Reynolds & Starr, P.C.

Memo

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| --- | --- |
| To: | James Reynolds |
| From: | Amanda Montes |
| cc: | Supervising Attorneys |
| Date: | May 30, 2020 |
| Re: | Pre-Litigation research |

In the anticipation of the upcoming meeting with Mrs. Samantha Crow’s widow, Greg Crow, and in regard to the litigation for his wrongful death suit, I have compiled this memorandum with the pre-litigation research that you have requested. In this memo I will discuss the parties of the lawsuit and the necessary causes of action needed to move forward with litigation in this case.

**Parties Involved**

In this case the plaintiffs will be for the estate of Samantha Crow and will include her widow, Greg Crow as well as their 3 minor children, Jessica Crow (eight years old), Bradley Crow (five years old), and Cooper Crow (three years old). Pursuant to 740 ILCS 180/2 the Illinois Wrongful Death Act the children and surviving spouse are eligible to file a lawsuit and recover damages. The lawsuit itself is filed in the name of the personal representative (i.e. executor) of the decedent's estate, rather than the family members.

The defendants to be named in this lawsuit is Dr. Richard Sayer, the Small Valley Country Club, and the bartender that provided the drinks to Dr. Sayer. Dr. Richard Sayer is the driver of the BMW that struck Mrs. Crow and the Small Valley Country Club, along with the bartender, provided alcoholic drinks to Dr. Sayer and allowed him to leave and drive while under the influence.

**Cause of Action**

In terms of causes of action, the Estate of Samantha Crow may seek pecuniary damages in a wrongful death suit against Dr. Sayer, the Small Valley Country Club, and the bartender. In Illinois, the Wrongful Death Act creates a cause of action in the name of the personal representative for the benefit of the widow and next-of-kin for their pecuniary injuries. 740 ILCS 180/1, 180/2. The Small Valley Country Club and the bartender can be held liable for pecuniary damages pursuant to 235 ILCS 5/6-21 which states that any person owning, renting, leasing or permitting the occupation of any building or premises with knowledge that alcoholic liquors are to be sold therein, or who having leased the same for other purposes, shall knowingly permit therein the sale of any alcoholic liquors that have caused the intoxication of any person, shall be liable, severally or jointly, with the person selling or giving the liquors.

Another cause of action will be to seek punitive damages against Dr. Richard Sayer. In Loitz v. Remington Arms Co., the Court held that a jury may award the plaintiff punitive damages where a defendant’s underlying conduct, resulting in harm to the plaintiff, is willful and wanton, outrageous, or where the defendant acted with actual malice, fraud, deliberate violence, or gross negligence. The defendant, Dr. Sayer, was highly intoxicated when he drove which shows a gross negligence on his part.

**Damages**

Pursuant to 740 ILCS 180/1 and 235 ILCS ILCS 5/6-21, the defendants, Dr. Richard Sayer, Small Valley Country Club, and the bartender, may be held liable and ordered to pay compensation for losses such as:

* Funeral expenses of decedent
* Loss of financial support
* Loss of inheritance
* Emotional distress
* Loss of companionship and parental guidance

Any damages recovered in the lawsuit are distributed to the eligible parties by the court in proportion to their dependence on the decedent's support. As the law does not provide a mathematical formula for determining the distribution, this is largely left to the court's discretion.

The term pecuniary injuries have been interpreted to include benefits of a pecuniary value, which includes money, goods, and services received by the next of kin of the deceased. When there are surviving children, it also includes the instruction, moral training, and education that the children would have received from the deceased parent. Pecuniary injuries have also been held to include the loss of consortium by the surviving spouse, Elliott v. Willis, 92 Ill.2d 530, 442 N.E.2d 163, 65 Ill.Dec. 852 (1982); the loss of a minor child's society by the parents, Bullard v. Barnes,102 Ill.2d 505, 468 N.E.2d 1228, 82 Ill.Dec. 448 (1984)

**Venue**

Under the Wrongful Death Act, a wrongful death claim in Illinois does not require the opening of a probate estate. The county where the accident occurred and where the country club is located, Cook County, will have personal jurisdiction over this case. Therefore, this claim needs to be filed with Cook County.

**Commencing Litigation**

In order to commence litigation, we must first file a complaint that will provide the defendant with notice of factual and legal grounds for the case. Along with the complaint, we must also file a summons that will notify the defendant that he is being sued in Cook County, Illinois.

**Conclusion**

We have a solid case for a wrongful death lawsuit against Dr. Sayer, Small Valley Country Club, and the bartender. I hope this memorandum has helped you find the information you need to have a successful consultation with Mr. Greg Crow. If I can be of any more assistance or if you have any questions, please don’t hesitate to contact me.

The Estate of Samantha Crow

Gregory Crow

Chicago, Il

Plaintiff

Vs.

Richard Sayer

And

Small Valley Country Club

Defendants

**SUMMONS**

**Notice to Defendant:**

In the case of the Estate of Samantha Crow v. Richard Sayer and Small Valley Country Club, you are hereby notified:

1. You have a lawsuit filed against you in Cook County, Illinois
2. You have 30 days after receiving this summons to file a written answer with the court and serve a copy to the opposing party.
3. If you do not respond within 30 days or take other action therein, then a judgement may be entered against you.

James Reynolds, Attorney

Estate of Samantha Crow,

C/O Gregory Crow

Plaintiff

Vs.

Richard Sayer,

Defendant

**COMPLAINT**

Plaintiff, Gregory Crow (hereinafter “Plaintiff”) hereby filed this Complaint against Defendant, Richard Sayer (hereinafter “Defendant”) by his attorney James Reynolds, Reynolds & Starr, P.C., on personal knowledge and alleges as follows:

**JURISDICTIONAL ALLEGATIONS**

This is a complaint for a wrongful death suit that is being filed by the Plaintiff against the Defendant. Pursuant to 740 ILCS 180/1, whenever the death of a person shall be caused by wrongful act, neglect or default, and the act, neglect or default is such as would, if death had not ensued, have entitled the party injured to maintain an action and recover damages in respect thereof, then and in every such case the person who or company or corporation which would have been liable if death had not ensued, shall be liable to an action for damages, notwithstanding the death of the person injured, and although the death shall have been caused under such circumstances as amount in law to felony.

**FACTUAL ALLEGATIONS**

On September 18 of last year, Samantha Crow, a 42-year-old wife and mother of three, was killed as she was running southbound on New Town Road in Chicago, Illinois. The accident happened at 8:34pm as Samantha was running towards her home; she was training for a marathon to be held in October. Samantha had started her run at 5pm and anticipated being home by 7pm. At the time of the accident Samantha was wearing a black sweatshirt, and dark grey sweatpants. She wore no reflective clothing that night because, as she had told her husband, she anticipated being home before sunset. Samantha was struck by the BMW being driven by Dr. Richard Sayer, a well-known and respected cardiologist in the community. At the time of the accident, Dr. Sayer was on his way home from a fundraising golf outing held at the Small Valley Country Club, where he is a member. Dr. Sayer and Samantha both were heading in the same direction when Dr. Sayer struck Samantha with his car. Thinking he had hit a deer, Dr. Sayer did not stop, he drove straight home. The speed limit on New Town Road is 35 miles per hour. Dr. Sayer was traveling 50 miles per hour at the very moment that he struck Samantha. As a result of the impact, Samantha’s body flew 167 feet. Her neck broke, and she was killed instantly. There is no evidence that Samantha was alive and/or conscious for any period of time after the accident.

**Negligence/Wrongful Death (Dr. Sayer)**

1. Pursuant to 625 ILCS 5/11-1003.1 every driver of a vehicle shall exercise due care to avoid colliding with any pedestrian, or any person operating a bicycle or other device propelled by human power and shall give warning by sounding the horn when necessary. Dr. Sayer owed a duty of care to Samantha Crow as he was operating a motor vehicle and under Illinois Statute, he must take precautions every time he operates his motor vehicle.
2. Dr. Sayer was also speeding at the time of the accident. Pursuant to 625 ILCS 5/11-601, No vehicle may be driven upon any highway of this State at a speed which is greater than is reasonable and proper with regard to traffic conditions and the use of the highway or endangers the safety of any person or property. The fact that the speed of a vehicle does not exceed the applicable maximum speed limit does not relieve the driver from the duty to decrease speed when approaching and crossing an intersection, approaching and going around a curve, when approaching a hill crest, when traveling upon any narrow or winding roadway, or when special hazard exists with respect to pedestrians or other traffic or by reason of weather or highway conditions. Speed must be decreased as may be necessary to avoid colliding with any person or vehicle on or entering the highway in compliance with legal requirements and the duty of all persons to use due care.
3. Pursuant to 625 ILCS 5/11-501(a), a person shall not drive or be in actual physical control of any vehicle within this State while: (1) the alcohol concentration in the person’s blood, other bodily substance, or breath is 0.08 or more based on the definition of blood and breath units in Section 11-501.2. Dr. Sayer’s blood alcohol content (BAC) was more than twice the legal limit at the time of his arrest, which was administered nearly 2 hours after the accident took place.

**Discovery Demands (Dr. Sayer)**

The Estate of Samantha Crow requests that opposing counsel provides the following documents:

1. The breathalyzer report from the time of his arrest
2. Dr. Sayer’s past driving record, including moving and non-moving violations
3. Any past automobile accident reports involving Dr. Sayer
4. A copy of an itemized receipt from the Small Valley Country Club to Dr. Sayer from September 18, 2019
5. Copies of statements from Dr. Sayer to police during the investigation
6. Copies of any witness testimony from Dr. Sayer’s criminal case

**Negligence/Wrongful Death (Small Valley Country Club)**

Although one does not have a duty to prevent the criminal acts of a third party, one does have a duty to refrain from assisting and encouraging such tortious conduct. If a plaintiff can demonstrate that the defendant did not merely fail to act, but also assisted the third party, then the requirement of a special relationship no longer applies. Simmons v. Homatas 236 Ill. 2d 459. The Small Valley Country Club had a duty to refrain from serving their patrons too much alcohol, which causes intoxication, and have the right to refuse service under the suspicion of intoxication. They did neither of these, therefore failed in their duty of care, making them liable for Samantha Crow’s death.

**Discovery Demands (Small Valley Country Club)**

1. An itemized report of all of Dr. Sayer’s purchases at Small Valley Country Club from September 18, 2019
2. A copy of any statement made by the bartender that was working during the event on September 18, 2019
3. Copies of any tapes from security cameras on the premises, included but not limited to, the bar area, the front entrance, the back entrance, and the parking lot
4. Any statement made by any employees working during the event, including but not limited to; other bartenders, servers, bus boys, and valets

WHEREFORE, the plaintiff requests that the courts compel the above-named defendants to produce copies of all information requested for discovery.

Respectfully submitted:

Amanda M. Montes

**AFFIDAVIT IN SUPPORT OF CLAIM**

I, James Reynolds, a practicing licensed attorney in the State of Illinois do thereby claim:

1. I am the attorney hired by the estate of Samantha Crow to represent them in these court proceedings
2. The statements in this claim are fair and true

Signed by:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

***James Reynolds, Attorney at Law***

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Estate of Samantha Crow

v.

Dr. Richard Sayer &

Small Valley Country Club

SUBPOENA

To: Small Valley Police Department

YOU ARE COMMANDED to appear to testify before the Honorable Judge William Michalek in Room 302, Cook County Illinois on June 21,2020, at 1:30 p.m.

YOU ARE COMMANDED ALSO to bring the following:

1. The entire police report for Dr. Sayer’s case, including but not limited to, any statements made to police, any toxicology reports, any medical reports

in your possession or control.

YOUR FAILURE TO APPEAR IN RESPONSE TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

WITNESS \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Clerk of Court

Atty . No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Name: \_\_\_\_\_\_\_\_\_\_

Attorney for: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

City/State/Zip:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Telephone: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

I served this subpoena by handing a copy to \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ on \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, \_\_\_\_\_\_\_\_ I paid the witness $ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for witness and mileage fees.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signed and sworn to before me on this \_\_\_\_\_\_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Notary Public

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Reynolds & Starr, P.C.

Memo

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| To: | James Reynolds |
| From: | Amanda Montes |
| cc: | Supervising Attorneys |
| Date: | June 9, 2020 |
| Re: | Estate of Samantha Crow/ defendants answer |

The defendant, Dr. Sayer, has provided us with an answer to our complaint. In his answer he has raised his line of defenses. I have included my research on his defenses and will outline what our responses should be to each of his defenses so that we can better plan our next move.

**Statute of Limitations**

Dr. Sayer claims that this case should be barred by the statute of limitations, but pursuant to 740 ILCS 180/2(e) An action may be brought within 5 years after the date of the death if the death is the result of violent intentional conduct or within one year after the final disposition of the criminal case if the defendant is charged with second degree murder under section 9-2 of the Criminal Code of 2012. We are well within the one year since Dr. Sayer’s criminal case commenced, therefore the statute of limitations is an invalid defense. The Wrongful Death Act provides that every death action shall be commenced within two years after the death of such person. Ill. Rev. Stat. ch. 70, par. 2(c) (1985). Arndt v. Resurrection Hosp., 163 Ill. App. 3d 209.

**Contributory Negligence of Plaintiff**

Dr. Sayer claims that the lawsuit is barred by the contributory negligence of the decedent, Samantha Crow. In cases involving negligence, the common law doctrine of contributory negligence is no longer the law in the state of Illinois, and in those instances where applicable it is replaced by the doctrine of comparative negligence. The Supreme Court of Illinois abolishes the common law doctrine of contributory negligence and adopts in its place the doctrine of comparative negligence in its pure form. Alvis v. Ribar, 85 Ill. 2d 1

**Comparative Negligence of Plaintiff**

# Dr. Sayer claims the decedent’s own negligence contributed to the accident and her death and that any award to Plaintiff be reduced by an amount equal to the percentage of the decedent’s own negligence. Pursuant to 735 ILCS 5/2-1116(c)In all actions on account of death, bodily injury or physical damage to property in which recovery is predicated upon fault, the contributory fault chargeable to the plaintiff shall be compared with the fault of all tortfeasors whose fault was a proximate cause of the death, injury, loss, or damage for which recovery is sought. The plaintiff shall be barred from recovering damages if the trier of fact finds that the contributory fault on the part of the plaintiff is more than 50% of the proximate cause of the injury or damage for which recovery is sought. The plaintiff shall not be barred from recovering damages if the trier of fact finds that the contributory fault on the part of the plaintiff is not more than 50% of the proximate cause of the injury or damage for which recovery is sought, but any economic or non-economic damages allowed shall be diminished in the proportion to the amount of fault attributable to the plaintiff. The plaintiff is not over 50% liable for the accident and therefore should not be barred from recovery. The measure of damages in a wrongful death claim is the benefits of pecuniary value, including money, goods and services decedent might have reasonably been expected to contribute to his widow and children. The factors to be considered are: what decedent customarily contributed in the past; what he earned and what he was likely to have earned in the future; what he spent for customary personal expenses; what instruction, moral training and superintendence of education he might reasonably have expected to give his children had he lived; his age; his health; his habits of industry, sobriety and thrift; and his occupation. Illinois Pattern Instruction 31.04. RICHARD H. PETERSON, Administrator of the Estate of Claude E. Tuggle v. STATE, 37 Ill. Ct. Cl. 104

# Assumption of Risk

# Dr. Sayer claims that Plaintiff knew it was dangerous to run on New Town Road after sunset and without wearing any reflective clothing and voluntarily assumed the risks associated with that action. Dr. Sayer claims that as a result the lawsuit is barred. Under the implied form of assumption of risk, plaintiff's willingness to assume a known risk is determined from the conduct of the parties rather than from an explicit agreement. The implied form of the doctrine has itself been subdivided into primary and secondary categories. The primary label has been applied to situations where a plaintiff has assumed known risks inherent in a particular activity or situation. The assumed risks there are not those created by defendant's negligence but rather by the nature of the activity itself. Thus, primary implied assumption of risk is, arguably, not a true negligence defense, since no cause of action for negligence is ever alleged. Duffy v. Midlothian Country Club, 135 Ill. App. 3d 429

# According to my research, the defendant has no defense claims with statute of limitations, assumption of risk, or contributory negligence. I feel we should enter a motion to dismiss those three defenses. Illinois does allow a defense of comparative negligence, but Samantha Crow’s percentage of liability will be well below the 51% mark it would need to be to bar and recovery. If you have any questions or need anything else from me, feel free to contact me.

**Trial Brief**

**In Opposition**

**To Defendant’s**

**Motion To Preclude**

SUPREME COURT OF THE STATE OF ILLINOIS

COOK COUNTY

The Estate of Samantha Crow

And

Gregory Crow,

Plaintiff,

**Trial Brief in Opposition**

Vs. **to Defendant’s Motion to Preclude**

Dr. Richard Sayer

And

Small Valley Country Club,

Defendants,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

The Estate of Samantha Crow and Gregory Crow, the surviving widow, seek a claim of wrongful death against Dr. Sayer and the Small Valley Country Club. Dr. Sayer was the operator of the vehicle that struck Mrs. Samantha Crow. The Small Valley Country Club was the location where the doctor was served alcoholic beverages prior to the accident.

STATEMENT OF FACTS

On September 18, 2019 Mrs. Samantha Crow died after the result of a hit and run accident on New Town Road, in Chicago, Illinois. Mrs. Crow was running in preparation of a marathon. She intended to be home by 7pm and therefore was not wearing reflective clothing. Her run went longer than she had originally told her husband and she was struck and killed at 8:34pm. At the time of the accident, the driver of the vehicle, later determined to be Dr. Sayer after a quick investigation, was traveling at 50 miles per hour in a zone that has a 35 mile per hour speed limit. As a result of the impact Mrs. Crow’s body was thrown 167 feet, breaking her neck and killing her instantly.

When the police found Dr. Sayer at his home, his BMW was under a tarp and had significant front bumper damage, including blood stains and pieces of hair. Dr. Sayer told police he believed he had hit a deer on his drive home from the Small Valley Country Club. The police administered a breathalyzer test, which occurred 5 hours after the accident, which showed that the doctor was still twice the legal limit of 0.08. Dr. Sayer ultimately was charged and tried for second-degree manslaughter, second-degree vehicular manslaughter, leaving the scene of an accident and driving while intoxicated. During the trial, Dr. Sayer admitted to ordering several rum and Diet Pepsi cocktails, Benedictine and brandy and a white crème de menthe at the golf outing that evening. Records subpoenaed from the country club for the criminal trial also showed that Dr. Sayer paid for a $100 bottle of Silver Oak Cabernet Sauvignon.

The criminal trial lasted for ten days. After five hours of deliberation the jury acquitted Dr. Sayer of all felony charges. He was convicted of misdemeanor driving while intoxicated, fined $1,000 and given a one-year jail sentence, in connection with the death of Mrs. Samantha Crow.

ARGUMENT

Pursuant to 740 ILCS 180/2(e)(5) An action may be brought within one year after the final disposition of the criminal case if the defendant is charged with involuntary manslaughter or reckless homicide under Section 9-3 of the Criminal Code of 2012. [720 ILCS 5/9-3]. Dr. Sayer was charged with second- degree manslaughter and was subsequently convicted of misdemeanor driving while intoxicated. The intoxication is a major part of the accident and the conviction is evidence that Dr. Sayer was in fact intoxicated when he struck Mrs. Crow with his car.

CONCLUSION

Dr. Sayer admitted to being under the influence and his breathalyzer test confirmed that he was in fact intoxicated at the time of the incident. The driving under the influence conviction is another affirmation to the intoxication at the time of the accident. That intoxication ties directly into the cause of the accident and the conviction should be allowed to be refernced in the civil proceedings.

Reynolds & Starr P.C.

Memo

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| To: | James Reynolds |
| From: | Amanda Montes |
| cc: | Supervising Attorneys |
| Date: | June 22, 2020 |
| Re: | Crow v. Sawyer; post-trial motions |

After reviewing the decision from the court and the jury’s verdict in the case of the Estate of Samantha Crow vs. Dr. Sayer and Small Valley Country Club, I have conducted research into possible recourses for our client Mr. Gregory Crow.

Pursuant to 735 ILCS 5/2-1401 (b) The petition must be filed in the same proceeding in which the order or judgment was entered but is not a continuation thereof. The petition must be supported by affidavit or other appropriate showing as to matters not of record. A petition to reopen a foreclosure proceeding must include as parties to the petition, but is not limited to, all parties in the original action in addition to the current record title holders of the property, current occupants, and any individual or entity that had a recorded interest in the property before the filing of the petition. All parties to the petition shall be notified as provided by rule.

Pursuant to 735 ILCS 5/2-1202 (b) Relief desired after trial in jury cases, heretofore sought by reserved motions for directed verdict or motions for judgment notwithstanding the verdict, in arrest of judgment or for new trial, must be sought in a single post-trial motion. Relief after trial may include the entry of judgment if under the evidence in the case it would have been the duty of the court to direct a verdict without submitting the case to the jury, even though no motion for directed verdict was made or if made was denied or ruling thereon reserved. The post-trial motion must contain the points relied upon, particularly specifying the grounds in support thereof, and must state the relief desired, as for example, the entry of a judgment, the granting of a new trial or other appropriate relief. Relief sought in post-trial motions may be in the alternative or may be conditioned upon the denial of other relief asked in preference thereto, as for example, a new trial may be requested in the event a request for judgment is denied.

(c) Post-trial motions must be filed within 30 days after the entry of judgment or the discharge of the jury, if no verdict is reached, or within any further time the court may allow within the 30 days or any extensions thereof. A party against whom judgment is entered pursuant to post-trial motion shall have like time after the entry of the judgment within which to file a post-trial motion.

We must file our notice of Appeal with the courts within 30 days of the verdict. I am including a notice for appeal in this memo in case our client would like to follow through with the appeals process. Please let me know if you need anything else.

SUPREME COURT OF THE STATE OF ILLINOIS

COOK COUNTY

Estate of Samantha Crow

And

Gregory Crow

Plaintiff,

Vs.

Dr. Richard Sayer

And

Small Valley Country Club

Defendant

**NOW COMES,** Gregory Crow, by way of his attorney, James Reynolds, to appeal to the Supreme Court of the State of Illinois, from the judgement by the Honorable William Michalek of the Civil Court of the City of Chicago, entered in the office of the Clerk of said court on June 22, 2020.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Gregory Crow

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

James Reynolds, attorney at law.

# REFLECTION

This course has been a challenging one for me, but also an excellent learning experience for the future. There is a lot of work to be done for the portfolio project and they all help me better prepare for my future career. I’ve learned a lot about Illinois’s Civil Process and how to draft the motions needed to file a civil claim. Even if I don’t work in the civil field the information, I have learned about civil procedures will still help me because there are times when the civil system and the criminal system may overlap. When doing this project, or any assignment you may receive, it is important to allot enough time to do a more thorough research. I learned how to better navigate through Lexis, and I know that will be a helpful tool in the future. There is a lot to learn in the legal field and sometimes it can seem overwhelming, but the more you work at it the easier it will become. The program outcomes I believe were fulfilled are

Classify and distinguish the various types of torts including intentional torts, negligence, and strict liability.

Assess and apply appropriate remedies and defenses to intentional torts, negligence and strict liability claims.

Draft and prepare pleadings associated with a specific tort claim.

Utilize rules of civil procedure and statutory and/or case law to develop and organize pleadings for the discovery, pre-trial, trial, and post-trial processes for a civil litigation notebook.

# I really believe this course was a great way to learn about torts and remedies and I feel that all the program outcomes were fulfilled by the instructor because the assignments covered a vast majority of a civil lawsuit from start to end. I only feel I didn’t fulfill them all personally because I still need some work in knowing all the rules and how to appropriately utilize them.

# Amanda Montes

# B00548316