

COUNT I
(Negligence-Robert Novak)

5. That on or about January 28, 2004 Plaintiff Chad Clarke was operating a motor vehicle on 6th St., N.W. in near its intersection with Pennsylvania Avenue, N.W., in Washington D.C.

6. That at that time and place Defendant Robert Novak was operating his motor vehicle on Pennsylvania Avenue, N.W. near its intersection with 6th St., N.W. in Washington, D.C.

7. That it then and there became and was the duty of the Defendant, Robert Novak, to exercise reasonable care to avoid subjecting foreseeable users of the roadway, including but not limited to Plaintiff Chad Clarke, to an unreasonable risk of bodily harm.

8. That, notwithstanding said duty, Defendant Robert Novak failed to obey a red traffic light governing his direction of travel, entered into the intersection of Pennsylvania Avenue and 6th Street at a high rate of speed and violently struck the motor vehicle being operated by Plaintiff Chad Clarke.

9. That, as a result of the accident, Plaintiff Chad Clarke was caused to suffer severe, painful and permanent injuries of body and mind.

10. That, as a result of the aforesaid injuries, Plaintiff Chad Clarke has and will in the future be caused to incur substantial medical expense, has and will in the future be caused to suffer a loss of wages and earning capacity, both temporarily

and permanently, and further has and will in the future be caused to suffer a loss of some of the ordinary pleasures of life.

WHEREFORE, Plaintiff Chad Clarke sues Defendant Robert Novak and demands judgment in the amount of One Hundred Thousand Dollars (\$100,000.00), plus costs.

COUNT II

(Claim for Property Damage-Robert Novak)

11. That Plaintiff Chad Clarke adopts and incorporates paragraphs 1-10 as if fully set forth herein and further alleges that on or about January 28, 2004 Plaintiff Chad Clarke was operating a motor vehicle on 6th St., N.W. in near its intersection with Pennsylvania Avenue, N.W., in Washington D.C.

12. That at that time and place Defendant Robert Novak was operating his motor vehicle on Pennsylvania Avenue, N.W. near its intersection with 6th St., N.W. in Washington, D.C.

13. That it then and there became and was the duty of the Defendant, Robert Novak, to exercise reasonable care to avoid subjecting foreseeable users of the roadway, including but not limited to Plaintiff Chad Clarke, to an unreasonable risk of bodily harm.

14. That, notwithstanding said duty, Defendant Robert Novak failed to obey a red traffic light governing his direction of travel, entered into the intersection of Pennsylvania Avenue and 6th Street at a high rate of speed and violently struck the motor vehicle being operated by Plaintiff Chad Clarke.

MCCARTHY
&
COSTELLO
L.L.P.
ONE TOWN CENTER
4201 NORTHVIEW DRIVE
SUITE 410
BOWIE, MD 20716
PHONE 301-262-7422
FAX 301-262-0562

15. That, as a result of the accident, the motor vehicle of Plaintiff Chad Clarke was considered a total loss.

16. That, as a further result of the accident, Plaintiff Chad Clarke incurred transportation expenses due to his car being totaled.

WHEREFORE, Plaintiff Chad Clarke sues Defendant Robert Novak and demands judgment in the amount of Ten Thousand Dollars (\$10,000.00), plus costs.

McCARTHY & COSTELLO, L.L.P.

By:

Timothy Altemus
Bar No. 451926
One Town Center
4201 Northview Drive
Suite 410
Bowie, Maryland 20716-2668
301-306-1900

DEMAND FOR JURY TRIAL

The Plaintiff demands a trial by jury as to all issues contained herein.

Timothy Altemus

McCARTHY
&
COSTELLO
L.L.P.
One Town Center
4201 Northview Drive
Suite 410
Bowie, MD 20716
Phone: 301-302-1422
FAX 301-262-0562