

VIRGINIA: IN THE CIRCUIT COURT OF THE CITY OF VIRGINIA BEACH

JOHN JULIUS KORTE and  
JUDITH M. KORTE, Co-Administrators of the  
Estate of JOHN JULIUS KORTE, JR.,  
deceased,

Plaintiff,

v.

AT LAW NO. CL10-6853

CAMERON P. CROCKETT  
SERVE AT: 928 Earl of Essex Arch  
Virginia Beach, VA 23454

and  
JOHN DOE  
an unknown motorist,

and  
PAULA G. CROCKETT,  
SERVE AT: 928 Earl of Essex Arch  
Virginia Beach, VA 23454

Defendants.

COMPLAINT

COME NOW, the plaintiffs, John Julius Korte and Judith M. Korte, Co-Administrators of the Estate of John Julius Korte, Jr., deceased, by counsel, and move this Honorable Court for judgment against the defendants, Cameron P. Crockett, John Doe and Paula G. Crockett, jointly and severally, in the amount and upon the grounds set forth as follows:

1. The plaintiffs, John Julius Korte and Judith M. Korte, are the parents of John Julius Korte, deceased, and qualified as the Co-Administrators of the Estate of John Julius Korte, Jr., deceased, in the Circuit Court of the City of Virginia Beach, on June 12, 2009, (copy of certificate of qualification attached).

2. At all times hereinafter mentioned, the plaintiffs' decedent, John Julius Korte, Jr., was a resident of the City of Virginia Beach, Virginia.

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3. On the December 28, 2008, the plaintiffs' decedent, John Julius Korte, Jr., was a passenger in a motor vehicle being operated by the defendant, Cameron P. Crockett, on Wolfsnare Road at or near its intersection with Cambridge Road in the City of Virginia Beach, Virginia.

4 At the aforesaid time and place, the defendant, Cameron P. Crockett, operated his vehicle in a negligent, reckless, willful and wanton manner, causing him to lose control of his vehicle and leave the roadway, striking a tree with great force and violence.

5. The negligence of the defendant, Cameron P. Crockett, includes, but is not limited to, failure to keep a proper lookout; failure to keep his vehicle under proper control; failure to give full time and attention to the operation of his vehicle; operating his vehicle at an excessive rate of speed under the circumstances then and there existing; failure to obey highway signs and devices; failure to remain within his lane of travel; crossing the centerline; operating his vehicle while under the influence of intoxicants; and a failure to comply with state laws and/or ordinances applicable to individuals operating motor vehicles in the Commonwealth of Virginia and the City of Virginia Beach, Virginia.

6. At the aforementioned time and place, the defendant, Cameron P. Crockett, operated his vehicle under the influence of intoxicants and in a willful and wanton manner as to evince a conscious disregard for the rights of others, including the plaintiffs' decedent.

7. The plaintiffs are entitled to seek punitive damages pursuant to Virginia Code §8.01-44.5 as amended and under Virginia common law.

8. At all relevant times, John Doe was an unknown motorist.

9. Upon information and belief, on December 28, 2008, the plaintiffs' decedent, John Julius Korte, Jr., was a passenger in a vehicle being operated by John Doe, an unknown motorist, on

Wolfsnare Road at or near its intersection with Cambridge Road in the City of Virginia Beach, Virginia.

10. At the aforesaid time and place, the defendant, John Doe, operated his vehicle in a negligent, reckless, willful and wanton manner, causing him to lose control of his vehicle and leave the roadway, striking a tree with great force and violence.

11. The negligence of the defendant, John Doe, includes, but is not limited to, failure to keep a proper lookout; failure to keep his vehicle under proper control; failure to give full time and attention to the operation of his vehicle; operating his vehicle at an excessive rate of speed under the circumstances then and there existing; failure to obey highway signs and devices; failure to remain within his lane of travel; crossing the centerline; and a failure to comply with state laws and/or ordinances applicable to individuals operating motor vehicles in the Commonwealth of Virginia and the City of Virginia Beach, Virginia.

12. At all relevant times, the defendant, Cameron P. Crockett, was operating a motor vehicle that was owned and maintained by the defendant, Paula G. Crockett.

13. At all relevant times, the defendant, Paula G. Crockett, negligently, recklessly, carelessly and willfully and wantonly entrusted her vehicle to be used by the defendant, Cameron P. Crockett.

14. The defendant, Paula G. Crockett, negligently, recklessly, carelessly and willfully and wantonly entrusted the use of her vehicle to her son, Cameron P. Crockett, an individual whom she knew operated his motor vehicle on numerous prior occasions in a reckless, willful and wanton manner and knew or should have know that he was going to operate his vehicle on the date of the collision in a reckless, willful and wanton manner and under the influence of alcohol and other intoxicants.

intoxicants.

15. As a direct and proximate result of the defendants' negligence, recklessness, and willful and wanton conduct, the plaintiff's decedent, John Julius Korte, Jr., sustained serious and permanent injuries which resulted in his death.

16. The lawful statutory beneficiaries of the decedent are his parents, John Julius Korte and Judith M. Korte, his brother, Benjamin Korte, and his sister, Elizabeth Korte.

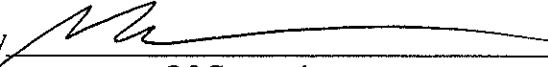
17. The lawful statutory beneficiaries of the decedent have sustained financial and pecuniary losses as a result of the death of John Julius Korte, Jr., and have suffered sorrow, mental anguish, solace, including loss of society, companionship, comfort, guidance, kindly offices and advice of the decedent and will in the future suffer financial and pecuniary loss, and will in the future suffer sorrow, mental anguish and solace, including loss of society, companionship, comfort, guidance, kindly offices and advice of the decedent.

18. The lawful statutory beneficiaries have incurred funeral and burial expenses and have also incurred expenses for the care, treatment and hospitalization of the decedent incident to the injury resulting in his death as well as other related medical expenses.

WHEREFORE, the plaintiffs move the Court for a judgment against the defendants, Cameron P. Crockett, John Doe and Paula G. Crockett, jointly and severally, in the amount of Five Million Dollars (\$5,000,000.00) compensatory damages and Five Million Dollars (\$5,000,000.00) punitive damages with interest from the date of the occurrence plus costs expended on their behalf.

**THE PLAINTIFFS DEMAND A TRIAL BY JURY.**

JOHN JULIUS KORTE and JUDITH M. KORTE,  
Co-Administrators of the Estate of JOHN JULIUS  
KORTE, JR., deceased

By   
Of Counsel

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