

IN THE IOWA DISTRICT COURT FOR CARROLL COUNTY

Region XII Council of Governments,

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NO. _____

Plaintiff,

)

vs.

)

Glenda Pudenz,

)

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Defendant.

)

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**PETITION AT LAW AND
JURY DEMAND**

COMES NOW Plaintiff, Region XII Council of Governments, by and through counsel,
and for their cause of action states as follows:

1. At all times material hereto, Region XII Council of Governments, Inc. is a not for profit corporation with its principal place of business in Carroll, Carroll County, Iowa.
2. At all times material hereto, Glenda Pudenz is an individual resident of Glidden, Carroll County, Iowa.
3. On or about February 3, 2016, Winston Huebner was operating a 2012 VPG MV-1 van northbound on Timber Avenue in Lanesboro, Carroll County, Iowa.
4. At or near the same time and place as described above, defendant was operating a 2008 Buick Enclave.
5. Mr. Huebner was unable to avoid the defendant's vehicle and a collision occurred.
6. The defendant was negligent in one or more of the following particulars:
 - a. In failing to keep a proper lookout;
 - b. In stopping on the travel portion of the roadway;
 - c. In failing to have proper lighting; and
 - d. In such other ways as proven by the evidence.

7. The fault of the defendant was a proximate cause of the collision and resulting damages to the plaintiff.
8. The plaintiff incurred costs for the repair of their vehicle.
9. The plaintiff incurred other collision related expenses.
10. The amount in controversy exceeds the minimum jurisdictional amount of this Court.

WHEREFORE, the plaintiff request judgment against the defendant for damages incurred by the plaintiff, together with maximum pre and post judgment interest and the costs of this action.

JURY DEMAND

The plaintiffs hereby demand a trial by jury.

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