

19<sup>TH</sup> JUDICIAL DISTRICT COURT  
EAST BATON ROUGE PARISH  
STATE OF LOUISIANA

NUMBER: \_\_\_\_\_

DIVISION: \_\_\_\_

LOUISIANA DEPARTMENT OF  
TRANSPORTATION & DEVELOPMENT

VS

GREGORY L. WRENN , JAMES FRANCO ESPERICUETA,  
TRAVIS MICHAEL ROBINSON TREYLIN GRACE  
CLEVELAND, STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY AND GOAUTO INSURANCE  
COMPANY

FILED: \_\_\_\_\_

\_\_\_\_\_DY CLERK

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PETITION

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The Louisiana, Department of Transportation and Development respectfully represents:

**1.**

Made defendants herein are:

- A. **James Franco Espericueta**, (“Espericueta”) a natural person of the full age of majority that can be served at 224 Jim Arrant Rd. W., Monroe, LA 71291;
- B. **Travis Marcel Robinson** (“Robinson”), a natural person the full age of majority that can be served at 107 W. Westridge Dr. Apartment B; West Monroe, LA 71291;
- C. **Treylin Grace Cleveland**, (“Cleveland”), a natural person the full age of majority that can be served at 888 Highway 80 E. Tallulah, LA 71282
- D. **Gregory L Wrenn**, (“Wrenn”), a natural person of the full age of majority that can be served at 106 Shalimar Dr. W. Monroe, LA 71291;
- E. **State Farm Mutual Automobile Insurance Company** (“State Farm”) a foreign insurer conducting business in Louisiana that can be served through the Louisiana Secretary of State at 8585 Archives Avenue, Baton Rouge, Louisiana 70809,
- F. **GoAuto Insurance Company**, (“GoAuto”) a domestic insurer that can be served through its registered agent Gregory W. Tramontin at 533 Highlandia Dr., Suite A Baton Rouge, LA 70810

who are justly and truly indebted unto the plaintiff for the following:

**2.**

Plaintiff is responsible for the administration, construction, improvement, maintenance, and repair of public transportation systems, traffic control devices, bridges, overpasses traffic barriers and guardrails under La. R. S. 48:11, and 36:501 et seq.

**3.**

Plaintiff is entitled to file and prosecute this suit without the payment of court costs in advance or as the same accrue under La. RS. 13:4521.

**4.**

Plaintiff owns an impact attenuator in Ouachita Parish, Louisiana at or near the intersection of Interstate 20 and Lee Joyner Memorial Expressway that was damaged in three, (3) motor vehicle accidents that occurred between September 13 and September 16, 2023 without sufficient time for plaintiff to document the full nature and extent of damages caused by each accident.

**5.**

The first accident occurred on September 13, 2023 at approximately 10:50 PM while Wrenn was operating a 2021 Ford Bronco, VIN # 3FMCR9D90MRB38669 and collided with the impact attenuator

**6.**

The second accident occurred on September 16, 2023 at approximately 4:42 PM, while Espericueta was operating a 2020 Dodge Charger, VIN #: 2C3CDXGJ2LH177324 at a high rate of speed and collided with a 2005 Pontiac Grand Am, VIN # 2G2WS522051283290 operated by Robinson, which was pushed into the impact attenuator.

**7.**

The third accident occurred shortly thereafter, at approximately 7:08 PM, when Cleveland was collided with the impact attenuator while driving a 2017 Ford Fusion VIN # 3FA6P0HD5HR363800.

**8.**

The accidents and resulting damages were caused by the concurrent fault of Wrenn, Espericueta, Robinson, and Cleveland which included:

- a) failing to keep a proper lookout;
- b) failing to keep proper control of said motor vehicle
- c) failing to take the proper evasive action to avoid the resulting collision;

- d) failing to maintain the vehicle as required for safe operation;
- e) failing to slow or stop the motor vehicle in time to avoid the resulting collision;
- f) operating the motor vehicle in a careless manner; and,
- g) all other acts and omissions shown at the trial of this matter.

**9.**

Espericueta was insured under a policy of liability insurance issued by State Farm, Policy Number 426-4073-A01-18 that provides coverage for plaintiff's damages.

**10.**

Robinson was insured under a policy of liability insurance issued by GoAuto, Policy Number 987787-13 that provides coverage for plaintiff's damages.

**11.**

Venue is proper under Louisiana Code of Civil Procedure article 42(7), La. R. S. 13:3203 & 22:1269(B) (1).

**12.**

Cleveland was insured under a policy of liability insurance issued by GoAuto, Policy Number 344049-27 that provides coverage for plaintiff's damages.

**WHEREFORE**, The Louisiana Department of Transportation and Development prays that after due proceedings are had, for entry of the judgment in its favor and against defendants, James Franco Espericueta, Travis Michael Robinson Treylin Grace Cleveland, State Farm Mutual Automobile Insurance Company and GoAuto Insurance Company finding them jointly and solidarily liable unto the Plaintiff for all damages allowed by law.

Plaintiff further prays for all other relief that is appropriate under the premises considered.

Respectfully Submitted,

**LOUISIANA DEPARTMENT OF  
TRANSPORTATION AND DEVELOPMENT**



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**PLEASE SERVE:**

**James Franco Espericueta,  
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West Monroe, La 71291**

**Travis Michael Robinson  
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West Monroe, La 71291**

**Treylin Grace Cleveland  
888 Highway 80 E.  
Tallulah, LA 71282**

**GoAuto Insurance Company  
Gregory W. Tramontin  
533 Highlandia Dr., Suite A  
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**State Farm Mutual Automobile Insurance Company  
Though the Louisiana Secretary of State  
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