

**IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA**

JAVIER QUINTERO, as Next Friend of
ROZIE QUINTERO, a Minor, and Next
of Kin of STEVIE LEIGH BRYANT,
Deceased, and KELSEA OLIVER, as
Temporary Administrator of the Estate of
STEVIE LEIGH BRYANT, Deceased,

CIVIL ACTION NO.
22A01210-5

Plaintiffs,

vs.

PRECISION 2000, INC.,

Defendant.

CONSOLIDATED PRE-TRIAL ORDER

The following constitutes a Pre-Trial Order entered in the above styled case after conference with counsel for the parties:

(1) The name, address and phone number of the attorneys who will conduct the trial are as follows:

Plaintiffs: Katherine L. McArthur
Caleb F. Walker
Lindsey S. Macon
Michael L. Thompson
Holly K. Stephens
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STATE COURT OF
DEKALB COUNTY, GA.
5/13/2025 6:06 PM
E-FILED
BY: Cleo Atwater

STATE COURT OF
DEKALB COUNTY, GA.
6/16/2025 2:00 PM
E-FILED
BY: Patricia Harris

-AND-

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Nicole C. Leet
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(2) The estimated time required for trial:

By Plaintiffs: 4-5 days

By Defendant: 7-10 days

(3) There are no motions or other matters pending for consideration by the court except as follows: There are currently no pending motions. The parties reserve the right to file motions in *limine* prior to trial of this case.

(4) The jury will be qualified as to relationship with the following:

By Plaintiffs: Javier Quintero; Rozie Quintero; Stevie Leigh Bryant, deceased; Kelsea Oliver; Katherine L. McArthur; Caleb F. Walker; Lindsey S. Macon; Michael L. Thompson; Holly K. Stephens; Bruce Hagen; Matt Hagen; Employees, Agents, Directors, Stockholders, or Policyholders of Precision 2000, Inc.; and Employees, Agents, Directors,

Stockholders or Policyholders of Travelers Property & Casualty Company of America, The Travelers Indemnity Company, and/or Travelers Indemnity Company of America, Inc.

By Defendants: Stevie L. Bryant; Javier Quintero; Rozie Quintero; Kelsea Oliver; Precision 2000, Inc.; Carl Anthony Smith; Lindsey S. Macon, Michael L. Thompson and Katherine L. McArthur or the McArthur Law Firm; Bruce A. Hagen and Matthew R. Hagen, or Hagen Roskopf, LLC; and any other law firm or attorney with a financial interest in the outcome of this case.

(5) A. All discovery has been completed, unless otherwise noted, and the court will not consider any further motions to compel discovery except for good cause shown. The parties, however, shall be permitted to take depositions of any person(s) for the preservation of evidence for use at trial.

B. Unless otherwise noted, the names of the parties as shown in the caption to this order are correct and complete and there is no question by any party as to the misjoinder or nonjoinder of any parties.

(6) The following is the Plaintiffs' brief and succinct outline of the case and contentions:

This is a construction negligence case arising from a motor vehicle crash occurring in a roadway construction area that caused massive blunt trauma injuries to Stevie Bryant's chest, abdomen, and pelvis, resulting in fatal internal hemorrhaging from which she died more than two hours later. On May 18, 2020, at approximately 5:43 p.m., Stevie Bryant was the passenger in a Mercedes sedan that was being driven by her fiancé, Lloyd Akano, and was traveling in the southbound HOV lane along the Downtown Connector in Atlanta, Georgia. In the moments preceding the collision, the driver of a Dodge Ram truck lost control of his vehicle while changing

lanes and collided with the passenger side of the Mercedes, causing the Mercedes to rotate counterclockwise, colliding with an improperly installed impact attenuator, and ultimately crashing into the exposed end of a concrete median barrier. Grady Emergency Medical Services responded to the scene of the collision. Ms. Bryant was extracted from the vehicle and transported to Grady Memorial Hospital. At Grady, EMS reported that Ms. Bryant had pulses and cardiac activity was observed during emergency surgery by the trauma team. During resuscitation attempts, she regained blood pressure and pulses, but she ultimately died at 8:00 p.m. Ms. Bryant's cause of death was recorded as blunt force injuries to the torso.

The collision occurred in a construction zone, where Precision 2000 was in the process of constructing a gravity wall along the lefthand shoulder to separate the southbound lanes of the interstate from the grassy median between the northbound and southbound lanes of travel. Plaintiffs contend that at the time of the collision Precision had placed two modules of a Traffix SLED device in front of the end of the concrete median wall, but had (1) failed to attach the SLED device to the wall using the required attachment piece and (2) failed to properly install the correct number of modules as required by the Traffix Devices installation manual and GDOT regulations by only placing two modules in front of the concrete median wall when four modules were required. For the duration of this project, Precision 2000 was required to comply with certain GDOT regulations, GDOT Standard Specifications, the Gravity Wall Project purchase order and contract between Precision 2000 and GDOT, the Traffix Devices SLED installation manual, as well as other state laws and regulations. At all times, Precision 2000 had, and was required to have, exclusive control of the construction site and was the sole party responsible for ensuring that the site was maintained in a safe condition both while workers were onsite and after hours until Precision 2000 completed the project and it was accepted by GDOT.

Plaintiffs also contend that Precision 2000 failed to train and supervise its employees to properly install the SLED device to protect Stevie Bryant and other drivers on the roadway and failed to staff the project with individuals trained and qualified to install and maintain the necessary impact attenuator. During the project, Precision 2000 did not have any employees staffed on the project that knew how to install the required SLED device in accordance with Traffix Devices installation manual for the SLED device. As a result, on the evening of May 18, 2020, Precision 2000 negligently left the worksite in an unsafe condition that subjected passengers on the roadway to the risk of impact with an exposed end of a median barrier wall. But for the negligence of Precision 2000 in leaving the construction site in this condition, Stevie Bryant would be here today.

Stevie Bryant suffered mentally and physically on May 18, 2020 from the moments leading up to the collision until she was pronounced dead at Grady Memorial Hospital from the injuries she sustained in this collision. At the time of her death, Stevie Bryant had one minor child, Rozie Quintero. Plaintiff Javier Quintero, as Next Friend of Rozie Quintero, a minor and next kin of Stevie Bryant, deceased, seeks damages from Defendant Precision 2000, Inc. for the full value of the life of Stevie Bryant, deceased. Kelsea Oliver, as Administrator of the Estate Stevie Leigh Bryant, deceased, seeks damages for the personal injuries and pain and suffering sustained by Stevie Bryant, as well as the medical bills and funeral and burial expenses for Stevie Bryant incurred as a result of this collision.

(7) The following is the Defendant's brief and succinct outline of the case and contentions:

On May 18, 2020 Lloyd Akano was travelling southbound on the I75/85 connector with Stevie Bryant in the front passenger seat of his 2016 Mercedes Benz C300. Suddenly and without warning Carl Anthony Smith's 2006 Dodge Ram 1500 collided with the Mercedes, pushing it off

the road in an uncontrolled spin. Lloyd Akano's uncontrollably spinning Mercedes struck an attenuator device placed on the exposed end of a concrete median barrier wall that was under construction. The concrete median barrier entered into the passenger compartment of the Mercedes, killing Stevie Bryant.

Plaintiffs bring this lawsuit solely against P2K, as the contractor working on building the concrete median barrier pursuant to a project contract with the Georgia Department of Transportation (GDOT).

(8) The issues for determination by the jury are as follows:

By Plaintiffs:

- A. Negligence;
- B. Causation;
- C. Amount of compensatory damages;
- D. Liability for punitive damages; and
- E. Amount of punitive damages.

By Defendants:

- A. Liability;
- B. Proximate cause; and
- C. Damages.

(9) Specifications of negligence including applicable code sections are as follows:

By Plaintiffs

- A. O.C.G.A. § 51-1-2 (ordinary diligence and ordinary negligence)
- B. O.C.G.A. § 51-1-8 (breach of private duty/professional negligence)
- C. O.C.G.A. § 51-12-23 and 51-12-9 (proximate cause)

- D. O.C.G.A. § 51-12-6 (pain and suffering damages)
- E. O.C.G.A. § 51-12-7 (medical bills, funeral and burial expenses and lost income)
- F. O.C.G.A. § 51-12-3 (direct and consequential damages distinguished)
- G. O.C.G.A. § 51-2-1(a) (imputation of negligence)
- H. O.C.G.A. § 51-2-2 (liability of torts of servant)
- I. O.C.G.A. § 51-4-2 (damages for wrongful death)
- J. O.C.G.A. § 51-12-5.1 (punitive damages)

By Defendants:

- A. O.C.G.A. § 51-12-3 and 51-12-9 (proximate cause)

(10) If the case is based on a contract, either oral or written, the terms of the contract are as follows (or, the contract is attached as an Exhibit to this order): Not applicable.

(11) The types of damages and the applicable measure of those damages are stated as follows:

By Plaintiffs:

- A. Special damages, consisting of;

- Medical bills - \$164,329.90 (Grady: \$149,665.55 + Emory Medical Care: \$12,821.00 + Grady EMS: \$1,843.35)

- Funeral and burial expenses – \$10,756.48

- B. General damages, consisting of:

- Full value of the life of Stevie Bryant;
 - Pain and suffering of Stevie Bryant, physical and mental; the amount of such damages to be determined by the enlightened conscience of fair and impartial jurors.

- C. Punitive damages, the amount of such damages to be determined by the enlightened conscience of the jury.

By Defendants:

- A. Medical Expenses, Funeral and Burial Expenses – reasonable and necessary expenses proximately caused by negligence of Defendant.
- B. Wrongful Death damages – measure is the enlightened conscience of fair and impartial jurors.
- C. Punitive Damages – measure is the enlightened conscience of fair and impartial jurors.

(12) If the case involves divorce, each party shall present to the court at the pre-trial conference the affidavits required by Rule 24.2. Not applicable.

(13) The following facts are stipulated: None

(14) The following is a list of all documentary and physical evidence that will be tendered at the trial by the Plaintiffs or Defendant. Unless noted, the parties have stipulated as to the authenticity of the documents listed and the exhibits listed may be admitted without further proof of authenticity. All exhibits shall be marked by counsel prior to trial so as not to delay the trial before the jury.

A. By the Plaintiffs:

1. Georgia Motor Vehicle Crash Report
2. Medical Records of Grady Memorial Hospital (05/18/2020)
3. Billing Records of Grady Memorial Hospital (05/18/2020)
4. Grady EMS Medical and Billing Records (5/18/2020)
5. Billing Records of Emory Medical Care Foundation (05/18/2020)
6. Billing Statement of Parrott Funeral Home & Crematory (05/22/2020)
7. Photos of Lloyd Akano's Vehicle
8. Photos of 2006 Dodge Ram 1500
9. Photos of Stevie Bryant
10. Videos of Stevie Bryant

11. Photos of Rozie Quintero
12. Videos of Rozie Quintero
13. Photos of Collision Site
14. Photos of Construction Site
15. Records from Georgia Department of Transportation, including but not limited to:
 - a. Georgia Department of Transportation Event Detail Report
 - b. Crash log
 - c. Contractor Affidavit
 - d. Prewrite Meeting Document
 - e. Purchase Order
 - f. Invitation to Bid with accompanying exhibits & appendices
 - g. Plan of Proposed I-75/85 SB Guardrail Replacement – Gravity Wall
 - h. Work Plan
 - i. Equipment List
 - k. Plats and Site Diagrams
 - l. Correspondence from Defendant
16. Open records received from Georgia State Patrol
 - a. Photos of scene of collision
 - b. Inspection photos
 - c. SCRT Report
17. Precision 2000's Health and Safety Manual
18. Traffix Devices SLED Device Installation Manual
19. Death Certificate
20. Obituary of Stevie Bryant
21. Letters of Administration
22. Medical and Funeral/Burial Expenses Itemization
23. Birth Certificate
24. Social Security Actuarial Life Table, 2014
25. Annuity Mortality Table for 1949, Ultimate
26. Defendant's Discovery Responses
27. Any exhibit to any deposition taken in the case
28. Medical charts, illustrations, and chronologies
29. Other Demonstrative Aids
30. Complete files of all experts disclosed by the Plaintiffs and Defendant in this case
31. Any documents or materials produced by the Defendant in discovery
32. Any exhibits listed by Defendants.

B. By the Defendant:

Defendant's Exhibit list will be supplemented. Defendant does not stipulate to the authenticity of any documents or physical evidence. Defendant reserves the right to use impeachment documents.

(15) Special authorities relied upon by Plaintiffs relating to peculiar evidentiary or other legal questions are as follows:

1. Alston & Bird, LLP v. Hatcher Management Holdings, LLC, 312 Ga. 350 (2021);
2. Pursuant to O.C.G.A. §§ 24-6-611 and 9-11-32(a)(2), Plaintiffs expect to call, for cross-examination purposes, adverse parties and witnesses identified with adverse parties;
3. Learned treatises related to principles of engineering and accident reconstruction; and
4. See Plaintiffs' Motions in Limine.

(16) Special authorities relied upon by Defendant relating to peculiar evidentiary or other legal questions are as follows: None at this time.

(17) All requests to charge anticipated at the time of trial will be filed in accordance with Rule 10.3.

(18) The testimony of the following persons may be introduced by depositions:

By Plaintiffs: Javier Quintero; Rozie Quintero, Kelsea Oliver, Sean Alexander; Roberto Vazquez; Fernando Vargas; Daniel Alarcon; Amado Delgado; Emiliano Perez; Jose Hernandez; Gustavo Perez; Luis Sanchez; John Cxypoliski; David Caranton; Jose Luis Ambriz; Devon Fields; Andrzej "Andrew" Kwasniak, Ph.D.; Herman Hill, P.E.; Lloyd Akano; Cliff Stover,

P.E., M.S.E.; Dr. Kevin Schrum, Ph.D., P.E.; Marc Paradiso; Carl Anthony Smith; Keneeshia N. Williams, M.D.; Joshua N. Wallenstein, M.D.; Timothy Jerome, M.D.; Emma Rooney, M.D.; Deepika Koganti, M.D.; Matthew Stanley, M.D.; Jason D. Sciarretta, M.D.; Michael M. Henniger, M.D.; Grady EMS personnel that responded to the scene of the collision; Georgia Department of Transportation employees or agents that investigated the collision or have knowledge regarding the construction project; and Georgia State Patrol Officers that responded to and investigated the collision.

By Defendants:

- i. Evidentiary depositions taken for trial; and any witness who is legally unavailable for trial or who the parties stipulate is unavailable for trial. Defendant objects to use of any other depositions.
- ii. Defendant specifically reserves the right to introduce deposition testimony for purposes of impeachment.

Any objections to the depositions or questions or arguments in the depositions shall be called to the attention of the court prior to the commencement of trial.

(19) The following are lists of witnesses the

A. Plaintiffs will have present at trial:

Javier Quintero

Kelsea Oliver

B. Plaintiffs may have present at trial:

Lloyd Akano

Sean Alexander

Guiomar Obregon

Carlos Sanchez
Roberto Vazquez
Fernando Vargas
Daniel Alarcon
Amado Delgado
Emiliano Perez
Jose Hernandez
Gustavo Perez
Luis Sanchez
John Cxypoliski
David Caranton
Jose Luis Ambriz
Devon Fields
Andrzej “Andrew” Kwasniak, Ph.D.
Herman Hill, P.E.
Cliff Stover, P.E., M.S.E.
Dr. Kevin Schrum, Ph.D., P.E.
Marc Paradiso
Carl Anthony Smith
Keneeshia N. Williams, M.D.
Joshua N. Wallenstein, M.D.
Timothy Jerome, M.D.
Emma Rooney, M.D.

Deepika Koganti, M.D.

Matthew Stanley, M.D.

Jason D. Sciarretta, M.D.

Michael M. Henniger, M.D.

Rachel Knapp

Rachel Bishop

Carol Bland

Daylie Oliver

Kandace Winn

Jacklyn Orozco

Pamela Bryant

Curt Bland

Romelia Rodriguez

Maria Quintero

Sgt. J. Robillard

TFC2 S. Pierce

TFC3 B. Watts

Israel Cuevas Salgado

Kelvin Wilson

Rodney Ryan

Ryan Anderson

Shane Bramlett

C. Defendant will have present at trial: None.

D. Defendant may have present at trial:

Defendant's witness list will be supplemented.

The parties respectfully reserve the right to amend this list of witnesses to include any witnesses identified in discovery but not listed herein and may do so by giving no less than five (5) days' notice prior to trial of any such additional witnesses to opposing counsel.

Opposing counsel may rely on representation that the designated party will have a witness present unless notice to the contrary is given in sufficient time prior to trial to allow the other party to subpoena the witness or obtain his testimony by other means.

(20) The form of all possible verdicts to be considered by the jury are as follows:

Plaintiffs will submit a special verdict form at the beginning of trial. The jury will not be asked to consider a non-party's alleged fault and no non-party is to be included on the verdict form.

(21) A. The possibilities of settling the case are: Poor.

B. The parties **do** want the case reported.

C. The cost of takedown will be shared equally between the parties.

Plaintiff:

D. The Plaintiffs request a 12-person jury and request two alternates be selected.

Defendant:

D. Other matters: None at this time.

Submitted by:

/s/ Katherine L. McArthur

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Attorneys for Defendant

It is hereby ordered that the foregoing, including the attachments thereto, constitutes the PRE TRIAL ORDER in the above case and supersedes the pleadings which may not be further amended except by order of the court to prevent manifest injustice.

This 16th day of June, 2025.



MIKE JACOBS, Judge
State Court of DeKalb County

STATE COURT OF
DEKALB COUNTY, GA.
5/13/2025 6:06 PM
E-FILED
BY: Cleo Atwater

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