STATE OF LOUISIANA, THROUGH DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT	NUMBER_____ DIV___
	14th JUDICIAL DISTRICT COURT
VERSUS	PARISH OF CALCASIEU
SANDY RUTH JONES AND STATE FARM INSURANCE COMPANY	STATE OF LOUISIANA

PETITION

The petition of the State of Louisiana, through Department of Transportation & Development (hereafter referred to as "the Department"), 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, respectfully represents that:

1.

Made defendants herein are:

I. **SANDY RUTH JONES** (hereafter "Jones"), a major person domiciled in the City of Katy, State of Texas, who was the driver/owner of the motor vehicle in question on January 11, 2015; and

II. **STATE FARM INSURANCE COMPANY** (hereafter "State Farm"), a foreign corporation authorized to do and doing business in the State of Louisiana, who was the insurer of the motor vehicle in question on January 11, 2015.

2.

Petitioner shows that, based on information and belief, the above named defendants are justly and truly indebted, jointly and in solido, to your petitioner for such damages as are reasonable in the premises, together with legal interest thereon from date of judicial demand, until paid, and for all costs of these proceedings.

3.

On or about January 11, 2015, the motor vehicle "2005 Chevrolet Corvette", VIN #:

1G1YY34U955129240, that is owned by defendant JONES, insured by defendant STATE FARM, and operated by JONES, was traveling East on I-10, at or near Mile Post 14.5, and 5.5 Miles West of LA 1256, in Calcasieu Parish, when the vehicle that JONES was driving, was traveling too fast for the conditions of the road (rain), lost control of her vehicle, hit another vehicle, and caused damage to the guardrail at said location. This accident caused damage to, a portion of the guardrail, with said Guardrail and its appurtenances being under the jurisdiction of the Department and owned by the State of Louisiana.

4.

Under the laws of the State of Louisiana, the construction, maintenance, and repair of the public state highways of the State of Louisiana, and the maintenance and repair of guardrails, including the subject structural damage to the Guardrail, at the location referred to above, are functions of your petitioner.

5.

As a result of the accident, the Department is required to repair the structural damage to the Guardrail of the subject roadway.

6.

Under the provisions of La. R.S. 13:4521, petitioner herein is entitled to file and prosecute this suit without the payment of costs of Court in advance or as the same accrue and without the necessity of advancing costs, bond, or surety therefore.

7.

Petitioner alleges amicable demand has been made to no avail.

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 had, there be judgment herein in favor of petitioner, the DEPARTMENT, and against the defendants, SANDY RUTH JONES, and STATE FARM 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

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PLEASE SERVE:

1. Sandy Ruth Jones
   7310 Starflower
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2. State Farm Insurance Company,
   through its agent for service of process,
   Secretary of State, State of Louisiana