



IN THE CIRCUIT COURT OF CALHOUN COUNTY, ALABAMA

**VERONICA LOVE, MINNIE ALLEN,
HILDA L. McCOMB, and WILLIE F.
CORNER;**

Plaintiffs,

v.

**TEAGUE VIP EXPRESS, LLC AND
ROBIN S. VINES;**

Defendants.

11-CV-2018 - _____

There may be other entities whose true names and identities are unknown to the Plaintiffs at this time who may be legally responsible for the claim(s) set forth herein who may be added by amendment by the Plaintiffs when its true names and identities are accurately ascertained by further discovery. Until that time, the Plaintiffs will designate these parties in accordance with ARCP 9(h). The word entity as used herein is intended to refer to and include any and all legal entities including individual persons, any and all forms of partnership, any and all types of corporations and unincorporated associations.

Fictitious Defendant A, being the correct name of the individual defendant identified herein as Robin S. Vines;

Fictitious Defendant B, being the correct name of the individual who operated the vehicle Plaintiffs occupied on the occasion described herein;

Fictitious Defendants C, D and E being that or those individual(s), corporation(s), or other entity that employed, retained, or was legally responsible for the conduct of Robin S. Vines and/or Fictitious Defendant A & B on the occasion described herein;

Fictitious Defendants F, G and H being that individual, corporation, or other entity that owned, leased, operated, or entrusted the vehicle(s) operated by Robin S. Vines and/or Fictitious Defendant A & B on the occasion described herein;

Fictitious Defendants I, J and K being the individual, firm, or corporation, respectively, responsible, for the inspection, maintenance, and repair of the vehicle which collided with the vehicle plaintiffs were riding in on the occasion described herein;

Fictitious Defendants L, M and N being the individual, corporation or other entity legally responsible for the incident made the basis of this suit; and

Fictitious Defendants O, P and Q being the correct legal name of defendant Teague VIP Express, LLC;

Defendants.)
)

COMPLAINT

1. Plaintiff Veronica Love is over nineteen years of age and is a resident of Madison County, Alabama.

2. Plaintiff Minnie Allen is over nineteen years of age and is a resident of Lawrence County, Alabama.

3. Plaintiff Hilda L. McComb is over nineteen years of age and is a resident of Morgan County, Alabama.

4. Plaintiff Willie F. Corner is over nineteen years of age and is a resident of Madison County, Alabama.

5. Based upon information and belief, Defendant Teague VIP Express, LLC (hereinafter "Teague VIP") is a limited liability company authorized to conduct business in the State of Alabama, with its principal office in Anniston, Calhoun County, Alabama.

6. Based upon information and belief, Defendant Robin S. Vines is over nineteen years of age and a resident of Anniston, Calhoun County, Alabama. At all times pertinent hereto, Defendant Vines was an employee and/or agent of Defendant Teague VIP Express, LLC and was operating a Teague VIP Express, LLC commercial bus in DeSoto County, Mississippi at the time of the incident.

7. The true names and identities of the other named defendants are unknown to Plaintiffs at this time and will be added by amendment in accordance with Rule 9(h) of the Alabama Rules of Civil Procedure when the true names and identities are ascertained.

8. The incident complained of herein occurred in DeSoto County, Mississippi.

9. Venue is proper in this Court as the Defendants reside in Calhoun County, Alabama, and Plaintiffs also reside in Alabama.

STATEMENT OF FACTS

10. On or about November 14, 2018, at approximately 12:35 p.m., Plaintiffs Veronica Love, Minnie Allen, Hilda L. McComb, and Willie F. Corner, were passengers in a commercial bus, driven by Defendant Vines and owned by Defendant Teague VIP, traveling southbound on I-269, in DeSoto County, Mississippi.

11. Defendant Teague VIP operates commercial buses and, on the date and time detailed above, was transporting paying customers from North Alabama to Tunica, Mississippi.

12. Defendant Vines, acting within the scope of her duties as an agent and employee of Defendant Teague VIP, improperly and in violation of the law, operated the passenger filled commercial bus too fast for the current weather conditions, causing her to lose control of the bus. The bus then weaved between lanes and struck a bridge wall before overturning and coming to a rest along the shoulder of the roadway.

13. Said conduct by Defendant Vines and Defendant Teague VIP caused Plaintiffs Veronica Love, Minnie Allen, Hilda L. McComb, and Willie F. Corner to be seriously and significantly injured.

14. More than forty (40) individuals were on the bus at the time of this incident and upon information and belief, sustained injuries and/or perished in the crash.

COUNT ONE: NEGLIGENCE **DEFENDANT ROBIN S. VINES** **PLAINTIFF VERONICA LOVE**

15. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through fourteen, above, as if set forth in full herein.

16. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines negligently operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather

conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

17. As a direct and proximate result of Defendant Robin S. Vines' negligence, Plaintiff Veronica Love was caused to suffer severe bodily injury.

18. Plaintiff Veronica Love is entitled to compensation from Robin S. Vines for:

- a) Medical expenses;
- b) Pain and suffering on account of personal injury;
- c) Mental anguish on account of personal injury;
- d) Permanent injuries;
- e) Disfigurement;
- h) Loss of earnings; and
- i) Loss of earning capacity.

WHEREFORE, Plaintiff Veronica Love demands judgment against Defendants, both named and fictitious, for compensatory damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT TWO: WANTONNESS
DEFENDANT ROBIN S. VINES
PLAINTIFF VERONICA LOVE

19. Plaintiffs adopt and re-allege the allegations set forth in paragraphs one through eighteen, above, as if set forth in full herein.

20. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines wantonly and/or recklessly operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

21. As a direct and proximate result of Defendant Robin S. Vines' wanton and/or reckless conduct, Plaintiff Veronica Love was caused to suffer severe bodily injury.

22. Plaintiff Veronica Love is entitled to compensation from Robin S. Vines for:
- a) Medical expenses;
 - b) Pain and suffering on account of personal injury;
 - c) Mental anguish on account of personal injury;
 - d) Permanent injuries;
 - e) Disfigurement;
 - h) Loss of earnings; and
 - i) Loss of earning capacity.
23. Plaintiff Veronica Love is entitled to punitive damages.

WHEREFORE, Plaintiff Veronica Love demands judgment against Defendants, both named and fictitious, for compensatory and punitive damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT THREE: NEGLIGENCE
DEFENDANT ROBIN S. VINES
PLAINTIFF MINNIE ALLEN

24. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through twenty-three, above, as if set forth in full herein.
25. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines negligently operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.
26. As a direct and proximate result of Defendant Robin S. Vines' negligence, Plaintiff Minnie Allen was caused to suffer severe bodily injury.
27. Plaintiff Minnie Allen is entitled to compensation from Robin S. Vines for:

- a) Medical expenses;
- b) Pain and suffering on account of personal injury;
- c) Mental anguish on account of personal injury;
- d) Permanent injuries;
- e) Disfigurement;
- h) Loss of earnings; and
- i) Loss of earning capacity.

WHEREFORE, Plaintiff Minnie Allen demands judgment against Defendants, both named and fictitious, for compensatory damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT FOUR: WANTONNESS
DEFENDANT ROBIN S. VINES
PLAINTIFF MINNIE ALLEN

28. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through twenty-seven, above, as if set forth in full herein.

29. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines wantonly and/or recklessly operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

30. As a direct and proximate result of Defendant Robin S. Vines' negligence, Plaintiff Minnie Allen was caused to suffer severe bodily injury.

31. Plaintiff Minnie Allen is entitled to compensation from Robin S. Vines for:

- a) Medical expenses;
- b) Pain and suffering on account of personal injury;
- c) Mental anguish on account of personal injury;
- d) Permanent injuries;
- e) Disfigurement
- h) Loss of earnings; and
- i) Loss of earning capacity.

32. Plaintiff Minnie Allen is entitled to punitive damages.

WHEREFORE, Plaintiff Minnie Allen demands judgment against Defendants, both named and fictitious, for compensatory and punitive damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT FIVE: NEGLIGENCE
DEFENDANT ROBIN S. VINES
PLAINTIFF HILDA L. McCOMB

33. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through thirty-two, above, as if set forth in full herein.

34. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines negligently operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

35. As a direct and proximate result of Defendant Robin S. Vines' negligence, Plaintiff Hilda L. McComb was caused to suffer severe bodily injury.

36. Plaintiff Hilda L. McComb is entitled to compensation from Robin S. Vines for:

- a) Medical expenses;
- b) Pain and suffering on account of personal injury;
- c) Mental anguish on account of personal injury;
- d) Permanent injuries;
- e) Disfigurement;
- h) Loss of earnings; and
- i) Loss of earning capacity.

WHEREFORE, Plaintiff Hilda L. McComb demands judgment against Defendants, both named and fictitious, for compensatory damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT SIX: WANTONNESS
DEFENDANT ROBIN S. VINES
PLAINTIFF HILDA L. McCOMB

37. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through thirty-six, above, as if set forth in full herein.

38. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines wantonly and/or recklessly operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

39. As a direct and proximate result of Defendant Robin S. Vines' negligence, Plaintiff Hilda L. McComb was caused to suffer severe bodily injury.

40. Plaintiff Hilda L. McComb is entitled to compensation from Robin S. Vines for:

- a) Medical expenses;
- b) Pain and suffering on account of personal injury;
- c) Mental anguish on account of personal injury;
- d) Permanent injuries;
- e) Disfigurement
- h) Loss of earnings; and
- i) Loss of earning capacity.

41. Plaintiff Hilda L. McComb is entitled to punitive damages.

WHEREFORE, Plaintiff Hilda L. McComb demands judgment against Defendants, both named and fictitious, for compensatory and punitive damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT SEVEN: NEGLIGENCE
DEFENDANT ROBIN S. VINES
PLAINTIFF WILLIE F. CORNER

42. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through forty-one, above, as if set forth in full herein.

43. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines negligently operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain

control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

44. As a direct and proximate result of Defendant Robin S. Vines' negligence, Plaintiff Willie F. Corner was caused to suffer severe bodily injury.

45. Plaintiff Willie F. Corner is entitled to compensation from Robin S. Vines for:

- a) Medical expenses;
- b) Pain and suffering on account of personal injury;
- c) Mental anguish on account of personal injury;
- d) Permanent injuries;
- e) Disfigurement;
- h) Loss of earnings; and
- i) Loss of earning capacity.

WHEREFORE, Plaintiff Willie F. Corner demands judgment against Defendants, both named and fictitious, for compensatory damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT EIGHT: WANTONNESS
DEFENDANT ROBIN S. VINES
PLAINTIFF WILLIE F. CORNER

46. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through forty-five, above, as if set forth in full herein.

47. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines wantonly and/or recklessly operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

48. As a direct and proximate result of Defendant Robin S. Vines' negligence, Plaintiff Willie F. Corner was caused to suffer severe bodily injury.

49. Plaintiff Willie F. Corner is entitled to compensation from Robin S. Vines for:

- a) Medical expenses;

- b) Pain and suffering on account of personal injury;
- c) Mental anguish on account of personal injury;
- d) Permanent injuries;
- e) Disfigurement
- h) Loss of earnings; and
- i) Loss of earning capacity.

50. Plaintiff Willie F. Corner is entitled to punitive damages.

WHEREFORE, Plaintiff Willie F. Corner demands judgment against Defendants, both named and fictitious, for compensatory and punitive damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT NINE: NEGLIGENCE
DEFENDANT TEAGUE VIP EXPRESS, LLC
PLAINTIFF VERONICA LOVE

51. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through fifty, above, as if set forth in full herein.

52. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines negligently operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

53. At the time of said incident, Defendant Robin S. Vines was working within the line and scope of her employment with Defendant Teague VIP Express, LLC, and/or was acting as an agent of Teague VIP Express, LLC.

54. As a direct and proximate result of Defendant Teague VIP's negligence, Veronica Love was caused to suffer severe physical injury.

55. Plaintiff Veronica Love is entitled to compensation from Teague VIP for:

- a) Medical expenses;
- b) Pain and suffering on account of personal injury;
- c) Mental anguish on account of personal injury;
- d) Permanent injuries;

- e) Disfigurement;
- h) Loss of earnings; and
- i) Loss of earning capacity.

56. Defendant Teague VIP Express, LLC is liable for the acts and omissions of Robin S. Vines under the laws of agency and/or the doctrine of *respondeat superior*.

WHEREFORE, Plaintiff Veronica Love, demands judgment against Defendants, both named and fictitious, for compensatory damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT TEN: WANTONNESS
DEFENDANT TEAGUE VIP EXPRESS, LLC
PLAINTIFF VERONICA LOVE

57. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through fifty-six, above, as if set forth in full herein.

58. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines wantonly and/or recklessly operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

59. At the time of said incident, Defendant Robin S. Vines was working within the line and scope of her employment with Defendant Teague VIP Express, LLC, and/or was acting as an agent of Teague VIP Express, LLC.

60. As a direct and proximate result of Defendant Teague VIP's wantonness, Plaintiff Veronica Love was caused to suffer severe bodily injury.

61. Defendant Teague VIP Express, LLC is liable for the acts and omissions of Robin S. Vines under the laws of agency and/or the doctrine of *respondeat superior*.

62. Plaintiff Veronica Love is entitled to compensation from Teague VIP for:

- a) Medical expenses;
- b) Pain and suffering on account of personal injury;

- c) Mental anguish on account of personal injury;
- d) Permanent injuries;
- e) Disfigurement;
- h) Loss of earnings; and
- i) Loss of earning capacity.

63. Plaintiff Veronica Love is entitled to punitive damages.

WHEREFORE, Plaintiff Veronica Love demands judgment against Defendants, both named and fictitious, for compensatory and punitive damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT ELEVEN: NEGLIGENCE
DEFENDANT TEAGUE VIP EXPRESS, LLC
PLAINTIFF MINNIE ALLEN

64. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through sixty-three, above, as if set forth in full herein.

65. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines negligently operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

66. At the time of said incident, Defendant Robin S. Vines was working within the line and scope of her employment with Defendant Teague VIP Express, LLC, and/or was acting as an agent of Teague VIP Express, LLC.

67. As a direct and proximate result of Defendant Teague VIP's negligence, Minnie Allen was caused to suffer severe physical injury.

68. Plaintiff Minnie Allen is entitled to compensation from Teague VIP for:

- a) Medical expenses;
- b) Pain and suffering on account of personal injury;
- c) Mental anguish on account of personal injury;
- d) Permanent injuries;

- e) Disfigurement;
- h) Loss of earnings; and
- i) Loss of earning capacity.

69. Defendant Teague VIP Express, LLC is liable for the acts and omissions of Robin S. Vines under the laws of agency and/or the doctrine of *respondeat superior*.

WHEREFORE, Plaintiff Minnie Allen, demands judgment against Defendants, both named and fictitious, for compensatory damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT TWELVE: WANTONNESS
DEFENDANT TEAGUE VIP EXPRESS, LLC
PLAINTIFF MINNIE ALLEN

70. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through sixty-nine, above, as if set forth in full herein.

71. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines wantonly and/or recklessly operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

72. At the time of said incident, Defendant Robin S. Vines was working within the line and scope of her employment with Defendant Teague VIP Express, LLC, and/or was acting as an agent of Teague VIP Express, LLC.

73. As a direct and proximate result of Defendant Teague VIP's wantonness, Plaintiff Minnie Allen was caused to suffer severe bodily injury.

74. Defendant Teague VIP Express, LLC is liable for the acts and omissions of Robin S. Vines under the laws of agency and/or the doctrine of *respondeat superior*.

75. Plaintiff Minnie Allen is entitled to compensation from Teague VIP for:

- a) Medical expenses;

- b) Pain and suffering on account of personal injury;
- c) Mental anguish on account of personal injury;
- d) Permanent injuries;
- e) Disfigurement;
- h) Loss of earnings; and
- i) Loss of earning capacity.

76. Plaintiff Minnie Allen is entitled to punitive damages.

WHEREFORE, Plaintiff Minnie Allen demands judgment against Defendants, both named and fictitious, for compensatory and punitive damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT THIRTEEN: NEGLIGENCE
DEFENDANT TEAGUE VIP EXPRESS, LLC
PLAINTIFF HILDA L. McCOMB

77. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through seventy-six, above, as if set forth in full herein.

78. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines negligently operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

79. At the time of said incident, Defendant Robin S. Vines was working within the line and scope of her employment with Defendant Teague VIP Express, LLC, and/or was acting as an agent of Teague VIP Express, LLC.

80. As a direct and proximate result of Defendant Teague VIP's negligence, Hilda L. McComb was caused to suffer severe physical injury.

81. Plaintiff Hilda L. McComb is entitled to compensation from Teague VIP for:

- a) Medical expenses;
- b) Pain and suffering on account of personal injury;
- c) Mental anguish on account of personal injury;

- d) Permanent injuries;
- e) Disfigurement;
- h) Loss of earnings; and
- i) Loss of earning capacity.

82. Defendant Teague VIP Express, LLC is liable for the acts and omissions of Robin S. Vines under the laws of agency and/or the doctrine of *respondeat superior*.

WHEREFORE, Plaintiff Hilda L. McComb, demands judgment against Defendants, both named and fictitious, for compensatory damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT FOURTEEN: WANTONNESS
DEFENDANT TEAGUE VIP EXPRESS, LLC
PLAINTIFF HILDA L. McCOMB

83. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through eighty-two, above, as if set forth in full herein.

84. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines wantonly and/or recklessly operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

85. At the time of said incident, Defendant Robin S. Vines was working within the line and scope of her employment with Defendant Teague VIP Express, LLC, and/or was acting as an agent of Teague VIP Express, LLC.

86. As a direct and proximate result of Defendant Teague VIP's wantonness, Plaintiff Hilda L. McComb was caused to suffer severe bodily injury.

87. Defendant Teague VIP Express, LLC is liable for the acts and omissions of Robin S. Vines under the laws of agency and/or the doctrine of *respondeat superior*.

88. Plaintiff Hilda L. McComb is entitled to compensation from Teague VIP for:

- a) Medical expenses;
- b) Pain and suffering on account of personal injury;
- c) Mental anguish on account of personal injury;
- d) Permanent injuries;
- e) Disfigurement;
- h) Loss of earnings; and
- i) Loss of earning capacity.

89. Plaintiff Hilda L. McComb is entitled to punitive damages.

WHEREFORE, Plaintiff Hilda L. McComb demands judgment against Defendants, both named and fictitious, for compensatory and punitive damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT FIFTEEN: NEGLIGENCE
DEFENDANT TEAGUE VIP EXPRESS, LLC
PLAINTIFF WILLIE F. CORNER

90. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through eighty-nine, above, as if set forth in full herein.

91. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines negligently operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

92. At the time of said incident, Defendant Robin S. Vines was working within the line and scope of her employment with Defendant Teague VIP Express, LLC, and/or was acting as an agent of Teague VIP Express, LLC.

93. As a direct and proximate result of Defendant Teague VIP's negligence, Willie F. Corner was caused to suffer severe physical injury.

94. Plaintiff Willie F. Corner is entitled to compensation from Teague VIP for:

- a) Medical expenses;
- b) Pain and suffering on account of personal injury;

- c) Mental anguish on account of personal injury;
- d) Permanent injuries;
- e) Disfigurement;
- h) Loss of earnings; and
- i) Loss of earning capacity.

95. Defendant Teague VIP Express, LLC is liable for the acts and omissions of Robin S. Vines under the laws of agency and/or the doctrine of *respondeat superior*.

WHEREFORE, Plaintiff Willie F. Corner, demands judgment against Defendants, both named and fictitious, for compensatory damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT SIXTEEN: WANTONNESS
DEFENDANT TEAGUE VIP EXPRESS, LLC
PLAINTIFF WILLIE F. CORNER

96. Plaintiff adopts and re-alleges the allegations set forth in paragraphs one through ninety-five, above, as if set forth in full herein.

97. On or about November 14, 2018, upon a public road or highway, to-wit: Southbound I-269 in DeSoto County, Mississippi, Defendant Robin S. Vines wantonly and/or recklessly operated a commercial motor vehicle, while in the line and scope of her employment with Defendant Teague VIP, in that she was traveling at an excessive speed for the weather conditions, she failed to maintain the vehicle within its lane of travel, and she failed to maintain control of the vehicle; she further allowed the commercial vehicle to strike the wall of a bridge, overturn, and leave the roadway.

98. At the time of said incident, Defendant Robin S. Vines was working within the line and scope of her employment with Defendant Teague VIP Express, LLC, and/or was acting as an agent of Teague VIP Express, LLC.

99. As a direct and proximate result of Defendant Teague VIP's wantonness, Plaintiff Willie F. Corner was caused to suffer severe bodily injury.

100. Defendant Teague VIP Express, LLC is liable for the acts and omissions of Robin S. Vines under the laws of agency and/or the doctrine of *respondeat superior*.

101. Plaintiff Willie F. Corner is entitled to compensation from Teague VIP for:

- a) Medical expenses;
- b) Pain and suffering on account of personal injury;
- c) Mental anguish on account of personal injury;
- d) Permanent injuries;
- e) Disfigurement;
- h) Loss of earnings; and
- i) Loss of earning capacity.

102. Plaintiff Willie F. Corner is entitled to punitive damages.

WHEREFORE, Plaintiff Willie F. Corner demands judgment against Defendants, both named and fictitious, for compensatory and punitive damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT SEVENTEEN
NEGLIGENT/WANTON HIRING, TRAINING AND SUPERVISION
DEFENDANT TEAGUE VIP EXPRESS, LLC

103. Plaintiffs adopt and re-allege the allegations set forth in items one through one hundred-two, above, as if set forth in full herein.

104. Defendant Teague VIP negligently and/or wantonly failed to properly hire, supervise and/or train Defendant Vines on proper operation of a commercial bus in inclement weather conditions, in maintaining a proper lane, and generally on the operation and speed of the subject Teague VIP commercial bus.

105. Defendant Teague VIP additionally negligently and/or wantonly failed to properly interview, screen, hire or retain drivers that understood or followed the applicable Federal and State laws, or the rules of the road, applicable to the operation of a commercial bus.

106. Such conduct was a proximate cause of Plaintiffs Veronica Love, Minnie Allen, Hilda L. McComb, and Willie F. Corner's injuries.

COUNT EIGHTEEN
NEGLIGENT/WANTON ENTRUSTMENT
DEFENDANT TEAGUE VIP EXPRESS, LLC

107. Plaintiffs adopt and re-allege the allegations set forth in items one through one hundred-six, above, as if set forth in full herein.

108. Defendant Teague VIP negligently and/or wantonly entrusted or loaned the operation of its commercial bus to Defendant Vines, after having notice that such driver was incompetent and/or incapable to operate the vehicle safely and consistent with the laws of the states in which she would be traveling, or with Federal regulations.

109. Such conduct was a proximate cause of Plaintiffs' injuries.

WHEREFORE, Plaintiffs Veronica Love, Minnie Allen, Hilda L. McComb, and Willie F. Corner, demand judgment against defendants, both named and fictitious, for compensatory and punitive damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT NINETEEN
COMBINED & CONCURRING NEGLIGENCE AND/OR WANTONNESS

110. Plaintiffs adopt and re-allege the allegations set forth in items one through one hundred-nine, above, as if set forth in full herein.

111. The combined and concurring negligence and/or wantonness as set forth in Counts One through Four, above, all Defendants, including fictitious defendants specifically identified in the caption and body of the Complaint incorporated herein, proximately contributed to the injuries and damages of Plaintiffs Veronica Love, Minnie Allen, Hilda L. McComb, and Willie F. Corner.

112. As a proximate result and consequence of Defendants' combined and concurring negligence and/or wantonness, Plaintiffs were caused to suffer the injuries and damages set forth in Counts One through Sixteen, above.

WHEREFORE, the foregoing grounds considered, Plaintiffs demand judgment against Defendants, both named and fictitious, for compensatory and punitive damages, in an amount deemed appropriate under the circumstances, plus the costs of this action.

COUNT TWENTY
FICTITIOUS DEFENDANTS

113. Plaintiffs adopt and re-alleges the allegations set forth in items in items one through one hundred-twelve above, as if set forth in full herein.

114. Plaintiffs allege and aver that the negligent or wanton acts and/or omissions of Fictitious Defendants A through Q proximately caused and/or combined and concurred with the negligence or wantonness of Robin S. Vines, Teague VIP Express, LLC, or other persons or entities to proximately cause plaintiffs Veronica Love, Minnie Allen, Hilda L. McComb, and Willie F. Corner's injuries and damages set forth in Counts One through Sixteen, above.

115. The true names and identities of Fictitious Defendants A through Q are unknown to plaintiffs at this time and will be added by amendment in accordance with Rule 9(h) of the Alabama Rules of Civil Procedure when the true names and identities are ascertained.

WHEREFORE, the foregoing grounds considered, Plaintiffs Veronica Love, Minnie Allen, Hilda L. McComb, and Willie F. Corner demand judgment against all Defendants in an amount deemed appropriate under the circumstances plus the costs of this action.

PLAINTIFFS REQUEST A TRIAL BY STRUCK JURY

/s/ Will League

 Will League (LEA013)

/s/ W. Heath Brooks

 W. Heath Brooks (BRO249)

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SERVE DEFENDANTS VIA U.S. CERTIFIED MAIL

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Anniston, AL 36201