

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

Hapless Hortense,
Plaintiff,

v.

Carl Careless,
Defendant.

Case No. 25-cv-1234

COMPLAINT

Plaintiff Hortense Hapless, by and through her undersigned attorneys, alleges as follows:

The Parties

1. Plaintiff Hortense Hapless is an individual residing in the State of North Carolina.
2. Defendant Carl Careless is an individual residing in the State of South Carolina.

Jurisdiction and Venue

3. This court has subject matter jurisdiction over the claims herein under 28 U.S.C. § 1332, because the Plaintiff and Defendants are citizens of different states and the amount in controversy between the

Plaintiff and each Defendant, without interest and costs, exceeds the sum or value of \$75,000.

4. Venue is proper in this district under 28 U.S.C. § 1331(b)(2), because a substantial part of the events or omissions giving rise to the claim occurred in this district.

Factual Background

5. On September 1, 2025, at the intersection of Greene and Friendly Streets in Greensboro, North Carolina, Defendant negligently drove an automobile into Plaintiff.

Count I

Negligence

6. Plaintiff repeats and realleges the allegations of Paragraphs 1 through 5 as if fully set forth herein.

7. As a result, Plaintiff was physically injured, lost wages or income, suffered physical and mental pain, and incurred medical expenses. .

Request For Relief

Therefore, Plaintiff requests that the Court enter judgment in her favor and grant the following relief:

(a) Compensatory damages, including medical expenses and lost wages;

- (b) Damages for mental and emotional distress;
- (c) Punitive damages;
- (d) An award of interest, including prejudgment interest, at the legal rate;
- (e) Costs of suit incurred; and
- (f) Such other relief as the court deems necessary, just, and proper.

Dated: October 31, 2025

Respectfully submitted,

Waldorf T. Flywheel

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