

**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.	:	
DANTE MILES, 3214 BELMONT PARK DR. DAYTON, OHIO 45424 Defendant.	:	<u>PLAINTIFF'S FIRST SET OF INTERROGATORIES DIRECTED TO DEFENDANT</u>
	:	
	:	
	:	

NOW COMES Plaintiff, Jordan Reyes, by and through counsel, and pursuant to Rule 33 of the Ohio Rules of Civil Procedure, requests the following interrogatories submitted to the Defendant, Dante Miles, to be answered in writing under oath within twenty-eight (28) days after the date of service hereof:

INSTRUCTIONS

1. These Interrogatories are continuing in character so as to require you to file supplementary answers if you obtain further or different information within a reasonable time before trial.
2. Where knowledge or information in possession of a party is requested, such request includes knowledge of the party's agents, representatives, and unless privileged, his attorneys.

3. Each answer shall be made separately and fully. Any incomplete or evasive answer may be treated as failure to answer.

DEFINITIONS

1. “Accident” or “incident” refers to the occurrence on March 15, 2025 at the intersection of 5th and Jefferson in Nashville.
2. “Passengers” means any individual who was present in Defendant’s vehicle at any time on the date of the incident, regardless of whether such individual requested or paid for transportation through the Rideshare Application.
3. “Rideshare application” means any mobile or digital platform used by Defendant to accept, manage, or complete requests for passenger transportation, including but not limited to applications such as Zoomzy, and includes all associated data, communications, and records generated or stored by such platform.

INTERROGATORIES

1. In your own words, describe how the accident occurred including all actions taken by you immediately preceding and directly after.

ANSWER:

2. Upon entering the intersection where the accident occurred, state the speed at which you were traveling.

ANSWER:

3. Describe the weather, traffic, and roadway conditions as well as what you observed of the intersection upon approach.

ANSWER:

4. Identify any person to whom you made any statement regarding the accident immediately following and within three (3) days after the accident and describe the substance of each statement, excluding statements made to your attorneys.

ANSWER:

5. Describe your engagement with the rideshare app at the time of the accident, including but not limited to whether you were logged into the app, transporting passengers or en route to a pick up.

ANSWER:

6. Identify any passengers that may have first hand knowledge of the incident that were in your vehicle during the hour preceding the accident, including their names, if known, and the approximate time each ride started and stopped, if applicable.

ANSWER:

7. Identify your point of origin and intended destination immediately prior to the accident.

ANSWER:

8. State the time you began operating your rideshare on the date of the accident and the total amount of time you had been driving prior to the accident.

ANSWER:

9. Describe the condition of the vehicle you were operating at the time of the accident, including but not limited to any known mechanical issues, recent maintenance and repairs within the six (6) months preceding the accident, and any known defects.

ANSWER:

10. State whether you consumed any alcohol, prescription medication or non-prescription drugs within eight (8) hours prior to the accident that may impair driving. If so, identify the substance, quantity consumed and time of consumption.

ANSWER:

Dated: March 26, 2026

Respectfully submitted,

/s/ John C. Pryor

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Attorney for Jordan Reyes

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 26, 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:

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

/s/ John C. Pryor

John C. Pryor, Esq. (32154)