

IN THE STATE COURT OF BRYAN COUNTY  
STATE OF GEORGIA

Filed in Clerk's Office  
Time 10:30

APR 29 2015

Rebecca G. Crowe  
Clerk of Courts  
Bryan County, Georgia

KIM DELOACH MCQUAIG, Individually, )  
and as Surviving Parent of ABBIE LORENE )  
DELOACH, deceased and as )  
ADMINISTRATRIX OF THE ESTATE OF )  
ABBIE LORENE DELOACH )

Plaintiff, )

v. )

U. S. XPRESS ENTERPRISES, INC., )  
TOTAL TRANSPORTATION OF MISSISSIPPI, )  
LLC, LIBERTY MUTUAL FIRE INSURANCE )  
GROUP, AON RISK SERVICES SOUTHWEST, )  
INC., LIBERTY INSURANCE )  
CORPORATION , MOUNTAIN LAKE )  
RISK RETENTION GROUP, INC. and )  
TRAVELERS PROPERTY CASUALTY CO. )  
OF AMERICA, )

Defendants. )

Civil Action No.: 2015-SV-072

SUMMONS

TO THE ABOVE NAMED DEFENDANT  
LIBERTY INSURANCE CORPORATION.:

c/o Registered Agent:  
Corporation Service Company  
40 Technology Parkway South #300  
Norcross, Georgia 30092

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney whose name and address is:

Mark A. Tate  
Tate Law Group, LLC  
Post Office Box 9060  
Savannah, Georgia 31412  
(912) 234-3030

an Answer to the Complaint which is herewith served upon you, within thirty (30) days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.

This 29 day of April, 2015.

Seal of Superior, State, Juvenile and Magistrate Courts  
Rebecca Crowe, Clerk  
State Court of Bryan County, Georgia  
OFFICE OF THE CLERK

By: [Signature]  
Clerk

\*Also served with a copy of Plaintiff's First Request for Production of Documents, Plaintiff's First Interrogatories to Defendants and Plaintiff's First Request for Admissions

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Plaintiff, )

Civil Action No.: 2015-SV-072

v. )

U. S. XPRESS ENTERPRISES, INC., )  
TOTAL TRANSPORTATION OF MISSISSIPPI, )  
LLC, LIBERTY MUTUAL FIRE INSURANCE )  
GROUP, AON RISK SERVICES SOUTHWEST, )  
INC., LIBERTY INSURANCE )  
CORPORATION, MOUNTAIN LAKE )  
RISK RETENTION GROUP, INC. and )  
TRAVELERS PROPERTY CASUALTY CO. )  
OF AMERICA, )

Defendants. ))

SUMMONS

TO THE ABOVE NAMED DEFENDANT  
TRAVELERS PROPERTY CASUALTY CO. OF AMERICA.:

c/o Registered Agent:  
Corporation Service Company  
40 Technology Parkway South #300  
Norcross, Georgia 30092

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney whose name and address is:

Mark A. Tate  
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Savannah, Georgia 31412  
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This 29 day of April, 2015.

Seal of the State, Juvenile and Magistrate Courts  
OFFICE OF THE CLERK  
Rebecca Crowe, Clerk  
State Court of Bryan County, Georgia

By: *James Brent*  
Clerk  
Bryan County, Georgia

IN THE STATE COURT OF BRYAN COUNTY  
STATE OF GEORGIA

Filed In Clerk's Office  
Time 10:10

APR 29 2015

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Clerk of Courts  
Bryan County, Georgia

KIM DELOACH MCQUAIG, Individually,  
and as Surviving Parent of ABBIE LORENE  
DELOACH, deceased and as  
ADMINISTRATRIX OF THE ESTATE OF  
ABBIE LORENE DELOACH

Plaintiff,

v.

U. S. XPRESS ENTERPRISES, INC.,  
TOTAL TRANSPORTATION OF MISSISSIPPI,  
LLC, LIBERTY MUTUAL FIRE INSURANCE  
GROUP, AON RISK SERVICES SOUTHWEST,  
INC., LIBERTY INSURANCE  
CORPORATION, MOUNTAIN LAKE  
RISK RETENTION GROUP, INC. and  
TRAVELERS PROPERTY CASUALTY CO.  
OF AMERICA,

Defendants.

Civil Action No. 2015-SY-072

SUMMONS

TO THE ABOVE NAMED DEFENDANT  
MOUNTAIN LAKE RISK RETENTION GROUP, INC.:

c/o Registered Agent:  
Corporation Service Company  
100 North Main Street, Suite 2  
Barre, VT 05641

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney whose name and address is:

Mark A. Tate  
Tate Law Group, LLC  
Post Office Box 9060  
Savannah, Georgia 31412  
(912) 234-3030

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This 29 day of April, 2015.

Rebecca Crowe, Clerk  
State Court of Bryan County, Georgia

By:

*[Signature]*  
Clerk  
SEAL  
OFFICE OF THE CLERK  
Bryan County, Georgia

IN THE STATE COURT OF BRYAN COUNTY  
STATE OF GEORGIA

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Bryan County, Georgia

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ADMINISTRATRIX OF THE ESTATE OF )  
ABBIE LORENE DELOACH )

Plaintiff, )

v. )

TOTAL TRANSPORTATION OF MISSISSIPPI, )  
LLC, LIBERTY MUTUAL FIRE INSURANCE )  
GROUP, AON RISK SERVICES SOUTHWEST, )  
INC., LIBERTY INSURANCE )  
CORPORATION, MOUNTAIN LAKE )  
RISK RETENTION GROUP, INC. and )  
TRAVELERS PROPERTY CASUALTY CO. )  
OF AMERICA, )

Defendants. )

Civil Action No.: 2015-SV-072

SUMMONS

TO THE ABOVE NAMED DEFENDANT  
AON RISK SERVICES SOUTHEAST, INC.:

c/o Registered Agent:  
Corporation Service Company  
40 Technology Parkway South #300  
Norcross, Georgia 30092

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney whose name and address is:

Mark A. Tate  
Tate Law Group, LLC  
Post Office Box 9060  
Savannah, Georgia 31412  
(912) 234-3030

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This 29 day of April, 2015.

Supreme, Juvenile and Magistrate  
OFFICE OF THE CLERK  
Rebecca Crowe, Clerk  
State Court of Bryan County, Georgia  
Bryan County, Georgia

By: \_\_\_\_\_  
Clerk

Filed in Clerk's Office  
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STATE OF GEORGIA

APR 29 2015

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Clerk of Courts  
Bryan County, Georgia

KIM DELOACH MCQUAIG, Individually, )  
and as Surviving Parent of ABBIE LORENE )  
DELOACH, deceased and as )  
ADMINISTRATRIX OF THE ESTATE OF )  
ABBIE LORENE DELOACH )

Plaintiff,

Civil Action No. 2015-SV-012

v.

U. S. XPRESS ENTERPRISES, INC., )  
TOTAL TRANSPORTATION OF MISSISSIPPI, )  
LLC, LIBERTY MUTUAL FIRE INSURANCE )  
GROUP, AON RISK SERVICES SOUTHWEST, )  
INC., LIBERTY INSURANCE )  
CORPORATION , MOUNTAIN LAKE )  
RISK RETENTION GROUP, INC. and )  
TRAVELERS PROPERTY CASUALTY CO. )  
OF AMERICA, )

Defendants.

SUMMONS

TO THE ABOVE NAMED DEFENDANT  
U.S. XPRESS ENTERPRISES, INC.:

c/o Registered Agent:  
Corporation Service Company  
40 Technology Parkway South #300  
Norcross, Georgia 30092

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney whose name and address is:

Mark A. Tate  
Tate Law Group, LLC  
Post Office Box 9060  
Savannah, Georgia 31412  
(912) 234-3030

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Rebecca Crowe, Clerk  
State Court of Bryan County, Georgia

By:

*[Signature]*  
Clerk

Seal: Superior, State, Juvenile and Magistrate Courts  
OFFICE OF THE CLERK  
Bryan County, Georgia

IN THE STATE COURT OF BRYAN COUNTY  
STATE OF GEORGIA

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Rebecca G. Crowe  
Clerk of Courts  
Bryan County, Georgia

KIM DELOACH MCQUAIG, Individually,  
and as Surviving Parent of ABBIE LORENE  
DELOACH, deceased and as  
ADMINISTRATRIX OF THE ESTATE OF  
ABBIE LORENE DELOACH

Plaintiff,

v.

U. S. XPRESS ENTERPRISES, INC.,  
TOTAL TRANSPORTATION OF MISSISSIPPI,  
LLC, LIBERTY MUTUAL FIRE INSURANCE  
GROUP, AON RISK SERVICES SOUTHWEST,  
INC., LIBERTY INSURANCE  
CORPORATION, MOUNTAIN LAKE  
RISK RETENTION GROUP, INC. and  
TRAVELERS PROPERTY CASUALTY CO.  
OF AMERICA,

Defendants.

Civil Action No.: 2015-SV-072

SUMMONS

TO THE ABOVE NAMED DEFENDANT  
LIBERTY MUTUAL FIRE INSURANCE GROUP:

c/o Registered Agent:  
Corporation Service Company  
40 Technology Parkway South #300  
Norcross, Georgia 30092

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney whose name and address is:

Mark A. Tate  
Tate Law Group, LLC  
Post Office Box 9060  
Savannah, Georgia 31412  
(912) 234-3030

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Seal of the Superior, State, Juvenile and Magistrate Courts  
SEAL  
Rebecca Crowe, Clerk  
State Court of Bryan County, Georgia

By:

Clerk

*[Handwritten Signature]*  
Bryan County, Georgia

IN THE STATE COURT OF BRYAN COUNTY  
STATE OF GEORGIA

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Plaintiff, )

v. )

U. S. XPRESS ENTERPRISES, INC., )  
TOTAL TRANSPORTATION OF MISSISSIPPI, )  
LLC, LIBERTY MUTUAL FIRE INSURANCE )  
GROUP, AON RISK SERVICES SOUTHWEST, )  
INC., LIBERTY INSURANCE )  
CORPORATION, MOUNTAIN LAKE )  
RISK RETENTION GROUP, INC. and )  
TRAVELERS PROPERTY CASUALTY CO. )  
OF AMERICA, )

Defendants. )

Civil Action No: 2015-SV-072

SUMMONS

TO THE ABOVE NAMED DEFENDANT  
TOTAL TRANSPORTATION OF MISSISSIPPI, LLC:

c/o Registered Agent:  
John D. Stomps  
125 Riverview Drive  
Richland, MS 39218

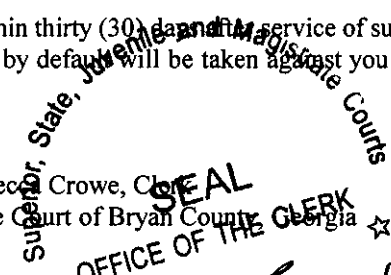
You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney whose name and address is:

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Rebecca G. Crowe, Clerk  
State Court of Bryan County, Georgia



By: [Signature]  
Clerk

\*Also served with a copy of Plaintiff's First Request for Production of Documents, Plaintiff's First Interrogatories to Defendants and Plaintiff's First Request for Admissions

IN THE STATE COURT OF BRYAN COUNTY  
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Plaintiff, )

v. )

U. S. XPRESS ENTERPRISES, INC., )  
TOTAL TRANSPORTATION OF MISSISSIPPI, )  
LLC, LIBERTY MUTUAL FIRE INSURANCE )  
GROUP, AON RISK SERVICES SOUTHWEST, )  
INC., LIBERTY INSURANCE )  
CORPORATION , MOUNTAIN LAKE )  
RISK RETENTION GROUP, INC. and )  
TRAVELERS PROPERTY CASUALTY CO. )  
OF AMERICA, )

Defendants. )

Civil Action No.: 2015-V-072-

COMPLAINT

COMES NOW the Plaintiff, Kim Deloach McQuaig, Individually, and as surviving parent of Abbie Lorene Deloach, deceased, and as Administratrix of the Estate of Abbie Lorene Deloach and files this her Complaint against Defendants, Total Transportation of Mississippi, LLC, Liberty Mutual Fire Insurance Group, Aon Risk Services Southwest, Inc., Liberty Insurance Corporation, Mountain Lake Risk Retention Group, Inc. and Travelers Property Casualty Co. Of America, showing to the Court as follows:



## I. JURISDICTION AND VENUE

1. Plaintiff Kim Deloach McQuaig Deloach is the Mother of Abbie Lorene Deloach, deceased and Administratrix of the Estate of Abbie Lorene Deloach. Kim Deloach McQuaig is a resident of Georgia. She brings Wrongful Death and Survival Actions against the Defendants.
2. Abbie Lorene Deloach was a resident of Georgia when she was killed in an automobile collision on I-16 in Ellabell, Bryan County, Georgia.
3. Defendant U. S. Xpress Enterprises, Inc. Is a Tennessee corporation and is subject to the jurisdiction and venue of this Court.
4. Defendant Total Transportation of Mississippi, LLC. (hereinafter referred to as "Total Transportation") is a Mississippi corporation licensed to do business within the State of Georgia and can be served with process through its registered agent John D. Stomps, 125 Riverview Drive, Richland, MS 39218. Defendant Total Transportation of Mississippi, LLC is registered with the United States Department of Transportation as a motor carrier.
5. Defendant Liberty Mutual Fire Ins Group ("Liberty Mutual") is a foreign corporation licenced to business in the State of Georgia and can be served with process through its registered agent, Corporation Service Company, 40 Technology Parkway South, Site 300, Norcross, GA 30092.
6. Defendant Aon Risk Services Southwest, Inc. ("Aon") is a foreign corporation licenced to business in the State of Georgia and can be served with process through

its registered agent, Corporation Service Company, 40 Technology Parkway South, Site 300, Norcross, GA 30092.

7. Defendant Liberty Insurance Corporation ("Liberty Insurance") is a foreign corporation licenced to business in the State of Georgia and can be served with process through its registered agent, Corporation Service Company, 40 Technology Parkway South, Site 300, Norcross, GA 30092.
8. Defendant Mountain Lake Risk Retention Group, Inc. ("Mountain Lake") is a Vermont corporation licenced to business in the State of Georgia and can be served with process through its registered agent, Corporation Service Company, 100 North Main Street, Suite 2, Barre, VT 05641.
9. Defendant Travelers Property Casualty Co. of America ("Travelers") is a foreign corporation licenced to business in the State of Georgia and can be served with process through its registered agent, Corporation Service Company, 40 Technology Parkway South, Site 300, Norcross, GA 30092.
10. On April 22, 2015, Defendant Total Transportation of Mississippi, LLC listed Defendants Liberty Mutual Fire Insurance Group, Aon Risk Services Southwest, Inc., Liberty Insurance Corporation, Mountain Lake Risk Retention Group, Inc. and Travelers Property Casualty Co. Of America (hereinafter referred to as "Insurance Defendants") as its registered insurers. Insurance Defendants are registered to issue insurance with the Georgia Insurance Commission, and Insurance Defendants are proper parties to this action pursuant to O.C.G.A. §40-1-112.

11. This cause of action is based upon injuries sustained by Plaintiff's daughter, Abbie Lorene Deloach, as a result of a motor vehicle collision occurring in Bryan County, Georgia.
12. Jurisdiction and venue are proper in this Court.

## II. FACTUAL ALLEGATIONS

13. Plaintiff renews and reaffirms herein each and every allegation of all preceding paragraphs.
14. On April 22, 2015, Abbie Lorene Deloach was a passenger in a motor vehicle which was traveling east on I-16 in Ellabell, Bryan County, Georgia.
15. At the same time, Defendant, Total Transportation's employee was operating a tractor-trailer traveling east on I-16 in Ellabell, Bryan County, Georgia.
16. Suddenly, and without warning, Defendant Total Transportation's employee ran into the rear of the vehicle in which Abbie Lorene Deloach was a passenger.
17. As a result of this collision, Abbie Lorene Deloach tragically suffered fatal injuries and was killed.

## III. CAUSES OF ACTION

### NEGLIGENCE *PER SE*

18. Plaintiff renews and reaffirms herein each and every allegation of all preceding paragraphs.
19. Defendant Total Transportation's employee was negligent *per se* by following too close in violation of O.C.G.A. § §40-6-49 among other violations.

20. By following too close, Defendant Total Transportation's employee failed to exercise regard for traffic and all other attendant circumstances, which negligence was the direct and proximate cause of the collision and the death of Abbie Lorene Deloach.
21. Defendant Total Transportation's employee acted recklessly, carelessly, and with total disregard of the rights and safety of other persons using said highway.
22. Defendant Total Transportation's employee had the last clear chance to avoid said collision.
23. Abbie Lorene Deloach was in no way negligent nor contributed to the accident in question.

#### **NEGLIGENCE**

24. Plaintiff renews and reaffirms herein each and every allegation of all preceding paragraphs.
25. Defendant Total Transportation's employee had a duty not to injure others while operating a motor vehicle on the roads of the State of Georgia.
26. Defendant Total Transportation's employee breached this duty by following too closely, failing to keep a proper lookout, driving at a speed greater than was reasonable and prudent under highway conditions, and driving without regard for the actual and potential hazards then existing.
27. Defendant Total Transportation's employee acted recklessly, carelessly, and with total disregard of the rights and safety of other persons in using said road.
28. Defendant Total Transportation's employee had the last clear chance to avoid said

collision.

29. Abbie Lorene Deloach was in no way negligent nor caused the incident complained of in this Complaint.
30. The negligence of Defendant Total Transportation's employee was the direct and proximate cause of the accident and death of Abbie Lorene Deloach.

#### **VICARIOUS LIABILITY OF DEFENDANT TOTAL TRANSPORTATION**

31. Plaintiff renews and reaffirms herein each and every allegation of all preceding paragraphs.
32. Upon information and belief, Defendant Total Transportation's driver was employed by Defendant Total Transportation. at the time of the incident which forms the basis of this complaint.
33. Defendant Total Transportation's employee was acting within the course and scope of his employment with Defendant Total Transportation at the time of his collision with Abbie Lorene Deloach.
34. Defendant Total Transportation is liable for the negligent acts of its employees pursuant under the doctrine of respondeat superior.

#### **BREACH OF CONTRACT**

35. Plaintiff renews and reaffirms herein each and every allegation of all preceding paragraphs.
36. Because Insurance Defendants provide indemnity insurance to Defendant Total Transportation, it is subject to this direct action pursuant to O.C.G.A. § 40-1-112.

37. Defendant Total Transportation has breached its contract to provide for the protection of the public.
38. Defendant Total Transportation is directly liable to Plaintiff for damages he has sustained.

#### **IV. INJURIES AND DAMAGES**

##### **WRONGFUL DEATH**

39. Plaintiff re-alleges and incorporates by reference all preceding paragraphs as if fully stated herein.
40. Plaintiff Kim Deloach McQuaig, as the surviving parent of Abbie Lorene Deloach, brings this action against Defendants for the wrongful death of Abbie Lorene Deloach, and seek to recover the full value of her life. Abbie Lorene Deloach was 21 years old at the time of her death and had a remaining life expectancy of 58.73 years.

##### **PUNITIVE DAMAGES**

41. Plaintiff renews and reaffirms herein each and every allegation of all preceding paragraphs.
42. Defendants' actions show willful misconduct, wantonness, and/or the entire want of care which would raise the presumption of conscious indifference to the consequences.
43. Plaintiff is entitled to an award of punitive damages to punish, penalize and deter Defendants' conduct.

## ATTORNEY'S FEES


44. Plaintiff renews and reaffirms herein each and every allegation of all preceding paragraphs.
45. Defendants have acted in bad faith, has been stubbornly litigious and have caused Plaintiff unnecessary trouble and expense and, accordingly, are liable to Plaintiff for attorneys' fees and costs of litigation pursuant to O.C.G.A. § 13-6-11.

WHEREFORE, Plaintiff prays:

- (A) That Summons and Process be issued and served upon Defendants;
- (B) For a trial by a jury comprised of twelve persons;
- ©) That Plaintiff be awarded an appropriate sum in excess of \$15,000.00 to compensate her for his injuries and damages;
- (D) That the Plaintiff be awarded attorneys' fees and all costs of litigation against Defendants;
- (E) That Plaintiff be awarded punitive damages; and
- (F) That Plaintiff recover such other and further relief as this Court deems just and proper.

Dated: April 29, 2015.

TATE LAW GROUP, LLC



Mark A. Tate  
State Bar No. 698820  
James E. Shipley  
State Bar No. 116508

IN THE STATE COURT OF BRYAN COUNTY  
STATE OF GEORGIA

ORIGINAL

KIM DELOACH MCQUAIG, Individually,  
and as Surviving Parent of ABBIE LORENE  
DELOACH, deceased and as  
ADMINISTRATRIX OF THE ESTATE OF  
ABBIE LORENE DELOACH

Plaintiff,

v.

U. S. XPRESS ENTERPRISES, INC.,  
TOTAL TRANSPORTATION OF MISSISSIPPI,  
LLC, LIBERTY MUTUAL FIRE INSURANCE  
GROUP, AON RISK SERVICES SOUTHWEST,  
INC., LIBERTY INSURANCE  
CORPORATION , MOUNTAIN LAKE  
RISK RETENTION GROUP, INC. and  
TRAVELERS PROPERTY CASUALTY CO.  
OF AMERICA,

Defendants.

Civil Action No.: 2015-SI-072

Filed in Clerk's Office  
Time 10:10

APR 29 2015

Rebecca G. Crowe  
Clerk of Courts  
Bryan County, Georgia

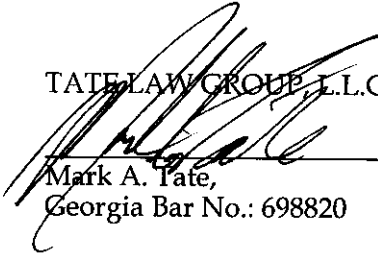
CERTIFICATION OF COMPLIANCE WITH UNIFORM COURT RULE 5.2

Pursuant to Uniform Superior Court Rule 5.2, the undersigned counsel for Plaintiff certifies that on April 29, 2015 Defendants in the above styled action was served with a copy of Plaintiff's First Request for Production of Documents, Plaintiff's First Interrogatories to Defendants and Plaintiff's First Request for Admissions by affixing a copy of same to the Summons and Complaint and serving on:

Defendant Total Transportation of Mississippi, LLC.  
c/o John D. Stomps  
125 Riverview Drive  
Richland, MS 39218

This 29<sup>th</sup> day of April, 2015.

TATELAW GROUP, L.L.C

  
Mark A. Tate,  
Georgia Bar No.: 698820

2 East Bryan Street, Suite 600  
Post Office Box 9060  
Savannah, GA 31412  
(912) 234-3030  
(912) 234-9700 fax



# General Civil Case Filing Information Form (Non-Domestic)

**Court**  
 Superior  
 State

**County** Bryan

**Date Filed** 04/29/2015

MM-DD-YY

**Docket #** 15-SV-072

ORIGINAL

Filed in Clerk's Office  
 Time  
**APR 29 2015**  
 Bryan County, Georgia

**Plaintiff(s)**

McQuaig, Kim DeLoach  
 Last First Middle I. Suffix Prefix Maiden

Estate of Abbie Lorene DeLoach  
 Last First Middle I. Suffix Prefix Maiden

\_\_\_\_\_  
 Last First Middle I. Suffix Prefix Maiden

\_\_\_\_\_  
 Last First Middle I. Suffix Prefix Maiden

**No. of Plaintiffs** 1

**Plaintiff/Petitioner's Attorney**  Pro Se

Tate, Mark A.  
 Last First Middle I. Suffix

**Bar #** 698820

**Defendant(s)**

U.S. Xpress Enterprises, Inc.  
 Last First Middle I. Suffix Prefix Maiden

Liberty Mutual Fire Insurance  
 Last First Middle I. Suffix Prefix Maiden

AON Risk Services Southwest, Inc.  
 Last First Middle I. Suffix Prefix Maiden

Total Transportation of Mississippi, LLC  
 Last First Middle I. Suffix Prefix Maiden

**No. of Defendants** 7

**Additional Defendants:**

Liberty Insurance Corporation  
 Mountain Lake Risk Retention Group, Inc.  
 Travelers Property Casualty Co. of America

**Check Primary Type (Check only ONE)**

- Contract/Account
- Wills/Estate
- Real Property
- Dispossessory/Distress
- Personal Property
- Equity
- Habeas Corpus
- Appeals, Reviews
- Post Judgement Garnishment, Attachment, or Other Relief
- Non-Domestic Contempt
- Tort (If tort, fill in right column)
- Other General Civil Specify \_\_\_\_\_

**If Tort is Case Type:  
 (Check no more than TWO)**

- Auto Accident
- Premises Liability
- Medical Malpractice
- Other Professional Negligence
- Product Liability
- Other Specify \_\_\_\_\_

**Are Punitive Damages Pleaded?**  Yes  No

I hereby certify that the documents in this filing (including attachments and exhibits) satisfy the requirements for redaction of personal or confidential information in O.C.G.A. 9-11-7.1