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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT - LAW DIVISION**

JOYCE KILBURG,

Plaintiff,

v.

MUNAWAR MOHIUDDIN; CHECKER TAXI  
COMPANY INC., a corporation; and  
ZANTE CAB CO., INC., a corporation,

Defendants.

No.

*Plaintiff Demands Trial by Jury*

**COMPLAINT AT LAW**

Plaintiff, JOYCE KILBURG, by and through her attorneys, CORBOY & DEMETRIO, P.C., complaining of defendants, MUNAWAR MOHIUDDIN; CHECKER TAXI COMPANY INC., a corporation; and ZANTE CAB CO., INC., a corporation, and each of them, states:

1. On October 6, 2009, at approximately 10:26 p.m., West Sheridan Road was an east/west road at or near its intersection with North Winthrop Avenue in Chicago, Cook County, Illinois.
2. At that time and place, MUNAWAR MOHIUDDIN drove a 2006 Ford Crown Victoria, as a taxicab, westbound on West Sheridan Road.
3. At that time and place, CHECKER TAXI COMPANY INC. owned the taxicab.
4. At that time and place, ZANTE CAB CO., INC. owned the taxicab.
5. At that time and place, MUNAWAR MOHIUDDIN was the duly authorized agent and/or employee of CHECKER TAXI COMPANY INC. and was driving the taxicab in the scope of his employment.
6. At that time and place, MUNAWAR MOHIUDDIN was the duly authorized agent

and/or employee of ZANTE CAB CO., INC. and was driving the taxicab in the scope of his employment.

7. At that time and place, JOYCE KILBURG was a passenger in the taxicab driven by MUNAWAR MOHIUDDIN.

8. At that time and place, MUNAWAR MOHIUDDIN lost control of the vehicle he was driving, causing it to leave the roadway and crash.

9. At that time and place, MUNAWAR MOHIUDDIN and CHECKER TAXI COMPANY INC. and/or ZANTE CAB CO., INC., by and through its agent and employee, MUNAWAR MOHIUDDIN, were negligent in one or more of the following ways:

a. Failed to drive as nearly as practicable entirely within a single lane without first ascertaining that movement from such lane could be made with safety, in violation of 625 ILCS 5/11-709;

b. Drove a vehicle at a speed which was greater than reasonable and proper with regard to the traffic conditions and the use of the highway, in violation of 625 ILCS 5/11-601(a);

c. Failed to keep a proper and sufficient lookout;

d. Left the roadway when it was not safe to do so; and/or

e. Failed to adequately protect its fare-paying customer, JOYCE KILBURG, from foreseeable harm.

10. As a proximate result of one or more of these acts and/or omissions, JOYCE KILBURG sustained injuries.

WHEREFORE, plaintiff, JOYCE KILBURG, demands judgment against defendants, MUNAWAR MOHIUDDIN; CHECKER TAXI COMPANY INC., a corporation; and ZANTE

CAB CO., INC., a corporation, and each of them, in an amount in excess of the minimum amount required for jurisdiction in the Law Division of the Circuit Court of Cook County, Illinois.

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