

**IN THE COURT OF COMMON PLEAS
MONTGOMERY COUNTY, OHIO**

JORDAN REYES, 1400 CLIFTON AVE. CINCINNATI, OHIO 45220 Plaintiff,	:	CASE NO. 2025 CV 01254
	:	JUDGE OLIVIA D. EDWARDS
	:	
v.	:	<u>ANSWER TO COMPLAINT</u>
DANTE MILES, 3214 BELMONT PARK DR. DAYTON, OHIO 45424 Defendant.	:	
	:	
	:	

Now comes Defendant, Dante Miles, hereby answers the allegations of the complaint filed by Plaintiff, Jordan Reyes, as follows:

ANSWER

1. Defendant, Dante Miles, lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 1 and therefore denies the same.
2. Defendant, Dante Miles, admits Paragraph 2 of Complaint.
3. Defendant, Dante Miles, admits Paragraph 3 of Complaint.
4. Defendant, Dante Miles, lacks sufficient knowledge or information to form a belief as to the truth of the allegations regarding the amount in controversy in Paragraph 4 and therefore denies the same.
5. Defendant, Dante Miles, admits that this Court has subject matter jurisdiction as alleged in Paragraph 5, but denies that he committed any tortious act as alleged.

6. Defendant, Dante Miles, admits that venue is proper in Montgomery County, Ohio as alleged in Paragraph 6.
7. Defendant, Dante Miles, lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 7 and therefore denies the same.
8. Defendant, Dante Miles, admits to Paragraph 8 to the extent that he was driving a 2022 Toyota Camry with Ohio license plate HCN-3642. Defendant, Dante Miles, denies acting negligently, denies that Plaintiff, Jordan Reyes, lawfully entered a designated crosswalk or that she was entitled to the right of way and denies alleged injuries or damages were caused by him.
9. Defendant, Dante Miles, lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 9 and therefore denies the same.
10. Defendant, Dante Miles, lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 10 and therefore denies the same.
11. Defendant, Dante Miles, lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 11 and therefore denies the same.
12. Defendant, Dante Miles, lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 12 and therefore denies the same.
13. Defendant, Dante Miles, lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 13 and therefore denies the same.
14. Defendant, Dante Miles, lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 14 and therefore denies the same.
15. Defendant, Dante Miles, lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 15 and therefore denies the same.

16. Defendant, Dante Miles, lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 16 and therefore denies the same.
17. Defendant, Dante Miles, lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 17 and therefore denies the same.
18. Defendant, Dante Miles, lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 18 and therefore denies the same.
19. Defendant, Dante Miles, lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 19 and therefore denies the same.
20. Defendant, Dante Miles, repeats and realleges his responses to the preceding paragraphs as though fully set forth herein.
21. Defendant, Dante Miles, admits Paragraph 21 of Complaint.
22. Defendant, Dante Miles, denies Paragraph 22 of Complaint.
23. Defendant, Dante Miles, denies Paragraph 23 of Complaint.
24. Defendant, Dante Miles, admits Paragraph 24 of Complaint.
25. Defendant, Dante Miles, denies that Plaintiff, Jordan Reyes, is entitled to judgment or any relief against Defendant, Dante Miles, as alleged in Paragraph 25 or in any other part of the Complaint.

FIRST DEFENSE - COMPARATIVE NEGLIGENCE

26. Defendant, Dante Miles, asserts that Plaintiff, Jordan Reyes', own negligence contributed to her alleged injuries, including but not limited to failing to pay attention while crossing the street, and any damages should be reduced in proportion to the degree of fault attributable to Plaintiff, Jordan Reyes, to be proved at trial.

SECOND DEFENSE - NO BREACH OF DUTY

27. Defendant, Dante Miles, asserts that at the time of the incident, he was lawfully driving in compliance with all applicable driving laws, including driving within the proper speed limits and proceeding on a green light, and therefore, did not breach any duty of care owed to Plaintiff, Jordan Reyes.

THIRD DEFENSE - ASSUMPTION OF RISK

28. Defendant, Dante Miles, further asserts that Plaintiff, Jordan Reyes, voluntarily engaged in known behavior that poses an inherent risk, including distraction while crossing the roadway, and assumed the risks associated with such conduct, which may reduce or bar her recovery.

FOURTH DEFENSE - PRE-EXISTING CONDITION

29. Defendant, Dante Miles, asserts that any injuries or damages claimed by Plaintiff, Jordan Reyes, may have been caused in whole or in part by pre-existing conditions unrelated to the incident alleged in the Complaint.

FIFTH DEFENSE - FAILURE TO MITIGATE

30. Defendant, Dante Miles, asserts that Plaintiff, Jordan Reyes, may have failed to mitigate her damages and that any recovery should be reduced in proportion to her failure to take reasonable steps to minimize harm.

31. Defendant, Dante Miles, reserves the right to assert additional defenses that may become apparent after discovery or at trial.

PRAYER

WHEREFORE, Defendant, Dante Miles, respectfully requests the following:

- 32. Deny Plaintiff's Claims in its entirety with prejudice;
- 33. Award all costs incurred in defending this action; and
- 34. Grant such other and further relief as the Court deems just and proper.

Dated: February 20, 2026

Respectfully submitted,

/s/ David B. Shelby

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Attorney for Dante Miles

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 20, 2026 a copy of the foregoing document was electronically filed with the Clerk of Court by using the ECF system which will send notice of electronic filing to the following:

John C. Pryor, Esq.
1250 Beech Street
Cincinnati, Ohio 45202
Attorney for Plaintiff

/s/ David B. Shelby

David B. Shelby, Esq. (12345)