

DISTRICT COURT, DENVER COUNTY, COLORADO 1437 Bannock Street, Room 256 (Clerk's Office) Denver, CO 80202 (720) 865-8614	DATE FILED December 31, 2019 2:49 PM FILING ID: 1ED052398C944 CASE NUMBER: 2019CV34953
Plaintiff: DEEANN HAMPTON v. Defendant: MELISSA HART	▲ COURT USE ONLY ▲
Brian Hugen, Esq. #40688 RAMOS LAW 3000 Youngfield Street, Suite 200 Wheat Ridge, CO 80215 Phone: (303) 733-6353 Fax: (303) 856-5666 Brian.H@ramoslaw.com	Case No: Div:
DISTRICT COURT CIVIL (CV) CASE COVER SHEET FOR INITIAL PLEADING OF COMPLAINT, COUNTERCLAIM, CROSS-CLAIM OR THIRD PARTY COMPLAINT	

1. This cover sheet shall be filed with the initial pleading of a complaint, counterclaim, cross-claim or third-party complaint in every district court civil (CV) case. It shall not be filed in Domestic Relations (DR), Probate (PR), Water (CW), Juvenile (JA, JR, JD, JV), or Mental Health (MH) cases. Failure to file this cover sheet is not a jurisdictional defect in the pleading but may result in a clerk's show cause order requiring its filing.

2. Simplified Procedure under C.R.C.P. 16.1 **applies** to this case **unless** (check one box below if this party asserts that C.R.C.P. 16.1 **does not** apply):

☐ This is a class action, forcible entry and detainer, Rule 106, Rule 120, or other similar expedited proceeding, **or**

☒ This party is seeking a monetary judgment against another party for more than \$100,000.00, including any penalties or punitive damages, but excluding attorney fees, interest and costs, as supported by the following certification:

By my signature below and in compliance with C.R.C.P. 11, based upon information reasonably available to me at this time, I certify that the value of this party's claims against one of the other parties is reasonably believed to exceed \$100,000."

Or

☐ Another party has previously filed a cover sheet stating that C.R.C.P. 16.1 does not apply to this case.

3. ☒ This party makes a **Jury Demand** at this time and pays the requisite fee. See C.R.C.P. 38. (Checking this box is optional.)

Date: December 31, 2019

RAMOS LAW
Original signatures on file at Ramos Law

/s/ Brian Hugen
Brian Hugen #40688
Attorneys for Plaintiff

NOTICE

This cover sheet must be served on all other parties along with the initial pleading of a complaint, counterclaim, cross-claim, or third-party complaint.

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COMPLAINT FOR DAMAGES AND JURY DEMAND	

The Plaintiff Deeann Hampton, by and through her legal counsel, Brian Hugen of Ramos Law, files her Complaint against the Defendant Melissa Hart as follows:

PARTIES AND JURISDICTION

1. For all pertinent times, the Plaintiff Deeann Hampton resides at 9900 E. Florida Avenue, #52, Aurora, CO 80247.
2. For all pertinent times, the Defendant Melissa Hart resides at 2660 N. Clermont Street, Denver, CO 80207.
3. The motor vehicle collision described herein occurred on Central Park Boulevard at Montview Boulevard in Denver, Colorado.
4. Due to the motor vehicle collision occurring in Denver, Colorado, Denver County District Court is a proper jurisdiction and venue pursuant to C.R.C.P. 98.

CLAIM FOR RELIEF

5. Plaintiff hereby incorporates all preceding paragraphs as though fully alleged herein.
6. On January 3, 2017, the Plaintiff Deeann Hampton was traveling southbound on Central Park Boulevard and was stopped at the traffic light at Montview Boulevard in Denver,

Colorado. The Defendant Melissa Hart was travelling behind Plaintiff, failed to stop and collided with the rear of Plaintiff's vehicle.

7. The Defendant Melissa Hart negligently caused the motor vehicle collision described in paragraph 6.
8. The Defendant Melissa Hart's negligence included, but was not limited to: careless driving, travelling too fast for the circumstances then and there existing, distracted driving and failing to maintain a proper lookout.
9. The Defendant Melissa Hart violated several traffic laws relating to the collision described in paragraph 6, including, but not limited to: careless driving, which is considered negligence *per se*.
10. The Plaintiff was not negligent in causing the collision described in paragraph 6.
11. As a direct and proximate result of the negligence of the Defendant Melissa Hart, and as a sole, direct and proximate result of the motor vehicle collision described in paragraph 6, the Plaintiff Deeann Hampton seeks damages for her personal injuries, which include past and future health care treatment, past and future mileage costs, past and future pain and suffering, past and future physical impairments, plus pre- and post-judgment interest and costs.

WHEREFORE, the Plaintiff Deeann Hampton requests that judgment be entered in her favor and against Defendant Melissa Hart in an amount to be determined at trial for all damages allowed, plus all costs allowed by law, pre- and post-judgment interest as permitted by law, and for such other and further relief as the Court deems just and proper.

PLAINTIFF DEMANDS A TRIAL BY JURY ON ALL ISSUES.

Respectfully submitted this 31st day of December, 2019.

RAMOS LAW
Original signatures on file at Ramos Law

/s/ Brian Hugen
Brian Hugen #40688
Attorneys for Plaintiff

Plaintiffs' Address
9900 E. Florida Avenue, #52
Aurora, CO 80247

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DISTRICT COURT CIVIL SUMMONS	

TO THE ABOVE-NAMED DEFENDANT:
MELISSA HART
2260 N. Clermont Street
Denver, CO 80207

YOU ARE HEREBY SUMMONED and required to file with the Clerk of this Court an answer or other response to the attached Complaint. If service of the Summons and Complaint was made upon you within the State of Colorado, you are required to file your answer or other response within 21 days after such service upon you. If service of the Summons and Complaint was made upon you outside of the State of Colorado, you are required to file your answer or other response within 35 days after such service upon you. Your answer or counterclaim must be accompanied with the applicable filing fee.

If you fail to file your answer or other response to the Complaint in writing within the applicable time period, the Court may enter judgment by default against you for the relief demanded in the Complaint without further notice.

Dated: December 31, 2019

RAMOS LAW

Original signatures on file at Ramos Law

/s/ Brian Hugen

Brian Hugen #40688

Attorneys for Plaintiff

This Summons is issued pursuant to Rule 4, C.R.C.P., as amended. A copy of the Complaint must be served with this Summons. This form should not be used where service by publication is desired.