

**ANZALONE LAW OFFICES**

**By: William F. Anzalone, Esquire  
Identification No.: 25681  
Jamie Joseph Anzalone, Esquire  
Identification No.: 202764**

**Attorney for: Plaintiffs**

**98 South Franklin Street  
Wilkes-Barre, PA 18701  
(570) 825-2719**

---

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

KAREN A. AMESBURY Executrix of the :  
ESTATE OF BRIAN MARK PATTON, :  
Deceased, and AMY BETH PATTON, :  
his wife, :

Plaintiffs :

JURY TRIAL DEMANDED

vs. :

CSA, LTD. (CSA), COMBAT SUPPORT :  
ASSOCIATES, AECOM GOVERNMENT :  
SERVICES, INC. (AECOM), RESEARCH :  
AND ANALYSIS MAINTENANCE, INC., :  
(RAM), SMI INTERNATIONAL CORP. :  
(SMI) and MORGAN LEE HANKS, :

Defendants :

No.

**COMPLAINT**

The Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, by and through their counsel, William F. Anzalone, Esquire, hereby complain against the above captioned Defendants and set forth the following in support thereof:

1. That the Plaintiff, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, is an adult individual who currently resides at 91 Diebel Avenue, Wilkes-Barre, Luzerne County, Pennsylvania 18702.

2. That the Plaintiff, Karen A. Amesbury, was duly appointed Executrix of the Estate of Brian Mark Patton, Deceased, by the Register of Wills of Luzerne County on November 30, 2009 and indexed to File No. 4009-1999.

3. That the Plaintiff, Amy Beth Patton, is the wife of the decedent, Brian Mark Patton, and is an adult individual who currently resides at 744 South Hanover Street, Nanticoke, Luzerne County, Pennsylvania 18634.

4. That the Defendant, CSA, LTD., hereinafter referred to as CSA, is a Cayman Island Corporation created to provide civil support services to the United States Department of Defense, Camp Doha, Kuwait, which said corporation was created and owned by the Defendant, Combat Support Associates, an unincorporated joint venture, with its principal offices located at 555 South Flower Street, Los Angeles, California, and/or 999 West Town and Country Road, Orange, California 92868 and/or 1200 Summit Avenue, Suite 320, Fort Worth, Texas 76102.

5. That the Defendant, Combat Support Associates, an unincorporated joint venture, was created to provide civilian support services to the United States Department of Defense, Camp Doha, Kuwait, with principal offices located at 555 South Flower Street, Los Angeles, California, and/or 999 West Town and Country Road, Orange, California 92868, and/or 1200 Summit Avenue, Suite 320, Fort Worth, Texas 76102, owns CSA, LTD. and which was created to provide civilian support services to the United States Department of Defense, Camp Doha, Kuwait.

6. That the Defendant, AECOM Government Services, Inc., hereinafter referred to as AECOM, is a corporation, whose principal offices are located at 1200 Summit Avenue, Suite 320, Fort Worth, Texas 76102-4406.

7. That the Defendant, Research and Analysis Maintenance, Inc., hereinafter referred to as RAM is a corporation, whose principal place of business is located at 9440 Viscount Boulevard, Suite 200, El Paso, Texas 79925.

8. That the Defendant, SMI International Corporation, hereinafter referred to as SMI, is a corporation, whose principal place of business is located at 5520 Tech Center Drive, Colorado Springs, Colorado 80919.

9. The said Defendants, AECOM, RAM, and SMI, all of which are U.S. based, own the said Defendant, Combat Support Associates, an unincorporated joint venture, which owns CSA, LTD.

10. That at all times material hereto, the said Defendants, either individually or collectively, conducted business in the Commonwealth of Pennsylvania on a continuous and systematic basis, through solicitations of the residents of the Commonwealth of Pennsylvania for job opportunities as well as continuously and systematically contracting with various government contractors and private contractors, whose manufacturing plants are located in the Commonwealth of Pennsylvania and the United States District Court for the Middle District of Pennsylvania, through products they would need in discharging their duties as a government contractor, in providing support services to the United States of America to its U.S. Military located at Camp Doha, Kuwait, allowing for venue in the United States District Court for the Middle District of Pennsylvania.

11. That the Defendant, Morgan Lee Hanks, is an adult individual, who currently resides at 3242 William Styron Square, Newport News, Virginia 23606.

12. That at all times relevant hereto, the Defendant, Morgan Lee Hanks, was the servant, agent, and/or employee of the Defendants, either individually and/or collectively, being employed by Combat Support Associates, or CSA, LTD., which was owned and controlled by Combat Support Associates, an unincorporated joint venture, which was owned by AECOM, SMI, and RAM, said Defendants, and at all times material hereto, was acting within the course and scope of his employment and with the permission and consent of the said Defendants.

13. That the amount in controversy herein, exclusive of interest and costs, is in excess of the amount of seventy-five thousand (\$75,000.00) dollars and the jurisdiction of this Court is based upon diversity of citizenship, 28 U.S.C. Section 1332.

14. That on November 19, 2009, at approximately 8:15 a.m., the Defendant, Morgan Lee Hanks, was the operator of a 2008 Mitsubishi Pajero, owned by the Defendants.

15. That on the aforementioned date and at the aforementioned time, the Plaintiff's Decedent, Brian Mark Patton, was the operator of 2007 Dodge Durango.

16. That on November 19, 2009, at approximately 8:15 am, the Plaintiff's Decedent, Brian Mark Patton, was traveling southbound on routine patrol on Alternate Supply Route (ASR) Aspen Road, Grid 38RQT3294670081, Buehring, Kuwait while the Defendant, Morgan Lee Hanks was traveling northbound on ASR Aspen Road nearing the vicinity of the Plaintiff's Decedent, Brian Mark Patton.

17. That on the aforementioned date and aforementioned time, the Defendant, Hanks, was illegally passing a northbound convoy consisting of six (6) buses and two (2) escort SUVs that had been traveling in a northbound direction on said ASR Aspen Road by going into the southbound lane at a speed in excess of double the speed limit for Aspen Road which was posted at 80 km at which point he saw the Plaintiff's Decedent, Brian Mark Patton's vehicle traveling and lawfully occupying the southbound oncoming lane.

18. That on the aforementioned date and at the aforementioned time, the Plaintiff's Decedent, Brian Mark Patton, took evasive action in an attempt to avoid a collision with the said Defendant, Hanks' vehicle, however was unable to do so, resulting in a violent collision, causing the death of the Plaintiff's Decedent, Brian Mark Patton.

WHEREFORE, the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, seek compensatory damages of the Defendants, CSA, LTD., Combat Support Associates, an unincorporated joint venture, AECOM, SMI, RAM, and Morgan Lee Hanks, jointly, severally, jointly and severally in an amount in excess of seventy-five thousand (\$75,000.00) dollars.

**COUNT I - NEGLIGENCE**

**KAREN A. AMESBURY, EXECUTRIX OF THE ESTATE OF BRIAN MARK PATTON, DECEASED, AND AMY BETH PATTON, HIS WIFE vs. CSA, LTD. (CSA), COMBAT SUPPORT ASSOCIATES, AECOM GOVERNMENT SERVICES, INC. (AECOM), RESEARCH AND ANALYSIS MAINTENANCE, INC., (RAM), SMI INTERNATIONAL CORP. (SMI) and MORGAN LEE HANKS,**

19. That the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, incorporate herein by reference

as though the same were herein set forth fully at length, paragraphs 1 - 18, inclusive, of this Complaint.

20. That the careless, reckless and negligent conduct of the Defendant, Morgan Lee Hanks, individually and as the agent, servant, workman and/or employee of the Defendants, vicariously, and of the Defendants, individually and/or collectively, which caused the death of the Plaintiff's Decedent, Brian Mark Patton, included, but is not limited to the following:

- a. In then and there failing to have his vehicle under such control so that it could be stopped within the assured clear distance ahead;
- b. In then and there failing to have his vehicle under such control that it could be stopped upon the appearance of danger;
- c. In then and there operating his vehicle at a speed greatly in excess for vehicles traveling on ASR Aspen Road;
- d. In then and there allowing his vehicle to collide with the Plaintiff's Decedent's vehicle;
- e. In then and there failing to sound his horn or otherwise give warning that he was about to collide with the vehicle being then and there operated by the Plaintiff's Decedent, Brian Mark Patton;
- f. In then and there losing complete control of his vehicle on ASR Aspen Road;
- g. In then and there attempting to make a pass on ASR Aspen Road when said road has posted no passing signs;
- h. In then and there failing to return to the northbound lane once the Plaintiff's Decedent's vehicle came into view;
- i. In then and there failing to prevent his vehicle from colliding with the Plaintiff's Decedent's vehicle;
- j. In then and there proceeding at a high rate of speed in the opposite lane of travel over a knoll on ASR Aspen Road, without knowing or having visibility of the southbound traveling vehicle operated by

the Plaintiff's Decedent, Brian Patton, placing said Brian Patton and his passenger, at great risk of serious injury or death;

- k. In then and there consciously disregarding the high probability of risk of serious harm or death which would be incurred by occupants of southbound vehicles on ASR Aspen Road, which would include the Plaintiff's Decedent, Brian Patton, and his passenger, when the said Defendant, Morgan Lee Hanks, proceeded at a high rate of speed in the opposite lane of travel over a knoll on ASR Aspen Road without knowing or having visibility of the said vehicle being then and there operated by the Plaintiff's Decedent, Brian Patton; and
- l. In then and there violating the rules of the road, the international rules of the road, as well as the motor vehicle provisions of the country of Kuwait as more specifically set forth in subparagraphs (a) through (k) inclusive.

WHEREFORE, the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, seek compensatory damages of the Defendants, CSA, LTD., Combat Support Associates, an unincorporated joint venture, AECOM, SMI, RAM, and Morgan Lee Hanks, jointly, severally, jointly and severally in an amount in excess of seventy-five thousand (\$75,000.00) dollars.

### **COUNT II - NEGLIGENCE**

**KAREN A. AMESBURY, EXECUTRIX OF THE ESTATE OF BRIAN MARK PATTON, DECEASED, AND AMY BETH PATTON, HIS WIFE vs. CSA, LTD. (CSA), COMBAT SUPPORT ASSOCIATES, AECOM GOVERNMENT SERVICES, INC. (AECOM), RESEARCH AND ANALYSIS MAINTENANCE, INC., (RAM), SMI INTERNATIONAL CORP. (SMI) and MORGAN LEE HANKS,**

21. That the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, incorporate herein by reference as though the same were herein set forth fully at length, paragraphs 1 - 20 inclusive of this Complaint.

22. That the carelessness, recklessness and negligence of the Defendants, individually and/or collectively in addition to those alleged in paragraph 19, consisted of the following:

- a. In then and there failing to train the Defendant, Morgan Lee Hanks, on the proper manner of passing a military convoy on roadways located in Kuwait;
- b. In then and there allowing the Defendant, Morgan Lee Hanks to operate their vehicle when they knew that said Morgan Lee Hanks had a history of driving in excess of the speed limit;
- c. In then and there entrusting one of their vehicles to Defendant, Morgan Lee Hanks when they knew that he had a history of driving recklessly;
- d. In then and there employing the Defendant, Morgan Lee Hanks, to drive one of their vehicles, knowing his adverse driving history;
- e. In then and there permitting the Defendant, Morgan Lee Hanks, to operate their motor vehicle, over the road, when they knew the Defendant, Morgan Lee Hanks, was not qualified to do so; and
- f. In then and there failing to enforce CSA's safety regulations and procedures relative to the operation of CSA's vehicles on roadways located in Kuwait.

WHEREFORE, the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, seek compensatory damages of the Defendants, CSA, LTD., Combat Support Associates, an unincorporated joint venture, AECOM, SMI, RAM, and Morgan Lee Hanks, jointly, severally, jointly and severally in an amount in excess of seventy-five thousand (\$75,000.00) dollars.



**COUNT III - PUNITIVE DAMAGES**

**KAREN A. AMESBURY, EXECUTRIX OF THE ESTATE OF BRIAN MARK PATTON, DECEASED, AND AMY BETH PATTON, HIS WIFE vs. CSA, LTD. (CSA), COMBAT SUPPORT ASSOCIATES, AECOM GOVERNMENT SERVICES, INC. (AECOM), RESEARCH AND ANALYSIS MAINTENANCE, INC., (RAM), SMI INTERNATIONAL CORP. (SMI) and MORGAN LEE HANKS,**

23. That the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, incorporate herein by reference as though the same were herein set forth fully at length, paragraphs 1 - 22 inclusive of this Complaint.

24. That the conduct of the Defendants, CSA, LTD. (CSA), Combat Support Associates, AECOM Government Services, Inc. (AECOM), Research and Analysis Maintenance, Inc. (RAM), SMI International Corp. (SMI) and Morgan Lee Hanks, individually and/or collectively as more particularly set forth in paragraphs 16 (a - l) and 22 (a- f) inclusive, constituted a wanton and reckless disregard for the safety of the Plaintiff's Decedent, Brian Mark Patton, and further constituted a conscious disregard for the high probability of risk of serious harm which would be incurred by the Plaintiff's Decedent for which punitive damages are warranted.

WHEREFORE, the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, seek punitive damages of the Defendants, CSA, LTD., Combat Support Associates, an unincorporated joint venture, AECOM, SMI, RAM, and Morgan Lee Hanks, jointly, severally, jointly and severally in an amount in excess of seventy-five thousand (\$75,000.00) dollars.

**COUNT IV - WRONGFUL DEATH**

**KAREN A. AMESBURY, EXECUTRIX OF THE ESTATE OF BRIAN MARK PATTON, DECEASED, AND AMY BETH PATTON, HIS WIFE vs. CSA, LTD. (CSA), COMBAT SUPPORT ASSOCIATES, AECOM GOVERNMENT SERVICES, INC. (AECOM), RESEARCH AND ANALYSIS MAINTENANCE, INC., (RAM), SMI INTERNATIONAL CORP. (SMI) and MORGAN LEE HANKS,**

25. That the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, incorporate herein by reference as though the same were herein set forth fully at length, paragraphs 1 - 24 inclusive of this Complaint.

26. That the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, brings this Action for Wrongful Death on behalf of the persons named in paragraph 23 of this Complaint pursuant to 42 Pa. C.S.A. Section 8301.

27. That the Decedent left surviving him the following persons entitled to recover for his Wrongful Death and on whose behalf this action is brought:

- a. Amy Beth Patton, wife;
- b. Nicholas Michael Patton, son;
- c. Brian James Patton, son.

28. That by reason of the death of the Decedent, Brian Mark Patton, the aforesaid Wrongful Death beneficiaries have incurred and therefore make claims for all hospital, medical, funeral, burial and Estate Administration expenses, as well as claims for the contributions the Decedent would have made to the aforescribed Wrongful Death beneficiaries during his lifetime and or any and all other losses and damages allowed by law.

29. That the Plaintiff's Decedent did not bring an action for personal injuries during his lifetime and no civil action for his death has been commenced against said Defendants.

WHEREFORE, the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, seek compensatory damages of the Defendants, CSA, LTD., Combat Support Associates, an unincorporated joint venture, AECOM, SMI, RAM, and Morgan Lee Hanks, jointly, severally, jointly and severally in an amount in excess of seventy-five thousand (\$75,000.00) dollars.

**COUNT V – SURVIVAL**

**KAREN A. AMESBURY, EXECUTRIX OF THE ESTATE OF BRIAN MARK PATTON, DECEASED, AND AMY BETH PATTON, HIS WIFE vs. CSA, LTD. (CSA), COMBAT SUPPORT ASSOCIATES, AECOM GOVERNMENT SERVICES, INC. (AECOM), RESEARCH AND ANALYSIS MAINTENANCE, INC., (RAM), SMI INTERNATIONAL CORP. (SMI) and MORGAN LEE HANKS,**

30. That the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, incorporate herein by reference as though the same were herein set forth fully at length, paragraphs 1 - 29 inclusive of this Complaint.

31. That the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, also bring this action on behalf of the Estate of Brian Mark Patton, Deceased, pursuant to 42 Pa. C.S.A. Section 8302.

32. That the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, claim on behalf of the Estate, damages suffered by the Estate by reason of the death of the Plaintiff's Decedent, including the monetary value of the earning power of the Decedent during his remaining

life expectancy, less the costs of his maintenance and contributions he would have made to the survivors, as well as the physical and mental pain and suffering endured by the Decedent prior to his death.

33. That the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, claim on behalf of the Estate in addition to the pain and suffering damages in the aforementioned paragraph, the emotional distress suffered by the Plaintiff's Decedent following the initial impact with the Defendant, Morgan Lee Hanks, and prior to his death.

WHEREFORE, the Plaintiffs, Karen A. Amesbury, Executrix of the Estate of Brian Mark Patton, Deceased, and Amy Beth Patton, his wife, seek compensatory damages of the Defendants, CSA, LTD., Combat Support Associates, an unincorporated joint venture, AECOM, SMI, RAM, and Morgan Lee Hanks, jointly, severally, jointly and severally in an amount in excess of seventy-five thousand (\$75,000.00) dollars.

Respectfully Submitted,

ANZALONE LAW OFFICES



WILLIAM F. ANZALONE, ESQUIRE



JAMIE JOSEPH ANZALONE, ESQUIRE  
Attorneys for Plaintiffs

VERIFICATION

I, AMY BETH PATTON, Plaintiff herein, certify that the statements contained in the foregoing Complaint are true and correct and are made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to unsworn falsification to authorities.

  
AMY BETH PATTON

JS 44 (Rev. 11/04)

### CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM)

<p><b>I. (a) PLAINTIFFS</b>                  Karen A. Amesbury, Executrix the Estate of Brian Mark Patton, Deceased and Amy Beth Patton, his wife,</p> <p><b>(b) County of Residence of First Listed Plaintiff</b> <u>Luzerne</u>                  (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p><b>(c) Attorney's (Firm Name, Address, and Telephone Number)</b>                  William F. Anzalone, Esquire, Anzalone Law Offices,                  98 S. Franklin St., Wilkes-Barre, PA 18701</p>	<p><b>DEFENDANTS</b>                  CSA, LTD. (CSA), COMBAT SUPPORT ASSOCIATES, AECOM                  GOVERNMENT SERVICES, INC. (AECOM), RESEARCH AND                  AND ANALYSIS MAINTENANCE, INC., et al                  County of Residence of First Listed Defendant <u>Los Angeles, CA</u>                  (IN U.S. PLAINTIFF CASES ONLY)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.</p> <p>Attorneys (If Known)</p>
--	---

<p><b>II. BASIS OF JURISDICTION</b> (Place an "X" in One Box Only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input checked="" type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p><b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:33%;">RTF 1 <input checked="" type="checkbox"/> DEF 1 <input type="checkbox"/></td> <td style="width:33%;">Incorporated or Principal Place of Business In This State</td> <td style="width:33%;">PTF 4 <input type="checkbox"/> DEF 4 <input type="checkbox"/></td> </tr> <tr> <td>Citizen of Another State</td> <td>2 <input type="checkbox"/> 2 <input type="checkbox"/></td> <td>Incorporated and Principal Place of Business In Another State</td> <td>5 <input type="checkbox"/> 5 <input checked="" type="checkbox"/></td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>3 <input type="checkbox"/> 3 <input type="checkbox"/></td> <td>Foreign Nation</td> <td>6 <input type="checkbox"/> 6 <input type="checkbox"/></td> </tr> </table>	Citizen of This State	RTF 1 <input checked="" type="checkbox"/> DEF 1 <input type="checkbox"/>	Incorporated or Principal Place of Business In This State	PTF 4 <input type="checkbox"/> DEF 4 <input type="checkbox"/>	Citizen of Another State	2 <input type="checkbox"/> 2 <input type="checkbox"/>	Incorporated and Principal Place of Business In Another State	5 <input type="checkbox"/> 5 <input checked="" type="checkbox"/>	Citizen or Subject of a Foreign Country	3 <input type="checkbox"/> 3 <input type="checkbox"/>	Foreign Nation	6 <input type="checkbox"/> 6 <input type="checkbox"/>
Citizen of This State	RTF 1 <input checked="" type="checkbox"/> DEF 1 <input type="checkbox"/>	Incorporated or Principal Place of Business In This State	PTF 4 <input type="checkbox"/> DEF 4 <input type="checkbox"/>										
Citizen of Another State	2 <input type="checkbox"/> 2 <input type="checkbox"/>	Incorporated and Principal Place of Business In Another State	5 <input type="checkbox"/> 5 <input checked="" type="checkbox"/>										
Citizen or Subject of a Foreign Country	3 <input type="checkbox"/> 3 <input type="checkbox"/>	Foreign Nation	6 <input type="checkbox"/> 6 <input type="checkbox"/>										

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

<p><b>CONTRACT</b></p> <p><input type="checkbox"/> 110 Insurance</p> <p><input type="checkbox"/> 120 Marine</p> <p><input type="checkbox"/> 130 Miller Act</p> <p><input type="checkbox"/> 140 Negotiable Instrument</p> <p><input type="checkbox"/> 150 Recovery of Overpayment &amp; Enforcement of Judgment</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)</p> <p><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</p> <p><input type="checkbox"/> 160 Stockholders' Suits</p> <p><input type="checkbox"/> 190 Other Contract</p> <p><input type="checkbox"/> 195 Contract Product Liability</p> <p><input type="checkbox"/> 196 Franchise</p>	<p><b>TORTS</b></p> <p><b>PERSONAL INJURY</b></p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel &amp; Slander</p> <p><input type="checkbox"/> 330 Federal Employers' Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input checked="" type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input type="checkbox"/> 360 Other Personal Injury</p> <p><b>PERSONAL INJURY</b></p> <p><input type="checkbox"/> 362 Personal Injury - Med. Malpractice</p> <p><input type="checkbox"/> 365 Personal Injury - Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</p> <p><b>PERSONAL PROPERTY</b></p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p>	<p><b>FORFEITURE/PENALTY</b></p> <p><input type="checkbox"/> 610 Agriculture</p> <p><input type="checkbox"/> 620 Other Food &amp; Drug</p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 630 Liquor Laws</p> <p><input type="checkbox"/> 640 R.R. &amp; Truck</p> <p><input type="checkbox"/> 650 Airline Regs.</p> <p><input type="checkbox"/> 660 Occupational Safety/Health</p> <p><input type="checkbox"/> 690 Other</p> <p><b>LABOR</b></p> <p><input type="checkbox"/> 710 Fair Labor Standards Act</p> <p><input type="checkbox"/> 720 Labor/Mgmt. Relations</p> <p><input type="checkbox"/> 730 Labor/Mgmt. Reporting &amp; Disclosure Act</p> <p><input type="checkbox"/> 740 Railway Labor Act</p> <p><input type="checkbox"/> 790 Other Labor Litigation</p> <p><input type="checkbox"/> 791 Empl. Ret. Inc. Security Act</p>	<p><b>BANKRUPTCY</b></p> <p><input type="checkbox"/> 422 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p><b>PROPERTY RIGHTS</b></p> <p><input type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 840 Trademark</p> <p><b>SOCIAL SECURITY</b></p> <p><input type="checkbox"/> 861 HIA (1395f)</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (405(g))</p> <p><b>FEDERAL TAX SUITS</b></p> <p><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)</p> <p><input type="checkbox"/> 871 IRS—Third Party 26 USC 7609</p>	<p><b>OTHER STATUTES</b></p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 410 Antitrust</p> <p><input type="checkbox"/> 430 Banks and Banking</p> <p><input type="checkbox"/> 450 Commerce</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations</p> <p><input type="checkbox"/> 480 Consumer Credit</p> <p><input type="checkbox"/> 490 Cable/Sat TV</p> <p><input type="checkbox"/> 810 Selective Service</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 875 Customer Challenge 12 USC 3410</p> <p><input type="checkbox"/> 890 Other Statutory Actions</p> <p><input type="checkbox"/> 891 Agricultural Acts</p> <p><input type="checkbox"/> 892 Economic Stabilization Act</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 894 Energy Allocation Act</p> <p><input type="checkbox"/> 895 Freedom of Information Act</p> <p><input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p>
--	--	--	--	--

**V. ORIGIN** (Place an "X" in One Box Only)

1 Original Proceeding

2 Removed from State Court

3 Remanded from Appellate Court

4 Reinstated or Reopened

5 Transferred from another district (specify)

6 Multidistrict Litigation

7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
28 U.S.C. Section 1332

Brief description of cause:  
Head on motor vehicle accident

**VII. REQUESTED IN COMPLAINT:**


CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

**DEMAND \$** \_\_\_\_\_

CHECK YES only if demanded in complaint:  
**JURY DEMAND:**  Yes  No

**VIII. RELATED CASE(S) IF ANY** (See instructions):

JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE 8-16-10 SIGNATURE OF ATTORNEY OF RECORD 

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_