

IN THE STATE COURT OF COBB COUNTY

COBB COUNTY, GA.  
FILES & OFFICE

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STATE COURT CLERK-15

STATE OF GEORGIA

VANESSA JORDAN-PEEPLES

PLAINTIFF,

V.

SHERRIE ANDERSON

DEFENDANTS.

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)  
)  
) CIVIL ACTION  
) NO. 14A2189-5  
)  
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)  
)

**COMPLAINT FOR PERSONAL INJURY DAMAGES AND DEMAND FOR TRIAL BY JURY**

COMES NOW, VANESSA JORDAN-PEEPLES, Plaintiff In the above-styled action, and files this her Complaint for Personal Injury Damages and Demand for Trial by Jury and shows this Court the following:

**Jurisdiction and Venue**

1.

Defendant, SHERRIE ANDERSON, is a resident of Cobb County and is subject to the jurisdiction and venue of this Court as a joint tortfeasor. Defendant may be served at his last known address 2926 Windstone Circle, Marietta, Georgia, 30062.

**Facts**

2.

At approximately 5:00 p.m. on Wednesday, September 26, 2012, Plaintiff was operating a Cobb Community Transit bus her

vehicle in the far right hand lane of Atlanta Street near it's intersection with Waverly Way.

**3.**

At approximately 5:00 p.m. on Wednesday, September 26, 2012, was driving a her vehicle in the lane immediately to Plaintiff's left on Atlanta Street near it's intersection with Waverly Way.

**Negligence**

**4.**

On said date and time, Defendant Sherrle Anderson recklessly and negligently changed lanes causing the vehicle she was operating to collided with the Plaintiff's vehicle.

**Damages**

**5.**

As a direct result of the collision proximately caused by the negligence of the Defendant, Plaintiff has sustained serious physical injuries, mental and emotional damage.

**6.**

As a direct result of the collision proximately caused by the ~~negligence of the Defendant~~, Plaintiff has incurred medical expenses and will have the need for future medical treatment.

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**7.**

As a direct result of the collision proximately caused by the negligence of the Defendants, Plaintiff has experienced physical pain and suffering.

**8.**

As a direct result of the collision proximately caused by the negligence of the Defendants, Plaintiff has incurred lost wages and has

lost the ability to perform her job duties as they were before the collision.

### **Punitive Damages**

#### **9.**

Plaintiff re-alleges and incorporates Paragraph's 1 through 8 above as if fully set forth herein.

#### **10.**

The acts alleged hereinabove were conducted willfully, maliciously, intentionally or with wanton disregard towards Plaintiff's rights. Such conduct was with such willful and wanton nature to show conscious indifference to and complete disregard for the rights and welfare of Plaintiff. Accordingly, as an example to others and as a penalty or by way of punishment, Plaintiff is entitled to punitive damages.

### **Attorney's Fees**

#### **11.**

Plaintiff re-alleges and incorporates Paragraph's 1 through 10 above as if fully set forth herein.

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#### **12.**


The Defendants, in the present action, have acted in bad faith, have been stubbornly litigious and have caused the Plaintiff unnecessary trouble and expense. As such, Plaintiff is entitled to an award of Attorney's Fees pursuant to O.C.G.A. §13-6-11.

**Prayer for Relief**

WHEREFORE, the Plaintiff respectfully prays:

- A. That summons be issued and that the Defendant be served as provided by law;
- B. That judgment be rendered for the Plaintiff and against the Defendant in such an amount as determined by a fair and impartial jury;
- C. That Plaintiff be awarded compensatory, general and punitive damages as allowed by law, and
- D. That all costs of this action, including attorney's fees, be cast upon Defendant and that Plaintiff have such other and further relief as this Court may deem just and proper.

This 31<sup>st</sup> day of July, 2014.

  
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Shoran R. Williams  
Attorney for the Plaintiff  
Georgia Bar No. 600118

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Reid Williams, LLC  
5555 Glenridge Connector  
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Atlanta, GA 30342  
(404) 236-0041

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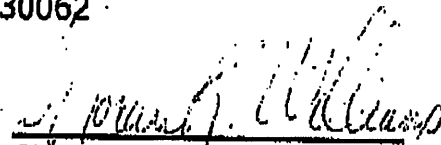
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) CIVIL ACTION  
) NO. 14A  
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**CERTIFICATE OF SERVICE**

This is to certify that I have on this day served the below listed parties with a true and correct copy of Plaintiff's Complaint by personal service with the Cobb County Sheriff's Office.

SHERRIE ANDERSON  
2926 WINDSTONE CIRCLE  
MARIETTA, GA 30062

This 31<sup>st</sup> day of July, 2014.



Shoran R. Williams  
Attorney for the Plaintiff  
Georgia Bar No. 600118

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