

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

JORDAN REYES,	:	CASE NO.
1400 CLIFTON AVE.	:	
CINCINNATI, OHIO 45220	:	JUDGE
Plaintiff,	:	
 	:	
v.	:	<u>COMPLAINT AND JURY DEMAND</u>
 	:	
DANTE MILES,	:	
3214 BELMONT PARK DR.	:	
DAYTON, OHIO 45424	:	
Defendant.	:	
	:	
	:	

NOW COMES Plaintiff, Jordan Reyes (“Ms. Reyes”), an individual, and brings this action for damages against Defendant, Dante Miles (“Mr. Miles”), an individual, and alleges as follows:

1. This action arises from a motor vehicle-pedestrian collision caused by Defendant’s negligence, resulting in serious bodily injury, educational disruptions and loss of earning potential.

PARTIES

2. Plaintiff, Jordan Reyes, is an individual residing at 1400 Clifton Ave., Cincinnati, OH 45220.
3. Defendant, Dante Miles, is an individual residing at 3214 Belmont Park Dr., Dayton, OH 45424.

JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction over this action as a country of general jurisdiction.
5. This Court has personal jurisdiction over Defendant, Dante Miles, because Defendant is an Ohio resident who resides in Montgomery County, Ohio, and is subject to the jurisdiction of Ohio courts under Ohio's long-arm statute and due process requirements.
6. Venue is proper in this Court pursuant to Ohio Civil Rule 3(B) because Defendant resides in Montgomery County, Ohio.
7. Although the underlying motor vehicle-pedestrian collision occurred in Davidson County, Tennessee, Defendant's residence in Montgomery County, Ohio provides a proper and sufficient basis for venue in this Court.

BACKGROUND

8. On March 15, 2025, at approximately 9:20pm, Ms. Reyes, a law student at the University of Cincinnati, was traveling by foot after leaving a legal internship networking event in downtown Nashville heading back to her hotel.
9. Upon approaching the intersection of 5th Avenue and Jefferson Street, Ms. Reyes lawfully entered the designated crosswalk and was entitled to the right of way when she was struck by Mr. Miles, who was driving a 2022 Toyota Camry bearing Ohio license plate HCN-3642.
10. Following the incident, Ms. Reyes was taken to the nearby Vanderbilt University Medical Center Emergency Department where diagnostic imaging confirmed a pelvic fracture, and she was referred for further orthopedic evaluation and treatment.

11. As a result of the collision, Ms. Reyes suffered severe bodily injuries, including a closed head injury and a non-displaced fracture of the left superior pubic ramus, causing significant pain, limited mobility and loss of normal daily function.
12. Ms. Reyes underwent the care of an orthopedic specialist, was non-weight bearing for approximately four weeks, required walking aids, underwent follow up imaging, physical therapy and ongoing treatment to regain mobility and strength.
13. Despite this care, Ms. Reyes continued to experience persistent pain.
14. Additionally, Ms. Reyes' head injury resulted in ongoing headaches, dizziness and difficulty concentrating, which interfered with her academics and daily life.
15. Additional evaluations and ongoing monitoring for neurological symptoms were required to address her neurological symptoms.
16. Ms. Reyes also experienced ongoing musculoskeletal pain in her lower back and pelvic region that did not resolve with conservative treatments, including chiropractic care and physical therapy; ultimately requiring neurosurgical intervention on December 2, 2025, undergoing a discectomy to decompress the affected nerve as a result of injuries sustained in the collision.
17. Following surgery, she continued rehabilitation to restore strength, mobility and daily function.
18. Although Ms. Reyes' initial medical care has been covered by the responsible third party insurance company, this accident caused substantial disruption to Ms. Reyes' education, including difficulty attending classes, completing coursework and participating in internships.

19. These disruptions and setbacks have affected her academic performance and altered her anticipated career trajectory, resulting in the loss of opportunities that would not have occurred but for Defendant's actions.

COUNT ONE: NEGLIGENCE

20. The Plaintiff re-alleges and incorporates by reference herein all of the allegations contained in paragraphs above and further states:

21. At relevant times, Defendant, Dante Miles, owed a duty to operate his vehicle with reasonable care, to maintain proper lookout, obey traffic laws, and yield the right of way to pedestrians lawfully within marked crosswalks, including Plaintiff, Jordan Reyes.

22. Defendant, Dante Miles, breached this duty by failing to maintain proper lookout, failing to yield right of way, and otherwise operating his vehicle in a careless and negligent manner.

23. Plaintiff, Jordan Reyes, further states as a direct and proximate cause of the Defendant's negligence, she suffered bodily injury, pain and suffering, loss of earning capacity, lost wages, and other damages to be proven at trial.

24. But for Defendant's negligence, Plaintiff would not have been injured.

25. Therefore, Plaintiff, Jordan Reyes, is entitled to judgment and relief against Defendant, Dante Miles, as set forth below.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Jordan Reyes, respectfully demands for judgment against Defendant, Dante Miles, and requests the following relief:

26. Award compensatory damages, including but not limited to ongoing medical expenses, loss of earning capacity, pain and suffering and emotional distress, in an amount to be determined by a jury;
27. Award all court costs and post-judgment interest as permitted by law;
28. Award costs of this action and discretionary costs as permitted by law; and
29. Grant such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Ms. Reyes demands a jury trial on all causes of action triable by jury.

Dated: February 12, 2026

Respectfully submitted,

/s/ John C. Pryor

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 12, 2026 a copy of the foregoing document was electronically filed with the Clerk of Court by using the e-filing system which will send notice of electronic filing to the following:

David B. Shelby, Esq.
4942 Single Street
Cincinnati, Ohio 45202
Attorney for Defendant

/s/ John C. Pryor

John C. Pryor, Esq. (32154)