

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

MARY A. BEAVER, Personal Representative  
of the Estate of DONNA HALSTEAD,  
Deceased,

Plaintiff,

v.

MEGABUS USA, LLC; and  
SHEMEKA HUDSON;

Defendants.

No.

**PLAINTIFF DEMANDS TRIAL BY JURY**

2012LC08997  
CALENDAR/ROOM F  
TIME 09:00  
PI Other

**FILED-9**  
2012 AUG 10 AM 8:36  
DOROTHY SHERMAN  
CLERK OF CIRCUIT COURT  
LAW DIVISION

**COMPLAINT AT LAW**

Plaintiff, MARY A. BEAVER, Personal Representative of the Estate of DONNA HALSTEAD, deceased, by and through his/her attorneys, CORBOY & DEMETRIO, P.C., complaining of defendants, MEGABUS USA, LLC ("MEGABUS") and SHEMEKA HUDSON, states:

**Negligence - Bus Strikes Pedestrian in Crosswalk - Wrongful Death**

1. On and prior to August 7, 2012, Canal Street was a roadway running north and south, and Adams Street was a roadway running east and west, and said streets intersected in the City of Chicago, Cook County, Illinois.

2. At said time and place, defendant, MEGABUS, was an interstate motor carrier, licensed to do business in Illinois, and was engaged in the business of transporting passengers.

3. At said time and place, defendant, MEGABUS, operated, maintained, managed, and controlled a bus which was proceeding north on Canal Street and was in the process of making a left turn onto westbound Adams Street.

4. At said time and place, defendant, SHEMEKA HUDSON, was the agent and/or employee of defendant, MEGABUS, and was operating the bus in the course and scope of her duties as agent/employee.

5. At said time and place, plaintiff's decedent, DONNA HALSTEAD, was a pedestrian and was crossing Adams Street in the crosswalk from south to north on the west side of Canal Street.

6. At said time and place, the bus operated by defendants, SHEMEKA HUDSON, and MEGABUS, struck plaintiff's decedent, DONNA HALSTEAD.

7. At said time and place, defendants, MEGABUS and SHEMEKA HUDSON, were negligent in one or more of the following ways:

- a. Operated their motor vehicle without keeping a proper and sufficient lookout;
- b. Failed to yield to the right-of-way to the plaintiff's decedent, a pedestrian, within a crosswalk, in violation of 625 ILCS 5/11-1002;
- c. Failed to exercise due care to avoid colliding with a pedestrian, upon a roadway, and failed to stop to give warning by sounding horn, in violation of 625 ILCS 5/11-1003.1; and
- d. Failed to yield to the right-of-way at intersection to a pedestrian before proceeding with left hand turn, in violation of 625 ILCS 5/11-902.

8. As a proximate result of one or more of the foregoing negligent acts or omissions of defendants, MEGABUS and SHEMEKA HUDSON, DONNA HALSTEAD sustained injuries resulting in her death on August 7, 2012.

9. At the time of her death, DONNA HALSTEAD was survived by her daughter, Mary A. Beaver, and her son, David A. Rubino, both of whom sustained personal and pecuniary loss as a result of the death of DONNA HALSTEAD.

10. MARY A. BEAVER, Personal Representative of the Estate of DONNA HALSTEAD, Deceased, brings this claim pursuant to 740 ILCS 180/1 *et seq.*, commonly known as the Wrongful Death Act of the State of Illinois.

WHEREFORE, plaintiff, MARY A. BEAVER, Personal Representative of the Estate of DONNA HALSTEAD, deceased, demands judgment against defendants, MEGABUS USA, LLC and SHEMEKA HUDSON, 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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Daniel M. Kotin

Daniel M. Kotin  
Corboy & Demetrio, P.C.  
Attorneys for Plaintiff  
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**AFFIDAVIT**

I, DANIEL M. KOTIN, state under oath:

1. I am an attorney associated with Corboy & Demetrio, P.C. and am responsible for filing  
of the Complaint at Law in this matter.

2. The total of money damages sought by plaintiff does exceed \$50,000.00, exclusive of  
interest and costs.



CORBOY & DEMETRIO, P.C.  
By: Daniel M. Kotin

SUBSCRIBED and SWORN to before me  
this 10th day of August, 2012.



NOTARY PUBLIC



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