

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

ANTHONY GLOEDE,)	CASE NO.
)	
Plaintiff,)	
)	
v.)	PETITION AND JURY DEMAND
)	
SKYLAR THOMAS MEINECKE,)	
)	
Defendant.)	

COMES NOW the Plaintiff, Anthony Gloede, by counsel and for his cause of action against Defendant Skylar Thomas Meinecke, state as follows:

GENERAL ALLEGATIONS

1. At all times material hereto, Plaintiff Anthony Gloede (“Gloede”), was a citizen and resident of Des Moines, Polk County, Iowa.
2. At all times material hereto, Defendant Skylar Thomas Meinecke (“Meinecke”) was a resident of Panora, Guthrie County, Iowa.
3. On or about November 3, 2017, Gloede, having a green light, was operating his motor vehicle heading north on the 63rd street bridge over Interstate 235 by-pass in Des Moines, Polk County, Iowa.
4. At said time and place, Defendant Meinecke was operating a motor vehicle facing South on 63rd street and turned left to travel eastbound on Interstate 235.
5. At said place and time, Defendant Meinecke while turning left struck Plaintiff Gloede’s car as Plaintiff was driving through the intersection, causing damage to Plaintiff’s car and personal injury to Plaintiff.

6. The collision and resulting damages sustained by Plaintiff Gloede were caused by the negligence of Defendant Meinecke in the following particulars:

- (a) Failing to maintain a proper lookout;
- (b) Failing to obey a traffic-control device;
- (c) Failing to yield the right-of-way;
- (d) Failing to have his vehicle under control;
- (e) Failing to give warning;
- (f) Failing to observe the rules of the road;
- (g) Failing to operate his vehicle in a careful and prudent manner;
- (h) Failing to travel at a reasonable and prudent speed; and
- (i) Failing to exercise care under the circumstances.

7. Defendant Meinecke's negligence was a proximate cause of Plaintiff Gloede's injuries, pain, and suffering.

8. Plaintiff Gloede has been damaged in the following respects:

- (a) Plaintiff received severe painful and permanent injuries;
- (b) Plaintiff has endured and will continue to endure great physical and mental pain, physical disability, and loss of enjoyment of life; and
- (c) Plaintiff has incurred and will continue to incur expenses for medical, surgery, physical therapy, medical bills and medications to treat his injuries.
- (d) Plaintiff has been precluded from performing his ordinary work and has in the past and will in the future suffer a loss of earnings and earning capacity.

WHEREFORE, Plaintiff Anthony Gloede, prays for judgment against Defendant Skylar Thomas Meinecke in such an amount as will fully and fairly compensate him for his injuries and damages alleged herein, for interest as allowed by law and the costs of this action.

JURY DEMAND

COMES NOW, the Plaintiff Anthony Gloede, and demands a trial by jury on all counts.

/s/ Nathan Vos _____
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Original filed.