FILED FOR RECORD
ST. JAMES PARISH, LA

2018 APR -6 PM 2:06

CLERK OF COURT

BY: _____

STATE OF LOUISIANA, THROUGH
DEPARTMENT OF TRANSPORTATION
AND DEVELOPMENT

NUMBER 38378 DIV. B

23rd JUDICIAL DISTRICT COURT

VERSUS

PARISH OF ST. JAMES

BRANDON J. DICKERSON,
JACK DOHENY COMPANIES, INC., AND
THE TRAVELERS INDEMNITY COMPANY

STATE OF LOUISIANA

April 6, 2018

Deputy Clerk

FIRST AMENDING PETITION

NOW INTO COURT, through undersigned counsel, comes the State of Louisiana, Through Department of Transportation & Development (hereafter referred to as "DOTD"), created under and by virtue of the laws of the State of Louisiana, and domiciled in the City of Baton Rouge, Parish of East Baton Rouge, State of Louisiana, who respectfully amends its original Petition in the following particulars:

I.

By amending Paragraph 1 to read as follows:

1.

"Made defendants herein are:

I. **BRANDON J. DICKERSON** (hereafter "Dickerson"), a major person domiciled in the City of Franklin, State of Louisiana, who was the operator of the subject vehicle on October 12, 2016; and

II. **TURNER SPECIALTY SERVICES, L.L.C.** (hereafter "Turner"), a Louisiana limited liability company who was the lessee of the subject vehicle and the employer of Defendant Dickerson on October 12, 2016; and

III. **ACE AMERICAN INSURANCE COMPANY,** (hereafter "ACE"), a foreign insurer who was the insurer of the subject vehicle on October 12, 2016."

II.

By amending Paragraph 3 to read as follows:

3.

"On or about October 12, 2016, defendant DICKERSON was operating a 2014 Kenworth

tractor with box van, VIN #: 1NKDL40X7EJ406189, bearing Michigan Apportioned license plate RB08071 (hereafter "Vehicle"), which was leased to defendant TURNER, and insured by defendant ACE, at or near the Sunshine Bridge on Louisiana Highway 70."

III.

By amending Paragraph 5 to read as follows:

5.

"Based on information and belief, defendant DICKERSON was employed by, and agent of, or otherwise on a mission for, defendant TURNER at the time of the above-described accident."

IV.

By amending the Prayer to read as follows:

WHEREFORE, petitioner prays that:

1. A certified copy of the above and foregoing pleading be served upon the defendants and they be cited to appear and defend this lawsuit; and
2. After all legal delays have expired and due proceedings are had, there be judgment herein in favor of petitioner, DOTD, and against the defendants, BRANDON J. DICKERSON, TURNER SPECIALTY SERVICES, L.L.C., and ACE AMERICAN INSURANCE COMPANY, for such damages as are reasonable in the premises, together with legal interest thereon from date of judicial demand, until paid, for all costs of these proceedings.

RESPECTFULLY SUBMITTED:

LOUISIANA DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT
OFFICE OF THE GENERAL COUNSEL

BY: _____
OF COUNSEL
JACOB K. WILSON
ATTORNEY FOR STATE, DOTD
LA BAR ROLL NO. 33433
1201 CAPITOL ACCESS ROAD,
ROOM N-328
BATON ROUGE, LA 70802
P. O. BOX 94245
BATON ROUGE, LA 70804-9245
PHONE: 225-242-4610
FACSIMILE: 225-242-4690
E-MAIL: jacob.wilson@la.gov

PLEASE SERVE:

1. Turner Specialty Services, L.L.C.
   Through its registered agent:
   John H. Fenner, III
   8687 United Plaza Boulevard
   Baton Rouge, LA 70809

2. ACE American Insurance Company
   Through its agent for service of process,
   State of Louisiana Secretary of State
   8585 Archives Avenue
   Baton Rouge, LA 70809

PLEASE WITHOLD SERVICE AT THIS TIME:

1. Brandon J. Dickerson

I hereby certify that the above and foregoing is a true and correct copy of the original on file and of record in my office

_____
Dty Clerk of Court
Parish of St. James, LA

Date_____