

NO. 2012-16428

**H I L E D**  
Chris Daniel  
District Clerk  
MAR 20 2012  
Harris County, Texas  
Deputy  
Time: \_\_\_\_\_  
By \_\_\_\_\_

**RAYMOND PEREZ**  
**Plaintiff,**

**V.**

**JOHN DERIC, WARREN**  
**CREAVALLE, ALEX DIXON, WILL**  
**BRUIN AND DYNAMO**  
**Defendants.**

§ **IN THE DISTRICT COURT**  
§  
§ **209 JUDICIAL DISTRICT**  
§  
§  
§  
§  
§  
§ **OF HARRIS COUNTY, TEXAS**

**PLAINTIFF'S ORIGINAL PETITION**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**NOW COMES RAYMOND PEREZ, hereinafter called Plaintiff, complaining of and about JOHN DERIC, WARREN CREAVALLE, ALEX DIXON, WILL BRUIN and DYNAMO, hereinafter called Defendants, and for cause of action shows unto the Court the following:**

**DISCOVERY CONTROL PLAN LEVEL**

1. Plaintiff intends that discovery be conducted under Discovery Level 2.

**PARTIES AND SERVICE**

2. Plaintiff, RAYMOND PEREZ, is an Individual whose address is TEXAS.
4. Defendant JOHN DERIC, an Individual who is a resident of Texas, may be served with process at his place of employment at the following address: DYNAMO STADIUM, 2222 Texas Street, Houston, Texas 77003 or anywhere he may be found. Service of said Defendant as described above can be effected by personal delivery.

5. Defendant WARREN CREAVALLE, an Individual who is a resident of Texas, may be served with process at the following address: DYNAMO STADIUM, 2222 Texas Street, Houston, Texas 77003 or anywhere he may be found. Service of said Defendant as

*P.Y.*

described above can be effected by personal delivery.

6. Defendant ALEX DIXON, an Individual who is a resident of Texas, may be served with process at his place of employment at the following address: DYNAMO STADIUM. Service of said Defendant as described above can be effected by personal delivery. No service is needed at this time.

7. Defendant WILL BRUIN, an Individual who is a resident of Texas, may be served with process at his place of employment at the following address: DYNAMO STADIUM. Service of said Defendant as described above can be effected by personal delivery. No Service is needed at this time.

8. Defendant DYNAMO, an Individual who is a resident of Texas, may be served with process at his office at the following address: DYNAMO STADIUM. Service of said Defendant as described above can be effected by personal delivery. No service is needed at this time.

#### **JURISDICTION AND VENUE**

9. The subject matter in controversy is within the jurisdictional limits of this court.

10. This court has jurisdiction over the parties because Defendants are Texas residents.

11. Venue in HARRIS County is proper in this cause.

#### **FACTS**

12. The Defendants assaulted the Plaintiff

#### **RAYMOND PEREZ'S CLAIM FOR NEGLIGENCE**

13. Defendants are guilty of negligence

#### **RAYMOND PEREZ'S CLAIM FOR ASSAULT**

14. Defendants are guilty of assault

**DAMAGES FOR PLAINTIFF, RAYMOND PEREZ**

15. As a direct and proximate result of the occurrence made the basis of this lawsuit, Plaintiff, RAYMOND PEREZ, was caused to suffer , and to incur the following damages:

- A. Reasonable medical care and expenses in the past. These expenses were incurred by Plaintiff, RAYMOND PEREZ for the necessary care and treatment of the injuries resulting from the accident complained of herein and such charges are reasonable and were usual and customary charges for such services in HARRIS County, Texas;
- B. Reasonable and necessary medical care and expenses which will in all reasonable probability be incurred in the future;
- C. Physical pain and suffering in the past;
- D. Physical pain and suffering in the future;
- E. Physical impairment in the past;
- F. Physical impairment which, in all reasonable probability, will be suffered in the future;
- G. Loss of earnings in the past;
- H. Loss of earning capacity which will, in all probability, be incurred in the future;
- I. Mental anguish in the past;
- J. Mental anguish in the future;
- K. Fear of future disease or condition;
- L. Cost of medical monitoring and prevention in the future; and
- M. Other damages.

**PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff, RAYMOND PEREZ, respectfully prays that the Defendants be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for the Plaintiff against Defendants, jointly and severally, for damages in an amount within the jurisdictional limits of the Court; together with pre-judgment interest at the maximum rate allowed by law; post-judgment interest at the legal rate, costs of court; and such other and further relief to which the Plaintiff may be entitled at law or in equity.

Respectfully submitted,

By: 

M.T.SANDOVAL  
Texas Bar No. 17624500  
P.O. BOX 1187  
HOUSTON, TEXAS 77251  
Tel. (713) 654-1050  
MTSATTYTX@AOL.COM  
Attorney for Plaintiff  
RAYMOND PEREZ

**PLAINTIFF HEREBY DEMANDS TRIAL BY JURY**