

STATE OF INDIANA)
) SS:
COUNTY OF HOWARD)

HOWARD

COURT

CAUSE NO: 34D04- 1810-CT-01160

REGINALD GREENE, SR.
Plaintiff

V.

JOSHUA COCHRAN
ANTOINETTE JENKINS
Defendants

FILED

OCT 03 2018

KIM WILSON
Clerk Howard Superior Court
DIVISION 4

COMPLAINT FOR CHILD WRONGFUL DEATH

Plaintiff says:

1. That Plaintiff, Reginald Greene, Sr., was the biological father of the decedent, Renay Jenkins, born December 12, 2007. She was killed by the careless and negligent acts and omissions of the Defendant, Joshua Cochran, on the 9th day of August, 2018, when, as a pedestrian, she was struck and killed by a vehicle operated by the Defendant Joshua Cochran;
2. That on the 9th day of August, 2018, the Defendant, Joshua Cochran, operated a motor vehicle westbound on Alto Road in and around the 800 block of East Alto Road in a careless and negligent manner such that he struck the person of Renay Jenkins, a pedestrian, who was walking eastbound at or near Alto Road, in the County of Howard, State of Indiana;
3. That the Defendant, Joshua Cochran, at the aforesaid time and place, carelessly and negligently failed to keep a proper lookout for pedestrians, failed to operate his vehicle at a reasonable rate of speed, failed to keep his vehicle under proper control and operated his vehicle while intoxicated at approximately 4:30 PM EST on the 9th day of August, 2018;
4. That the careless and negligent operation of a motor vehicle by the Defendant,

Joshua Cochran on the 9th day of August, 2018, was the responsible cause of the death of the decedent, Renay Jenkins;

5. That as a result of the wrongful death of Renay Jenkins, the Plaintiff, Reginald Greene, Sr., has lost the services of his child; lost the child's love and companionship; incurred medical expenses caused by the child's death; and incurred funeral and burial expenses.

6. That Antoinette Jenkins is the biological mother of Renay Jenkins and is joined in this proceeding to answer as her interest may appear.

WHEREFORE, the Plaintiff, Reginald Greene, Sr., prays for a Judgment of money damages against the Defendant Joshua Cochran in an amount that will reasonably compensate him for the wrongful death of his child, Renay Jenkins, the costs of this action and such other and further relief as the Court deems appropriate in the premises.



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