

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

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

DIVISION: \_\_\_\_

STATE OF LOUISIANA, DEPARTMENT OF  
TRANSPORTATION & DEVELOPMENT  
VS

DARREN MICHAEL HARRISON AND GEICO GENERAL  
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. **Darren Michael Harrison**, (“Harrison”) a natural person of the full age of majority that can be served at 3912 S. I 10 Service Rd. W., Apt. 163, Metairie, LA 70001; and,
- B. **GEICO General Insurance Company**, (“Geico”) 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,

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 bridge rail that was damaged in a single vehicle accident on November 14, 2022, while Harrison was operating a 2015, GMC pickup, VIN #: 3GTU2WEC9FG301677 on Interstate 10 in Ascension Parish, Louisiana.

5.

The accident and resulting damages were caused by the sole fault of Harrison 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.

**6.**

Harrison was insured under a policy of liability insurance issued by Geico, Policy Number 8008413000 that provides coverage for plaintiff's damages.

**7.**


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

**WHEREFORE**, The State of Louisiana, Department of Transportation and Development prays that after due proceedings are had, for entry of the judgment in its favor and against defendants, Darren Michael Harrison and GEICO General 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:**

**Darren Michael Harrison  
3912 S. I 10 Service Rd. W., Apt. 163  
Metairie, LA 70001**

**GEICO General Insurance Company  
Through the Louisiana Secretary of State  
8585 Archives Avenue  
Baton Rouge, Louisiana 70809**

