

IN THE CIRCUIT COURT OF ADAIR COUNTY, MISSOURI  
ASSOCIATE DIVISION

██████████ COCHRAN,

████████████████████  
████████████████████

Plaintiff,

vs.

Case No.

██████████ SULLIVAN,

████████████████████  
████████████████████

and

██████████ LOTTON,

████████████████████  
████████████████████

Defendant.

PETITION FOR DAMAGES

COMES NOW Plaintiff, ██████████ Cochran, by and through her attorney, Mark L. Williams of Meyer, McClamroch & Williams, LLC and for her Petition for Damages states to the Court as follows:

1. Plaintiff is, and was at all times mentioned herein, a resident of LaPlata, Macon County, Missouri.
2. Defendant ██████████ Sullivan (hereinafter "Defendant Sullivan") is, and was at all times mentioned herein, a resident of Novinger, Adair County, Missouri.
3. Defendant ██████████ Lotton (hereinafter "Defendant Lotton") is, and was at all times mentioned herein, a resident of Kirksville, Adair County, Missouri.

4. Venue is proper in this Court as the collision mentioned herein occurred in Adair County, Missouri.

5. On October 31, 2017 Plaintiff was the owner of, and front seat passenger in, a 2016 Ford CMAX automobile.

6. On October 31, 2017, at approximately 6:24 p.m., Defendant Sullivan was permissively operating Defendant Lotton's 2006 Chevrolet Cobalt automobile in Kirksville, Adair County, Missouri in a southbound direction on Baltimore Street near the intersection of Baltimore and Illinois Streets.

7. Plaintiff's vehicle was also traveling in a southbound direction on Baltimore Street in Kirksville, Adair County, Missouri on October 31, 2017 at approximately 6:24 p.m.

8. On the date and time stated above, Plaintiff's vehicle was directly in front of Defendant's vehicle.

9. On the date and time stated above, Plaintiff's vehicle was stopped in the southbound lane of Baltimore Street due to a red light controlling the intersection of Baltimore and Illinois Streets.

10. Defendant Sullivan was negligent in her operation of Defendant Lotton's vehicle in that she:

- a. failed to operate the 2006 Chevrolet Cobalt with the highest degree of care;
- b. failed to keep a proper lookout; and
- c. failed to slacken speed in time to avoid the collision.

11. Defendant Sullivan's negligent and careless operation of Defendant Lotton's 2006 Chevrolet Cobalt caused Defendant Lotton's vehicle to collide with the rear of Plaintiff's vehicle and thereby causing \$13,409.66 in damages to Plaintiff's vehicle. A complete list of the damages caused to Plaintiff's vehicle is attached hereto, marked as Exhibit 1 and incorporated herein by this reference.

12. As a further direct and proximate result of Defendants' negligence, Plaintiff has incurred vehicle storage fees in the amount of \$2,625.00 and part fees in the amount of \$500.00.

13. On October 31, 2017 Defendant Lotton entrusted Defendant Sullivan with operating his 2006 Chevrolet Cobalt in Kirksville, Missouri.

14. Defendant Lotton knew or should have known of Defendant Sullivan's inability to operate his 2006 Chevrolet Cobalt with the highest degree of care.


15. Defendant Lotton's negligence in trusting that Defendant Sullivan would operate his 2006 Chevrolet Cobalt in Kirksville, Missouri on October 31, 2017 with the highest degree of care proximately caused damage to Plaintiff's 2016 Ford CMAX automobile, storage fees and part fees as outlined in paragraphs 11 and 12 above.

16. After giving Defendants credits for all payments towards Plaintiff's damages, Plaintiff has incurred damages in the amount of \$10,415.49.


WHEREFORE, Plaintiff, [REDACTED] Cochran prays that this Court enter judgment against Defendants in the amount of \$10,415.49 for damages caused to her 2016 Ford CMAX automobile; for her suit and court costs and for such other and further judgments as this Court deems just and proper in the premises.


Respectfully submitted,

MEYER, McCLAMROCH & WILLIAMS, LLC  
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ATTORNEYS FOR PLAINTIFF

By:   
Mark L. Williams #39355

STATE OF MISSOURI     )  
                                  ) ss.  
COUNTY OF ADAIR     )

 Cochran, after being duly sworn upon her oath, states that the above facts stated in the foregoing Petition for Damages are true and correct to the best of her information and belief.

   
 Cochran

Subscribed and sworn to before me this 15<sup>th</sup> day of January, 2018.

SAVANNA B. HAGAR  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Macon County  
My Commission Expires: August 07, 2021  
Commission Number: 17580300

  
Notary Public