

SUMMONS

STATE OF MINNESOTA
COUNTY OF HENNEPIN
DISTRICT COURT

FOURTH JUDICIAL DISTRICT

CASE TYPE: Personal Injury

Ms. Taquoia Hammick,
Plaintiff,

v.
Yassin Nadif Ahmed,
Defendant.

TO: DEFENDANT ABOVE-NAMED AND HIS ATTORNEY OF RECORD

YOU ARE BEING SUED. The Plaintiff has started a lawsuit against you. The Plaintiffs Complaint against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no Court file number on this Summons.

YOU MUST REPLY WITHIN 20 DAYS TO PROTECT YOUR RIGHTS. You must give or mail to the person who signed this Summons a written response called an Answer within 20 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at Magna Law Firm, 2915 Wayzata Blvd, Minneapolis, MN 55405.

YOU MUST RESPOND TO EACH CLAIM. The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS. If you do not Answer within 20 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond. A Default Judgment can then be entered against you for the relief requested in the Complaint.

LEGAL ASSISTANCE. You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.

ALTERNATIVE DISPUTE RESOLUTION. The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

Dated: November 18, 2018

MAGNA LAW FIRM

By: /s/ Oliver E. Nelson

Oliver E. Nelson, III (# 0347280)

Attorney for the Plaintiff

2915 Wayzata Blvd.

Minneapolis, MN 55405

Telephone (612) 767-1871

COMPLAINT

STATE OF MINNESOTA

COUNTY OF HENNEPIN

DISTRICT COURT

FOURTH JUDICIAL DISTRICT

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Plaintiff, for her claim for relief, states and alleges as follows:

I.

On 03/21/2016, Plaintiff, Taquoia Hammick was sitting in her vehicle stopped at red light at the intersection of 1st Avenue South and 26th Street East. When her light turned green, she began to proceed through the intersection when suddenly, the Defendant pulled his vehicle in front of her causing a collision. This collision occurred because of the carelessness and negligence of Defendant.

II.

As a result of Defendant's negligence, Plaintiff sustained severe and permanent injuries, satisfying the thresholds set forth at Minn. Stat §65B.51, Subd. 3 (1978); as a result, she has in the past and will in the future incur medical expenses for the treatment of her injuries; she has in the past and will in the future incur a loss of earnings and of earning capacity; she has in the past and will in the future endure great physical and emotional suffering; as a result, Plaintiff Taquoia Hammick has been injured and damaged in an amount greater than Fifty Thousand Dollars (\$50,000.00).

WHEREFORE, Plaintiff prays for judgment against Defendant as follows:

1. Damages in an amount greater than Fifty Thousand Dollars (\$50,000.00);

2. For costs, disbursements and fees incurred herein;

3. For such other and further relief as the Court deems just and equitable.

On behalf of my client, I hereby acknowledge that costs, disbursements and reasonable attorney's fees and witness fees may be awarded to the opposing party or parties, should the Court find that a party or attorney has acted in bad faith, asserted a claim or defense that is frivolous and costly to the party, asserted an unfounded position solely to delay the ordinary course of proceedings or to harass, or commit a fraud upon the Court.

Dated: November 18, 2018

By: /s/ Oliver E. Nelson

MAGNA LAW FIRM

Oliver E. Nelson, III (# 0347280) Attorney for the Plaintiff

2915 Wayzata Blvd.

Minneapolis, MN 55405

Telephone (612) 767-1871

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