

4. Defendant is subject to this Court's personal jurisdiction under Md. Code Ann., Cts. & Jud. Proc. §§ 6-102 and 103.

FACTS

5. This case involves an auto accident that occurred or about September 18, 2019, at the intersection of Pratt and Light Streets in downtown Baltimore. Plaintiff was lawfully operating her vehicle eastbound on Pratt Street when she came to stop for a red light at the Light Street intersection.

6. Defendant was also travelling eastbound on Pratt Street and was directly behind Plaintiff's vehicle. When Plaintiff came to a stop for the traffic signal at Light Street, Defendant was unable to stop or slow down and rear-ended Plaintiff's vehicle.

7. As a result of being struck from behind by Defendant's vehicle, the back end of Plaintiff's car was crushed and her body was violently thrust forward into the steering wheel and dashboard. Plaintiff suffered physical trauma to her neck, back, and left knee and she was taken to University of Maryland Hospital in an ambulance.

8. As a direct and proximate cause of the negligence of Defendant, Plaintiff sustained severe and permanent injuries. Plaintiff's damages include pre-impact fright, medical expenses in the past, medical expenses into the future, inconvenience, disfigurement, mental anguish in the past, mental anguish into the

future, physical pain and suffering in the past, and physical pain and suffering that Plaintiff is expected to endure into the future.

COUNT I
(Negligence)

The allegations set forth in the foregoing numbered paragraphs are incorporated herein.

9. Defendant had a duty to act reasonably and use due care while driving a vehicle. This duty included, but was not limited to, maintaining proper speed for the conditions; reducing speed or stopping to avoid a collision; maintaining a proper distance between vehicles; observing all traffic safety rules in effect; and controlling her vehicle so as to avoid a collision.

10. Defendant breached that duty when Defendant failed to reasonably control the vehicle she was operating; failed to maintain a safe distance; and failed to reduce speed or stop to avoid a collision, resulting in a collision that struck the Plaintiff's vehicle from behind.

11. As a direct and proximate result of Defendant's negligent operation of her vehicle, Plaintiff sustained severe and permanent injuries. Plaintiff's damages include but are not limited to: pre-impact fright, medical expenses in the past, medical expenses into the future, inconvenience, disfigurement, mental anguish in the past, mental anguish into the future,

physical pain and suffering in the past, and physical pain and suffering that Plaintiff is expected to endure into the future.

12. All of the above damages were directly and proximately caused by the aforementioned negligence of Defendant, and were incurred without contributory negligence or assumption of the risk on the part of Plaintiff.

WHEREFORE: Plaintiff demands judgment against Defendant in an amount in excess of \$75,000.00, plus costs, pre-judgment interest, and post-judgment interest as this Court deems appropriate.

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