

STATE OF SOUTH CAROLINA)
)
COUNTY OF ORANGEBURG)
)
JOSHUA STANLEY, as Personal)
Representative of the Estate of AMBER)
STANLEY, JACK STANLEY ,and)
AUTUMN STANLEY, deceased,)
Plaintiff,)
)
v.)
)
KIA MOTORS CORP., a foreign corporation;)
KIA MOTORS AMERICA, INC., a foreign)
corporation; HYUNDAI AMERICA)
TECHNICAL CENTER, INC., a foreign)
corporation, d/b/a KIA DESIGN CENTER)
AMERICA; and SOUTH CAROLINA)
DEPARTMENT OF TRANSPORTATION,)
)
Defendants.)

IN THE COURT OF COMMON PLEAS
CIVIL ACTION NO.: 2019-CP-38-

SUMMONS
(Jury Trial Requested)

TO THE ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at P.O. Box 457Hampton, SC 29924, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

**PETERS, MURDAUGH, PARKER, ELTZROTH,
DETRICK**

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May 21, 2019
Hampton, South Carolina

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF ORANGEBURG

C.A. No. 2019-CP-38-

JOSHUA STANLEY, as Personal Representative of the Estates of AMBER STANLEY, JACK STANLEY and AUTUMN STANLEY, deceased,

Plaintiff,

vs.

KIA MOTORS CORP., a foreign corporation; KIA MOTORS AMERICA, INC., a foreign corporation; HYUNDAI AMERICA TECHNICAL CENTER, INC., a foreign corporation, d/b/a KIA DESIGN CENTER AMERICA; and SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION,

Defendants.

COMPLAINT

(Wrongful Death Action)

(Survival Action)

(Jury Trial Requested)

Plaintiff, JOSHUA STANLEY, as Personal Representative of the Estates of AMBER STANLEY, deceased; JACK STANLEY, deceased; and AUTUMN STANLEY, deceased; sues the Defendants, KIA MOTORS CORP, a foreign corporation, KIA MOTORS AMERICA, INC., a foreign corporation, HYUNDAI AMERICA TECHNICAL CENTER, INC., a foreign corporation, d/b/a KIA DESIGN CENTER AMERICA, and SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION, and alleges as follows:

General Allegations

1. Plaintiff JOSHUA STANLEY is a citizen and resident of Nassau County, Florida.
2. Plaintiff, JOSHUA STANLEY, is the duly appointed, qualified, and acting Personal Representative of the Estate of AMBER STANLEY, deceased, by Letters of Administration dated June 6, 2018, File No. 2018-CP-0200, Circuit Court of Nassau County, Florida.

3. Plaintiff, JOSHUA STANLEY, is the duly appointed, qualified, and acting Personal Representative of the Estate of JACK STANLEY, deceased, by Letters of Administration dated June 6, 2018, File No. 2018-CP-0201, Circuit Court of Nassau County, Florida.

4. Plaintiff, JOSHUA STANLEY, is the duly appointed, qualified, and acting Personal Representative of the Estate of AUTUMN STANLEY, deceased, by Letters of Administration dated June 6, 2018, File No. 2018-CP-0202, Circuit Court of Nassau County, Florida.

5. This is a wrongful death action pursuant to S.C. Code § 15-51-10, filed by JOSHUA STANLEY in his capacity as personal representative for the wrongful deaths of AMBER STANLEY, JACK STANLEY and AUTUMN STANLEY.

6. This is also a survival action to recover for conscious pain and suffering of AMBER STANLEY, JACK STANLEY and AUTUMN STANLEY, brought by Plaintiff JOSHUA STANLEY in his capacity as personal representative.

7. On or about the date of loss, May 7, 2018, JOSHUA STANLEY and AMBER STANLEY were husband and wife residing in Nassau County, Florida.

8. On or about the date of loss, May 7, 2018, JACK STANLEY and AUTUMN STANLEY were minor children, leaving their only living parent, JOSHUA STANLEY, their father as the statutory survivor and next of kin.

9. The Plaintiff, JOSHUA STANLEY, is entitled to recover on behalf of the Estate of AMBER STANLEY, the following:

- (a) Conscious pain, suffering, and emotional distress;
- (b) Funeral Expenses;

(c) Lost wages, including future earnings.

10. The Plaintiff, JOSHUA STANLEY, as Personal Representative of the Estate of AMBER STANLEY, is entitled to recover the following:

- (a) Loss of support and companionship from May 7, 2018, into the future;
- (b) Mental anguish as a result of Amber Stanley's injury and death on May 7, 2018, into the future; and
- (c) Pain and suffering as a result of Amber Stanley's injury and death on May 7, 2018, into the future.

11. The Plaintiff, JOSHUA STANLEY, is entitled to recover on behalf of the Estates of JACK STANLEY and AUTUMN STANLEY, the following:

- (a) Conscious pain, suffering, and emotional distress,
- (b) Funeral Expenses.

12. The Plaintiff, JOSHUA STANLEY, as Personal Representative of the Estates of JACK STANLEY and AUTUMN STANLEY, is entitled to recover the following:

- (a) Mental pain and suffering as a result of each decedent's injury and death on May 7, 2018, into the future; and
- (b) The loss of each decedent's support and services from May 7, 2018, into the future.

13. This court has jurisdiction over the parties hereto, the subject matter hereof, and is the court of proper venue for maintaining this action.

The Defendants

14. Defendant, KIA MOTORS CORP, ("KMC"), is a foreign corporation under the laws of South Korea with its principal place of business at 231 Yangjae-dong, Seocho-gu, Seoul,

137-938, South Korea. At all times pertinent to this Complaint, Defendant KMC was and is in the business of designing, manufacturing, marketing, promoting, advertising and selling motor vehicles including the vehicle known as the Kia Soul.

15. Defendant KMC is engaged in solicitation and/or service activities within the State of South Carolina which resulted in the deaths of AMBER STANLEY, JACK STANLEY and AUTUMN STANLEY.

16. Defendant, KIA MOTORS AMERICA, INC. ("KMA") is a foreign corporation organized and incorporated under the laws of the State of California with its principal place of business at 111 Peters Canyon Road, Irvine, California 92606, and is licensed to do business in the State of South Carolina. At all times pertinent to this Complaint, Defendant KMA was and is in the business of designing, manufacturing, marketing, promoting, advertising and selling motor vehicles including the vehicle known as the Kia Soul.

17. Defendant KMA is engaged in solicitation and/or service activities within the State of South Carolina which resulted in the deaths of AMBER STANLEY, JACK STANLEY, minor children and AUTUMN STANLEY.

18. At the times material hereto, Defendant, HYUNDAI AMERICA TECHNICAL CENTER, INC. ("HATCI"), d/b/a KIA DESIGN CENTER AMERICA, is an incorporated business organized under the laws of the State of Michigan with its principal place of business at 6800 Geddes Rd., Superior Township, Michigan. At all times pertinent to this Complaint, Defendant HATCI was and is in the business of designing, marketing, promoting, advertising and selling motor vehicles including the vehicle known as the Kia Soul.

19. Defendant HATCI is engaged in automotive research and development of Kia motor vehicles, including the subject 2011 Kia Soul.

20. Defendant SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION (“SCDOT”) is a government entity as defined by the S.C. Code of Laws, 1976, and is charged by law with the safe construction and maintenance of the State’s roadways. The action against this defendant is brought pursuant to S.C. Code Ann. § 15-78-10 et seq. which provides both jurisdiction and venue are property in Orangeburg County as this action arises therein.

The Product

21. The term “Subject Vehicle” refers to a certain 2011 Kia Soul motor vehicle bearing vehicle identification number KNDJT2A16B7203385, designed, manufactured, assembled and originally placed into the stream of commerce by KMC, KMA and HATCI.

22. Upon information and belief, at the time of this incident, the Subject Vehicle and its component sub-assemblies at issue were in the same essential condition as they were at the time that they left the Defendants’ control.

The Incident

23. On May 7, 2018, AMBER STANLEY, deceased, was lawfully driving northbound in the Subject Vehicle on I-95 near Orangeburg, South Carolina. She was properly restrained in the driver’s seat using the lap and shoulder belt provided in the Subject Vehicle, and the two minor children, JACK STANLEY and AUTUMN STANLEY, were properly restrained in their respective child safety seats in the back seat of the Subject Vehicle.

24. Near mile marker 86, the driver, AMBER STANLEY, struck an alligator crossing the highway, lost control of the Subject Vehicle and traveled into the center median, whereupon the Subject Vehicle impacted a tree and caught fire.

25. All three occupants were consumed by the post-collision fire and were pronounced dead at the scene.

26. The incident which forms the basis of this Complaint was a foreseeable collision event arising out of ordinary use of the Subject Vehicle at the time.

FIRST CLAIM FOR RELIEF

Negligence of KMC, KMA and HATCI for Design Defect

27. Plaintiff adopts and realleges each prior paragraph, where relevant, as if set forth fully herein.

28. Defendants, KMC, KMA and HATCI (collectively "Kia Defendants"), as the designer, manufacturer and distributor of the Subject Vehicle, owed to the general public, including the deceased, the duty to design, manufacture, test, market and sell vehicles that were reasonably safe, and/or not unreasonably dangerous to use. Defendants breached that duty in the following manner:

- (a) In failing to include in the design of the door latch system emergency unlocking features that would allow for ingress/egress of the vehicle following a collision.
- (b) The vehicle fuel delivery system was designed in a manner that it unreasonably allowed gasoline to escape and ignite in this foreseeable frontal collision.
- (c) The vehicle was not adequately designed to prevent a post-collision fuel fed fire.
- (d) The floor pan, surrounding structures and vehicle frame lacked sufficient strength to resist crumpling in the event of this foreseeable frontal collision.
- (e) The fuel system, including the fuel tank, lacked protection from post-collision fire caused by impact damage to the Subject Vehicle.

- (f) The vehicle was designed with inadequate testing to determine the effects of a frontal impact on this type of vehicle.
- (g) Failing to ensure that the Subject Vehicle was reasonably crashworthy;
- (h) Failing to exercise reasonable care in the design of the Subject Vehicle and its occupant protection systems, including the driver's seat and occupant restraint systems;
- (i) Failing to exercise reasonable care in the testing of the Subject Vehicle and its occupant protection systems, including the driver's seat and occupant restraint systems;
- (j) Failing to adopt and implement adequate warnings regarding Subject Vehicle and its occupant protection systems.
- (k) Failing to adopt and implement adequate safety hierarchy procedures and policies;
- (l) Adequate warnings, both pre-sale and post-sale, were not provided to users of the subject vehicle, including plaintiff, about the unreasonably dangerous and defective condition of the vehicle and the vehicle's propensity to leak fuel, ignite and become engulfed in fire after a foreseeable frontal collision.

29. The vehicle was also defective as marketed in that the advertising and marketing campaigns and programs undertaken by the Kia Defendants misled consumers as to the safety features of the vehicle and the integrity of the fuel system to withstand a frontal collision and failed to warn consumers of the dangerous conditions inherent in the design of the vehicle as described herein, including a propensity to ignite and become engulfed in fire in a frontal collision and lack of crashworthiness.

30. At all times relevant, as a direct and proximate result of the respective and collective negligence of Defendants KMC, KMA and HATCI and the breaches complained of herein, decedents AMBER STANLEY, JACK STANLEY and AUTUMN STANLEY died horrific deaths as a result of the post-collision fuel-fed fire from this crash.

31. WHEREFORE, Plaintiff demands judgment against Defendants, KIA MOTORS CORP., KIA MOTORS AMERICA, INC., and HYUNDAI AMERICA TECHNICAL CENTER, INC., for compensatory damages and costs of suit, together with such other relief as the Court may deem appropriate and demands a trial by jury on all issues so triable.

SECOND CLAIM FOR RELIEF

Negligence of KMC, KMA and HATCI for Manufacturing Defect

32. Plaintiff adopts and realleges each prior paragraph, where relevant, as if set forth fully herein.

33. At all times relevant herein, Defendants HMC, HMA and HATCI were respectively and collectively responsible for the manufacture, selection, inspection, testing, design, assemblage, equipment, marketing, distribution, and sale of the Subject Vehicle and its components, including but not limited to its fuel system, frame structure, and occupant restraint systems.

34. At all times relevant herein, Defendants HMA, HMC and HATCI respectively and collectively manufactured the Subject Vehicle and its component parts, including the fuel system, vehicle frame structure, and occupant restraint systems, and it owed the Stanley family a duty of reasonable care to manufacture, select, inspect, test, assemble, equip, market, distribute, and sell the Subject Vehicle and its components, so that it would conform to its intended design and so that it would provide a reasonable degree of occupant protection and safety during foreseeable collisions occurring in the real world highway environment of its expected use.

35. At all times relevant herein, as manufactured, selected, inspected, tested,

assembled, equipped, marketed, distributed, and sold by Defendants HMC, HMA and HATCI, the Subject Vehicle is and was uncrashworthy, defective, unreasonably dangerous, and unsafe for foreseeable users and occupants because its fuel system, frame structure, and occupant protection systems are and were inadequately manufactured and constructed, did not conform to its intended design, and failed to provide the degree of occupant protection, and safety a reasonable consumer would expect in foreseeable accidents occurring in the real world environment of its expected use.

36. Defendants, KMC, KMA and HATCI (collectively "Kia Defendants"), were negligent, grossly negligent, willful, wanton, reckless and careless in the manufacture of the Subject Vehicle, and breached their duties of care owed to the Stanley family by:

- (a) Failing to manufacture, test, assemble and/or install the vehicle fuel delivery system, frame structure, and occupant restraint systems so as to prevent gasoline to escape and ignite in this foreseeable frontal collision.
- (b) Failing to manufacture the vehicle to prevent a post-collision fuel-fed fire.
- (c) Failing to manufacture, test, assemble and install the floor pan, surrounding structures and vehicle frame with sufficient strength to resist crumpling in the event of this foreseeable frontal collision.
- (d) Failing to manufacture, test, assemble and install the fuel system, including the fuel tank, with adequate protection from post-collision fire caused by impact damage to the Subject Vehicle.
- (e) Failing to exercise reasonable care in the testing of the Subject Vehicle and its fuel system, frame structure, and occupant protection systems to determine the effects of a frontal impact on this type of vehicle.

- (f) Failing to exercise reasonable care in the inspection of the Subject Vehicle and its fuel system, frame structure, and occupant protection systems to determine the effects of a frontal impact on this type of vehicle.
- (g) Failing to adopt and implement adequate warnings regarding the Subject Vehicle and its fuel system, frame structure, and occupant protection systems.
- (h) Failing to incorporate appropriate quality assurance procedures in the manufacture of the Subject Vehicle and its fuel system, frame structure, and occupant protection systems;
- (i) Failing to ensure that the Subject Vehicle was reasonably crashworthy;
- (j) Failing to adopt and implement adequate safety hierarchy procedures and policies;
- (k) Failing to provide adequate warnings, both pre-sale and post-sale, to users of the Subject Vehicle, including plaintiff, about the unreasonably dangerous and defective condition of the vehicle and the vehicle's propensity to leak fuel, ignite and become engulfed in fire after a foreseeable frontal collision; and
- (l) In failing to ensure that the emergency unlocking feature, if present, was functional;
- (m) Such other and further particulars as the evidence may show.

37. The vehicle was also defective as marketed in that the advertising and marketing campaigns and programs undertaken by the Kia Defendants misled consumers as to the safety features of the vehicle and the integrity of the fuel system to withstand a frontal collision and failed to warn consumers of the dangerous conditions inherent in the design of the vehicle as

described herein, including a propensity to ignite and become engulfed in fire in a frontal collision and lack of crashworthiness.

38. At all times relevant, as a direct and proximate result of the respective and collective negligence of Defendants KMC, KMA and HATCI and the breaches complained of herein, decedents AMBER STANLEY, JACK STANLEY and AUTUMN STANLEY died horrific deaths as a result of the post-collision fuel-fed fire from this crash.

WHEREFORE, Plaintiff demands judgment against Defendants, KIA MOTORS CORP., KIA MOTORS AMERICA, INC., and HYUNDAI AMERICA TECHNICAL CENTER, INC., for compensatory damages and costs of suit, together with such other relief as the Court may deem appropriate and demands a trial by jury on all issues so triable.

THIRD CLAIM FOR RELIEF

Strict Liability in Tort, Section 15-73-10, S.C. Code of Laws, Ann. (1976, as amended)

39. Plaintiff adopts and realleges each prior paragraph, where relevant, as if set forth fully herein.

40. At all times relevant herein, there was in full force and effect certain statutes of the State of South Carolina pertaining to Sellers of Defective Products as set forth in Section 15-73-10 et seq. of the South Carolina Code of Laws (1976, as amended).

41. Pursuant to S.C. Code § 15-73-10 et seq., Defendants HMC, HMA and HATCI are strictly liable for designing, testing, manufacturing, distributing, selling, and/or placing a defective and unreasonably dangerous product into the stream of commerce.

42. At all times relevant herein, the Subject Vehicle and its fuel system, frame structure, and occupant protection systems, were defective and unreasonably dangerous as to its design, manufacture, distribution and warnings, causing the Subject Vehicle to be in a defective condition that made it unreasonably dangerous for its intended use.

43. At all times relevant herein, Defendants HMC, HMA and HATCI were collectively and respectively responsible for the design, manufacture and sale of the Subject Vehicle and its fuel system, frame structure, and occupant protection systems prior to the Incident on May 7, 2018.

44. At all times relevant, the Subject Vehicle was being used in an intended and/or foreseeable manner when the Incident alleged herein occurred. Amber Stanley neither misused nor materially altered the Subject Vehicle, and upon information and belief, the Subject Vehicle was in the same or substantially similar condition that it was in at the time of purchase.

45. At all times relevant herein, the Subject Vehicle is and was unreasonably dangerous and defective because it was designed, manufactured and sold with a fuel system, frame structure, and occupant protection systems, which allowed the Subject Vehicle to burst into flames upon impact in foreseeable collisions, including the Incident.

46. At all times relevant, Defendants HMC, HMA and HATCI were aware of feasible alternative designs which would have minimized or eliminate altogether the risk of injury posed by the Subject Vehicle and its fuel system, frame structure, and occupant protection systems.

47. At all times relevant herein, Defendants HMC, HMA and HATCI had a duty to warn users of the dangers associated with the Subject Vehicle and its fuel system, frame structure, and occupant protection systems.

48. At all times relevant herein, Defendants HMC, HMA and HATCI failed to warn of the inherent and latent defects that made this product dangerous and unsafe for its intended use.

49. At all times relevant herein, Defendants HMC, HMA and HATCI failed to design, test, manufacture, inspect, and/or sell a product that was safe for its intended use.

50. As a direct and proximate result of the sale of the unreasonably dangerously designed and manufactured Subject Vehicle by Defendants HMC, HMA and HATCI, AMBER STANLEY,

JACK STANLEY, and AUTUMN STANLEY died horrific deaths as a result of the post-collision fuel-fed fire from this crash.

51. WHEREFORE, Plaintiff demands judgment against Defendants, KIA MOTORS CORP., KIA MOTORS AMERICA, INC., and HYUNDAI AMERICA TECHNICAL CENTER, INC., for compensatory damages and costs of suit, together with such other relief as the Court may deem appropriate and demands a trial by jury on all issues so triable.

FOURTH CLAIM FOR RELIEF

Failure to Warn

52. Plaintiff adopts and realleges each prior paragraph, where relevant, as if set forth fully herein.

53. At all times relevant herein, Defendants KMC, KMA and HATCI, as manufacturers of the Subject Vehicle and its fuel system, frame structure, and occupant protection systems, owed a duty to warn of foreseeable dangerous conditions of the Subject Vehicle which would impair its safety.

54. At all times relevant herein, Defendants KMC, KMA and HATCI, collectively and respectively knew or should have known that the Subject Vehicle's fuel system, frame structure, and occupant protection systems were insufficiently robust so as to prevent the post-collision fuel-fed fire in foreseeable collisions, including during the Incident.

55. At all times relevant herein, Defendants KMC, KMA and HATCI collectively and respectively would have had no reason to believe that users would realize this potential danger.

56. At all times relevant herein, Defendants KMC, KMA and HATCI affirmatively failed to exercise reasonable care to inform users of the Subject Vehicle's dangerous condition created by the propensity of the Subject Vehicle's frame structure to fail and its fuel system to be

compromised and breached causing post-collision fuel-fed fires in foreseeable collisions, including during the Incident.

57. As a direct and proximate result of the collective and respective failures of Defendants KMC, KMA and HATCI's failure to warn of the dangers posed by the Subject Vehicle's fuel system, frame structure, and occupant protection systems, and the breaches complained herein, AMBER STANLEY, JACK STANLEY, and AUTUMN STANLEY died horrific deaths as a result the post-collision fuel-fed fire from this crash.

58. WHEREFORE, Plaintiff demands judgment against Defendants, KIA MOTORS CORP., KIA MOTORS AMERICA, INC., and HYUNDAI AMERICA TECHNICAL CENTER, INC., for compensatory damages and costs of suit, together with such other relief as the Court may deem appropriate and demands a trial by jury on all issues so triable.

FIFTH CLAIM FOR RELIEF

Negligence as to SCDOT

59. Plaintiff adopts and realleges each prior paragraph, where relevant, as if set forth fully herein.

60. Plaintiff is informed and believes that SCDOT had a duty to construct, install, maintain, inspect, and/or correct conditions along the right-of-way of I-95 in Orangeburg County, South Carolina, including fencing along the tree line parallel to the roadway designed to keep wildlife from encroaching upon and crossing the roadway.

61. Plaintiff is informed and believes that SCDOT had a duty to maintain, inspect, and/or correct conditions in the median between the northbound and southbound lanes of I-95 in Orangeburg County, South Carolina, including removing trees to create a clear zone from the edge of the interstate roadway into the median.

62. The injuries and deaths incurred by Plaintiff's beneficiaries and heirs were directly and proximately caused by the Defendant SCDOT's careless, negligent, reckless, willful and/or wanton acts in one or more of the following particulars:

- (a) In failing to properly design, locate, install and maintain the fencing along the tree line parallel to the roadway designed to keep wildlife from encroaching upon and crossing the roadway.
- (b) In failing to inspect the roadway for hazardous conditions such as wildlife, including alligators, on the roadway during mating season.
- (c) In failing to remove trees in the median between the northbound and southbound lanes to create a traversable and unobstructed roadside area (clear zone) extending beyond the edge of the high-speed roadway.
- (d) In violating its own rules for the maintenance of the roadway and right of way.
- (e) Any other particulars as established by the evidence.

63. SCDOT's acts and/or omissions created an unreasonable risk of injuries to vehicle occupants and the motoring public, including the Stanley family.

64. As a direct and proximate result of SCDOT's negligence, and the breaches complained of herein, decedents AMBER STANLEY, JACK STANLEY and AUTUMN STANLEY died horrific deaths as a result the post-collision fuel-fed fire from this crash.

65. WHEREFORE, Plaintiff demands judgment against Defendant, SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION, for compensatory damages and costs of suit, together with such other relief as the Court may deem appropriate and demands a trial by jury on all issues so triable.

DEMAND FOR JURY TRIAL

66. Plaintiff demands trial by jury on all issues so triable.

**PETERS, MURDAUGH, PARKER,
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