1/7/2014 1:51:09 PM
Amalia Rodriguez-Mendoza
District Clerk
Travis County
D-1-GN-14-000041

CAUSE NO	D-1-GN-14-	·000041 	D-1-GN-14-00
ANGELA SCURRY, individually and o	on §	IN THE DISTRI	CT COURT
behalf of the ESTATE OF MORRIS	§		
SCURRY, deceased,	§		
	§		
Plaintiff,	§	53RD	
	§	JUDICIAI	DISTRICT
v.	§		
	§		
38TH STREET CHICKEN, LLC, a Tex	kas §		
Limited Liability Company, doing	§	TRAVIS COUN	TY, TEXAS
business as BUSH'S CHICKEN; and	§		
HAMMOCK PARTNERS, LLC, a	§		
Delaware Limited Liability Company,	§		
	§	DEMAND FOR A JU	URY TRIAL

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE COURT:

Defendants.

COMES NOW Plaintiff, Angela Scurry, individually and on behalf of the Estate of Morris Scurry, deceased (hereinafter "Plaintiff"), by and through her undersigned counsel, and hereby complains of 38th Street Chicken, LLC, doing business as Bush's Chicken, and Hammock Partners, LLC (hereinafter "Defendants"), and for these causes of action would respectfully show to the Court as follows:

I. DISCOVERY CONTROL PLAN

1. Plaintiff intends that discovery be conducted under Level 2 in accordance with the Texas Rules of Civil Procedure ("TRCP") 190.3.

II. PARTIES

- 2. Plaintiff Angela Scurry is, at all relevant times was, an individual residing in Bell County, Texas.
- 3. Plaintiff Angela Scurry is the surviving spouse of the late Morris Scurry. She brings suit individually for the wrongful death damages she suffered as a result of her husband's

wrongful death pursuant to Texas Civil Practice & Remedies Code ("CRPC") §71.001, *et seq.*, and she is bringing a survival claims pursuant to CRPC §71.021, *et seq.*, as the heir of the late Morris Scurry.

- 4. At the time of his death, Morris Scurry was a resident of Bell County, Texas.
- 5. Defendant Hammock Partners, LLC, is, and at all relevant times was, a foreign limited liability company organized under the laws of the State of Delaware, registered and licensed to do business throughout the State of Texas, including at its principal office in Texas located at 201 South Lakeline Blvd., Cedar Park, Texas 78613. Defendant Hammock Partners, LLC, may be served with process through serving its registered agent, James Hammock, at its registered address located at 4205 Long Champ Drive, Austin, Texas 78746.
- 6. Defendant 38th Street Chicken, LLC, is, and at all relevant times was, a limited liability company organized under the laws of the State of Texas doing business as Bush's Chicken, engaged in the business of managing and operating a Bush's Chicken restaurant under a franchise granted by Defendant Hammock Partners, LLC. Defendant 38th Street Chicken, LLC's restaurant is located at 812 38th Street, Killeen, Texas 76543. Defendant 38th Street Chicken, LLC, may be served with process through serving its registered agent, Corey Bush, at its registered address located at 812 38th Street, Killeen, Texas 76543.
- 7. Plaintiff is informed and believe, and on that basis allege, that at all times mentioned in this petition, Defendants were the agents and employees of their codefendants, and in doing the things alleged in this petition were acting within the course and scope of such agency and employment.

III. JURISDICTION AND VENUE

8. The Court has jurisdiction over Defendants 38th Street Chicken, LLC, doing business as Bush's Chicken, and Hammock Partners, LLC, as said Defendants are limited

liability companies doing business in the State of Texas. The Court has jurisdiction as the amount in controversy for the causes of action stated herein exceeds the minimum jurisdictional limits of the Court.

- 9. Pursuant to CRPC §15.002(a)(3), venue is proper in the County of Travis, State of Texas, because Defendant Hammock Partners, LLC, has its principal office located at 201 South Lakeline Blvd, Cedar Park, Texas 78613 and its office mailing address located at 4205 Long Champ Drive, Austin, Texas 78746, both of which are in Travis County, Texas.
- 10. An administration of the Estate of Morris Scurry is not necessary or pending, as Morris Scurry died intestate with less than two debts, nor is there a justifiable reason for the administration of the estate. Therefore, in accordance with established Texas law as restated in *Shepherd v. Ledford*, 962 S.W.2d 28, 31-32 (Tex. 1998), Plaintiff Angela Scurry brings the survival claim as the late Morris Scurry's heir at law.

IV. FACTUAL ALLEGATIONS

- 11. At all times mentioned in this petition, Defendant 38th Street Chicken, LLC, solicited the patronage of customers and offered to furnish to the public various foods and food items for immediate consumption on and off the premises of Defendants' restaurant located at 912 North 38th Street, Killeen, Texas (the "Location").
- 12. On November 27, 2012, Plaintiff Angela Scurry ("Plaintiff") and her late husband, Morris Scurry ("Decedent"), purchased chicken strips at the drive through window of the Location for immediate consumption.
- 13. Immediately after purchasing the chicken strips from Defendants, Decedent ate some of the food on the way home but finished the balance of it later that night.

- 14. At approximately 3:00 a.m. on November 28, 2012, Plaintiff was awakened by the sound of Decedent vomiting and having diarrhea. Decedent had consistent diarrhea and vomiting for the following three hours.
- 15. Later on November 28, 2012, while shopping at Wal-Mart, Decedent complained of diarrhea to Plaintiff and returned home with Plaintiff. After they arrived at their residence, Plaintiff unloaded the groceries purchased from Wal-Mart and Decedent went ahead of her into the house. Decedent collapsed inside the home, and upon entering the home, Plaintiff found Decedent on the floor writhing in pain.
- 16. Plaintiff and her daughter loaded Decedent into their car to take him to the hospital. On the way to the hospital, Decedent was complaining of such an immense amount of pain, Plaintiff became scared, stopped the car, and called 911 for an ambulance to meet them.
- 17. Thereafter, Decedent was taken by ambulance to the hospital. Decedent was diagnosed with an infection caused by the Campylobacter bacteria. During his hospital stay, Decedent suffered a cardiac arrest as a result of the infection and was on the verge of dying, but was resuscitated. Decedent was eventually released on December 7, 2012, to his home.
- 18. Decedent returned to the hospital two more times after his initial release December 11, 2012 and December 18, 2012, complaining of the same symptoms and was admitted for the same diagnosis, treatment, and then subsequently released.
- 19. On December 21, 2012, Decedent collapsed again at home from the pain of the infection and was pronounced dead on arrival to the hospital. Decedent's Campylobacterosis illness and subsequent death was a result of the infection in his body of the Campylobacter bacteria.

- 20. An infection by the Campylobacter bacteria is caused by eating raw or undercooked poultry meat or from cross-contamination of other foods by raw or undercooked poultry meat. The chicken products that Decedent consumed that were served from Defendants' restaurant establishment contained the Campylobacter bacteria and upon Decedent's ingestion of the products, caused Decedent's Campylobacterosis and subsequent death.
- 21. Upon reviewing the Bell County Health District's Inspection Forms for the Defendants' location where Decedent purchased the chicken productions, there is a history of improper cooking temperature, cross contamination, and other violations that would cause the Campylobacter bacteria to develop Campylobacterosis in their customers, including Decedent.
- 22. Plaintiff is informed and believes, and on that basis alleges, that Defendants, their agents, officers, or employees, failed to properly prepare the chicken products served to Decedent that ultimately caused Decedent's death.
- 23. As a result of the Defendants' conduct, Plaintiff and Decedent's estate have suffered damages.

V. SURVIVAL ACTION PURSUANT TO CRPC §§17.021, 17.022

24. For all causes of action listed hereunder, such actions are actionable by the Plaintiff in her capacity as Morris Scurry's surviving spouse and heir at law brought against Defendants on behalf and for the benefit of the Estate of Morris Scurry pursuant to CRPC §§17.021.

VI. WRONGFUL DEATH ACTION PURSUANT TO CRPC §§71.001 – 71.012

25. For all causes of action listed hereunder, such actions are actionable by the Plaintiff in her capacity as the surviving spouse of Morris Scurry brought against Defendants on behalf and for the benefit of Plaintiff, individually, and for all other heirs of Decedent set by statute pursuant to CRPC $\S\S71.001 - 71.012$.

VII. CAUSES OF ACTION

NEGLIGENCE (Against all Defendants)

- 26. Plaintiff re-alleges each and every allegation contained in foregoing paragraphs as though fully set forth herein word for word.
- 27. As the owners and/or operators of the Location, Defendants had a duty to serve wholesome and uncontaminated food for public consumption.
- 28. As set forth herein, on November 27, 2012, Decedent patronized Defendants' restaurant and ordered and ate food in the form of chicken strips as indicated herein. Before doing so, Decedent was in good health. In the hours after consuming the food, and without consuming any other food, Decedent became ill, exhibited symptoms of pain, diarrhea, and vomiting, and was taken to a hospital for treatment and diagnosed as suffering from Campylobacterosis, a bacterial infection of the Campylobacter bacteria.
- 29. The food that Decedent consumed which was ordered from Defendants' restaurant was defective and unfit for human consumption, in that it was not prepared in such a way as to either keep the food from cross-contamination or to kill the Campylobacter bacteria. Defendants knew, or should have known, of this defect or lack of fitness in the exercise of reasonable diligence.
- 30. In serving the food to Decedent, Defendants breached their duty to Decedent and to members of the public by serving spoiled, diseased, or otherwise unwholesome food that was unfit for human consumption, and was negligent in selecting, preparing, and serving such food to Decedent. More specifically, the Defendants' negligence consisted of the following acts or omissions, any one of which, either separately or concurrently with another, was a proximate cause of the plaintiff's illness and damages:

- a. Serving food that was not properly refrigerated.
- b. Using food containers that were not properly sterilized.
- c. Employing workers and food handlers who failed to comply with the ordinances of Killeen, Texas as to food handling.
- d. Serving food items to Decedent that was uncontaminated.
- e. Failing to properly cook the food served to Decedent
- f. Failing to prevent cross-contamination and/or failing to prevent the sale and serving of contaminated food
- g. Failing to properly inspect the food actually served Decedent.
- 31. Defendants could reasonably foresee that if it sold contaminated, defective food that consumers such as Decedent would suffer injuries and damages.
- 32. The defects in the food were not discoverable by ordinary inspection by Decedent, and Decedent did not know, nor did Decedent have any reasonable means of knowing when consuming the food, that it was contaminated or was unfit for human consumption.
- 33. As a proximate result of Defendants' negligence, Decedent suffered physical injuries and pain and mental anguish up to and including Decedent's untimely death, incurred reasonable medical expenses for hospital services, treatment by physicians, nursing care, medicine, and after Decedent's untimely death, Decedent's estate incurred reasonable costs of a suitable funeral and burial, all damages which are within the jurisdictional limits of this court and are recoverable by the Plaintiff on behalf of the Estate of Decedent pursuant to CRPC §71.021, et seq.
- 34. As a proximate result of Defendants' negligence which resulted in the untimely death of Decedent, Plaintiff, individually and on behalf of those other heirs and beneficiaries as

allowed by law, has suffered pecuniary loss from the Decedent's death, including loss of care, maintenance, support, services, advice, counsel, and contributions of a pecuniary value that they would, in reasonable probability, have received from Decedent during his lifetime had decedent lived, all damages which are within the jurisdictional limits of this court and are recoverable by Plaintiff, individually and on behalf of those other heirs and beneficiaries as allowed by law, pursuant to CRPC §71.001, et seq.

35. Plaintiff, individually, has suffered additional losses by virtue of the destruction of the spousal relationship, including the right to love, affection, solace, comfort, companionship, society, emotional support, and happiness. Plaintiff has suffered severe mental depression and anguish, grief, and sorrow as a result of the death of decedent, and is likely to continue to suffer for a long time in the future. For these losses, Plaintiff seeks damages in a sum within the jurisdictional limits of the Court.

NEGLIGENCE – RES IPSA LOQUITUR (Against all Defendants)

- 36. Plaintiff re-alleges each and every allegation contained in the foregoing paragraphs as though fully set forth herein word for word.
- 37. As the owners and/or operators of the Location, Defendants had a duty to serve wholesome and uncontaminated food for public consumption.
- 38. As set forth herein, on November 27, 2012, Decedent patronized Defendants' restaurant and ordered and ate food in the form of chicken strips as indicated herein. Before doing so, Decedent was in good health. In the hours after consuming the food, and without consuming any other food, Decedent became ill, exhibited symptoms of pain, diarrhea, and vomiting, and was taken to a hospital for treatment and diagnosed as suffering from Campylobacterosis, a bacterial infection of the Campylobacter bacteria.

- 39. The food that Decedent consumed which was ordered from Defendants' restaurant was defective and unfit for human consumption, in that it was not prepared in such a way as to either keep the food from cross-contamination or to kill the Campylobacter bacteria. Defendants knew, or should have known, of this defect or lack of fitness in the exercise of reasonable diligence.
- 40. In serving the food to Decedent, Defendants breached their duty to Decedent and to members of the public by serving spoiled, diseased, or otherwise unwholesome food that was unfit for human consumption, and was negligent in selecting, preparing, and serving such food to Decedent.
- 41. If Plaintiff is unable to prove specific acts of negligence, then Plaintiff alleges that the making and preparation of the food in question was within the exclusive control of Defendants and that Plaintiff or Decedent had no means of ascertaining the manner in which the food was prepared, nor did Plaintiff or Decedent have anything to do with preparing the food, and that were it not for the negligence of Defendants, the food sold to Decedent would not have contained anything injurious to his health and cause him to die.
- 42. As a proximate result of Defendants' negligence, Decedent suffered physical injuries and pain and mental anguish up to and including Decedent's untimely death, incurred reasonable medical expenses for hospital services, treatment by physicians, nursing care, medicine, and after Decedent's untimely death, Decedent's estate incurred reasonable costs of a suitable funeral and burial, all damages which are within the jurisdictional limits of this court and are recoverable by Plaintiff on behalf of the Estate of Decedent pursuant to CRPC §71.021, et seq.

- 43. As a proximate result of Defendants' negligence which resulted in the untimely death of Decedent, Plaintiff, individually and on behalf of those other heirs and beneficiaries as allowed by law, has suffered pecuniary loss from the Decedent's death, including loss of care, maintenance, support, services, advice, counsel, and contributions of a pecuniary value that they would, in reasonable probability, have received from Decedent during his lifetime had decedent lived, all damages which are within the jurisdictional limits of this court and are recoverable by Plaintiff, individually and on behalf of those other heirs and beneficiaries as allowed by law, pursuant to CRPC §71.001, et seq.
- 44. Plaintiff, individually, has suffered additional losses by virtue of the destruction of the spousal relationship, including the right to love, affection, solace, comfort, companionship, society, emotional support, and happiness. Plaintiff has suffered severe mental depression and anguish, grief, and sorrow as a result of the death of decedent, and is likely to continue to suffer for a long time in the future. For these losses, Plaintiff seeks damages in a sum within the jurisdictional limits of the Court.

BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY (Against all Defendants)

- 45. Plaintiff re-alleges each and every allegation contained in the foregoing paragraphs as though fully set forth herein word for word.
- 46. As proprietor of a restaurant, Defendants are merchants for purposes of Texas Business and Commerce Code §2.314(b). As such, Defendants impliedly warranted that the food served in the restaurant, including the chicken strips that Decedent ordered and consumed, was merchantable and fit for eating. Decedent relied on Defendants' implied warranty of merchantability in purchasing and consuming the chicken strips from Defendants.

- 47. Defendants, their agents, officers, and employees, in serving the chicken strips containing the Campylobacter bacteria to Decedent, breached the implied warranty of merchantability pursuant to the Texas Business and Commerce Code § 2.314 and the implied warranty that the food was reasonably fit for human consumption.
- 48. As a result of Defendants' breach of their implied warranty, Decedent suffered physical injuries and pain and mental anguish up to and including Decedent's untimely death, incurred reasonable medical expenses for hospital services, treatment by physicians, nursing care, medicine, and after Decedent's untimely death, Decedent's estate incurred reasonable costs of a suitable funeral and burial, all damages which are within the jurisdictional limits of this court and are recoverable by Plaintiff on behalf of the Estate of Decedent pursuant to CRPC §71.021, et seq.
- 49. As a result of Defendants' breach of their implied warranty which resulted in the untimely death of Decedent, Plaintiff, individually and on behalf of those other heirs and beneficiaries as allowed by law, has suffered pecuniary loss from the Decedent's death, including loss of care, maintenance, support, services, advice, counsel, and contributions of a pecuniary value that they would, in reasonable probability, have received from Decedent during his lifetime had decedent lived, all damages which are within the jurisdictional limits of this court and are recoverable by Plaintiff, individually and on behalf of those other heirs and beneficiaries as allowed by law, pursuant to CRPC §71.001, *et seq*.
- 50. Plaintiff, individually, has suffered additional losses by virtue of the destruction of the spousal relationship, including the right to love, affection, solace, comfort, companionship, society, emotional support, and happiness. Plaintiff has suffered severe mental depression and anguish, grief, and sorrow as a result of the death of decedent, and is likely to continue to suffer

for a long time in the future. For these losses, Plaintiff seeks damages in a sum within the jurisdictional limits of the Court.

STRICT LIABILITY IN TORT (Against all Defendants)

- 51. Plaintiff re-alleges each and every allegation contained in the foregoing paragraphs as though fully set forth herein word for word.
- 52. Defendants, their agents, officers, and employees, are strictly liable in tort for serving unwholesome and unfit food to Decedent in the form of chicken strips containing the Campylobacter bacteria.
- 53. As a result of the serving of unwholesome and unfit food by Defendants to Decedent, Decedent suffered physical injuries and pain and mental anguish up to and including Decedent's untimely death, incurred reasonable medical expenses for hospital services, treatment by physicians, nursing care, medicine, and after Decedent's untimely death, Decedent's estate incurred reasonable costs of a suitable funeral and burial, all damages which are within the jurisdictional limits of this court and are recoverable by Plaintiff on behalf of the Estate of Decedent pursuant to CRPC §71.021, et seq.
- 54. As a result of the serving of unwholesome and unfit food by Defendants to Decedent which resulted in the untimely death of Decedent, Plaintiff, individually and on behalf of those other heirs and beneficiaries as allowed by law, has suffered pecuniary loss from the Decedent's death, including loss of care, maintenance, support, services, advice, counsel, and contributions of a pecuniary value that they would, in reasonable probability, have received from Decedent during his lifetime had decedent lived, all damages which are within the jurisdictional limits of this court and are recoverable by Plaintiff, individually and on behalf of those other heirs and beneficiaries as allowed by law, pursuant to CRPC §71.001, et seq.

55. Plaintiff, individually, has suffered additional losses by virtue of the destruction of the spousal relationship, including the right to love, affection, solace, comfort, companionship, society, emotional support, and happiness. Plaintiff has suffered severe mental depression and anguish, grief, and sorrow as a result of the death of decedent, and is likely to continue to suffer for a long time in the future. For these losses, Plaintiff seeks damages in a sum within the jurisdictional limits of the Court.

VIII. CONDITIONS PRECEDENT

56. All conditions have been performed or occurred for all claims asserted herein.

IX. DEMAND FOR TRIAL BY JURY

57. Plaintiff hereby demands trial by jury on all claims for which the law provides a right to jury trial.

X. PRAYER FOR RELIEF

WHEREFORE PREMISES CONSIDERED, Plaintiff, Angela Scurry, individually and as the surviving spouse of Morris Scurry, deceased, respectfully requests that Defendants be cited to appear and answer, and that upon final trial, the Estate of Morris Scurry, and those persons that are Decedent's statutory beneficiaries, including Plaintiff Angela Scurry, recover the following:

- a. General and special damages according to proof at trial, such damages in the form of monetary relief over \$1,000,000;
- b. Exemplary/punitive damages allowed by statute or common law for all causes of action where allowed;
- c. Attorney's fees incurred in this litigation;
- d. Costs of court;
- e. Pre-judgment interest;

- f. Post-judgment interest; and
- g. All other and further relief, general and special, legal or equitable, which thisCourt deems just and proper.

Respectfully Submitted,

CHRISTMAN KELLEY & CLARKE, PC

/s/ Kenton S. Brice
Brett A. Nelson (Bar No. 24068874)
brett@christmankelley.com
Kenton S. Brice (Bar No. 24069415)
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Attorneys for Plaintiff
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972.253.4440
866.611.9852 fax

CIVIL CASE INFORMATION SHEET

1/7/2014 1:51:09 PM

Amalia Rodriguez-Mendoza **District Clerk**

CAUSE NUMBER (FOR CLERK USE ONLY): _ COURT (FOR CLERK USE ONLY): ___ **Travis County** D-1-GN-14-000041

STYLED ANGELA SCURRY V. 38TH STREET CHICKEN, LLC, ET AL (e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at

the time of filing.								
1. Contact information for person	on completing case information sho	eet:	Names of parties in case:			Person or entity completing sheet is:		
Name: Kenton S. Brice	Email: kenton@christmankelley.com		Plaintiff(s)/Petitioner(s):		□ <i>Pro Se</i> □Title I	Attorney for Plaintiff/Petitioner Pro Se Plaintiff/Petitioner Title IV-D Agency		
Address: 2570 Justin Road, Suite 240	Telephone: 972.253.4440		Angela Scurry, individually and on behalf of the Estate of Morris Scurry		Other:	al Parties in Child Support Case:		
City/State/Zip: Highland Village, Texas 75077	Fax: <u>866.611.9852</u>		Defendant(s)/Respondent(s): 38 th Street Chicken, LLC, d/b/a		Custodial			
Signature: /s/ Kenton S. Brice	State Bar No: 24069415		Bush's Chicken; and Hammock Parnters, LLC			Non-Custodial Parent: Presumed Father:		
			[Attach additional page as nec	cessary to list all par	ties]			
2. Indicate case type, or identify	the most important issue in the ca	ise (selec	et only 1):	1		·, ,		
	Civil			Family Law Post-judgment Actions				
Contract	Injury or Damage		Real Property	Marriage	Relationship	(non-Title IV-D)		
Debt/Contract Consumer/DTPA Debt/Contract Fraud/Misrepresentation Other Debt/Contract: Foreclosure Home Equity—Expedited	Assault/Battery Construction Defamation Malpractice Accounting Legal Medical Other Professional		inent Domain/ indemnation tition iet Title espass to Try Title her Property:	Annulme	ent Marriage Void Children	Enforcement Modification—Custody Modification—Other Title IV-D Enforcement/Modification Paternity Reciprocals (UIFSA) Support Order		
Other Foreclosure Franchise	Liability:	Related to Criminal Matters				***************************************		
Insurance	Motor Vehicle Accident Premises			2 22 24 24 25 25 25 25 25 25 25 25 25 25 25 25 25	amily Law	Parent-Child Relationship		
Landlord/Tenant Non-Competition Partnership Other Contract:	Asbestos/Silica Other Product Liability List Product: Other Injury or Damage: WDT	Jud Nor Seiz Wri Pre	ounction gment Nisi n-Disclosure zure/Forfeiture it of Habeas Corpus— -indictment ner:	Enforce Judgmer Habeas (Name C Protectiv Remova of Mino	nt Corpus hange ve Order I of Disabilities	Adoption/Adoption with Termination Child Protection Child Support Custody or Visitation Gestational Parenting Grandparent Access Paternity/Parentage		
Employment	Other (Civil				Termination of Parental		
Discrimination Retaliation Termination Workers' Compensation Other Employment:	Administrative Appeal Antitrust/Unfair Competition Code Violations Foreign Judgment Intellectual Property	□Per □Sec □Tor	wyer Discipline petuate Testimony eurities/Stock rtious Interference her:			Rights Other Parent-Child: ——		
Tax			Probate & M					
Tax Appraisal Tax Delinquency Other Tax	Probate/Wills/Intestate Administration Dependent Administration Independent Administration Other Estate Proceedings Guardianship—Minor Mental Health Other:							
3. Indicate procedure or remedy	y, if applicable (may select more tha	an 1):						
Appeal from Municipal or Justice Court Arbitration-related Attachment Bill of Review Certiorari Class Action Declaratory Judgment Garnishment Interpleader License Mandamus Post-judgment			Prejudgment Remedy Protective Order Receiver Sequestration Temporary Restraining Order/Injunction Turnover					
4. Indicate damages sought (do not select if it is a family law case): Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees								
Less than \$100,000, including Less than \$100,000 and non-r Over \$100,000 but not more Over \$200,000 but not more t	monetary relief than \$200,000	its, exper	nses, pre-judgment inter	est, and attorne	y tees			