

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LOREL MAZUR,)
)
 Plaintiff,)
)
 v.)
)
 J.B. HUNT TRANSPORT, INC.)
)
 Defendant.)

No.:

Plaintiff Demands a Trial By Jury

2016100999
CALENDAR ROOM
TIME 00:00
PI. No. 00000000000000000000
2016 OCT 11 AM 9:10
CLERK OF CIRCUIT COURT
LAW DIVISION

COMPLAINT AT LAW
COUNT I – NEGLIGENCE – J.B. HUNT TRANSPORT, INC.

Plaintiff, LOREL MAZUR, by her attorneys, CLIFFORD LAW OFFICES, P.C., complaining of Defendant, J.B. HUNT TRANSPORT, INC. (hereinafter “J.B. HUNT”), states:

1. On September 12, 2016, 51st Street was a public roadway running in a general east and west direction at or near its intersection with Kedzie Avenue in the City of Chicago, County of Cook and State of Illinois.
2. On September 12, 2016, Kedzie Avenue was a public roadway running in a general north and south direction at or near its intersection with 51st Street in the City of Chicago, County of Cook and State of Illinois.
3. On September 12, 2016, at approximately 2:27 p.m. Defendant, J.B. HUNT, owned a semi-truck traveling in a westbound direction on 51st Street at or near the intersection of 51st Street and Kedzie Avenue, in the City of Chicago, County of Cook.
4. On September 12, 2016, at approximately 2:27 p.m., Defendant, J.B. Hunt, Individually and by and through its currently unknown employee and/or agent, operated a semi-truck traveling in a westbound direction on 51st Street at or near the intersection of 51st Street and Kedzie Avenue, in the City of Chicago, County of Cook.

5. On September 12, 2016, at approximately 2:27 p.m., Defendant, J.B. HUNT, Individually and by and through its currently unknown employee and/or agent, maintained a semi-truck traveling in a westbound direction on 51st Street at or near the intersection of 51st Street and Kedzie Avenue, in the City of Chicago, County of Cook.

6. On September 12, 2016, at approximately 2:27 p.m., Defendant, J.B. HUNT, Individually and by and through its currently unknown employee and/or agent, managed a semi-truck traveling in a westbound direction on 51st Street at or near the intersection of 51st Street and Kedzie Avenue, in the City of Chicago, County of Cook.

7. On September 12, 2016, at approximately 2:27 p.m., Defendant, J.B. HUNT, Individually and by and through its currently unknown employee and/or agent, controlled a semi-truck traveling in a westbound direction on 51st Street at or near the intersection of 51st Street and Kedzie Avenue, in the City of Chicago, County of Cook.

8. On September 12, 2016, at approximately 2:27 p.m., Plaintiff, LOREL MAZUR, was a pedestrian lawfully present at the northeast corner of 51st Street and Kedzie Avenue in the City of Chicago, County of Cook and State of Illinois.

9. On September 12, 2016, Defendant, J.B. HUNT, owed Plaintiff, LOREL MAZUR, a duty to exercise reasonable care when owning, operating, managing, maintaining and controlling its vehicle.

10. On September 12, 2016, at approximately 2:27 p.m., the currently unknown employee and/or agent of Defendant, J.B. HUNT, executed a right hand turn from westbound 51st Street onto northbound Kedzie Avenue and struck Plaintiff, LOREL MAZUR, while she was on the northeast corner of 51st Street and Kedzie Avenue in the City of Chicago, County of Cook and State of Illinois.

11. At the aforementioned time and place, Defendant, J.B. HUNT, Individually and by and through its currently unknown agent and/or employee, was negligent in one or more of the following respects:

- a. Proceeded at a speed which was greater than reasonable and proper with regard to traffic conditions and the use of the highway, or which endangered the safety of persons or property, in violation of 625 ILCS 5/11-601;
- b. Failed to decrease speed when approaching and crossing an intersection, in violation of 625 ILCS 5/11-601;
- c. Operated its motor vehicle without keeping a proper and sufficient lookout;
- d. Failed to yield the right-of-way to the Plaintiff, a pedestrian, in violation of 625 ILCS 5/11-1002;
- e. Drove onto a sidewalk in violation of Chicago Municipal Code § 9-40-070;
- f. Negligently drove its vehicle onto a sidewalk; and
- g. Failed to give audible warning with its horn when such warning was reasonable necessary to insure safety, in violation of 625 ILCS 5/12-601.

12. As a direct and proximate result of one or more of the foregoing negligent acts and/or omissions, Plaintiff, LOREL MAZUR, sustained injuries of a permanent, personal and pecuniary nature.

WHEREFORE, Plaintiff, LOREL MAZUR, demands judgment against Defendant, J.B. HUNT TRANSPORT, INC., for a sum in excess of FIFTY THOUSAND DOLLARS (\$50,000.00)



Attorneys for Plaintiff

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AFFIDAVIT REGARDING DAMAGES SOUGHT

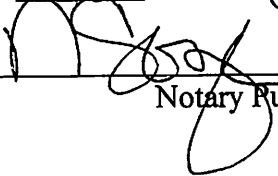
MICHAEL S. KRZAK, being first duly sworn under oath, states as follows:

1. That the affiant is one of the attorneys of record for the parties in this matter.
2. That the total money damages sought in this civil action exceeds the amount of \$50,000.00.

FURTHER AFFIANT SAYETH NOT.

By: 
MICHAEL S. KRZAK

SUBSCRIBED AND SWORN to before me
this 10th day of October, 2016.


Notary Public

