4     Defendant Boys & Girls Club failed to act reasonably and otherwise exercise  
5 ordinary care by, among other things, failing to monitor the crossing of all children in a  
6 crosswalk during poor visibility weather conditions.

7           5.5     As a result of this Defendant's negligence, Plaintiffs were injured, suffered,  
8 and continue to suffer, physical disability and pain, emotional trauma, medical expenses, loss  
9 of earnings and earning capacity, loss of consortium, and other damages.  
10

11  
12           WHEREFORE, Plaintiffs pray for judgment against Defendants, jointly and  
13 severally, as follows:  
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15           1.     For all damages sustained by Plaintiff ██████ in an amount to be proven at trial,  
16 including without limitation, past and future medical expense and other healthcare expenses,  
17 pain and suffering, both mental and physical, loss of enjoyment of life, disability, past and  
18 future special damages, and other damages;

19           2.     Interest calculated at the maximum amount allowable by law, including pre-  
20 and post-judgment interest;  
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22           3.     A reasonable attorney's fee as allowed by law;

23           4.     Costs and disbursements pursuant to statute; and

24           5.     Other and further relief as this Court may deem just and equitable.  
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Dated this 15<sup>th</sup> day of October.

**DAVIS LAW GROUP, P.S.**

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*Attorneys for Plaintiffs*