

to persons lawfully and rightfully along and upon said public streets including the Plaintiff herein.

4. That at the time and place aforesaid, the vehicle being driven by the Defendant, ANDREA BIRD, came into contact with the vehicle being driven by the Plaintiff, ROBERT MOTTA.
5. That at the time and place aforesaid, the Defendant, was then and there guilty of one or more or all of the following careless and negligent acts and omissions which proximately caused the collision, injuries and damages to Plaintiff:
 - a. Carelessly and negligently operated, maintained, managed and controlled said motor vehicle;
 - b. Carelessly and negligently operated Defendant's motor vehicle without sufficient and proper lookout for other vehicles then and there proceeding at said time and place;
 - c. Carelessly and negligently failed to decrease the speed of Defendant's vehicle to avoid colliding with other vehicles then and there proceeding at said time and place in violation of Chapter 625 ILCS 5/11-601;
 - d. Carelessly and negligently operated, maintained, managed and controlled Defendant's vehicle at a rate of speed that was greater than reasonable without regard to traffic conditions then and there existing, in violation of Chapter 625 ILCS 5/11-601;
 - e. Carelessly and negligently failed to have Defendant's vehicle equipped with proper, adequate and sufficient brakes and braking equipment, contrary to and in violation of the provisions of Chapter 625 ILCS 5/12-301;
 - f. Carelessly and negligently failed to give audible warning with a horn in violation of the provisions of Chapter 625 ILCS 5/12-601;
 - g. Carelessly and negligently failed to slow or stop Defendant's vehicle when danger of a collision was apparent to said Defendant;
 - h. Carelessly and negligently changed lanes when it was not safe to do so in violation of the provisions of Chapter 625, Section 5/11-709 of the Illinois Compiled Statutes;
 - i. Carelessly and negligently deviated from Defendant's lane in violation of the provisions of Chapter 625, Section 5/11-709 of the Illinois Compiled Statutes; or

- j. Otherwise carelessly and negligently operated Defendant's motor vehicle.
6. That as a direct and proximate result of the aforesaid negligent and careless acts of the Defendant, ANDREA BIRD, , the motor vehicle of the Defendant struck the motor vehicle being thereof, the motor vehicle driven by the Plaintiff sustained property damage and the Plaintiff, ROBERT MOTTA, was then and there seriously injured, both internally and externally, and Plaintiff thereby sustained injuries to Plaintiff's muscles, tissues, ligaments and nervous system, suffered great pain, distress and physical impairment, all of which is permanent in nature; incurred and will continue to incur great expenses for necessary medical and hospital care and attention, lost great gains and profits which Plaintiff otherwise would have acquired and has been kept from attending to Plaintiff's ordinary affairs and duties.

WHEREFORE, the Plaintiff, ROBERT MOTTA prays for judgment against the Defendant, ANDREA BIRD, for a sum in excess of \$50,000.00 plus costs.

Respectfully submitted,

SHUMAN LEGAL

By: 
Attorneys for Plaintiff

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In Your Favor.™

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