

SUMMONS

STATE OF MINNESOTA
COUNTY OF HENNEPIN
DISTRICT COURT
FOURTH JUDICIAL DISTRICT
Court File #:27-CV-17-xxxx
Khadra Abdullahi
Plaintiff,
Vs.
Rigoberto Rodriguez,
Defendant.

THE STATE OF MINNESOTA TO:
Defendant Rigoberto Rodriguez:

You are hereby summoned and required to serve upon Plaintiffs' attorney an Answer to the Complaint, which is herewith served upon you, within 20 days, exclusive of the day of service. If you fail to do so, judgment by Default will be entered against you for the relief demanded in the Complaint.

Date: June 15, 2018

Signed: D. Gregor Mulligan
Attorney for Plaintiffs
3209 West 76th Street Suite 200
Edina, MN 55435
(952) 832-5250
Attorney No. 203592

COMPLAINT

STATE OF MINNESOTA
COUNTY OF HENNEPIN
DISTRICT COURT
FOURTH JUDICIAL DISTRICT
Court File #:27-CV-17-xxxxx
Khadra Abdullahi
Plaintiff,
Vs.
Rigoberto Rodriguez,
Defendant.

PLAINTIFF, for her COMPLAINT, states the following:

On November 20, 2013 in the afternoon, Plaintiff was driving southbound on France Avenue in Minneapolis, Minnesota. She was in the far right lane and she had just driven across the bridge over State Highway 62. Her car was moving through the intersection between France Avenue and the exit ramp for eastbound Highway 62. Plaintiff had the green light and was proceeding normally. Suddenly, Plaintiffs car was struck violently on the passenger side by a car driven by Defendant as he went through a red light and failed to yield to traffic moving along France Avenue. The point of impact on Plaintiff's car was even with the back seat. The collision cause Plaintiffs car to spin violently.

While driving a motor vehicle, Defendant had a duty to use reasonable care. Defendant breach his duty when he entered France Avenue against a red light and he failed to yield to traffic moving by on France Avenue. Defendant's driving conduct was the direct and proximate cause of the collision with Plaintiff's car. The collision caused real and compensable damages.

Plaintiff's car was damaged severely. The cost of repair exceeded the market value of the car. Plaintiff suffered physical injuries in the collision. Plaintiff's medical bills exceed the statutory minimum for bringing a lawsuit in the state of Minnesota. Her medical bills continue to increase as she receives treatment for her injuries. Presently, the total medical bills are in excess of \$8,000.00.

WHEREFOR, Plaintiff seeks a Judgment against Defendant and in favor of Plaintiff for an amount in excess of \$50,000.00 plus costs, expenses and fees.

Date: June 15, 2018
Signed: D. Gregory Mulligan
Attorney for Plaintiffs
3209 West 76th Street, Suite 200
Edina, MN 55435
(952) 832-5250
Attorney No. 203592

ACKNOWLEDGMENT

Plaintiffs and D. Gregory Mulligan, Attorney for Plaintiffs, hereby acknowledge that sanctions may be imposed against parties and their counsel if any fraudulent or harassing actions are filed with the Courts of Minnesota.

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