

FILED IN CLERK OF SUPERIOR COURT GWINNETT COUNTY GA
2015 OCT 19 PM 2:32
RICHARD ALEXANDER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

GALAWEZH SHOWAN,)
)
 Plaintiff,)
)
 v.)
)
 PATRICK PRESSDIE and)
 KRISPY KREME DOUGHNUT)
 CORPORATION,)
)
 Defendants.)

CIVIL ACTION
FILE NO.:

DEMAND FOR JURY TRIAL

15 C-05672-4

COMPLAINT FOR DAMAGES

COMES NOW, Galawezh Showan, Plaintiff in the above-styled action, and brings this her Complaint for Damages against the above-named Defendants Patrick Pressdie and Krispy Kreme Doughnut Corporation, and respectfully shows this Honorable Court the following:

PARTIES, JURISDICTION & VENUE

1.

Plaintiff Galawezh Showan is a resident of the State of Georgia and willfully avails herself of the jurisdiction and venue of this Honorable Court.

2.

Defendant Patrick Pressdie (hereinafter, "Defendant Pressdie") is a Georgia resident and is subject to the jurisdiction and venue of this Court. Service can be made on said Defendant by serving him at his residence of 3559 Salem Road, Lot G12, Covington, Newton County, Georgia 30016 or wherever else he may be found and served in accordance with Georgia law.

3.

Defendant Krispy Kreme Doughnut Corporation (hereinafter "Defendant Krispy Kreme") is a



foreign for-profit corporation organized under the laws of the State of North Carolina that is authorized to, and actively does, transact business within the State of Georgia. Defendant Krispy Kreme may be served with Summons and Complaint by serving its registered agent for service of process, to wit: Corporation Service Company, 40 Technology Parkway South, Suite 300, Norcross, Gwinnett County, Georgia 30092. Once duly served with process, Defendant Krispy Kreme is subject to the jurisdiction and venue of this Honorable Court.

4.

At all times relevant hereto, Defendant Pressdee was operating a 2012 GMC Savana within the course and scope of his employment and/or agency with Defendant Krispy Kreme. As a result, Defendant Krispy Kreme is vicariously liable under the doctrine of *respondent superior* for the negligence of Defendant Pressdee.

5.

Jurisdiction is proper in this Honorable Court.

6.

Venue is proper in this Honorable Court.

FACTS

7.

On or about April 27, 2015, Defendant Pressdee was traveling southbound on Scenic Highway (S.R. 124) near Webb Gin House Road in Snellville, Gwinnett County, Georgia.

8.

At about that same time and place, Plaintiff was stopped at a red light at the intersection of Scenic Highway (S.R. 124) and Webb Gin House Road in Snellville, Gwinnett County, Georgia.

9.

As Defendant Pressdee approached the intersection of Scenic Highway (S.R. 124) and Webb Gin House Road, he negligently failed to stop his vehicle and collided with the rear of Plaintiff's vehicle, causing it to then impact with another vehicle in front of it.

10.

As a result of the collision, Plaintiff was severely injured and was taken from the scene of the collision via EMS to the emergency room at Gwinnett Medical Center.

11.

Defendant Pressdee was cited with following too closely in violation of O.C.G.A. § 40-6-49.

12.

The collision was the direct and proximate cause of the negligence of Defendants.

13.

Plaintiff was not negligent and did not otherwise cause or contribute to the occurrence of the collision.

DAMAGES

14.

As a direct and proximate result of the negligent acts and omissions of the Defendants, Plaintiff has suffered, and continues to suffer, among other things, the following harms and losses:

- (a) Various bodily injuries;
- (b) Past, present, and future mental and physical pain and suffering, emotional distress, disruption of normal life, and diminution in the enjoyment of life;
- (c) Past, present, and future medical expenses.

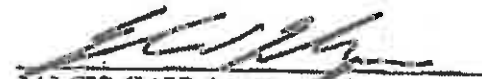
PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays for the following relief:

- (a) That process and summons be issued and served upon the Defendants;
- (b) That this matter be tried to a jury of twelve (12) persons;
- (c) That judgment for general damages be awarded to the Plaintiff in an amount to be determined by the enlightened conscience of a fair and impartial jury;
- (d) That judgment be awarded to the Plaintiff for special damages as shown at trial;
- (e) That judgment be awarded to the Plaintiff for all other damages recoverable under applicable law;
- (e) That the cost of this action be cast upon the Defendants; and
- (f) That the Plaintiff have such other further relief as this Court deems proper.

Respectfully submitted this 19th day of October, 2015.

SLAPPEY & SADD, LLC


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RICHARD ALEXANDER, CLERK

GALAWEZH SHOWAN)
Plaintiff,)

v.)

PATRICK PRESSDEE,)
KRISPY KREME DOUGHNUT)
CORPORATION)
Defendants.)

Case No.:
15-C-05612-S4

ENTRY AND NOTICE OF APPEARANCE

PLEASE NOTE the entry of the appearance of TALAL "PEREZ" GHOSHEH, attorneys of record for the Plaintiff, GALAWEZH SHOWAN. Notice is provided pursuant to the Uniform Rules for the Superior Court, Rule 4.2, and counsel requests that copies of all court notices, calendars, etc., in the above-numbered case be sent to him.

This 6th day of December, 2015,



Attorney for Plaintiff
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