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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

LEWIS TAYLOR, JR., individually

Plaintiff,

vs.

EDWARD R. WELCH and JANE DOE
WELCH, individually and the marital
community composed thereof,

Defendants.

NO.
COMPLAINT FOR DAMAGES

COMES NOW Plaintiff against the above-named Defendants, and states and alleges
as follows:

I. PARTIES & JURISDICTION

1.1 Plaintiff Lewis Taylor is now, and was at all relevant times hereinafter
alleged, a resident of King County, Washington.

1.2 Defendant Edward R. Welch is now believed to be, and was at all relevant
times hereinafter alleged, a resident of King County, Washington. If this Defendant is
married, his acts and omissions hereinafter described were for and on behalf of his marital
community.

1 2.9 Defendant Edward R. Welch was operating his vehicle with frost on the
2 windshield.

3 2.10 Defendant Edward R. Welch was cited for Reckless Driving.

4 2.11 Plaintiff Lewis Taylor, Jr. sustained bodily injuries and other damages as a
5 result of the collision.
6

7
8 **III. CAUSE OF ACTION--NEGLIGENCE**

9 3.1 Plaintiff re-alleges the allegations contained in Sections I through II, and
10 incorporates them as though fully set forth herein.

11 3.2 Defendant Edward R. Welch owed Plaintiff a duty of care and a duty to act
12 reasonably.

13 3.3 Defendant Edward R. Welch breached his duty of care and his duty to act
14 reasonably by, among other things, failing to operate his vehicle in a safe, careful and
15 prudent manner.
16

17 3.4 Defendant Edward R. Welch breached his duty of care and his duty to act
18 reasonably by, among other things, failing to exercise ordinary care and causing a collision
19 with the Plaintiff.
20

21 3.5 As a result of the Defendant's negligent conduct, Plaintiff was injured,
22 suffered, and continues to suffer, physical disability and pain, emotional trauma, medical
23 expenses, loss of earnings and earning capacity, and other damages.
24

25 **IV. NO CONTRIBUTORY NEGLIGENCE/COMPARATIVE FAULT**

1 4.1 The damages suffered by Plaintiff were not caused by any fault, carelessness,
2 or negligence on his part, but were caused solely and proximately by the tortious acts and/or
3 omissions of Defendant.

4 4.2 There are no other entities which caused or contributed to Plaintiff's injuries
5 or damages.
6

7 WHEREFORE, Plaintiff prays for judgment against the Defendant, jointly and
8 severally, as follows:
9

10 1. For all damages sustained by Plaintiff in an amount proven at trial, including
11 past and future medical expenses and other health care expenses, pain and suffering, both
12 mental and physical, past and future permanent partial disability and disfigurement, loss of
13 enjoyment of life, damages to property, past and future special damages, and other damages;
14

15 2. Interest calculated at the maximum amount allowable by law, including pre-
16 and post-judgment interest;

17 3. A reasonable attorney's fee as allowed by law;

18 4. Costs and disbursements pursuant to statute; and

19 5. Other and further relief as this Court may deem just and equitable.
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21
22 ///

23 ///

1 Dated this 12th day of December, 2018.

2
3 **DAVIS LAW GROUP, P.S.**

4 /s/ W. BRADFORD BERNADT

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Attorneys for Plaintiff Lewis Taylor