

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

BRIAN RICHARDS and KRISTINE RICHARDS)	
As Independent Administrators of the)	
Estate of SEAN PATRICK RICHARDS,)	
Deceased,)	
Plaintiffs,)	
)	
v.)	
)	No.
FULLER’S CAR WASH, INC.;)	
102 W. CHICAGO, LLC;)	
FULLER’S SERVICE CENTER, INC.,)	<i>Plaintiff Demands Trial By Jury</i>
FULLER’S REAL ESTATE HOLDINGS, LLC;)	
DOUGLAS FULLER FAMILY, LP,)	
D.A. FULLER CORPORATION,)	
MARTIN CONTRERAS, as father, guardian and)	
Next friend of MARTIN CONTRERAS, JR.))	
DOUGLAS A. FULLER, JR., and)	
SUSAN FULLER GROENEWOLD,)	
Defendants.)	

COMPLAINT AT LAW

NOW COME Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, as Independent Administrators of the Estate of SEAN PATRICK RICHARDS, deceased, through their attorneys, CLIFFORD LAW OFFICES, P.C., complaining of Defendants, FULLER’S CAR WASH, INC., a corporation, 102 W. CHICAGO, LLC, a corporation, FULLER’S SERVICE CENTER, INC., a corporation, FULLER’S REAL ESTATE HOLDINGS, LLC, a corporation, DOUGLAS FULLER FAMILY, L.P., a partnership, D.A. FULLER CORPORATION, MARTIN CONTRERAS, as father, guardian and next friend of MARTIN CONTRERAS, JR. (hereinafter “CONTRERAS”), DOUGLAS A. FULLER, JR., and SUSAN FULLER GROENEWOLD, and in support thereof, state as follows:

COUNT I – WRONGFUL DEATH – FULLER’S CAR WASH, INC.

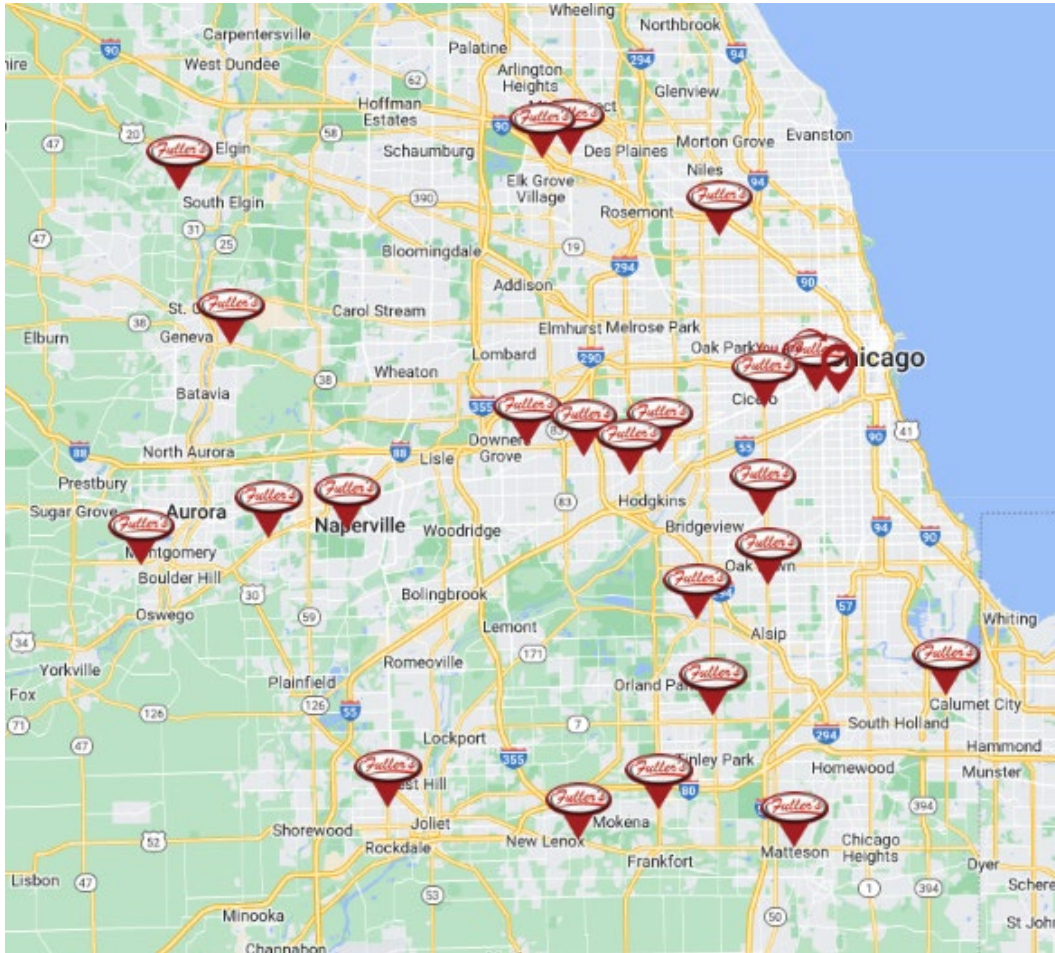
1. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S CAR WASH, INC., was a corporation incorporated within the State of Illinois. Defendant's President and Secretary is Matthew Fuller with an address at 9124 W. 47th St., Brookfield, County of Cook, State of Illinois.

2. On and before July 17, 2023, Defendant, FULLER'S CAR WASH, INC., operated a corporate website which proffers to the public that FULLER'S CAR WASH, INC., does substantial business in the County of Cook, listing as Fuller's Car Wash Locations¹:

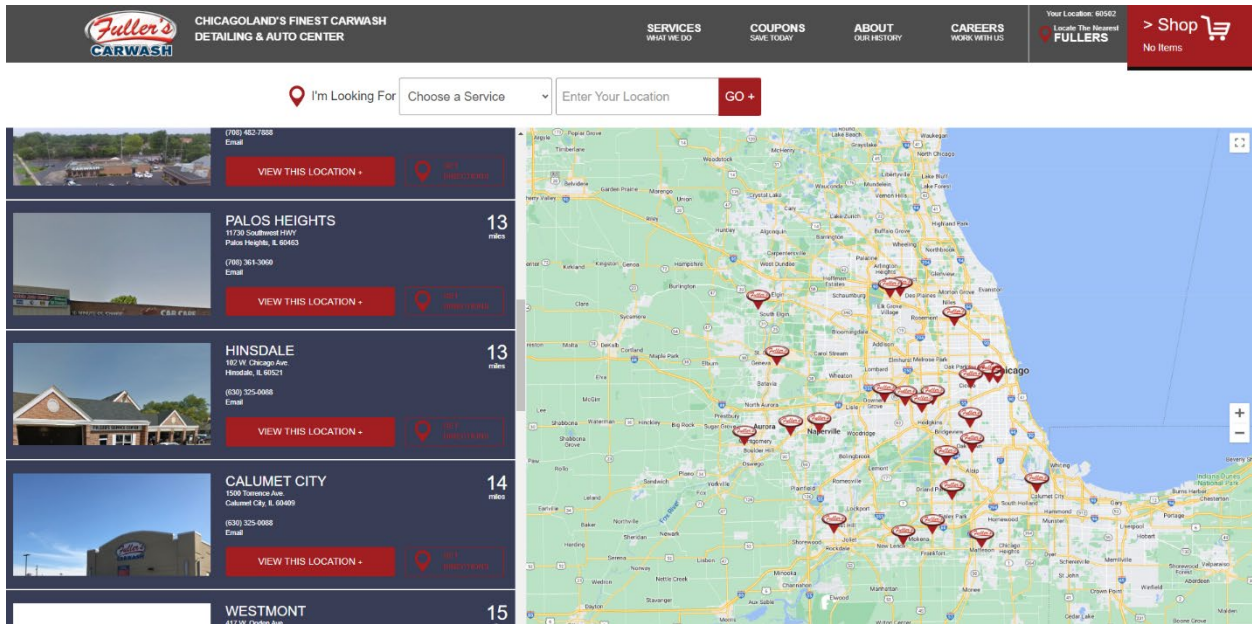
- 2146 South Rockwell, Chicago, Illinois 60608 (Cook County);
- 2912 Cicero Ave., Cicero, Illinois 60804 (Cook County);
- 7459 State Road, Bedford Park, Illinois 60638 (Cook County);
- 9124 47th Street, Brookfield, Illinois 60513 (Cook County);
- 4800 N. Nagle Ave., Harwood Heights, Illinois 60706 (Cook County);
- 4750 W. 103rd St., Oak Lawn, Illinois 60453 (Cook County);
- 5550 S. Brainard Ave., Countryside, Illinois 60525 (Cook County);
- 11730 Southwest HWY, Palos Heights, Illinois 60463 (Cook County);
- 102 W. Chicago Ave., Hinsdale, Illinois 60521 (DuPage County);
- 1500 Torrence Ave., Calumet City, Illinois 60409 (Cook County);
- 417 Ogden Ave., Westmont, Illinois 60559 (DuPage County);
- 15610 S. Harlem Ave., Orland Park, Illinois 60462 (Cook County);
- 771 W. Algonquin Road, Des Plaines, Illinois 60016 (Cook County) ;
- 1140 E. Higgins Road, Elk Grove Village, Illinois 60007 (Cook/DuPage County);
- 19510 La Grange Road, Mokena, Illinois 60448 (Will County)
- 4002 211th St., Matteson, Illinois 60443 (Cook County)
- 1725 East Lincoln Highway, New Lenox, Illinois 60451 (Will County);
- 952 W. 75th St., Naperville, Illinois 60565 (Will/DuPage County);
- 2850 Ogden Ave., Aurora, Illinois 60504 (DuPage County) ;
- 0804 North Larkin Ave., Crest Hill, Illinois (Will County);
- 1122 E. State St. (Rt. 83), Geneva, Illinois 60134 (Kane County);
- 1180 S. Randall Road, Elgin, Illinois 60120 (Kane County);
- 2051 Orchard Road, Montgomery, Illinois 60538 (Kane/Kendall County)

¹ <https://www.fullerscarwash.com/location/>

3. On an before July 17, 2023, Defendant, FULLER’S CAR WASH, INC., did substantial business in the Chicagoland area, including the County of Cook, as shown by a map of locations listed on their website:



4. On and before July 17, 2023, and at all times mentioned herein, Defendant, FULLER’S CAR WASH, INC., specifically listed the Hinsdale Carwash located at 102 W. Chicago Ave, Hinsdale, Illinois 60521 on its website under the section “Locate The Nearest Fullers”:



5. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S CAR WASH, INC., owned a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

6. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S CAR WASH, INC., operated a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

7. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S CAR WASH, INC., managed a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

8. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S CAR WASH, INC., maintained a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

9. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S CAR WASH, INC., controlled a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

10. On July 17, 2023, and at all times mentioned herein, Defendant, CONTRERAS, was a duly appointed actual agent and/or employee of Defendant, FULLER'S CAR WASH, INC., acting at all times within the course and scope of his actual agency and/or employment.

11. On July 17, 2023, and at all times mentioned herein, the aforementioned car wash owned, operated, managed, maintained and controlled by FULLER'S CAR WASH, INC., was located at or near the intersection of Chicago Avenue and Lincoln Street, and the exit of the car wash faced in a generally eastbound direction towards Lincoln Street.

12. On July 17, 2023, at approximately 2:30 p.m., Defendant, CONTRERAS, as a duly authorized agent and/or employee of Defendant, FULLER'S CAR WASH, INC., entered and operated a 2020 Jeep Wrangler which was exiting the aforementioned car wash and hit the accelerator.

13. On July 17, 2023, and at all times mentioned herein, the aforementioned car wash had no barriers that separated the exit of the car wash and the sidewalk adjacent to Lincoln Street.

14. On July 17, 2023, at approximately 2:30 p.m., Plaintiff's decedent, SEAN PATRICK RICHARDS, was lawfully walking along the sidewalk located on the west side of Lincoln Street, located due south from its intersection with Chicago Avenue.

15. On July 17, 2023, at approximately 2:30 p.m., Defendant, FULLER'S CAR WASH, INC., by and through its duly authorized actual agent and/or employee, CONTRERAS, pressed the accelerator of the 2020 Jeep Wrangler causing it to proceed across a sidewalk, through a curb, a street parking spot, two lanes of traffic and another street parking spot on Lincoln Street, jump a curb, proceed across another sidewalk and ultimately crash into Fontano's Subs.

16. On July 17, 2023, during the course of events as delineated in Paragraph 15 of Count V of this Complaint at Law, the 2020 Jeep Wrangler being operated by Defendant, FULLER'S CAR WASH, INC., by and through its actual agent and/or employee, Defendant,

CONTRERAS, struck Plaintiff's decedent, SEAN PATRICK RICHARDS, a lawful and innocent bystander.

17. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S CAR WASH, INC., individually, had a duty to operated its car wash in a safe and careful manner so as to avoid causing injury and/or death to third persons.

18. Specifically, prior to July 17, 2023, Defendant, FULLER'S CAR WASH, INC., was on notice of other instances where vehicles exiting the car wash had proceeded straight over the curb, through the sidewalk, and onto Lincoln Street, including, but not limited to:

- a) In approximately July of 2007, a Jeep Grande Cherokee owned by Diana Newlin was taken to the aforementioned car wash. As it was exiting, an employee entered the vehicle and pressed the accelerator, causing the car to jump the curb, cross Lincoln Street, and crash into a pickup truck parked in front of Fontano's Subs, totaling the Jeep Grande Cherokee for which Defendant paid for in full;
- b) Approximately a year prior to July of 2023, two vehicles rolled out of Fuller's Car Wash, crossed Lincoln Street, and t-boned a vehicle owned by Lauri Aldrich which was parked outside of Fontano's Subs. Upon information and belief, Ms. Aldrich specifically told the car wash that many bikers and pedestrians pass by Fuller's exit all day long and something needed to be done to make sure the area was safer, yet Defendant made no efforts to prevent this from happening again.

19. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S CAR WASH, INC., was negligent in one or more of the following ways:

- a) Did not have policies/procedures for the safe exit of vehicles from the car wash exit;
- b) Instructed drivers to accelerate in order to remove vehicles from the car wash under conditions that created an unreasonable danger;
- c) Allowed employees who were unfit to operate motor vehicles to enter vehicles with instruction to accelerate;
- d) Did not have barriers to prevent vehicles from exiting the car wash parking lot towards Lincoln Street;
- e) Repeatedly ignored prior occurrences which put Defendant on notice of the unsafe condition presented by its car wash;
- f) Did not provide adequate training, instruction and experience to its agents and/or employees;
- g) Caused an permitted an inexperienced employee to operated the subject Jeep Wrangler when Defendant knew, or reasonably should have known, that he was unfit to do so;

- h) Did not provide any visual or other types of warnings to pedestrians who were lawfully walking in the area of the car wash of the known dangers posed;
- i) Was otherwise careless and negligent.

20. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S CAR WASH, INC., by and through its actual agent and/or employee, CONTRERAS, was negligent in one or more of the following ways:

- a) Carelessly and negligently operated and controlled the 2020 Jeep Wrangler;
- b) Carelessly and negligently failed to exercise the degree or care and caution that a reasonable person under similar circumstances would have exercised in the operation of the 2020 Jeep Wrangler;
- c) Did not keep an adequate, or any, lookout during the operation of the 2020 Jeep Wrangler;
- d) Operated and controlled the 2020 Jeep Wrangler at a speed that was greater than was reasonable in violation of 625 ILCS 5/11-601;
- e) Failed to give audible warning with the horn, when such warning was reasonable and necessary, in violation of 625 ILCS 5/12-601;
- f) Operated a motor vehicle in a reckless manner, in violation of 625 ILCS 5/11-503;
- g) Operated and controlled a motor vehicle with a willful and wanton disregard for the safety of others, in violation of 625 ILCS 5/11-503(a);
- h) Did not decrease speed so as to avoid colliding with a person, in violation of 625 ILCS 5/11-601;
- i) Left legal roadways creating an unreasonably dangerous risk to those on a sidewalk;
- j) Was otherwise careless and negligent.

21. As a direct and proximate result of one or more of the aforementioned acts and/or omissions, Plaintiff's decedent, SEAN PATRICK RICHARDS, sustained injuries which resulted in his death on July 20, 2023 at The University of Chicago Comer Children's Hospital located at 5721 S. Maryland Ave., Chicago, County of Cook, State of Illinois.

22. Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, are the duly appointed Independent Administrators of the Estate of SEAN PATRICK RICHARDS, and bring this action pursuant to the Wrongful Death Act of the State of Illinois, 740 ILCS 180/1 *et seq.*

23. On and after July 20, 2023, Plaintiff's decedent, SEAN PATRICK RICHARDS, left surviving him his parents, Brian Richards and Kristine Richards, as well as his siblings, Conor

Richards, Grace Richards and Finn Richards (a minor), all of whom have sustained damages including, but not limited to, grief, sorrow and emotional distress, loss of society, as well as other damages.

WHEREFORE, Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, demand Judgment in their favor and against Defendant, FULLER’S CAR WASH, INC., in an amount in excess of the jurisdictional limitation of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT II – SURVIVAL ACT – FULLER’S CAR WASH, INC.

1-23. Plaintiff re-adopts and re-alleges Paragraphs 1-23 of Count I of this Complaint at Law as if fully set forth here in this Count II.

24. As a direct and proximate result of the aforementioned negligent acts and/or omissions of Defendant, FULLER’S CAR WASH, INC., Plaintiff’s Decedent, SEAN PATRICK RICHARDS, sustained injuries of a personal and pecuniary nature prior to his death on July 20, 2023, including, but not limited to, pain and suffering, pre-impact fright and terror, and loss of a normal life, and had SEAN PATRICK RICHARDS survived he would have been entitled to bring an action for these injuries, and this action survives his passing.

25. Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, are the duly appointed administrators of the Estate of SEAN PATRICK RICHARDS, deceased, and bring this action pursuant to the Illinois Survival Act, 755 ILCS 5/27-6, *et seq.*

WHEREFORE, Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, demand Judgment in their favor and against Defendant, FULLER’S CAR WASH, INC., in an amount in excess of the jurisdictional limitation of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT III – WRONGFUL DEATH – 102 W. CHICAGO, LLC

1. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, LLC, was a corporation incorporated within the State of Illinois, with a Principal Address of 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

2. On and before July 17, 2023, and at all times mentioned herein, Douglas A. Fuller, Jr. and Susan J. Fuller Groenewold were the managers/members having the authority of manager of Defendant, 102 W. CHICAGO, LLC.

3. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, LLC, owned a property located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

4. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, LLC, operated a property located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

5. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, LLC, managed a property located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

6. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, LLC, maintained a property located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

7. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, LLC, controlled a property located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

8. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, LLC, owned a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

9. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, LLC, operated a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

10. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, LLC, managed a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

11. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, LLC, maintained a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

12. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, LLC, controlled a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

13. On July 17, 2023, and at all times mentioned herein, Defendant, CONTRERAS, was a duly appointed actual agent and/or employee of Defendant, 102 W. CHICAGO, LLC, acting at all times within the course and scope of his actual agency and/or employment.

14. On July 17, 2023, and at all times mentioned herein, the aforementioned car wash owned, operated, managed, maintained and controlled by Defendant, 102 W. CHICAGO, LLC, was located at or near the intersection of Chicago Avenue and Lincoln Street, and the exit of the car wash faced in a generally eastbound direction towards Lincoln Street.

15. On July 17, 2023, at approximately 2:30 p.m., Defendant, CONTRERAS, as a duly authorized agent and/or employee of Defendant, 102 W. CHICAGO, LLC, entered and operated a 2020 Jeep Wrangler which was exiting the aforementioned car wash and hit the accelerator.

16. On July 17, 2023, and at all times mentioned herein, the aforementioned car wash had no barriers that separated the exit of the car wash and the sidewalk adjacent to Lincoln Street.

17. On and before July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, LLC, did not install barriers to separate the exit of the carwash and adjacent driveway from the sidewalk next to Lincoln Street.

18. On July 17, 2023, at approximately 2:30 p.m., Plaintiff's decedent, SEAN PATRICK RICHARDS, was lawfully walking along the sidewalk located on the west side of Lincoln Street, located due south from its intersection with Chicago Avenue.

19. On July 17, 2023, at approximately 2:30 p.m., Defendant, 102 W. CHICAGO, LLC, by and through its duly authorized actual agent and/or employee, CONTRERAS, pressed the accelerator of the 2020 Jeep Wrangler causing it to proceed across a sidewalk, through a curb, a street parking spot, two lanes of traffic and another street parking spot on Lincoln Street, jump a curb, proceed across another sidewalk and ultimately crash into Fontano's Subs.

20. On July 17, 2023, during the course of events as delineated in Paragraph 19 of Count I of this Complaint at Law, the 2020 Jeep Wrangler being operated by Defendant, 102 W. CHICAGO, LLC, by and through its actual agent and/or employee, Defendant, CONTRERAS, struck Plaintiff's decedent, SEAN PATRICK RICHARDS, a lawful and innocent bystander.

21. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, LLC, individually, had a duty to operate its car wash in a safe and careful manner so as to avoid causing injury and/or death to third persons.

22. Specifically, on and before July 17, 2023, Defendant, 102 W. CHICAGO, was on notice of other instances where vehicles exiting the car wash had proceeded straight over the curb, through the sidewalk, and onto Lincoln Street, including, but not limited to:

- a) In approximately July of 2007, a Jeep Grande Cherokee owned by Diana Newlin was taken to the aforementioned car wash. As it was exiting, an employee entered the vehicle and pressed the accelerator, causing the car to jump the curb, cross Lincoln Street, and crash into a pickup truck parked in front of Fontano's Subs, totaling the Jeep Grande Cherokee for which Defendant paid for in full; and
- b) Approximately a year prior to July of 2023, two vehicles rolled out of Fuller's Car Wash, crossed Lincoln Street, and t-boned a vehicle owned by Lauri Aldrich which

was parked outside of Fontano's Subs. Upon information and belief, Ms. Aldrich specifically told the car wash that many bikers and pedestrians pass by Fuller's exit all day long and something needed to be done to make sure the area was safer, yet Defendant made no efforts to prevent this from happening again.

23. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, was individually negligent in one or more of the following ways:

- a) Did not have policies/procedures for the safe exit of vehicles from the car wash exit;
- b) Instructed drivers to accelerate in order to remove vehicles from the car wash under conditions that created an unreasonable danger;
- c) Allowed employees who were unfit to operate motor vehicles to enter vehicles with instruction to accelerate;
- d) Did not have barriers to prevent vehicles from exiting the car wash parking lot towards Lincoln Street, even with notice of prior occurrences;
- e) Repeatedly ignored prior occurrences which put Defendant on notice of the unsafe condition presented by its car wash;
- f) Did not provide adequate training, instruction and experience to its agents and/or employees;
- g) Caused and permitted an inexperienced employee to operate the subject Jeep Wrangler when Defendant knew, or reasonably should have known, that he was unfit to do so;
- h) Did not provide any visual or other types of warnings to pedestrians who were lawfully walking in the area of the car wash of the known dangers posed;
- i) Was otherwise careless and negligent.

24. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, by and through its actual agent and/or employee, CONTRERAS, was negligent in one or more of the following ways:

- a) Carelessly and negligently operated and controlled the 2020 Jeep Wrangler;
- b) Carelessly and negligently failed to exercise the degree or care and caution that a reasonable person under similar circumstances would have exercised in the operation of the 2020 Jeep Wrangler;
- c) Did not keep an adequate, or any, lookout during the operation of the 2020 Jeep Wrangler;
- d) Operated and controlled the 2020 Jeep Wrangler at a speed that was greater than was reasonable in violation of 625 ILCS 5/11-601;
- e) Failed to give audible warning with the horn, when such warning was reasonable and necessary, in violation of 625 ILCS 5/12-601;
- f) Operated a motor vehicle in a reckless manner, in violation of 625 ILCS 5/11-503;
- g) Operated and controlled a motor vehicle with a willful and wanton disregard for the safety of others, in violation of 625 ILCS 5/11-503(a);
- h) Did not decrease speed so as to avoid colliding with a person, in violation of 625 ILCS 5/11-601;

- i) Left legal roadways creating an unreasonably dangerous risk to those on a sidewalk;
- j) Was otherwise careless and negligent.

25. As a direct and proximate result of one or more of the aforementioned acts and/or omissions, Plaintiff's decedent, SEAN PATRICK RICHARDS, sustained injuries which resulted in his death on July 20, 2023, at The University of Chicago Comer Children's Hospital located at 5721 S. Maryland Ave., Chicago, County of Cook, State of Illinois.

26. Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, are the duly appointed Independent Administrators of the Estate of SEAN PATRICK RICHARDS, and bring this action pursuant to the Wrongful Death Act of the State of Illinois, 740 ILCS 180/1 *et seq.*

27. On and after July 20, 2023, Plaintiff's decedent, SEAN PATRICK RICHARDS, left surviving him his parents, Brian Richards and Kristine Richards, as well as his siblings, Conor Richards, Grace Richards and Finn Richards (a minor), all of whom have sustained damages including, but not limited to, grief, sorrow and emotional distress, loss of society, as well as other damages.

WHEREFORE, Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, demand Judgment in their favor and against Defendant, 102 W. CHICAGO, LLC, in an amount in excess of the jurisdictional limitation of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT IV – SURVIVAL ACT – 102 W. CHICAGO, LLC

1-27. Plaintiff re-adopts and re-alleges Paragraphs 1-27 of Count III of this Complaint at Law as if fully set forth here in this Count IV.

28. As a direct and proximate result of the aforementioned negligent acts and/or omissions of Defendant, 102 W. CHICAGO, LLC, both individually and by and through its agents, Plaintiff's Decedent, SEAN PATRICK RICHARDS, sustained injuries of a personal and pecuniary nature prior to his death on July 20, 2023, including, but not limited to, pain and suffering, pre-

impact fright and terror, and loss of a normal life, and had SEAN PATRICK RICHARDS survived he would have been entitled to bring an action for these injuries, and this action survives his passing.

29. Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, are the duly appointed administrators of the Estate of SEAN PATRICK RICHARDS, deceased, and bring this action pursuant to the Illinois Survival Act, 755 ILCS 5/27-6, *et seq.*

WHEREFORE, Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, demand Judgment in their favor and against Defendant, 102 W. CHICAGO, LLC, in an amount in excess of the jurisdictional limitation of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT V – WRONGFUL DEATH – FULLER’S SERVICE CENTER, INC.

1. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER’S SERVICE CENTER, INC., was a corporation incorporated within the State of Illinois, with a Principal Address of 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

2. On and before July 17, 2023, and at all times mentioned herein, Defendant, FULLER’S SERVICE CENTER, INC., was in the business of owning, operating, managing, maintaining and controlling automobile service centers, including car washes.

3. On and before July 17, 2023, and at all times mentioned herein, Douglas A. Fuller, Jr. was the President and Susan J. Fuller-Groenewold was the Secretary/Director of Defendant, FULLER’S SERVICE CENTER, INC.

4. On and before July 17, 2023, and at all times mentioned herein, Defendant, FULLER’S SERVICE CENTER, INC., did business throughout the State of Illinois, including in Cook County, Illinois, through an auto service and tire center as well as eleven (11) full-service

car washes, which included car washes in Western Springs (Cook County), Oak Lawn (Cook County), and Cicero (Cook County).

5. On and before July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S SERVICE CENTER, INC. advertised themselves to residents of Cook County, inviting customers to visit their Service Center or any of the Fuller Car Wash Locations – “Whether you are from Hinsdale or a surrounding community like Clarendon Hills or Western Springs, we invite you to visit Fuller's Service Center and any of our Fuller Car Wash locations.” (<https://www.fullersservicecenter.com/About-Us>).

6. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S SERVICE CENTER, INC., owned a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

7. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S SERVICE CENTER, INC., operated a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

8. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S SERVICE CENTER, INC., managed a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

9. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S SERVICE CENTER, INC., maintained a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

10. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S SERVICE CENTER, INC., controlled a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

11. On July 17, 2023, and at all times mentioned herein, Defendant, CONTRERAS, was a duly appointed actual agent and/or employee of Defendant, FULLER'S SERVICE CENTER, INC., acting at all times within the course and scope of his actual agency and/or employment.

12. On July 17, 2023, and at all times mentioned herein, the aforementioned car wash owned, operated, managed, maintained and controlled by FULLER'S SERVICE CENTER, INC., was located at or near the intersection of Chicago Avenue and Lincoln Street, and the exit of the car wash faced in a generally eastbound direction towards Lincoln Street.

13. On July 17, 2023, at approximately 2:30 p.m., Defendant, CONTRERAS, as a duly authorized agent and/or employee of Defendant, FULLER'S SERVICE CENTER, INC., entered and operated a 2020 Jeep Wrangler which was exiting the aforementioned car wash and hit the accelerator.

14. On July 17, 2023, and at all times mentioned herein, the aforementioned car wash had no barriers that separated the exit of the car wash and the sidewalk adjacent to Lincoln Street.

15. On and before July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S SERVICE CENTER, INC., did not install barriers to separate the exit of the carwash and adjacent driveway from the sidewalk next to Lincoln Street.

16. On July 17, 2023, at approximately 2:30 p.m., Plaintiff's decedent, SEAN PATRICK RICHARDS, was lawfully walking along the sidewalk located on the west side of Lincoln Street, located due south from its intersection with Chicago Avenue.

17. On July 17, 2023, at approximately 2:30 p.m., Defendant, FULLER'S SERVICE CENTER, INC., by and through its duly authorized actual agent and/or employee, CONTRERAS,

pressed the accelerator of the 2020 Jeep Wrangler causing it to proceed across a sidewalk, through a curb, a street parking spot, two lanes of traffic and another street parking spot on Lincoln Street, jump a curb, proceed across another sidewalk and ultimately crash into Fontano's Subs.

18. On July 17, 2023, during the course of events as delineated in Paragraph 17 of Count III of this Complaint at Law, the 2020 Jeep Wrangler being operated by Defendant, FULLER'S SERVICE CENTER, INC., by and through its actual agent and/or employee, Defendant, CONTRERAS, struck Plaintiff's decedent, SEAN PATRICK RICHARDS, a lawful and innocent bystander.

19. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S SERVICE CENTER, INC., individually, had a duty to operate its car wash in a safe and careful manner so as to avoid causing injury and/or death to third persons.

20. Specifically, on and before July 17, 2023, Defendant, FULLER'S SERVICE CENTER, INC., was on notice of other instances where vehicles exiting the car wash had proceeded straight over the curb, through the sidewalk, and onto Lincoln Street, including, but not limited to:

- a) In approximately July of 2007, a Jeep Grande Cherokee owned by Diana Newlin was taken to the aforementioned car wash. As it was exiting, an employee entered the vehicle and pressed the accelerator, causing the car to jump the curb, cross Lincoln Street, and crash into a pickup truck parked in front of Fontano's Subs, totaling the Jeep Grande Cherokee for which Defendant paid for in full; and
- b) Approximately a year prior to July of 2023, two vehicles rolled out of Fuller's Car Wash, crossed Lincoln Street, and t-boned a vehicle owned by Lauri Aldrich which was parked outside of Fontano's Subs. Upon information and belief, Ms. Aldrich specifically told the car wash that many bikers and pedestrians pass by Fuller's exit all day long and something needed to be done to make sure the area was safer, yet Defendant made no efforts to prevent this from happening again.

21. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S SERVICE CENTER, INC., was individually negligent in one or more of the following ways:

- a) Did not have policies/procedures for the safe exit of vehicles from the car wash exit;
- b) Instructed drivers to accelerate in order to remove vehicles from the car wash under conditions that created an unreasonable danger;
- c) Allowed employees who were unfit to operate motor vehicles to enter vehicles with instruction to accelerate;
- d) Did not have barriers to prevent vehicles from exiting the car wash parking lot towards Lincoln Street, even with notice of prior occurrences;
- e) Repeatedly ignored prior occurrences which put Defendant on notice of the unsafe condition presented by its car wash;
- f) Did not provide adequate training, instruction and experience to its agents and/or employees;
- g) Caused and permitted an inexperienced employee to operate the subject Jeep Wrangler when Defendant knew, or reasonably should have known, that he was unfit to do so;
- h) Did not provide any visual or other types of warnings to pedestrians who were lawfully walking in the area of the car wash of the known dangers posed;
- i) Was otherwise careless and negligent.

22. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S SERVICE CENTER, INC., by and through its actual agent and/or employee, CONTRERAS, was negligent in one or more of the following ways:

- a) Carelessly and negligently operated and controlled the 2020 Jeep Wrangler;
- b) Carelessly and negligently failed to exercise the degree or care and caution that a reasonable person under similar circumstances would have exercised in the operation of the 2020 Jeep Wrangler;
- c) Did not keep an adequate, or any, lookout during the operation of the 2020 Jeep Wrangler;
- d) Operated and controlled the 2020 Jeep Wrangler at a speed that was greater than was reasonable in violation of 625 ILCS 5/11-601;
- e) Failed to give audible warning with the horn, when such warning was reasonable and necessary, in violation of 625 ILCS 5/12-601;
- f) Operated a motor vehicle in a reckless manner, in violation of 625 ILCS 5/11-503;
- g) Operated and controlled a motor vehicle with a willful and wanton disregard for the safety of others, in violation of 625 ILCS 5/11-503(a);
- h) Did not decrease speed so as to avoid colliding with a person, in violation of 625 ILCS 5/11-601;
- i) Left legal roadways creating an unreasonably dangerous risk to those on a sidewalk;
- j) Was otherwise careless and negligent.

23. As a direct and proximate result of one or more of the aforementioned acts and/or omissions, Plaintiff's decedent, SEAN PATRICK RICHARDS, sustained injuries which resulted in his death on July 20, 2023, at The University of Chicago Comer Children's Hospital located at 5721 S. Maryland Ave., Chicago, County of Cook, State of Illinois.

24. Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, are the duly appointed Independent Administrators of the Estate of SEAN PATRICK RICHARDS, and bring this action pursuant to the Wrongful Death Act of the State of Illinois, 740 ILCS 180/1 *et seq.*

25. On and after July 20, 2023, Plaintiff's decedent, SEAN PATRICK RICHARDS, left surviving him his parents, Brian Richards and Kristine Richards, as well as his siblings, Conor Richards, Grace Richards and Finn Richards (a minor), all of whom have sustained damages including, but not limited to, grief, sorrow and emotional distress, loss of society, as well as other damages.

WHEREFORE, Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, demand Judgment in their favor and against Defendant, FULLER'S SERVICE CENTER, INC., in an amount in excess of the jurisdictional limitation of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT VI – SURVIVAL ACT – FULLER'S SERVICE CENTER, INC.

1-25. Plaintiff re-adopts and re-alleges Paragraphs 1-25 of Count V of this Complaint at Law as if fully set forth here in this Count VI.

26. As a direct and proximate result of the aforementioned negligent acts and/or omissions of Defendant, FULLER'S SERVICE CENTER, INC., both individually and by and through its agents, Plaintiff's Decedent, SEAN PATRICK RICHARDS, sustained injuries of a personal and pecuniary nature prior to his death on July 20, 2023, including, but not limited to, pain and suffering, pre-impact fright and terror, and loss of a normal life, and had SEAN PATRICK

RICHARDS survived he would have been entitled to bring an action for these injuries, and this action survives his passing.

27. Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, are the duly appointed administrators of the Estate of SEAN PATRICK RICHARDS, deceased, and bring this action pursuant to the Illinois Survival Act, 755 ILCS 5/27-6, *et seq.*

WHEREFORE, Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, demand Judgment in their favor and against Defendant, FULLER'S SERVICE CENTER, INC., in an amount in excess of the jurisdictional limitation of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT VII – WRONGFUL DEATH – FULLER'S REAL ESTATE HOLDINGS, LLC

1. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, was a corporation incorporated within the State of Illinois, with a Principal Address of 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

2. On and before July 17, 2023, and at all times mentioned herein, Douglas A. Fuller, Jr. and Susan J. Fuller-Groenewold were the Managers of Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC.

3. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, owned a parcel of land located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521 and collected rent for the aforementioned property from various Fuller's entities.

4. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, owned a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

5. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, operated a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

6. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, managed a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

7. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, maintained a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

8. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, controlled a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

9. On July 17, 2023, and at all times mentioned herein, Defendant, CONTRERAS, was a duly appointed actual agent and/or employee of Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, acting at all times within the course and scope of his actual agency and/or employment.

10. On July 17, 2023, and at all times mentioned herein, the aforementioned car wash owned, operated, managed, maintained and controlled by FULLER'S REAL ESTATE HOLDINGS, LLC, was located at or near the intersection of Chicago Avenue and Lincoln Street, and the exit of the car wash faced in a generally eastbound direction towards Lincoln Street.

11. On July 17, 2023, at approximately 2:30 p.m., Defendant, CONTRERAS, as a duly authorized agent and/or employee of Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC,

entered and operated a 2020 Jeep Wrangler which was exiting the aforementioned car wash and hit the accelerator.

12. On July 17, 2023, and at all times mentioned herein, the aforementioned car wash had no barriers that separated the exit of the car wash and the sidewalk adjacent to Lincoln Street.

13. On July 17, 2023, at approximately 2:30 p.m., Plaintiff's decedent, SEAN PATRICK RICHARDS, was lawfully walking along the sidewalk located on the west side of Lincoln Street, located due south from its intersection with Chicago Avenue.

14. On July 17, 2023, at approximately 2:30 p.m., Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, by and through its duly authorized actual agent and/or employee, CONTRERAS, pressed the accelerator of the 2020 Jeep Wrangler causing it to proceed across a sidewalk, through a curb, a street parking spot, two lanes of traffic and another street parking spot on Lincoln Street, jump a curb, proceed across another sidewalk and ultimately crash into Fontano's Subs.

15. On July 17, 2023, during the course of events as delineated in Paragraph 14 of Count VII of this Complaint at Law, the 2020 Jeep Wrangler being operated by Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, by and through its actual agent and/or employee, Defendant, CONTRERAS, struck Plaintiff's decedent, SEAN PATRICK RICHARDS, a lawful and innocent bystander.

16. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, individually, had a duty to operated its car wash in a safe and careful manner so as to avoid causing injury and/or death to third persons.

17. Specifically, prior to July 17, 2023, Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, was on notice of other instances where vehicles exiting the car wash had proceeded straight over the curb, through the sidewalk, and onto Lincoln Street, including, but not limited to:

- a) In approximately July of 2007, a Jeep Grande Cherokee owned by Diana Newlin was taken to the aforementioned car wash. As it was exiting, an employee entered the vehicle and pressed the accelerator, causing the car to jump the curb, cross Lincoln Street, and crash into a pickup truck parked in front of Fontano's Subs, totaling the Jeep Grande Cherokee for which Defendant paid for in full;
- b) Approximately a year prior to July of 2023, two vehicles rolled out of Fuller's Car Wash, crossed Lincoln Street, and t-boned a vehicle owned by Lauri Aldrich which was parked outside of Fontano's Subs. Upon information and belief, Ms. Aldrich specifically told the car wash that many bikers and pedestrians pass by Fuller's exit all day long and something needed to be done to make sure the area was safer, yet Defendant made no efforts to prevent this from happening again.

18. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, was negligent in one or more of the following ways:

- a) Did not have policies/procedures for the safe exit of vehicles from the car wash exit;
- b) Instructed drivers to accelerate in order to remove vehicles from the car wash under conditions that created an unreasonable danger;
- c) Allowed employees who were unfit to operate motor vehicles to enter vehicles with instruction to accelerate;
- d) Did not have barriers to prevent vehicles from exiting the car wash parking lot towards Lincoln Street;
- e) Repeatedly ignored prior occurrences which put Defendant on notice of the unsafe condition presented by its car wash;
- f) Did not provide adequate training, instruction and experience to its agents and/or employees;
- g) Caused an permitted an inexperienced employee to operated the subject Jeep Wrangler when Defendant knew, or reasonably should have known, that he was unfit to do so;
- h) Did not provide any visual or other types of warnings to pedestrians who were lawfully walking in the area of the car wash of the known dangers posed;
- i) Was otherwise careless and negligent.

19. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, by and through its actual agent and/or employee, CONTRERAS, was negligent in one or more of the following ways:

- a) Carelessly and negligently operated and controlled the 2020 Jeep Wrangler;
- b) Carelessly and negligently failed to exercise the degree or care and caution that a reasonable person under similar circumstances would have exercised in the operation of the 2020 Jeep Wrangler;
- c) Did not keep an adequate, or any, lookout during the operation of the 2020 Jeep Wrangler;
- d) Operated and controlled the 2020 Jeep Wrangler at a speed that was greater than was reasonable in violation of 625 ILCS 5/11-601;
- e) Failed to give audible warning with the horn, when such warning was reasonable and necessary, in violation of 625 ILCS 5/12-601;
- f) Operated a motor vehicle in a reckless manner, in violation of 625 ILCS 5/11-503;
- g) Operated and controlled a motor vehicle with a willful and wanton disregard for the safety of others, in violation of 625 ILCS 5/11-503(a);
- h) Did not decrease speed so as to avoid colliding with a person, in violation of 625 ILCS 5/11-601;
- i) Left legal roadways creating an unreasonably dangerous risk to those on a sidewalk;
- j) Was otherwise careless and negligent.

20. As a direct and proximate result of one or more of the aforementioned acts and/or omissions, Plaintiff's decedent, SEAN PATRICK RICHARDS, sustained injuries which resulted in his death on July 20, 2023 at The University of Chicago Comer Children's Hospital located at 5721 S. Maryland Ave., Chicago, County of Cook, State of Illinois.

21. Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, are the duly appointed Independent Administrators of the Estate of SEAN PATRICK RICHARDS, and bring this action pursuant to the Wrongful Death Act of the State of Illinois, 740 ILCS 180/1 *et seq.*

22. On and after July 20, 2023, Plaintiff's decedent, SEAN PATRICK RICHARDS, left surviving him his parents, Brian Richards and Kristine Richards, as well as his siblings, Conor Richards, Grace Richards and Finn Richards (a minor), all of whom have sustained damages including, but not limited to, grief, sorrow and emotional distress, loss of society, as well as other damages.

WHEREFORE, Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, demand Judgment in their favor and against Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, in

an amount in excess of the jurisdictional limitation of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT VIII – SURVIVAL ACT – FULLER’S REAL ESTATE HOLDINGS, LLC

1-22. Plaintiff re-adopts and re-alleges Paragraphs 1-22 of Count V of this Complaint at Law as if fully set forth here in this Count VI.

23. As a direct and proximate result of the aforementioned negligent acts and/or omissions of Defendant, FULLER’S REAL ESTATE HOLDINGS, LLC, Plaintiff’s Decedent, SEAN PATRICK RICHARDS, sustained injuries of a personal and pecuniary nature prior to his death on July 20, 2023, including, but not limited to, pain and suffering, pre-impact fright and terror, and loss of a normal life, and had SEAN PATRICK RICHARDS survived he would have been entitled to bring an action for these injuries, and this action survives his passing.

24. Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, are the duly appointed administrators of the Estate of SEAN PATRICK RICHARDS, deceased, and bring this action pursuant to the Illinois Survival Act, 755 ILCS 5/27-6, *et seq.*

WHEREFORE, Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, demand Judgment in their favor and against Defendant, FULLER’S REAL ESTATE HOLDINGS, LLC, in an amount in excess of the jurisdictional limitation of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT IX – WRONGFUL DEATH – CONTRERAS

1. On July 17, 2023, and at all times mentioned herein, Defendant, CONTRERAS resided at 5624 S. Washington St., Hinsdale, Illinois 60521.

2. On July 17, 2023, Defendant, CONTRERAS, operated and controlled a 2020 Jeep Wrangler exiting a car wash at which he was employed at or near 102 W. Chicago, Hinsdale, Illinois.

3. On July 17, 2023, and at all times mentioned herein, Defendant, CONTRERAS, was a duly appointed actual agent and/or employee of Defendant, 102 W. CHICAGO, LLC, acting at all times within the course and scope of his actual agency and/or employment.

4. On July 17, 2023, and at all times mentioned herein, Defendant, CONTRERAS, was a duly appointed actual agent and/or employee of Defendant, FULLER'S CAR WASH, INC., acting at all times within the course and scope of his actual agency and/or employment.

5. On July 17, 2023, and at all times mentioned herein, Defendant, CONTRERAS, was a duly appointed actual agent and/or employee of Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC, acting at all times within the course and scope of his actual agency and/or employment.

6. On July 17, 2023, and at all times mentioned herein, Defendant, CONTRERAS, was a duly appointed actual agent and/or employee of Defendant, DOUGLAS FULLER FAMILY, LP, acting at all times within the course and scope of his actual agency and/or employment.

7. On July 17, 2023, and at all times mentioned herein, the aforementioned car wash was located at or near the intersection of Chicago Avenue and Lincoln Street, and the exit of the car wash faced in a generally eastbound direction towards Lincoln Street.

8. On July 17, 2023, at approximately 2:30 p.m., Defendant, CONTRERAS, entered and operated a 2020 Jeep Wrangler which was exiting the aforementioned car wash and hit the accelerator.

9. On July 17, 2023, and at all times mentioned herein, the aforementioned car wash had no barriers that separated the exit of the car wash and the sidewalk adjacent to Lincoln Street.

10. On July 17, 2023, at approximately 2:30 p.m., Plaintiff's decedent, SEAN PATRICK RICHARDS, was lawfully walking along the sidewalk located on the west side of Lincoln Street, located due south from its intersection with Chicago Avenue.

11. On July 17, 2023, at approximately 2:30 p.m., Defendant, CONTRERAS, pressed the accelerator of the 2020 Jeep Wrangler causing it to proceed across a sidewalk, through a curb, a street parking spot, two lanes of traffic and another street parking spot on Lincoln Street, jump a curb, proceed across another sidewalk and ultimately crash into Fontano's Subs.

12. On July 17, 2023, during the course of events as delineated in Paragraph 11 of Count IX of this Complaint at Law, the 2020 Jeep Wrangler being operated by Defendant, CONTRERAS, struck Plaintiff's decedent, SEAN PATRICK RICHARDS, a lawful and innocent bystander.

13. On July 17, 2023, and at all times mentioned herein, Defendant, CONTRERAS, was negligent in one or more of the following ways:

- a) Carelessly and negligently operated and controlled the 2020 Jeep Wrangler;
- b) Carelessly and negligently failed to exercise the degree or care and caution that a reasonable person under similar circumstances would have exercised in the operation of the 2020 Jeep Wrangler;
- c) Did not keep an adequate, or any, lookout during the operation of the 2020 Jeep Wrangler;
- d) Operated and controlled the 2020 Jeep Wrangler at a speed that was greater than was reasonable in violation of 625 ILCS 5/11-601;
- e) Failed to give audible warning with the horn, when such warning was reasonable and necessary, in violation of 625 ILCS 5/12-601;
- f) Operated a motor vehicle in a reckless manner, in violation of 625 ILCS 5/11-503;
- g) Operated and controlled a motor vehicle with a willful and wanton disregard for the safety of others, in violation of 625 ILCS 5/11-503(a);
- h) Did not decrease speed so as to avoid colliding with a person, in violation of 625 ILCS 5/11-601;

- i) Left legal roadways creating an unreasonably dangerous risk to those on a sidewalk;
- j) Was otherwise careless and negligent.

14. As a direct and proximate result of one or more of the aforementioned acts and/or omissions, Plaintiff's decedent, SEAN PATRICK RICHARDS, sustained injuries which resulted in his death on July 20, 2023 at The University of Chicago Comer Children's Hospital located at 5721 S. Maryland Ave., Chicago, County of Cook, State of Illinois.

15. Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, are the duly appointed Independent Administrators of the Estate of SEAN PATRICK RICHARDS, and bring this action pursuant to the Wrongful Death Act of the State of Illinois, 740 ILCS 180/1 *et seq.*

16. On and after July 20, 2023, Plaintiff's decedent, SEAN PATRICK RICHARDS, left surviving him his parents, Brian Richards and Kristine Richards, as well as his siblings, Conor Richards, Grace Richards and Finn Richards (a minor), all of whom have sustained damages including, but not limited to, grief, sorrow and emotional distress, loss of society, as well as other damages.

WHEREFORE, Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, demand Judgment in their favor and against Defendant, MARTIN CONTRERAS, as father, guardian and next friend of MARTIN CONTRERAS, JR., in an amount in excess of the jurisdictional limitation of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT X – SURVIVAL ACT - CONTRERAS

1-16. Plaintiff re-adopts and re-alleges Paragraphs 1-16 of Count IX of this Complaint at Law as if fully set forth here in this Count X.

17. As a direct and proximate result of the aforementioned negligent acts and/or omissions of Defendant, CONTRERAS, Plaintiff's Decedent, SEAN PATRICK RICHARDS,

sustained injuries of a personal and pecuniary nature prior to his death on July 20, 2023, including, but not limited to, pain and suffering, pre-impact fright and terror, and loss of a normal life, and had SEAN PATRICK RICHARDS survived he would have been entitled to bring an action for these injuries, and this action survives his passing.

18. Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, are the duly appointed administrators of the Estate of SEAN PATRICK RICHARDS, deceased, and bring this action pursuant to the Illinois Survival Act, 755 ILCS 5/27-6, *et seq.*

WHEREFORE, Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, demand Judgment in their favor and against Defendant, MARTIN CONTRERAS, as father, guardian and next friend of MARTIN CONTRERAS, JR., in an amount in excess of the jurisdictional limitation of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT XI – WRONGFUL DEATH – DOUGLAS A. FULLER, JR.

1. On July 17, 2023, and at all times mentioned herein, Defendant, DOUGLAS A. FULLER, JR., resided at 5627 S. Washington St., Hinsdale, Illinois 60521.

2. On July 17, 2023, and at all times mentioned herein, Defendant, DOUGLAS A. FULLER, JR. was a manager/member of Defendant, 102 W. CHICAGO, LLC.

3. On July 17, 2023, and at all times mentioned herein, Defendant, DOUGLAS A. FULLER, JR., was the President of Defendant, FULLER’S SERVICE CENTER, INC.

4. On July 17, 2023, and at all times mentioned herein, Defendant, DOUGLAS A. FULLER, JR., was a manager/member of Defendant, FULLER’S REAL ESTATE HOLDINGS, LLC.

5. On July 17, 2023, and at all times mentioned herein, Defendant, DOUGLAS A. FULLER, JR., was the President and Director of Defendant, D.A. FULLER CORPORATION.

6. On July 17, 2023, and at all times mentioned herein, Defendant, DOUGLAS A. FULLER, JR., was a partner of Defendant, DOUGLAS FULLER FAMILY, LP.

7. On July 17, 2023, and at all times mentioned herein, Defendant, DOUGLAS A. FULLER, JR., owned a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

8. On July 17, 2023, and at all times mentioned herein, Defendant, DOUGLAS A. FULLER, JR., operated a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

9. On July 17, 2023, and at all times mentioned herein, Defendant, DOUGLAS A. FULLER, JR., managed a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

10. On July 17, 2023, and at all times mentioned herein, Defendant, DOUGLAS A. FULLER, JR., maintained a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

11. On July 17, 2023, and at all times mentioned herein, Defendant, DOUGLAS A. FULLER, JR., controlled a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

12. On and before July 17, 2023, Defendant, DOUGLAS A. FULLER, JR., was on notice of other instances where vehicles exiting the car wash had proceeded straight over the curb, through the sidewalk, and onto Lincoln Street, including, but not limited to:

- c) In approximately July of 2007, a Jeep Grande Cherokee owned by Diana Newlin was taken to the aforementioned car wash. As it was exiting, an employee entered the vehicle and pressed the accelerator, causing the car to jump the curb, cross Lincoln Street, and crash into a pickup truck parked in front of Fontano's Subs, totaling the Jeep Grande Cherokee for which Defendant paid for in full; and
- d) Approximately a year prior to July of 2023, two vehicles rolled out of Fuller's Car Wash, crossed Lincoln Street, and t-boned a vehicle owned by Lauri Aldrich which was parked outside of Fontano's Subs. Upon information and belief, Ms. Aldrich specifically told the car wash that many bikers and pedestrians pass by Fuller's exit all day long and something needed to be done to make sure the area was safer, yet Defendant made no efforts to prevent this from happening again.

13. On and before July 17, 2023, and at all times mentioned herein, despite notice of other instances where vehicles exiting the car wash and proceeding straight over the curb, through the sidewalk, and onto Lincoln Street, Defendant, DOUGLAS A. FULLER, JR., took no action to erect or construct barriers which would prevent vehicles from exiting the car wash and proceeding onto Lincoln Street.

14. On and before July 17, 2023, Defendant, DOUGLAS A. FULLER, JR., was aware that the sidewalk located on Lincoln Street immediately adjacent to the car wash exit was an area where there was frequent pedestrian foot traffic.

15. On and before July 17, 2023, Defendant, DOUGLAS A. FULLER, JR., allowed inexperienced drivers to be employed at the subject car wash.

16. On and before July 17, 2023, Defendant, DOUGLAS A. FULLER, JR., improperly supervised the car wash premises.

17. On and before July 17, 2023, Defendant, DOUGLAS A. FULLER, JR., allowed the car wash premises to operate in an unreasonably safe condition for pedestrians lawfully walking past the premises.

18. On and before July 17, 2023, and at all times mentioned herein, Defendant, DOUGLAS A. FULLER, JR., individually, had a duty to own, operate, manage, maintain and control the aforementioned car wash in a reasonably safe and careful manner so as to avoid causing injury and/or death to third persons.

19. On July 17, 2023, and at all times mentioned herein, Defendant, DOUGLAS A. FULLER, JR. was individually negligent in one or more of the following respects:

- a) Did not have policies/procedures for the safe exit of vehicles from the car wash exit;
- b) Instructed drivers to accelerate in order to remove vehicles from the car wash under conditions that created an unreasonable danger;

- c) Allowed employees who were unfit to operate motor vehicles to enter vehicles with instruction to accelerate;
- d) Did not have barriers to prevent vehicles from exiting the car wash parking lot towards Lincoln Street, even with notice of prior occurrences;
- e) Repeatedly ignored prior occurrences which put Defendant on notice of the unsafe condition presented by its car wash;
- f) Did not provide adequate training, instruction and experience to its agents and/or employees;
- g) Caused and permitted an inexperienced employee to operate the subject Jeep Wrangler when Defendant knew, or reasonably should have known, that he was unfit to do so;
- h) Did not provide any visual or other types of warnings to pedestrians who were lawfully walking in the area of the car wash of the known dangers posed;
- i) Was otherwise careless and negligent.

20. As a direct and proximate result of one or more of the aforementioned acts and/or omissions, Plaintiff's decedent, SEAN PATRICK RICHARDS, sustained injuries which resulted in his death on July 20, 2023, at The University of Chicago Comer Children's Hospital located at 5721 S. Maryland Ave., Chicago, County of Cook, State of Illinois.

21. Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, are the duly appointed Independent Administrators of the Estate of SEAN PATRICK RICHARDS, and bring this action pursuant to the Wrongful Death Act of the State of Illinois, 740 ILCS 180/1 *et seq.*

22. On and after July 20, 2023, Plaintiff's decedent, SEAN PATRICK RICHARDS, left surviving him his parents, Brian Richards and Kristine Richards, as well as his siblings, Conor Richards, Grace Richards and Finn Richards (a minor), all of whom have sustained damages including, but not limited to, grief, sorrow and emotional distress, loss of society, as well as other damages.

WHEREFORE, Plaintiffs, BRIAN and KRISTINE RICHARDS, as Independent Administrators of the Estate of SEAN PATRICK RICHARDS, Deceased, demand Judgment in their favor and against Defendant, DOUGLAS A. FULLER, JR., in an amount in excess of the jurisdictional limitation of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT XII – SURVIVAL ACT – DOUGLAS A. FULLER, J.R.

1-22. Plaintiff re-adopts and re-alleges Paragraphs 1-22 of Count XI of this Complaint at Law as if fully set forth here in this Count XII.

23. As a direct and proximate result of the aforementioned negligent acts and/or omissions of Defendant, DOUGLAS A. FULLER, JR., Plaintiff's Decedent, SEAN PATRICK RICHARDS, sustained injuries of a personal and pecuniary nature prior to his death on July 20, 2023, including, but not limited to, pain and suffering, pre-impact fright and terror, and loss of a normal life, and had SEAN PATRICK RICHARDS survived he would have been entitled to bring an action for these injuries, and this action survives his passing.

24. Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, are the duly appointed administrators of the Estate of SEAN PATRICK RICHARDS, deceased, and bring this action pursuant to the Illinois Survival Act, 755 ILCS 5/27-6, *et seq.*

WHEREFORE, Plaintiffs, BRIAN and KRISTINE RICHARDS, as Independent Administrators of the Estate of SEAN PATRICK RICHARDS, Deceased, demand Judgment in their favor and against Defendant, DOUGLAS A. FULLER, JR., in an amount in excess of the jurisdictional limitation of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT XIII – WRONGFUL DEATH – SUSAN FULLER GROENEWOLD

1. On July 17, 2023, and at all times mentioned herein, Defendant, SUSAN FULLER GROENEWOLD, resided at 125 N. Lincoln St., Hinsdale, Illinois 60521.

2. On July 17, 2023, and at all times mentioned herein, Defendant, SUSAN FULLER GROENEWOLD, was a manager/member of Defendant, 102 W. CHICAGO, LLC.

3. On July 17, 2023, and at all times mentioned herein, Defendant, SUSAN FULLER GROENEWOLD, was the Secretary and Director of Defendant, FULLER'S SERVICE CENTER, INC.

4. On July 17, 2023, and at all times mentioned herein, Defendant, SUSAN FULLER GROENEWOLD, was a manager/member of Defendant, FULLER'S REAL ESTATE HOLDINGS, LLC.

5. On July 17, 2023, and at all times mentioned herein, Defendant, SUSAN FULLER GROENEWOLD, was the Secretary of Defendant, D.A. FULLER CORPORATION.

6. On July 17, 2023, and at all times mentioned herein, Defendant, SUSAN FULLER GROENEWOLD, was a partner of Defendant, DOUGLAS FULLER FAMILY, LP.

7. On July 17, 2023, and at all times mentioned herein, Defendant, SUSAN FULLER GROENEWOLD, owned a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

8. On July 17, 2023, and at all times mentioned herein, Defendant, SUSAN FULLER GROENEWOLD, operated a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

9. On July 17, 2023, and at all times mentioned herein, Defendant, SUSAN FULLER GROENEWOLD, managed a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

10. On July 17, 2023, and at all times mentioned herein, Defendant, SUSAN FULLER GROENEWOLD, maintained a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

11. On July 17, 2023, and at all times mentioned herein, Defendant, SUSAN FULLER GROENEWOLD, controlled a car wash located at 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

12. On and before July 17, 2023, Defendant, SUSAN FULLER GROENEWOLD, was on notice of other instances where vehicles exiting the car wash had proceeded straight over the curb, through the sidewalk, and onto Lincoln Street, including, but not limited to:

- a) In approximately July of 2007, a Jeep Grande Cherokee owned by Diana Newlin was taken to the aforementioned car wash. As it was exiting, an employee entered the vehicle and pressed the accelerator, causing the car to jump the curb, cross Lincoln Street, and crash into a pickup truck parked in front of Fontano's Subs, totaling the Jeep Grande Cherokee for which Defendant paid for in full; and
- b) Approximately a year prior to July of 2023, two vehicles rolled out of Fuller's Car Wash, crossed Lincoln Street, and t-boned a vehicle owned by Lauri Aldrich which was parked outside of Fontano's Subs. Upon information and belief, Ms. Aldrich specifically told the car wash that many bikers and pedestrians pass by Fuller's exit all day long and something needed to be done to make sure the area was safer, yet Defendant made no efforts to prevent this from happening again.

13. On and before July 17, 2023, and at all times mentioned herein, despite notice of other instances where vehicles exiting the car wash and proceeding straight over the curb, through the sidewalk, and onto Lincoln Street, Defendant, SUSAN FULLER GROENEWOLD., took no action to erect or construct barriers which would prevent vehicles from exiting the car wash and proceeding onto Lincoln Street.

14. On and before July 17, 2023, Defendant, SUSAN FULLER GROENEWOLD, was aware that the sidewalk located on Lincoln Street immediately adjacent to the car wash exit was an area where there was frequent pedestrian foot traffic.

15. On and before July 17, 2023, Defendant, SUSAN FULLER GROENEWOLD, allowed inexperienced drivers to be employed at the subject car wash.

16. On and before July 17, 2023, Defendant, SUSAN FULLER GROENEWOLD, improperly supervised the car wash premises.

17. On and before July 17, 2023, Defendant, SUSAN FULLER GROENEWOLD, allowed the car wash premises to operate in an unreasonably safe condition for pedestrians lawfully walking past the premises.

18. On and before July 17, 2023, and at all times mentioned herein, Defendant, SUSAN FULLER GROENEWOLD, individually, had a duty to own, operate, manage, maintain and control the aforementioned car wash in a reasonably safe and careful manner so as to avoid causing injury and/or death to third persons.

19. On July 17, 2023, and at all times mentioned herein, Defendant, SUSAN FULLER GROENEWOLD was individually negligent in one or more of the following respects:

- a) Did not have policies/procedures for the safe exit of vehicles from the car wash exit;
- b) Instructed drivers to accelerate in order to remove vehicles from the car wash under conditions that created an unreasonable danger;
- c) Allowed employees who were unfit to operate motor vehicles to enter vehicles with instruction to accelerate;
- d) Did not have barriers to prevent vehicles from exiting the car wash parking lot towards Lincoln Street, even with notice of prior occurrences;
- e) Repeatedly ignored prior occurrences which put Defendant on notice of the unsafe condition presented by its car wash;
- f) Did not provide adequate training, instruction and experience to its agents and/or employees;
- g) Caused and permitted an inexperienced employee to operate the subject Jeep Wrangler when Defendant knew, or reasonably should have known, that he was unfit to do so;
- h) Did not provide any visual or other types of warnings to pedestrians who were lawfully walking in the area of the car wash of the known dangers posed;
- i) Was otherwise careless and negligent.

20. As a direct and proximate result of one or more of the aforementioned acts and/or omissions, Plaintiff's decedent, SEAN PATRICK RICHARDS, sustained injuries which resulted in his death on July 20, 2023, at The University of Chicago Comer Children's Hospital located at 5721 S. Maryland Ave., Chicago, County of Cook, State of Illinois.

21. Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, are the duly appointed Independent Administrators of the Estate of SEAN PATRICK RICHARDS, and bring this action pursuant to the Wrongful Death Act of the State of Illinois, 740 ILCS 180/1 *et seq.*

22. On and after July 20, 2023, Plaintiff's decedent, SEAN PATRICK RICHARDS, left surviving him his parents, Brian Richards and Kristine Richards, as well as his siblings, Conor Richards, Grace Richards and Finn Richards (a minor), all of whom have sustained damages including, but not limited to, grief, sorrow and emotional distress, loss of society, as well as other damages.

WHEREFORE, Plaintiffs, BRIAN and KRISTINE RICHARDS, as Independent Administrators of the Estate of SEAN PATRICK RICHARDS, Deceased, demand Judgment in their favor and against Defendant, SUSAN FULLER GROENEWOLD, in an amount in excess of the jurisdictional limitation of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT XIV – SURVIVAL ACT – SUSAN FULLER GROENEWOLD

1-22. Plaintiff re-adopts and re-alleges Paragraphs 1-22 of Count XIII of this Complaint at Law as if fully set forth here in this Count XIV.

23. As a direct and proximate result of the aforementioned negligent acts and/or omissions of Defendant, SUSAN FULLER GROENEWOLD, Plaintiff's Decedent, SEAN PATRICK RICHARDS, sustained injuries of a personal and pecuniary nature prior to his death on July 20, 2023, including, but not limited to, pain and suffering, pre-impact fright and terror, and loss of a normal life, and had SEAN PATRICK RICHARDS survived he would have been entitled to bring an action for these injuries, and this action survives his passing.

24. Plaintiffs, BRIAN RICHARDS and KRISTINE RICHARDS, are the duly appointed administrators of the Estate of SEAN PATRICK RICHARDS, deceased, and bring this action pursuant to the Illinois Survival Act, 755 ILCS 5/27-6, *et seq.*

WHEREFORE, Plaintiffs, BRIAN and KRISTINE RICHARDS, as Independent Administrators of the Estate of SEAN PATRICK RICHARDS, Deceased, demand Judgment in their favor and against Defendant, SUSAN FULLER GROENEWOLD, in an amount in excess of the jurisdictional limitation of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT XV – JOINT VENTURE – VICARIOUS LIABILITY

1. On July 17, 2023, and at all times mentioned herein, Defendant, 102 W. CHICAGO, LLC, was a corporation incorporated within the State of Illinois, with a Principal Address of 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

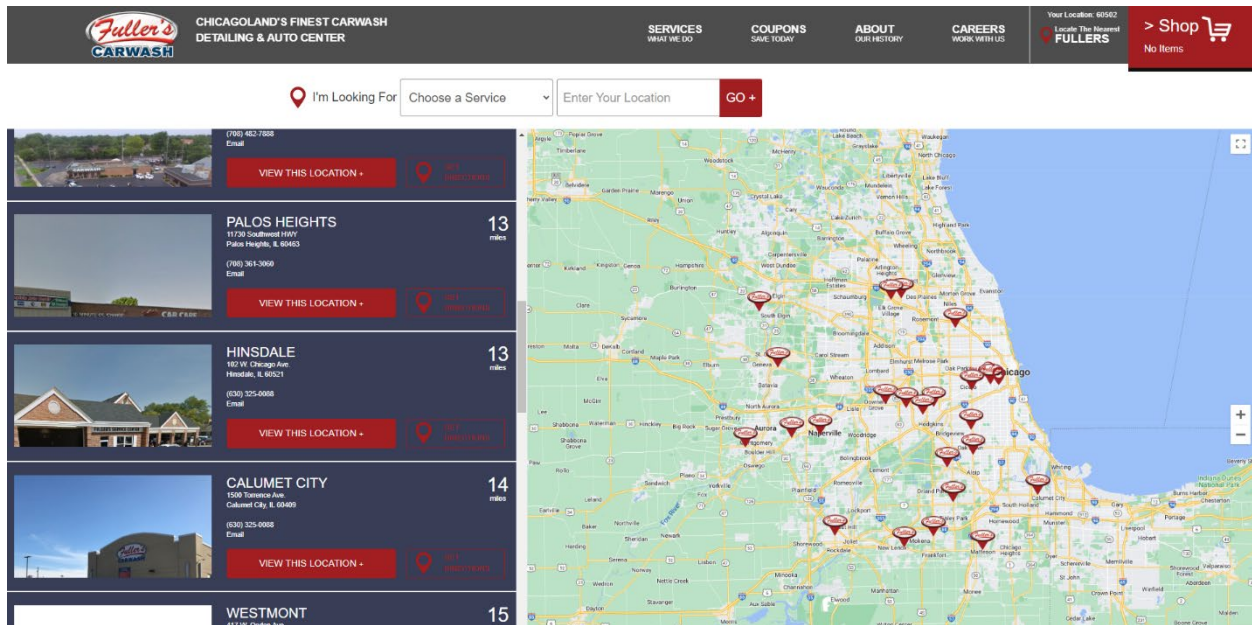
2. On and before July 17, 2023, and at all times mentioned herein, Douglas A. Fuller, Jr. and Susan J. Fuller-Groenewold were the managers/members having the authority of manager of Defendant, 102 W. CHICAGO, LLC.

3. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER’S SERVICE CENTER, INC., was a corporation incorporated within the State of Illinois, with a Principal Address of 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

4. On and before July 17, 2023, and at all times mentioned herein, Defendant, FULLER’S SERVICE CENTER, INC. was in the business of owning, operating, managing, maintaining and controlling automobile service centers, including car washes.

5. On and before July 17, 2023, and at all times mentioned herein, Douglas A. Fuller, Jr. was the President and Susan J. Fuller-Groenewold was the Secretary/Director of Defendant, FULLER’S SERVICE CENTER, INC.

6. On and before July 17, 2023, and at all times mentioned herein, Defendant, FULLER’S CAR WASH, INC., specifically listed the Hinsdale Carwash located at 102 W. Chicago Ave, Hinsdale, Illinois 60521 on its website under the section “Locate The Nearest Fullers”:



7. On July 17, 2023, and at all times mentioned herein, Defendant, FULLER’S REAL ESTATE HOLDINGS, LLC, was a corporation incorporated within the State of Illinois, with a Principal Address of 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

8. On and before July 17, 2023, and at all times mentioned herein, Douglas A. Fuller, Jr. and Susan J. Fuller-Groenewold were the Managers of Defendant, FULLER’S REAL ESTATE HOLDINGS, LLC.

9. On and before July 17, 2023, and at all times mentioned herein, Defendant, D.A. FULLER CORPORATION, was a corporation incorporated within the State of Illinois, with a Principal Address of 102 W. Chicago Avenue, Hinsdale, Illinois 60521.

10. On and before July 17, 2023, and at all times mentioned herein, Douglas A. Fuller, Jr. was the President and Director and Susan Fuller Groenewold was the Secretary of Defendant, D.A. FULLER CORPORATION.

11. On and before July 17, 2023, Defendant, DOUGLAS FULLER FAMILY, LP, was a Limited Partnership registered in the State of Illinois with a designated office located at 102 W. Chicago Ave., Hinsdale, Illinois 60521.

12. On and before July 17, 2023, Defendant, D.A. FULLER CORPORATION, and Defendant, DOUGLAS FULLER FAMILY, LP, were comprised as a general partnership, wherein the two partners had joined together in a business/venture for their common benefit, including, but not limited to, the owning of land and operation of corporations, each contributing property, money, and services to the business/venture and having a continuity of interest in any profits.

13. On and before July 17, 2023, Defendants, D.A. FULLER CORPORATION and DOUGLAS FULLER FAMILY, LP, were engaged in a joint venture with Defendants, 102 W. CHICAGO, LLC, FULLER'S SERVICE CENTER, INC., FULLER'S CAR WASH, INC., and FULLER'S REAL ESTATE HOLDINGS, LLC, in that:

- a) The aforementioned corporations/partnerships had a continuity of managers/directors through Douglas A. Fuller, Jr. and Susan Fuller Groenewold;
- b) Those managers owned and managed corporations to own property, such as Defendant, 102 W. CHICAGO AVE LLC and FULLER'S REAL ESTATE HOLDINGS, LLC, and other companies to manage such companies, such as FULLER'S SERVICE CENTER, INC. and FULLER'S CAR WASH, INC.;
- c) The corporations and partnerships had a community of interest in the purpose of the joint association;
- d) The managers/members/directors of each had a right to direct and govern the policy or conduct of the other members through Douglas A. Fuller, Jr. and Susan Fuller Groenewold;
- e) The corporations and partnerships had a right to joint control and management of the property used in the enterprise; and
- f) Those corporations and partnerships engaged in a sharing of both profits and losses.

14. That should Defendants, 102 W. CHICAGO, LLC, FULLER'S SERVICE CENTER, INC., FULLER'S CAR WASH, INC., and FULLER'S REAL ESTATE HOLDINGS, LLC, or any of them, be found liable for the injuries and damages to Plaintiff, then Defendants, D.A. FULLER CORPORATION and DOUGLAS FULLER FAMILY, LP are vicariously liable for such conduct, and are liable for any judgment rendered in this case.

WHEREFORE, Plaintiffs, BRIAN and KRISTINE RICHARDS, as Independent Administrators of the Estate of SEAN RICHARDS, deceased, demand judgement against Defendants, D.A. FULLER CORPORATION and DOUGLAS FULLER FAMILY, LP, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00).

Respectfully Submitted,

/s/ Bradley M. Cosgrove
Attorney for Plaintiff

CLIFFORD LAW OFFICES, P.C.

Robert A. Clifford (RAC@cliffordlaw.com)
Bradley M. Cosgrove (BMC@cliffordlaw.com)
Charles R. Haskins (CRH@cliffordlaw.com)
120 N. LaSalle St., Suite 3600
Chicago, Illinois 60602
P : 312/899-9090
Firm I.D. : 32640