

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF CHARLOTTESVILLE

SHARON D. LOVE, ADMINISTRATOR OF THE ESTATE  
OF YEARDLEY R. LOVE, DECEASED,

Plaintiff,

v.

Case No.: 2012-130

GEORGE W. HUGUELY, V,

Defendant.

FILED  
APR 26 2012

2012 APR 26 A 10:11 L

CIRCUIT COURT CLERK'S OFFICE  
CHARLOTTESVILLE, VA  
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BY: *[Signature]*  
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### COMPLAINT

COMES NOW the plaintiff, Sharon D. Love, Administrator of the Estate of Yeardley R. Love, Deceased, and for her Complaint, seeking judgment and award of execution against the defendant, George W. Huguely, V, states as follows:

#### I. PARTIES

1. The plaintiff is Sharon D. Love, who qualified in the Circuit Court of the City of Charlottesville, Virginia as Administrator of the Estate of Yeardley R. Love, Deceased ("Love"), who died on or about May 3, 2010 as a result of injuries she suffered as a result of the actions of the defendant, George W. Huguely, V ("Huguely").
2. The statutory beneficiaries of the Estate of Yeardley R. Love are her mother, Sharon D. Love, and her sister, Alexis D. Love.
3. The defendant is George W. Huguely, V.

#### II. BACKGROUND FACTS

4. Love and Huguely, both students at the University of Virginia, had been in a girlfriend-boyfriend relationship prior to May 2, 2010.

5. On May 2-3, 2010, Huguely entered Love's apartment, located in the City of Charlottesville, Virginia, and engaged in a physical altercation with Love ("the Occurrence"), ultimately resulting in injuries to Love and her death.

6. At the time of her death, Love was 22 years of age, and pursuant to the Table of Life Expectancy, Virginia Code Section 8.01-419, she had a life expectancy of 58.9 years. Plaintiff brings this lawsuit seeking compensatory damages in the sum of \$29,450,000.

7. As a result of her death, the statutory beneficiaries of Love, her mother, Sharon D. Love, and her sister, Alexis D. Love, have suffered substantial damages.

**COUNT ONE – ALTERNATIVE COUNT - NEGLIGENCE –  
FAILURE TO USE ORDINARY CARE**

8. This Count is one of several alternative counts: that Huguely was negligent in the Occurrence, insofar as he failed to use ordinary care, leading to an accident for which he was responsible that resulted in the injuries and death of Love.

9. The negligence of Huguely was a proximate cause of Love's injuries and death.

**COUNT TWO – ALTERNATIVE COUNT – NEGLIGENCE –  
INDIFFERENCE AND ACTING WITH UTTER DISREGARD OF CAUTION**

10. This Count is one of several alternative counts: that Huguely was negligent in the Occurrence, insofar as he acted with such indifference to Love that his conduct constituted an utter disregard of caution amounting to a complete neglect of the safety of Love.

11. The negligence of Huguely as stated in Paragraph 10 was a proximate cause of Love's injuries and death.

**COUNT THREE – ALTERNATIVE COUNT – NEGLIGENCE – ACTING WITH  
CONSCIOUS DISREGARD AND RECKLESS INDIFFERENCE**

12. This Count is one of several alternative counts: that Huguely was negligent in the Occurrence, insofar as he acted with a conscious disregard for the safety of Love and/or with a reckless indifference to the consequences to Love when Huguely was aware, or should have been aware, of his conduct and from his knowledge of the existing circumstances, that his conduct would probably result in injury and/or death to Love.

13. The negligence of Huguely as stated in Paragraph 12 was a proximate cause of Love's injuries and death.

**COUNT FOUR – ALTERNATIVE COUNT – WILLFUL AND MALICIOUS  
INJURY AND DEATH TO LOVE**

14. This Count is one of several alternative counts: that in the Occurrence, Huguely willfully and maliciously caused the injuries and/or death of Love.

**COUNT FIVE – ALTERNATIVE COUNT – ASSAULT AND/OR BATTERY**

15. This Count is one of several alternative counts: that in the Occurrence, Huguely's actions constituted an assault and/or battery of Love.

16. As a result of the assault and/or battery of Love by Huguely, Love suffered injuries and death.

**COUNT SIX – ALTERNATIVE COUNT - PUNITIVE DAMAGES**

17. This Count is one of several alternative counts: that Huguely's actions on May 2-3, 2010 were willful and/or wanton and/or malicious and/or done with actual malice

and/or so reckless as to evince a conscious disregard for the safety and life of Love, such that an award of punitive damages is warranted.

### DAMAGES

18. As a proximate result of the accidental negligence of Huguely, as set forth in the alternative in Count One, and/or in the alternative, the negligence of Huguely as set forth in Count Two, and/or in the alternative, the negligence of Huguely, as set forth in Count Three, and/or in the alternative, Huguely's willful and malicious injury and death of Love, as set forth in Count Four, and/or in the alternative, Huguely's assault and/or battery of Love, as set forth in Count Five, Love died and the statutory beneficiaries of Love suffered the following damages: sorrow, mental anguish, and loss of solace, which may include society, companionship, comfort, guidance, kindly offices, and advice of the decedent; reasonably expected loss of income of the decedent; reasonably expected loss of services, protection, care, and assistance of the decedent; reasonable funeral and burial expenses; and such punitive damages as may be awarded pursuant to Counts Three, Four, Five and/or Six; and have otherwise been damaged and suffered harm and loss.

### MISCELLANEOUS

19. Trial by jury is demanded.

20. Plaintiff reserves her right to amend these pleadings as necessitated by discovery.

### PRAYER FOR RELIEF – COUNT ONE - NEGLIGENCE

WHEREFORE, the plaintiff, Sharon D. Love, Administrator of the Estate of Yeardeley R. Love, Deceased, respectfully prays as to the alternative Count One for judgment and an award of execution, against the defendant, George W. Huguely, V, in the



sum of \$29,450,000 in compensatory damages, plus interest from the date of the Occurrence on May 2-3, 2010, pursuant to Virginia Code §8.01-382, her costs, and if applicable, attorney fees, and for such further relief as is necessary and proper.

**PRAYER FOR RELIEF – COUNT TWO - INDIFFERENCE AND ACTING  
WITH UTTER DISREGARD OF CAUTION**

WHEREFORE, the plaintiff, Sharon D. Love, Administrator of the Estate of Yeardley R. Love, Deceased, respectfully prays as to the alternative Count Two for judgment and an award of execution, against the defendant, George W. Huguely, V, in the sum of \$29,450,000 in compensatory damages, plus interest from the date of Occurrence on May 2-3, 2010, pursuant to Virginia Code §8.01-382, her costs, and if applicable, attorney fees, and for such further relief as is necessary and proper.

**PRAYER FOR RELIEF – COUNT THREE - ACTING WITH CONSCIOUS  
DISREGARD AND RECKLESS INDIFFERENCE**

WHEREFORE, the plaintiff, Sharon D. Love, Administrator of the Estate of Yeardley R. Love, Deceased, respectfully prays as to the alternative Count Three for judgment and an award of execution, against the defendant, George W. Huguely, V, in the sum of \$29,450,000 in compensatory damages, and the sum of \$1,000,000 in punitive damages, plus interest from the date of Occurrence on May 2-3, 2010, pursuant to Virginia Code §8.01-382, her costs, and if applicable, attorney fees, and for such further relief as is necessary and proper.

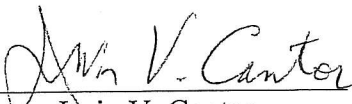
**PRAYER FOR RELIEF – COUNT FOUR - WILLFUL AND MALICIOUS  
INJURY AND DEATH**

WHEREFORE, the plaintiff, Sharon D. Love, Administrator of the Estate of Yeardley R. Love, Deceased, respectfully prays as to the alternative Count Four for judgment and an award of execution, against the defendant, George W. Huguely, V, in the sum of \$29,450,000 in compensatory damages, and the sum of \$1,000,000 in punitive damages, plus interest from the date of Occurrence on May 2-3, 2010, pursuant to Virginia Code §8.01-382, her costs, and if applicable, attorney fees, and for such further relief as is necessary and proper.

**PRAYER FOR RELIEF – COUNT FIVE – ASSAULT AND/OR BATTERY**

WHEREFORE, the plaintiff, Sharon D. Love, Administrator of the Estate of Yeardley R. Love, Deceased, respectfully prays as to the alternative Count Five for judgment and an award of execution, against the defendant, George W. Huguely, V, in the sum of \$29,450,000 in compensatory damages, and the sum of \$1,000,000 in punitive damages, plus interest from the date of Occurrence on May 2-3, 2010, pursuant to Virginia Code §8.01-382, her costs, and if applicable, attorney fees, and for such further relief as is necessary and proper.

Sharon D. Love, Administrator of the  
Estate of Yeardley R. Love, Deceased

  
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