

FILED
11/24/2025 9:09 AM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2025L014520
Calendar, F
35486764

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

ALYZA LOPEZ as Independent Administrator)
of the Estate of TANYA NAVARRO,)
Deceased,)
)
Plaintiff,)
)
v.)
)
RAFFERTY’S IRISH PUB, INC.,)
and FINN CURRAN,)
)
Defendants.)

No.
Plaintiffs Demand Trial By Jury

COMPLAINT AT LAW
COUNT I
WRONGFUL DEATH
FINN CURRAN

Plaintiff, ALYZA LOPEZ as surviving child and Independent Administrator of the Estate of TANYA NAVARRO, Deceased, by and through their attorneys, CLIFFORD LAW OFFICES, P.C., complaining of Defendant, FINN CURRAN, state as follows:

1. On and before December 13, 2024, LaGrange Road was a public roadway running in a general north and south direction at or near Weeping Willow Road in the City of Hodgkins, County of Cook, and State of Illinois.
2. On or around December 13, 2024, Defendant, FINN CURRAN, owned a motor vehicle southbound on the 7200 Block of LaGrange Road at or near Weeping Willow Road, in the City of Hodgkins, County of Cook, and State of Illinois.

3. On or around December 13, 2024, Defendant, FINN CURRAN, maintained a motor vehicle southbound on the 7200 Block of LaGrange Road at or near Weeping Willow Road, in the City of Hodgkins, County of Cook, and State of Illinois.

4. On or around December 13, 2024, Defendant, FINN CURRAN, controlled a motor vehicle southbound on the 7200 Block of LaGrange Road at or near Weeping Willow Road, in the City of Hodgkins, County of Cook, and State of Illinois.

5. On or around December 13, 2024, Defendant, FINN CURRAN, managed a motor vehicle southbound on the 7200 Block of LaGrange Road at or near Weeping Willow Road, in the City of Hodgkins, County of Cook, and State of Illinois.

6. On or around December 13, 2024, Defendant, FINN CURRAN, operated a motor vehicle southbound on the 7200 Block of LaGrange Road at or near Weeping Willow Road, in the City of Hodgkins, County of Cook, and State of Illinois.

7. On or around December 13, 2024, Plaintiff's Decedent, TANYA NAVARRO, was a passenger in a disabled vehicle on the far-right lane of the southbound lanes of the 7200 Block of LaGrange Road at or near Weeping Willow Road, in the City of Hodgkins, County of Cook, and State of Illinois.

8. On or around December 13, 2024, there existed another vehicle on the far-right lane in front of the vehicle that Plaintiff's Decedent, TANYA NAVARRO, was a passenger in, on the southbound lanes of the 7200 Block of LaGrange Road at or near Weeping Willow Road, in the City of Hodgkins, County of Cook, and State of Illinois.

9. On or around December 13, 2024, it was the intention of Defendant, FINN CURRAN, to continue southbound on LaGrange Road.

10. On or around December 13, 2024, Defendant, FINN CURRAN, owed a duty to operate his vehicle in a reasonably safe manner.

11. On or around December 13, 2024, the vehicle operated by Defendant, FINN CURRAN, struck the vehicle in which Plaintiff's Decedent, TANYA NAVARRO, was a passenger, causing said vehicle to strike the vehicle ahead on the shoulder.

12. On or around December 13, 2024, Defendant, FINN CURRAN, was negligent in that:

- a) Operated his motor vehicle without keeping a proper and sufficient lookout;
- b) 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 Illinois Compiled Statutes, 1992, Chapter 625, Act 5, Section 11-601;
- c) Failed to decrease speed so as to avoid colliding with another vehicle, in violation of Illinois Compiled Statutes, 1992, Chapter 625, Act 5, Section 11-601;
- d) Failed to drive his vehicle as nearly as practicable entirely within a single lane, in violation of 625 ILCS 5/11-709;
- e) Failed to give audible warning with his horn when such warning was reasonable necessary to insure safety, in violation of Illinois Compiled Statutes, 1992, Chapter 625, Act 5, Section 12-601; and
- f) Operated said vehicle while under the influence of alcohol, in violation of Illinois Compiled Statutes, 1992, Chapter 625, Act 5, Section 11-501. (Also "Narcotic Drug").

13. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant, FINN CURRAN, Plaintiff's Decedent, TANYA NAVARRO, suffered injuries of a personal, pecuniary, and permanent nature that resulted in her death on December 13, 2024.

14. Plaintiffs, ALYZA LOPEZ, are the duly appointed Independent Administrator of the Estate of TANYA NAVARRO, Deceased, and brings this cause of action pursuant to the Wrongful Death Act, 740 ILCS 180/1, *et seq.*

15. TANYA NAVARRO, Deceased, left surviving ALYZA LOPEZ and ALIYAH PHILLIPS, each of whom have sustained personal and pecuniary loss including loss of love, support, guidance, affection, companionship, and society.

WHEREFORE Plaintiff, ALYZA LOPEZ, as Independent Administrator of the Estate of TANYA NAVARRO, Deceased, demands that judgment be entered against Defendant, FINN CURRAN, for an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), including interest and costs of this lawsuit.

COUNT II

SURVIVAL ACT

FINN CURRAN

Plaintiffs, ALYZA LOPEZ and ALIYAH PHILLIPS, as surviving children and Co-Special Representatives of the Estate of TANYA NAVARRO, Deceased, by and through their attorneys, CLIFFORD LAW OFFICES, P.C., complaining of Defendant, FINN CURRAN, state as follows:

1. On and before December 13, 2024, LaGrange Road was a public roadway running in a general north and south direction at or near Weeping Willow Road in the City of Hodgkins, County of Cook, and State of Illinois.

2. On or around December 13, 2024, Defendant, FINN CURRAN, owned a motor vehicle southbound on the 7200 Block of LaGrange Road at or near Weeping Willow Road, in the City of Hodgkins, County of Cook, and State of Illinois.

3. On or around December 13, 2024, Defendant, FINN CURRAN, maintained a motor vehicle southbound on the 7200 Block of LaGrange Road at or near Weeping Willow Road, in the City of Hodgkins, County of Cook, and State of Illinois.

4. On or around December 13, 2024, Defendant, FINN CURRAN, controlled a motor vehicle southbound on the 7200 Block of LaGrange Road at or near Weeping Willow Road, in the City of Hodgkins, County of Cook, and State of Illinois.

5. On or around December 13, 2024, Defendant, FINN CURRAN, managed a motor vehicle southbound on the 7200 Block of LaGrange Road at or near Weeping Willow Road, in the City of Hodgkins, County of Cook, and State of Illinois.

6. On or around December 13, 2024, Defendant, FINN CURRAN, operated a motor vehicle southbound on the 7200 Block of LaGrange Road at or near Weeping Willow Road, in the City of Hodgkins, County of Cook, and State of Illinois.

7. On or around December 13, 2024, Plaintiff's Decedent, TANYA NAVARRO, was a passenger in a disabled vehicle on the far-right lane of the southbound lanes of the 7200 Block of LaGrange Road at or near Weeping Willow Road, in the City of Hodgkins, County of Cook, and State of Illinois.

8. On or around December 13, 2024, there existed another vehicle on the far-right lane in front of the vehicle that Plaintiff's Decedent, TANYA NAVARRO, was a passenger in, on the southbound lanes of the 7200 Block of LaGrange Road at or near Weeping Willow Road, in the City of Hodgkins, County of Cook, and State of Illinois.

9. On or around December 13, 2024, it was the intention of Defendant, FINN CURRAN, to continue southbound on LaGrange Road.

10. On or around December 13, 2024, Defendant, FINN CURRAN, owed a duty to operate his vehicle in a reasonably safe manner.

11. On or around December 13, 2024, the vehicle operated by Defendant, FINN CURRAN, struck the vehicle in which Plaintiff's Decedent, TANYA NAVARRO, was a passenger, causing said vehicle to strike the vehicle ahead on the shoulder.

12. On or around December 13, 2024, Defendant, FINN CURRAN, was negligent in that:

- a) Operated his motor vehicle without keeping a proper and sufficient lookout;
- b) 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 Illinois Compiled Statutes, 1992, Chapter 625, Act 5, Section 11-601;
- c) Failed to decrease speed so as to avoid colliding with another vehicle, in violation of Illinois Compiled Statutes, 1992, Chapter 625, Act 5, Section 11-601;
- d) Failed to drive his vehicle as nearly as practicable entirely within a single lane, in violation of 625 ILCS 5/11-709;
- e) Failed to give audible warning with his horn when such warning was reasonable necessary to insure safety, in violation of Illinois Compiled Statutes, 1992, Chapter 625, Act 5, Section 12-601; and
- f) Operated said vehicle while under the influence of alcohol, in violation of Illinois Compiled Statutes, 1992, Chapter 625, Act 5, Section 11-501. (Also "Narcotic Drug").

13. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant, FINN CURRAN, Plaintiff's Decedent, TANYA NAVARRO, sustained injuries of a personal, permanent, and pecuniary nature, including conscious pain and

suffering prior to her death on December 13, 2024, and had she survived, would have been entitled to bring this action for damages, and this action thus survives her.

14. Plaintiff, ALYZA LOPEZ, is the duly appointed Independent Administrator of the Estate of TANYA NAVARRO, Deceased, and brings this action pursuant to the Survival Act, 755 ILCS 5/27-6, et seq.

WHEREFORE Plaintiff, ALYZA LOPEZ, as Independent Administrator of the Estate of TANYA NAVARRO, Deceased, demands that judgment be entered against Defendant, FINN CURRAN, for an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), including interest and costs of this lawsuit.

COUNT III

DRAM SHOP

RAFFERTY'S IRISH PUB, INC.

Plaintiff, ALYZA LOPEZ, as surviving child and Independent Administrator of the Estate of TANYA NAVARRO, Deceased, by and through their attorneys, CLIFFORD LAW OFFICES, P.C., complaining of Defendant, RAFFERTY'S IRISH PUB, INC., state as follows:

1. On and before December 13, 2024, Defendant, RAFFERTY'S IRISH PUB, INC., owned a restaurant, tavern or liquor dispensing establishment on the premises of 10901 Joliet Road, in the City of Countryside, County of Cook, and State of Illinois.

2. On and before December 13, 2024, Defendant, RAFFERTY'S IRISH PUB, INC., operated a restaurant, tavern or liquor dispensing establishment on the premises of 10901 Joliet Road, in the City of Countryside, County of Cook, and State of Illinois.

3. On and before December 13, 2024, Defendant, RAFFERTY'S IRISH PUB, INC., managed a restaurant, tavern or liquor dispensing establishment on the premises of 10901 Joliet Road, in the City of Countryside, County of Cook, and State of Illinois.

4. On and before December 13, 2024, Defendant, RAFFERTY'S IRISH PUB, INC., maintained a restaurant, tavern or liquor dispensing establishment on the premises of 10901 Joliet Road, in the City of Countryside, County of Cook, and State of Illinois.

5. On and before December 13, 2024, Defendant, RAFFERTY'S IRISH PUB, INC., was engaged in the business of dispensing alcoholic liquor to the public.

6. On or around December 13, 2024, Defendant, FINN CURRAN, was a patron of Defendant, RAFFERTY'S IRISH PUB, INC, on the premises of 10901 Joliet Road, in the City of Countryside, County of Cook, and State of Illinois.

7. On or around December 13, 2024, Defendant, RAFFERTY'S IRISH PUB, INC., at their tavern and liquor dispensing establishment by and through their authorized agents, servants and employees sold or gave to Defendant, FINN CURRAN, alcoholic liquors which caused his intoxication.

8. On and before December 13, 2024, Defendant, RAFFERTY'S IRISH PUB, INC., was under a duty to not serve alcoholic beverages to its patrons, including Defendant, FINN CURRAN, to the point of intoxication.

9. On or around December 13, 2024, by Defendant, FINN CURRAN's own admission, upon exiting the premises he was given a to-go drink by Defendant, RAFFERTY'S IRISH PUB, INC., by and through their authorized agents, servants and employees, which

contained alcohol, and that according to Defendant, FINN CURRAN, Defendant, RAFFERTY'S IRISH PUB, INC., knew of this drink.

10. On and before December 13, 2024, Defendant, RAFFERTY'S IRISH PUB, INC., was under a duty not to permit Defendant, FINN CURRAN, to leave its premises with an open glass containing alcohol, which would further intoxicate him after his departure and exposure to the public.

11. On and before December 13, 2024, the 7200 Block of LaGrange Road was a public roadway running in a general north and south direction at or near Weeping Willow Road in the City of Hodgkins, County of Cook, and State of Illinois.

12. On or around December 13, 2024, Defendant, FINN CURRAN, while intoxicated owned, operated, and controlled, managed and maintained a motor vehicle southbound on LaGrange Road at or near Weeping Willow Road in the City of Hodgkins, County of Cook, and State of Illinois.

13. On or around December 13, 2024, the vehicle operated by Defendant, FINN CURRAN, struck the vehicle in which Plaintiff's Decedent, TANYA NAVARRO, was a passenger.

14. On or around December 13, 2024, FINN CURRAN, continued to consume alcohol after striking the vehicle in which Plaintiff's Decedent, TANYA NAVARRO, was a passenger.

15. On or around December 13, 2024, the glass container broken in two found on the driver's side floorboard of Defendant, FINN CURRAN's, vehicle appeared to match the glass containers found at the premises of Defendant, RAFFERTY'S IRISH PUB, INC.

16. As a direct and proximate result of the intoxication of Defendant, FINN CURRAN, Plaintiff's Decedent, TANYA NAVARRO, sustained injuries of a personal, pecuniary, and permanent nature, resulting in her death on December 13, 2024.

17. Plaintiffs, ALYZA LOPEZ is the duly appointed Independent Administrator of the Estate of TANYA NAVARRO, Deceased, and brings this action pursuant to 235 ILCS 5/6, commonly known as the Dram Shop Act of Illinois.

WHEREFORE Plaintiffs, ALYZA LOPEZ, as Independent Administrator of the Estate of TANYA NAVARRO, Deceased, demands that judgment be entered against Defendant, RAFFERTY'S IRISH PUB, INC., for an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00)

Respectfully submitted,

/s/ Joseph T. Murphy

Attorney for Plaintiff

Joseph T. Murphy
CLIFFORD LAW OFFICES, P.C.
120 North LaSalle, 36th Floor
Chicago, Illinois 60602
312/899-9090
Atty. No.: 32640
jtm@cliffordlaw.com