

IN THE STATE COURT OF LIBERTY COUNTY
 STATE OF GEORGIA


 Linda Dixon Thompson, Clerk
 Liberty County, Georgia

ANDREA MICHELINE KONIG,)
 INDIVIDUALLY, AND AS)
 ADMINISTRATOR OF THE ESTATE)
 OF ERIK C.K. KONIG,)
)
 Plaintiff,)
)
 v.)
)
 RONALD O. LAIRAMORE, SR.,)
)
 Defendant.)
 _____)

CIVIL ACTION

FILE NO. _____

COMPLAINT

COMES NOW Andrea Micheline Konig, Individually, and as Administrator of the Estate of Erik C.K. Konig, Plaintiff herein, and files her Complaint against Defendant Ronald O. Lairamore, Sr., and shows this Honorable Court as follows:

1.

Plaintiff Andrea Micheline Konig is the surviving mother of Erik C.K. Konig and is the Administrator of the Estate of Erik C.K. Konig.

2.

Defendant Ronald O. Lairamore, Sr. is a resident of 609 Thornwood Way, Hinesville, Liberty County, Georgia 31313, and may be personally served at said address, and is subject to the jurisdiction and venue of this Court.

3.

On or about December 25, 2018, Erik Konig was operating his bicycle northbound on W. Oglethorpe Highway in Liberty County, Georgia. At all times relevant, Erik Konig was exercising reasonable care for his own safety.

4.

On the above-mentioned date, Defendant was operating his vehicle while under the influence of alcohol and/or drugs, and was traveling northbound on W. Oglethorpe Highway when he failed keep a proper lookout, failed to maintain a safe distance, followed too closely, and struck Erik Konig.

5.

At all times relevant hereto, Defendant was operating his vehicle in a reckless, negligent, malicious, willful, and wanton manner which resulted in the above-described collision and caused Erik Konig to suffer fatal injuries, general damages, and special damages.

6.

At all times relevant hereto, Defendant was operating his vehicle while he was under the influence of alcohol and/or drugs.

7.

Defendant is negligent per se because (1) he was driving while under the influence of alcohol and/or drugs and was in violation of other Georgia laws regarding the operation of motor vehicles, (2) he violated Georgia's laws regarding the operation of motor vehicles, (3) the laws were designed to prevent the type of collision involved in the subject litigation, (4) Erik Konig was a member of the class intended to be protected by said laws, and (5) the violation of said laws proximately caused Erik Konig tremendous pain and suffering and ultimately resulted in his death.

8.

Defendant's intentional acts, negligence, and negligence per se proximately caused injuries

to Erik Konig which caused him tremendous pain and suffering and ultimately resulted in his death, and Plaintiff seeks recovery from Defendant for all damages to which she is entitled.

9.

Defendant's conduct, specifically, driving while under the influence of alcohol and/or drugs, constitutes and indicates a conscious, willful, and wanton disregard for the safety of others, evincing such an entire want of care as to raise the presumption of a conscious indifference to the consequences, and is so aggravating as to warrant, justify, and demand the imposition of punitive damages pursuant to O.C.G.A. § 51-12-5.1 to penalize and punish Defendant for his misconduct and to deter him from engaging in such aggravating conduct in the future.

10.

As a direct and proximate result of Defendant's intentional acts, negligence, and negligence per se, Erik Konig suffered both general and special damages, including but not limited to, tremendous pain and suffering, and Plaintiff seeks recovery from Defendant for these damages as well as damages in an amount equal to the full value of the life of Erik Konig.

11.

As a direct and proximate result of Defendant's intentional acts, negligence, and negligence per se, Erik Konig incurred medical expenses prior to this death and also incurred burial expenses. The total amount of such damages incurred before death as well as burial expenses exceed \$500,000.00, the exact amount to be proven at trial, and Plaintiff seeks recovery from Defendant for these damages.

12.

As a direct and proximate result of Defendant's intentional acts, negligence, and negligence

per se, Erik Konig also has suffered a loss of wages he would have earned had he survived. At the time of his death, Erik Konig was an able-bodied person of 33 years of age whose death ended a reasonable life expectancy of more than 50 years. As a result of his injuries and death, Eric Konig lost wage and employment benefits in excess of \$5,000,000.00, the exact amount to be proven at trial, for which Plaintiff seeks recovery.

13.

Defendant has acted in bad faith, has been stubbornly litigious, and has caused Plaintiff unnecessary trouble and expense by forcing Plaintiff to resort to the use of the court system in order to resolve her claim when there is no bona fide controversy. Accordingly, Plaintiff seeks attorney's fees and expenses of litigation pursuant to O.C.G.A. § 13-6-11.

Wherefore, Plaintiff prays that:

- (a) Summons and Complaint be served upon Defendant according to the law;
- (b) Plaintiff recovers from Defendant a sum of damages to compensate for the full value of the life of Erik Konig and for all injuries and damages incurred by the Estate of Erik Konig, including, but not limited to, an amount sufficient to compensate for conscious pain and suffering, medical expenses, burial expenses, and lost wages;
- (c) Plaintiff recover from Defendant a sum of damages to compensate her for attorney's fees and costs of litigation pursuant to O.C.G.A. § 13-6-11;
- (d) Judgment be rendered against Defendant Ronald O. Lairamore, Sr. for punitive damages to punish and to deter like or similar conduct in the future;
- (e) Plaintiff be awarded prejudgment interest on her damages as allowed by law;
- (f) Interest on the judgment be awarded at the legal rate from the date of judgment;

- (g) All costs of this action be taxed against Defendant; and
- (h) Plaintiff have any and all other relief the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial for each claim for which she has a right to a jury.

This 29th day of July, 2020.

Respectfully submitted,

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