

IN THE CIRCUIT COURT OF LOGAN COUNTY ARKANSAS
___ DIVISION

VIRGINIA HAMILTON

PLAINTIFF

Vs.

CASE NO. 423CV-20-65
Div 2

DAVID MOORE
d/b/a/ CHIGGER VALLEY RODEO COMPANY

DEFENDANT

COMPLAINT

Comes now the Plaintiff, Virginia Hamilton, by and through her counsel, Lloyd W.

“Tre” Kitchens, and for her Complaint states:

1. Plaintiff is an individual resident of Logan County, Arkansas.
2. Defendant is an individual resident of Logan County, Arkansas.
3. The events complained of herein occurred in Logan County, Arkansas. This

Court has jurisdiction to hear this matter and is the proper venue.

4. On July 4, 2020, the Defendant put on a rodeo. As part of the event, the Plaintiff and other women were invited to come to the rodeo floor. No one told the women what was going to happen or what event was going to take place. #1287

5. Once the women, including the Plaintiff, were on the rodeo floor, agents of the Defendant released a steer into the rodeo arena.

6. The steer in question proceed to gore and trample the Plaintiff, almost killing her.

7. The Plaintiff never signed a release, informed consent, or anything else indicating that she might get gored and trampled and almost killed.

FILED
Date 9-21-2020 Time 10:17

Elaine Robertson
Circuit Clerk, Logan County, AR

Hecky Grant

8. The actions of the Defendant are grossly negligent, and so outrageous as to imply malice.

9. The Defendant knew, or should have known, in light of the surrounding circumstances that his conduct would naturally and probably result in injury to the Plaintiff, and he continued such conduct in reckless disregard for the consequences from which malice may be inferred.

10. As a proximate result of the Defendant's actions, the Plaintiff has suffered painful personal injuries, incurred medical bills, lost wages, and suffered other out of pocket expenses.

WHEREFORE, Plaintiff prays for a judgment against the Defendant in an amount sufficient to compensate her for her injuries, and in excess of the minimum amount for Federal Diversity of Citizenship cases (\$75,000); and for punitive damages in an amount sufficient to punish the Defendant and deter others from such similar conduct in excess of the minimum amount for Federal Diversity of Citizenship cases (\$75,000); and for all other just and proper relief.

PLAINTIFF PRAYS FOR A JURY TRIAL.

Respectfully submitted,

THE BRAD HENDRICKS LAW FIRM
500 C Pleasant Valley Drive
Little Rock, Arkansas 72227
(501) 221-0444
(501) 661-0196 fax
tkitchens@bradhendricks.com

BY: 

LLOYD W. "TRÉ" KITCHENS, ABN 99075



THE BRAD HENDRICKS
LAW FIRM
A Professional Association

Brad Hendricks ††
Lamar Porter †
Christopher R. Heil
David Rawls †
George R. Wise, Jr.
Matthew E. Hartness †

All Licensed in Arkansas
† Also Licensed in Texas
†† Also Licensed in Texas & Missouri
‡ Also Licensed in Louisiana

500 C Pleasant Valley Drive
Little Rock, Arkansas 72227
Telephone: (501) 221-0444
Fax: (501) 661-0196

www.bradhendricks.com

Caroline C. Lewis
Lloyd W. "Tré" Kitchens
Sheldon D. Smith
Edward T. Oglesby ‡
Gary Davis *

* Of Counsel

September 17, 2020

Logan County Circuit Court
Circuit Clerk
366 North Broadway, Room 2
Booneville, AR 72927

RE: *Virginia Hamilton v. David Moore, d/b/a Chigger Valley Rodeo Company*

Dear Clerk:

Enclosed for filing please find the original and two (2) copies of a Complaint; the Civil Cover Sheet; and our firm check in the amount of \$167.50 for the filing and summons fee. Also enclosed is the Summons to be completed and filed by the Clerk regarding this matter. Please return the filed marked copies of these documents to me in the enclosed self-addressed, stamped envelope.

Thank you for your assistance in this matter. Should you have any questions, please contact me.

Sincerely,

Reba Westerman
Paralegal

rwesterman@bradhendricks.com

/rw

Enclosures