

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS

**TARSHERMIKA AMOS, COREY HUBBARD,
TESHA CUMMINS, ANTONIO CUMMINS,
AND CARLOS BOZEMAN, INDIVIDUALLY
AND AS WRONGFUL DEATH BENEFICIARIES OF
WANDA BELL-FREEMAN, DECEASED**

PLAINTIFFS

V.

CIVIL ACTION NO. : _____

**SHORTER COLLEGE GARDENS, INC., MILLENNIA
HOUSING MANAGEMENT, LTD., SUMMIT UTILITIES,
INC., SUMMIT UTILITIES ARKANSAS, INC.
ARKANSAS OKLAHOMA GAS CORPORATION,
CENTERPOINT ENERGY, INC., DIEDRA LADD, AND
JOHN DOES 1-10**

DEFENDANTS

**COMPLAINT
(TRIAL BY JURY REQUESTED)**

COME NOW, Plaintiffs, Tarshermika Amos, Corey Hubbard, Antonio Cummins, Tesha Cummins, and Carlos Bozeman, individually and as wrongful death beneficiaries of Wanda Bell-Freeman, deceased, by and through undersigned counsel and pursuant to the laws of the State of Arkansas and the Arkansas Rules of Civil Procedure, and file this Complaint against Defendants Shorter College Gardens, Inc., Millennia Housing Management, Ltd., Summit Utilities, Inc. Summit Utilities Arkansas, Inc., Arkansas Oklahoma Gas Corporation, CenterPoint Energy, Inc., Diedra Ladd, and John Does 1-10. In support thereof, Plaintiffs would respectfully show unto this Honorable Court the following, to-wit:

I. JURISDICTION AND VENUE

1. This Honorable Court has jurisdiction and venue over the parties and this cause of action. This civil action arises out of the tortious acts and omissions of the Defendants committed in whole or in part in Pulaski County in the State of Arkansas against residents of the State of Arkansas.

2. Venue is proper because the present action has been instituted where the act(s) and/or omission(s) of the individual defendants occurred.

3. Plaintiffs Tarshermika Amos, Corey Hubbard, Antonio Cummins, Tesha Cummins, and Carlos Bozeman have standing to bring the instant action as no personal representative or executor/administrator has been appointed by the Court.

4. Plaintiff Casandra Denzmore has standing to bring the instant action as no personal representative or executor/administrator has been appointed by the Court.

II. PARTIES

5. Plaintiff Tarshermika Amos is an adult resident citizen of Little Rock, Pulaski County, AR.

6. Plaintiff Corey Hubbard is an adult resident citizen of Milwaukee, WI.

7. Plaintiff Tesha Cummins is an adult resident citizen of Milwaukee, WI.

8. Plaintiff Antonia Cummins is an adult resident citizen of North Little Rock, Pulaski County, AR.

9. Plaintiff Carlos Bozeman is an adult resident citizen of Jacksonville, AR.

10. Defendant Shorter College Gardens, Inc. is an Arkansas non-profit corporation who may be served through its registered agent, A. S. Johnson, located at 604 Locust Street, North Little Rock, AR.

11. Defendant Millennia Housing Management, Ltd. is a foreign corporation formed under the laws of the State of Ohio but authorized to do business in the State of Arkansas and may be served through its registered agent, CT Corporation, located at 124 West Capitol Avenue, Suite 1900, Little Rock, AR 72201.

12. Defendant Summit Utilities, Inc. is a foreign corporation who may be received by certified mail at its corporate office at 10825 E. Geddes Avenue, Suite 410, Centennial, CO, 80112.

13. Defendant Summit Utilities Arkansas, Inc. is a foreign corporation formed under the laws of the State of Colorado but authorized to do business in the State of Arkansas and may be served through its registered agent, Cogency Global, Inc., 125 Twin Lakes Drive, Little Rock, AR 72205.

14. Defendant Arkansas Oklahoma Gas Corporation is an Arkansas corporation who may be served through its registered agent, Cogency Global, Inc., 1215 Twin Lakes Drive, Little Rock, AR 72205.

15. Defendant CenterPoint Energy, Inc. is a foreign corporation who may be served through its registered agent, CT Corporation System, 124 West Capitol Avenue, Suite 1900, Little Rock, AR 72201 or at its corporate office located at 1111 Louisiana Street, Houston, TX 77002.

16. Defendant Diedra Ladd is an adult resident citizen of the State of Arkansas and may be served at 800 N. Beech Street, North Little Rock, AR.

17. Defendants John Does 1-10 are other individuals, persons, corporate persons or entities who may be liable for all or part of the negligible acts or omissions committed resulting in the subject incident which involved and resulted in the horrific

death of Wanda Bell-Freeman and Eloise Childs. Plaintiffs are currently unable to identify these Defendants despite diligent efforts. Said Defendants are named insofar as their acts and/or omissions were negligent and/or otherwise tortious with respect to the security, supervision and/or protection of Plaintiffs. Alternatively, these Defendants are liable for the negligent and/or otherwise tortious acts and/or omissions of others with respect to the security, supervision and/or protection of Plaintiffs.

III. FACTS

18. Defendant Summit Utilities, Inc. owns natural gas distribution and transmission subsidiaries that operate in Arkansas, Colorado, Maine, Missouri, and Oklahoma. Defendant Summit Utilities, Inc. holds itself out to provide safe, clean and affordable natural gas to businesses and residents in five states through Colorado Natural Gas, Summit Natural Gas of Missouri, Inc., Summit Natural Gas of Maine, Inc. and Arkansas Oklahoma Gas Corporation. Each of Summit's subsidiaries constructs and installs natural gas distribution systems with the goal of supporting economic development by providing clean-burning, safe and reliable natural gas to residential and commercial customers through exceptional customer service and commitment to community. Overall, Summit entities serve approximately 100,000 customers and operate more than 5,400 miles of pipeline in Arkansas, Colorado, Maine, Missouri and Oklahoma.

19. Defendants Summit Utilities, Inc. operates Colorado Natural Gas, Summit Natural Gas of Missouri, Inc., Summit Natural Gas of Maine, Inc. and Arkansas Oklahoma Gas Corporation (collectively "Summit Defendants") are privately held utility and gas transmission companies that hold themselves out to be a "natural gas energy

provider [providing services] to 525,000 families and businesses throughout Arkansas, Oklahoma, and the Texarkana, Texas area. In those three states, [Summit] operate 17,000 miles of gas main pipeline with the [alleged] goal of providing safe, clean, and reliable natural gas to [their] service areas through exceptional customer care and an unwavering commitment to community.”

20. Upon information and belief, Summit Utilities, Inc., Summit Utilities Arkansas, Inc., and Arkansas Oklahoma Gas Corporation are a single enterprise whose duties, at all times relevant to this Complaint, included but were not limited to:

- a. Day-to-day control of personnel management for all employees in the corporate enterprise who made decisions regarding gas distribution in North Little Rock;
- b. Approval of decisions regarding employees who work or assist in the work performed in North Little Rock;
- c. Management of the on-site managers or management were handled through the corporate enterprise;
- d. Management of personnel were handled through the corporate enterprise;
- e. Substantial periodic financial support supplied through the corporate enterprise; and
- f. Approval of staffing were handled through the corporate enterprise.

Upon information and belief, the Summit Defendants have a close interrelation of operations, as well as centralized control of personnel matters, common management and common ownership and financial control. Upon information and belief, the Summit

Defendants are a single employer enterprise in terms of function and for purposes of sharing in liabilities of members of the corporate enterprise.

21. Summit Defendants, through the single enterprise, serve over 625,000 customers and operates more than 23,400 miles of pipeline in six states. Summit holds themselves out to be “resilient, agile, inclusive, and deeply committed to its people, communities, and building a sustainable energy future.”

22. On or about January 10, 2022, Summit Utilities, Inc. announced it closed on its acquisition of the gas distribution assets of CenterPoint Energy, Inc. (“CenterPoint”) in Arkansas, Oklahoma and Texarkana, Texas.

23. Upon information and belief, Defendant CenterPoint Energy Services, Inc. operated and maintained the gas distribution system in North Little Rock, Arkansas prior to January 10, 2022.

24. Upon information and belief, Defendant CenterPoint Energy Services, Inc. knew or should have known of gas pressure issues and/or other gas issues at 800 North Beech Street, North Little Rock, AR and failed to properly maintain the gas lines.

25. Upon information and belief, prior to their acquisition of Defendant CenterPoint Energy Services, Inc.’s gas distribution system, the Summit Defendant failed to conduct an adequate inspection or failed to test the pressure in the gas distribution system that provided gas to 800 North Beech Street. Or, in the alternative, upon information and belief, the Summit Defendants were aware of the problems with the gas distribution system and failed to repair the system.

26. Sometime in January 2022, CenterPoint Energy, Inc. sold its natural gas distribution utilities in Arkansas and Oklahoma to Summit Utilities, Inc. The assets included approximately 17,000 miles of main pipeline in Arkansas.

27. Defendants Shorter College Gardens, Inc. and Millennia Housing Management, Ltd. and John Doe 1 own, operate and rent apartments at 800 N. Beech Street, North Little Rock, AR.

28. On or about October 4, 2022, Wanda Bell-Freeman, deceased, was a lawful resident of 800 N. Beech Street, North Little Rock, AR.

29. Eloise Childs, deceased, was a guest of Wanda Bell-Freeman at 800 N. Beech Street, North Little Rock, AR.

30. In the weeks prior to October 4, 2022—and, more specifically on October 3, 2022, tenants complained to management, including but not limited to Defendant Diedra Ladd that they smelled what they believed to be natural gas. In fact, on October 3, 2022, Wanda Bell-Freeman complained to management/maintenance about the smell of gas.

31. In the early morning hours of October 4, 2022, a fire erupted in Ms. Bell-Freeman's apartment unit due to an explosion from the leaking gas.



32. Unfortunately, Ms. Bell-Freeman's apartment at 800 N. Beech Street, North Little Rock, AR did not have functioning and/or adequate smoke detectors, fire alarms, fire extinguishers, or other fire abatement equipment. Unfortunately, no one addressed the tenants' complaints about the smell of gas.

33. As a result of the fire, Ms. Bell-Freeman and Ms. Childs perished along with another adult.

34. Ms. Bell-Freeman and others were not removed from the fire and smoke-filled units until fire fighters arrived and extinguished the flames. Ms. Bell-Freeman and others were heard screaming while they died in the most horrific fashion imaginable.

35. Upon information and belief, at the time of the fire, Shorter College Gardens had inadequate, improperly trained maintenance personnel and managers.

36. Upon information and belief, Shorter College Gardens were required to have functioning smoke detectors if it were to receive funds from HUD's Section 8 program. **(By making this allegation, Plaintiffs are NOT asserting any federal claims**

but is only asserting it should have functioning smoke detectors if it accepted Section 8 funds.)

37. Upon information and belief, Defendants Diedra Ladd knew from prior knowledge that the smoke detectors and fire alarms were either inoperable or not present and there was a gas leak.

38. Upon information and belief, the Summit Defendants, Defendant CenterPoint, and John Does 1-10, through their employees, provided maintenance services, including but not limited to installing/replacing/inspecting gas lines. As such, these defendants are liable for the negligent acts of its employees.

39. Defendants Shorter College Gardens, Inc., Millennia Housing Management, Ltd and Diedra Ladd knew or should have known that reasonable fire protection measures and warnings were needed for tenants and/or others and that no warnings were provided and the fire protection measures provided were unreasonable and inadequate to warn decedents or others.

40. Defendants Shorter College Gardens, Inc., Millennia Housing Management, Ltd and Diedra Ladd knew or should have known that gas leak preventions were needed for tenants and/or others and that they needed to provide warnings of an active gas leak.

41. Defendants collectively failed to fulfill their joint, several, and collective duty to use reasonable care and to take adequate and reasonable precautions or measures to protect residents and their guests of their apartment units from foreseeable harm and danger, including the harm suffered by Wanda Bell-Freeman, Eloise Childs and others on the day in question.

42. Defendants collectively failed to fulfill their joint, several, and collective duty to take reasonable safety measures, including but not limited to having and maintaining fully functioning smoke detectors and/or fire alarms.

43. Defendants collectively failed to fulfill their joint, several, and collective duty to take reasonable safety measures, including but not limited to having and maintaining non-leaking gas lines.

44. As a result, Defendants pursuant to the doctrine of respondeat superior, as well as for any negligence of their own.

45. As a direct and proximate result of the collective negligence and breach of duties of care of the Defendants, Wanda Bell-Freeman and Eloise Childs died as a result of an apartment fire.

CLAIMS FOR RELIEF
COUNT I - NEGLIGENT HIRING, RETENTION, SUPERVISION, CONTROL
AND FAILURE TO TAKE REMEDIAL ACTION

46. Plaintiffs re-allege and incorporate herein the foregoing allegations of this Complaint as if set forth herein in their entirety.

47. At the time and on the occasion in question, Defendants had a duty to exercise ordinary care in the hiring, supervising and training of its employees, as well as in the maintenance of its fire safety measures. Defendants breached that duty in the following respects, among others:

- (a) failing to adequately inquire into the competence of their employees, agents or servants;
- (b) failing to adequately train their employees, agents or servants;
- (c) failing to properly supervise their employees, agents or servants;

- (d) failing to comply with industry standards and regulations regarding safety measures, fire protection, and gas leak detections and;
- (f) other acts of negligent hiring, retention, supervision and control as will be more fully shown at trial.

The above acts constitute negligence and were each a proximate cause of the occurrence in question. Further, the act(s) and/or omission(s) of Defendants proximately caused Plaintiffs' damages.

COUNT II – PREMISES LIABILITY

48. Plaintiffs re-allege and incorporate herein the foregoing allegations of this Complaint as if set forth herein in their entirety.

49. Defendants Shorter College Gardens, Inc., Millennia Housing Management, Ltd and Diedra Ladd as the proprietor(s)/operator(s) of a business in Arkansas owed Wanda Bell-Freeman and Eloise Childs a duty to maintain the premises in a reasonably secure or safe condition, including duty to exercise reasonable care to protect them from reasonably foreseeable injury. At all relevant times hereto, the aforementioned Defendants were negligent in their failure to fulfill their duty of ordinary reasonable care to make Shorter College Gardens Apartments reasonably safe, including failing to take reasonable precautions or measures to protect patrons from the foreseeable harm suffered by Wanda Bell-Freeman and Eloise Childs.

50. Defendants were or should have been aware of the defective conditions of the premises, including, but not limited to, fully functioning smoke detectors, fire alarms, carbon monoxide detectors, leaking gas lines, among other things.

51. Defendants had actual or constructive knowledge of the lack of smoke detectors and other fire protection items, leaking gas lines, among other things. Defendants failed to take reasonable, timely corrective action in spite of their actual and/or constructive knowledge, which proximately caused death of Wanda Bell-Freeman and Eloise Childs.

52. Defendants had actual or constructive knowledge of the necessity of warning residents and invitees of the inadequate fire protection measures, including but not limited to the lack of smoke detectors and fire alarms, leaking gas lines, among other things. Defendants failed to take reasonable, timely corrective action in spite of their actual and/or constructive knowledge, which proximately caused the death of Wanda Bell-Freeman and Eloise Childs.

53. Defendants had actual or constructive knowledge of the necessity of reasonable inspection of Shorter College Gardens Apartments and the need to make the premises safe from the foreseeable harm suffered by Wanda Bell-Freeman and Eloise Childs. Defendants failed to take reasonable, timely corrective action in spite of their actual and/or constructive knowledge, which proximately caused the death of Wanda Bell-Freeman and Eloise Childs.

COUNT III - WRONGFUL DEATH

54. Plaintiffs re-allege and incorporate herein the foregoing allegations of this Complaint as if set forth herein in their entirety.

55. Wanda Bell-Freeman had a reasonable life expectancy of years remaining. Wanda Bell-Freeman was a good, faithful and industrious women. She gave her family wise counsel, advice and help, and in all reasonable probability would have continued to

advise and counsel them to the best of her ability. By reason of the death of Wanda Bell-Freeman, the decedent's beneficiaries have been damaged in an amount in excess of the jurisdictional limits of this Court as will be proven at trial, including but not limited to those damages outlined herein.

56. Plaintiffs assert claims for the recovery of damages in the amount the jury determines to be just, taking into consideration all damages of every kind to the decedent and all damages of every kind to any and all interested parties in the suit, pursuant to Arkansas' wrongful-death statute. These claims shall include but shall not be limited to: (1) medical and funeral costs; (2) the present net cash value of the life expectancy of the deceased; (3) the loss of the companionship and society of the decedent; (4) the pain and suffering of the decedent between the time of injury and death; (5) punitive damages, and (6) any other element of damages awarded by the Court.

57. By reason of the negligence and/or gross negligence of the Defendants, and the death of Wanda Bell-Freeman, it was reasonably necessary to provide for the funeral service and the burial, a sum which was fair, reasonable, customary and necessary.

COUNT IV – NEGLIGENCE

58. Plaintiffs re-allege and incorporate herein the foregoing allegations of this Complaint as if set forth herein in their entirety.

59. Defendants, as the owner(s) and/or operator(s) of a business premises, owe a duty to exercise reasonable care to protect the decedents from reasonably foreseeable injuries, specifically, the duty to provide reasonable safety measures for the protection of

all residents, invitees, guests and patrons of the apartment complex from foreseeable harm.

60. Defendants and other relevant employees/agents owe a duty to invitees to exercise reasonable care to protect said invitee from reasonably foreseeable injuries, specifically the duty to make the premises safe and to provide adequate safety measures.

61. Defendants knew or should have known before the date of the subject incident that the subject premises were not adequately equipped with fire protective measures, such as smoke detectors among other things, and had a leaking gas line. As a result, Defendants were aware that the apartments were not reasonably safe for their residents.

62. Despite its knowledge of these unsafe conditions, Defendants did nothing to remedy or address the unsafe conditions and inadequacies.

63. More specifically, Wanda Bell-Freeman and Eloise Childs' death occurred as a result and proximate consequence of Defendants' negligence, breach of duty of care, failure to warn of inadequate or non-existing fire protection, among other things, and for failing to ensure that the property was being properly maintained and failure to provide adequate fire protection on the property.

64. As a direct and proximate result of the collective negligence and breach of duty of care of Defendants, Wanda Bell-Freeman and Eloise Childs died as a result of an apartment fire. As a result, Plaintiffs seek damages, including but not limited to, for wrongful death, mental pain and suffering, emotional distress, conscious pain and suffering, loss of past and future earnings, and any other economic, non-economic,

actual, compensatory, incidental, and/or consequential damages recoverable, pursuant to Arkansas Wrongful Death statute or any other relevant statute.

COUNT V – GROSS NEGLIGENCE

65. Plaintiffs re-allege and incorporate herein the foregoing allegations of this Complaint as if set forth herein in their entirety.

66. The actions of Defendants when viewed objectively, involved an extreme degree of risk considering the probability and magnitude of the potential harm to the decedents. Defendants had actual, subjective awareness of the risk, but nevertheless preceded with conscious indifference to the rights, safety or welfare of decedents herein and as such constitutes gross negligence (malice) as the term is defined under Arkansas law. As a result, Plaintiffs are entitled to the recovery of punitive damages.

67. Defendants were grossly negligent inasmuch as they should have been on notice as to any previous negligent act(s) and/or omission(s) of its employees, agents, and/or servants in the following particulars, among others:

- (a) failing to have adequate fire alarms and smoke detectors when they have represented that they were present;
- (b) representing that they had fire alarms and smoke detectors when in fact they did not; and
- (f) other acts of negligence as will be more fully shown at trial.

The above acts constitute gross negligence and were each a proximate cause of the occurrence in question. Further, the act(s) and/or omission(s) of Defendants proximately caused Plaintiffs' damages.

COUNT VI - RESPONDEAT SUPERIOR

68. Plaintiffs re-allege and incorporate herein the foregoing allegations of this Complaint as if set forth herein in their entirety.

69. Certain John Doe Defendants 2-10 was/were in the course and scope of his/her employment with Shorter College Gardens, Inc., Millennia Housing Management, Ltd., Summit Utilities, Inc., Summit Utilities Arkansas, Inc., Arkansas Oklahoma Gas Corporation, and CenterPoint Energy, Inc., at all relevant times immediately subsequent and preceding the accident in question, and therefore, these Defendants are liable for the negligence of its employee(s)/statutory employee(s).

70. At all pertinent times, Defendants collectively were in sole and complete control of their fire protection measures and personnel as well as the individuals they allowed onto their premises. Defendants negligently, recklessly failed to exercise the power necessary to avert such casualty by insuring that the proper supervision, experience, and fire safety measures were in place to avoid Wanda Bell-Freeman and Eloise Childs' death.

71. Defendants were presented with an available opportunity to avoid the resulting incident. Defendants, however, failed to exercise such control over their fire safety measures, among other things, to prevent the death of decedents.

72. The duty of care owed to decedents was therefore breached by the Defendants.

73. The manner of injuries sustained by decedents/Plaintiffs is the type of event that does not ordinarily occur in the absence of negligence.

74. The act(s) and/or omission(s) of these Defendants, under the present set of circumstances, provide an inference of negligence of the part of these Defendants, either

individually or collectively, so as to establish a prima facie case. The mere occurrence of this incident and the resulting injury, taken with the surrounding circumstances, should allow for an inference of negligence against these Defendants.

75. The above acts constitute negligence and were each a proximate cause of the occurrence in question. Further, the act(s) and/or omission(s) of these Defendants proximately caused the death of Wanda Bell-Freeman and Eloise Childs.

COUNT VII: STRICT LIABILITY

76. Plaintiffs re-allege and incorporate herein the foregoing allegations of this Complaint as if set forth herein in their entirety.

77. At all times herein, the Summit Defendants and Defendant CenterPoint Energy were the owners and operators of the pipeline.

78. At all times relevant to this action, the Summit Defendants and Defendant CenterPoint Energy had supervision, custody, and control of the pipeline.

79. At all times relevant to this action, the Summit Defendants and Defendant CenterPoint Energy were under a continuing duty to protect the decedents and others from the natural consequences of a gas leak from the pipeline.

80. The Summit Defendants and Defendant CenterPoint Energy were engaged in an ultrahazardous activity by distributing natural gas.

81. Plaintiffs were harmed as a result of the Summit Defendants and Defendant CenterPoint Energy failure to maintain and inspect the pipes which led to a gas leak.

82. The injuries sustained by Plaintiff and the Class as a result of the leak and its aftermath were the direct and proximate result of the Summit Defendants and Defendant CenterPoint Energy's activities.

83. The harm to Plaintiffs and the decedents was and is the kind of harm that would be reasonably anticipated as a result of the risks created by distributing natural gas and not properly maintaining the pipeline that transmit gas to 800 N. Beech Street, North Little Rock, AR.

84. The Summit Defendants and Defendant CenterPoint are liable to Plaintiffs for all damages arising from this ultrahazardous activity, including but not limited to all compensatory damages, and punitive damages

85. The wrongful acts, representations and/or omissions of the Summit Defendants and Defendant CenterPoint, hereinabove set forth, were made, adopted, approved, authorized, endorsed and/or ratified by their officers, directors or managing agents, and were done maliciously, oppressively, fraudulently and/or with a willful and knowing disregard of the probable dangerous consequences for the health and safety of Plaintiffs and their community. The officers, directors and/or managing agents of Defendants had advanced knowledge of aging infrastructure, including but not limited to: aging pipelines, and/or safety systems; and/or the lack of an effective integrity management program to ensure the safety of the operation of their gas platform and pipelines. The officers, directors and/or managing agents of the Summit Defendants and Defendant CenterPoint also had advanced knowledge that a failure to maintain, inspect, assess, replace, and/or repair infrastructure would result in the probability of a catastrophic event, which foreseeably would lead to harm and/or injuries to the health and safety of Plaintiffs and their community, generally. In failing to take protective measures to safeguard against the danger, the officers, directors and/or managing agents of the Summit Defendants and Defendant CenterPoint acted with a willful and/or knowing

disregard of the probable dangerous consequences, and/or acted with an awareness of the probable dangerous consequences of their conduct and deliberately failed to avoid those consequences, thereby creating a substantial risk of injury to Plaintiff and the community at large.

PRAYER FOR RELIEF

Plaintiffs re-allege and incorporate herein the foregoing allegations of this Complaint as if set forth herein in their entirety.

Pursuant to the Arkansas Rules of Civil Procedure, Plaintiffs demand that all issues of fact in this case be tried by a jury.

Plaintiffs and for their causes of action, prays for judgment against all Defendants, as follows:


1. For damages to be determined by the jury, in an amount exceeding the minimum jurisdictional requirement of this Court, and adequate to compensate Plaintiffs for all the injuries and damage sustained;
2. For all general and special damages caused by the conduct of Defendants;
3. For the costs of litigating this case;
4. For punitive damages sufficient to punish Defendants for their egregious conduct and to deter all Defendants from repeating such atrocities; and
5. For all other relief to which Plaintiffs are entitled by Arkansas law.

Dated this the 13th day of October, 2022.

Respectfully submitted,

**TARSHERMIKA AMOS, COREY HUBBARD,
TESHA CUMMINS, AND CARLOS
BOZEMAN, INDIVIDUALLY AND AS**

**WRONGFUL DEATH BENEFICIARIES OF
WANDA BELL-FREEMAN, DECEASED**

BY: 
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