

2009 JUL -6 PM 1:52

GREGORY D. LANGHAM
CLERK

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO

HOLLIE ROERICK, individually and as guardian)
of ALEX ROERICK, a minor,)

Plaintiffs,)

v.)

JBS USA, LLC d/b/a "JBS Swift & Company,")
a foreign corporation,)

Defendant.)

'09 - CV - 01584 COA-KMT DEP. CLK

NO. _____

Demand for Jury Trial

COMPLAINT FOR DAMAGES

COME NOW the Plaintiffs, by and through their attorneys of record, Kara Knowles of Montgomery Little Soran & Murray, PC, and William D. Marler of Marler Clark LLP (admission *pro hac vice* pending), and allege as follows:

I. PARTIES

1. The Plaintiff Hollie Roerick lives in Albuquerque, New Mexico. Plaintiff Hollie Roerick is the natural parent of the minor child, Alex Roerick, who is thirteen years old.
2. The Defendant, JBS USA, LLC, d/b/a "JBS Swift & Company" (hereinafter "JBS Swift") is a foreign corporation organized and existing under the laws of the state of Delaware, with its principal place of business in Greeley, Colorado.
3. At all times relevant hereto, JBS Swift was a manufacturer and seller of various beef products sold throughout the United States, including in the State of New Mexico.

II. JURISDICTION AND VENUE

4. This Court has jurisdiction over the subject matter of this action pursuant to 28 USC § 1332(a) because the matter in controversy exceeds \$75,000.00, exclusive of costs, it is