

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

Case Number: CAL20-14484

Ebony Bates
PLAINTIFF

VS

Eckered / Rite Aid
DEFENDANT

JUDGMENT

This matter having been decided by:

A Judge

Jury verdict,

With Judge White presiding, it is this 13th day of July 2023

ORDERED AND ADJUDGED that:

CASE DISMISSED

Judgment entered in favor of the Plaintiff Ebony Bates
and against the Defendant Eckered /Rite Aid

in the sum of \$19,990,000.00

all relief is denied

Costs are assessed against the Defendant

Mahasin El Amin

CLERK OF THE COURT 78270

AOC-CC-302
(5/98)

ENTERED: 7/24/2023

CALIA

2023 JUL 24

CLERK OF THE COURT

CLERK OF THE CIRCUIT COURT
FOR PRINCE GEORGES COUNTY, MD

JUL 21 2023

FILED

FILED

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

Case Number: CAL20-14484

Ebony Bates
PLAINTIFF

VS

Richmond Muraguri
Eckered / Rite Aid
DEFENDANT

JUDGMENT

This matter having been decided by:

A Judge

Jury verdict,

With Judge White presiding, it is this 13th day of July 2023

ORDERED AND ADJUDGED that:

CASE DISMISSED

Judgment entered in favor of the Plaintiff Ebony Bates
and against the Defendants Richmond Muraguri and Eckered
/Rite Aid

in the sum of \$311,988.43

all relief is denied

Costs are assessed against the Defendant

Mahasin El Amin

CLERK OF THE COURT 782 70

AOC-CC-302
(5/98)

ENTERED: 7/24/2023

DELETED

803 1 3 01

7/24/2023 12:39 PM

CLERK OF THE CIRCUIT COURT
FOR PRINCE GEORGES COUNTY, MD

JUL 21 2023

FILED

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

Case Number: CAL20-14484

Ebony Bates
PLAINTIFF

VS

Richmond Muraguri
DEFENDANT

JUDGMENT

This matter having been decided by:

A Judge

Jury verdict,

With Judge White presiding, it is this 13th day of July 2023

ORDERED AND ADJUDGED that:

CASE DISMISSED

Judgment entered in favor of the Plaintiff Ebony Bates
and against the Defendant Richmond Muraguri

in the sum of \$10,000.00

all relief is denied

Costs are assessed against the Defendant

Mahasin El Amin

CLERK OF THE COURT 78270

AOC-CC-302
(5/98)

ENTERED: 7/24/2023

CLERK
7/24/2023
7:00 PM
7/24/2023

CLERK OF THE CIRCUIT COURT
FOR PRINCE GEORGE'S COUNTY, MD

JUL 21 2023

FILED

13



CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

14735 Main Street
Upper Marlboro Maryland 20772

To: ECKERD CORPORATION
THE CORPORATION TRUST INC
2405 YORK ROAD
SUITE 202
LUTHERVILLE TIMONIUM, MD 21093

Case Number: CAL20-14484
Related Case Number(s):

BATES VS MURAGURI

Date: 7/24/2023

NOTICE OF RECORDED JUDGMENT

I HEREBY CERTIFY that the following judgment has been recorded in this court in the above entitled case.

Judgment against: ECKERD CORPORATION
THE CORPORATION TRUST INC
2405 YORK ROAD
SUITE 202
LUTHERVILLE TIMONIUM MD 21093

Judgment in favor of: Ebony Bates
6324 Suitland Rd
Suitland MD 20746

Judgment ordered on:	07/13/2023	Other fee:	\$
Judgment entry date:	07/24/2023	Service fee:	\$
Amount of judgment:	\$19,990,000.00	Attorney fee:	\$
Pre judgment interest:			
Appearance fee:	\$	Total judgment:	\$19,990,000.00
Filing fee:	\$		

Comments:

IN TESTIMONY, I set my hand and affix the seal of this court.

Mahasin El Amin
Clerk of the Circuit Court #733

Notice

You may receive a Judgment Debtor (Defendant) Information Sheet (CC-DC-CV-114) from the plaintiff or the plaintiff's attorney requesting information under oath about you, your employment, and your assets, liabilities, income, and expenses. You do not have to complete and return that form, but if you fail to do so within the time allowed, you may be summoned to appear or undergo an examination under oath before a judge or examiner regarding those matters. If you fully complete and return the completed Judgment Debtor (Defendant) Information Sheet within the time allowed, you will not be subject to discovery in aid of enforcement for at least one year from the entry of the judgment against you, unless the judgment creditor has been granted leave of court for good cause shown.



CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

14735 Main Street
Upper Marlboro Maryland 20772

E-FILED: Prince George's Circuit Court
Circuit Court Clerks: 301-952-2848
Calendar Management: 301-952-3850
Docket #: 24/2023 12:39 PM, Submission: 7/24/2023 12:39 PM
Envelope: 13422021

To: ECKERD CORPORATION
THE CORPORATION TRUST INC
2405 YORK ROAD
SUITE 202
LUTHERVILLE TIMONIUM, MD 21093

Case Number: CAL20-14484
Related Case Number(s):

BATES VS MURAGURI

Date: 7/24/2023

NOTICE OF RECORDED JUDGMENT

I HEREBY CERTIFY that the following judgment has been recorded in this court in the above entitled case.

Judgment against: RICHMOND MURAGURI
4509 BLACKBIRDS FOLLY LANE
BOWIE MD 20720

ECKERD CORPORATION
THE CORPORATION TRUST INC
2405 YORK ROAD
SUITE 202
LUTHERVILLE TIMONIUM MD 21093

Judgment in favor of: Ebony Bates
6324 Suitland Rd
Suitland MD 20746

Judgment ordered on:	07/13/2023	Other fee:	\$
Judgment entry date:	07/24/2023	Service fee:	\$
Amount of judgment:	\$311,988.43	Attorney fee:	\$
Pre judgment interest:		Total judgment:	\$312,163.43
Appearance fee:	\$10.00		
Filing fee:	\$165.00		

Comments:

IN TESTIMONY, I set my hand and affix the seal of this court.

Mahasin El Amin
Clerk of the Circuit Court #733

Notice

You may receive a Judgment Debtor (Defendant) Information Sheet (CC-DC-CV-114) from the plaintiff or the plaintiff's attorney requesting information under oath about you, your employment, and your assets, liabilities, income, and expenses. You do not have to complete and return that form, but if you fail to do so within the time allowed, you may be summoned to appear or undergo an examination under oath before a judge or examiner regarding those matters. If you fully complete and return the completed Judgment Debtor (Defendant) Information Sheet within the time allowed, you will not be subject to discovery in aid of enforcement for at least one year from the entry of the judgment against you, unless the judgment creditor has been granted leave of court for good cause shown.



CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

14735 Main Street
Upper Marlboro Maryland 20772

To: RICHMOND MURAGURI
4509 BLACKBIRDS FOLLY LANE
BOWIE, MD 20720

Case Number: CAL20-14484
Related Case Number(s):

BATES VS MURAGURI

Date: 7/24/2023

NOTICE OF RECORDED JUDGMENT

I HEREBY CERTIFY that the following judgment has been recorded in this court in the above entitled case.

Judgment against: RICHMOND MURAGURI
4509 BLACKBIRDS FOLLY LANE
BOWIE MD 20720

Judgment in favor of: Ebony Bates
6324 Suitland Rd
Suitland MD 20746

Judgment ordered on:	07/13/2023	Other fee:	\$
Judgment entry date:	07/24/2023	Service fee:	\$
Amount of judgment:	\$10,000.00	Attorney fee:	\$
Pre judgment interest:		Total judgment:	\$10,000.00
Appearance fee:	\$		
Filing fee:	\$		

Comments:

IN TESTIMONY, I set my hand and affix the seal of this court.

Mahasin El Amin
Clerk of the Circuit Court #733

Notice

You may receive a Judgment Debtor (Defendant) Information Sheet (CC-DC-CV-114) from the plaintiff or the plaintiff's attorney requesting information under oath about you, your employment, and your assets, liabilities, income, and expenses. You do not have to complete and return that form, but if you fail to do so within the time allowed, you may be summoned to appear or undergo an examination under oath before a judge or examiner regarding

those matters. If you fully complete and return the completed Judgment Debtor (Defendant) Information Sheet within the time allowed, you will not be subject to discovery in aid of enforcement for at least one year from the entry of the judgment against you, unless the judgment creditor has been granted leave of court for good cause shown.

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

EBONY BATES

Plaintiff

v.

RICHMOND MURAGURI and
ECKERD/RITE AID

Defendants

Case No: CAL20-14484

FILED

JUL 13 2023

#782FC

CLERK OF THE CIRCUIT COURT
FOR PRINCE GEORGE'S COUNTY, MD

VERDICT SHEET

1. Do you find by a preponderance of the evidence that Richmond Muraguri committed a battery to Ebony Bates on August 10, 2017?

Yes

No

Proceed to Question 2.

2. Do you find by a preponderance of the evidence that Richmond Muraguri committed a false imprisonment of Ebony Bates on August 10, 2017?

Yes

No

If your answers to Questions 1 and 2 are No, stop here; you have reached your verdict.

3. *If your answer to Question 1 is Yes, do you also find by a preponderance of the evidence that Ebony Bates sustained a personal injury caused by the battery?*

Yes

No

4. *If your answer to Question 2 is Yes, do you also find by a preponderance of the evidence that Ebony Bates sustained any actual injury caused by false imprisonment?*

Yes No

5. *If your answers to Questions 3 and/or 4 are Yes, what damages, if any, do you award to Ebony Bates?*

Past Medical Expenses (for thumb injury upon Battery):	<u>100% (10,988.43)</u>
Non-Economic Damages (for Battery)	<u>300,000</u>
Damages (for False Imprisonment)	<u>1,000</u>
Total:	<u>311,988.43</u>

Proceed to Questions 6 and 7.

6. *Do you find by clear and convincing evidence that Richmond Muraguri acted with malice to Ebony Bates on August 10, 2017 upon committing battery?*

Yes No

7. *Do you find by clear and convincing evidence that Richmond Muraguri acted with malice to Ebony Bates on August 10, 2017 upon committing false imprisonment?*

Yes No

If your answers to Questions 6 and 7 are No, stop here; you have reached your verdict.

8. If you have awarded any damages in answer to Question 5, and if your answers to Questions 6 and/or 7 are Yes, what punitive damages, if any, do you award to Ebony Bates?

Total Punitive Damages 20,000,000.00

- | | |
|---|----------------------|
| (a) Punitive Damages for battery | <u>10,000,000.00</u> |
| - By Richmond Muraguri | <u>5,000.00</u> |
| - By Eckerd/Rite Aid | <u>9,995,000.00</u> |
| (b) Punitive Damages for false imprisonment | <u>10,000,000.00</u> |
| - By Richmond Muraguri | <u>5,000.00</u> |
| - By Eckerd/Rite Aid | <u>9,995,000.00</u> |

23

Jury Foreperson

Date: 7/13/2023

CIVIL - NON-DOMESTIC CASE INFORMATION REPORT

DIRECTIONS

Plaintiff: This Information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Judge of the Court of Appeals pursuant to Rule 2-111(a).

Defendant: You must file an Information Report as required by Rule 2-323(h).

THIS INFORMATION REPORT CANNOT BE ACCEPTED AS A PLEADING

FORM FILED BY: PLAINTIFF DEFENDANT **CASE NUMBER** _____
(Clerk to insert)

CASE NAME: Ebony Bates Plaintiff vs. Richmond Muraguri, et al. Defendant

PARTY'S NAME: Ebony Bates **PHONE:** _____

PARTY'S ADDRESS: 6324 Suitland Road, Suitland MD 20746

PARTY'S E-MAIL: _____

If represented by an attorney:

PARTY'S ATTORNEY'S NAME: Lorraine Lawrence-Whittaker **PHONE:** (410) 997-4100

PARTY'S ATTORNEY'S ADDRESS: 5300 Dorsey Hall Drive, Suite 100, Ellicott City, MD 21042

PARTY'S ATTORNEY'S E-MAIL: llw@lwtrialteam.com

JURY DEMAND? Yes No

RELATED CASE PENDING? Yes No If yes, Case #(s), if known: _____

ANTICIPATED LENGTH OF TRIAL?: _____ hours _____ days

PLEADING TYPE

New Case: Original Administrative Appeal Appeal

Existing Case: Post-Judgment Amendment

If filing in an existing case, skip Case Category/ Subcategory section - go to Relief section.

IF NEW CASE: CASE CATEGORY/SUBCATEGORY (Check one box.)

<p>TORTS</p> <p><input type="checkbox"/> Asbestos</p> <p><input checked="" type="checkbox"/> Assault and Battery</p> <p><input type="checkbox"/> Business and Commercial</p> <p><input type="checkbox"/> Conspiracy</p> <p><input type="checkbox"/> Conversion</p> <p><input type="checkbox"/> Defamation</p> <p><input checked="" type="checkbox"/> False Arrest/Imprisonment</p> <p><input type="checkbox"/> Fraud</p> <p><input type="checkbox"/> Lead Paint - DOB of Youngest Plt: _____</p> <p><input type="checkbox"/> Loss of Consortium</p> <p><input type="checkbox"/> Malicious Prosecution</p> <p><input type="checkbox"/> Malpractice-Medical</p> <p><input type="checkbox"/> Malpractice-Professional</p> <p><input type="checkbox"/> Misrepresentation</p> <p><input type="checkbox"/> Motor Tort</p> <p><input type="checkbox"/> Negligence</p> <p><input type="checkbox"/> Nuisance</p> <p><input type="checkbox"/> Premises Liability</p> <p><input type="checkbox"/> Product Liability</p> <p><input type="checkbox"/> Specific Performance</p> <p><input type="checkbox"/> Toxic Tort</p> <p><input type="checkbox"/> Trespass</p> <p><input type="checkbox"/> Wrongful Death</p> <p>CONTRACT</p> <p><input type="checkbox"/> Asbestos</p> <p><input type="checkbox"/> Breach</p> <p><input type="checkbox"/> Business and Commercial</p> <p><input type="checkbox"/> Confessed Judgment</p> <p>(Cont'd)</p> <p><input type="checkbox"/> Construction</p> <p><input type="checkbox"/> Debt</p> <p><input type="checkbox"/> Fraud</p>	<p><input type="checkbox"/> Government</p> <p><input type="checkbox"/> Insurance</p> <p><input type="checkbox"/> Product Liability</p> <p>PROPERTY</p> <p><input type="checkbox"/> Adverse Possession</p> <p><input type="checkbox"/> Breach of Lease</p> <p><input type="checkbox"/> Detinue</p> <p><input type="checkbox"/> Distress/Distrain</p> <p><input type="checkbox"/> Ejectment</p> <p><input type="checkbox"/> Forcible Entry/Detainer</p> <p><input type="checkbox"/> Foreclosure</p> <p><input type="checkbox"/> Commercial</p> <p><input type="checkbox"/> Residential</p> <p><input type="checkbox"/> Currency or Vehicle</p> <p><input type="checkbox"/> Deed of Trust</p> <p><input type="checkbox"/> Land Installments</p> <p><input type="checkbox"/> Lien</p> <p><input type="checkbox"/> Mortgage</p> <p><input type="checkbox"/> Right of Redemption</p> <p><input type="checkbox"/> Statement Condo</p> <p><input type="checkbox"/> Forfeiture of Property / Personal Item</p> <p><input type="checkbox"/> Fraudulent Conveyance</p> <p><input type="checkbox"/> Landlord-Tenant</p> <p><input type="checkbox"/> Lis Pendens</p> <p><input type="checkbox"/> Mechanic's Lien</p> <p><input type="checkbox"/> Ownership</p> <p><input type="checkbox"/> Partition/Sale in Lieu</p> <p><input type="checkbox"/> Quiet Title</p> <p><input type="checkbox"/> Rent Escrow</p> <p><input type="checkbox"/> Return of Seized Property</p> <p><input type="checkbox"/> Right of Redemption</p> <p><input type="checkbox"/> Tenant Holding Over</p>	<p>PUBLIC LAW</p> <p><input type="checkbox"/> Attorney Grievance</p> <p><input type="checkbox"/> Bond Forfeiture Remission</p> <p><input type="checkbox"/> Civil Rights</p> <p><input type="checkbox"/> County/Mncpl Code/Ord</p> <p><input type="checkbox"/> Election Law</p> <p><input type="checkbox"/> Eminent Domain/Condemn.</p> <p><input type="checkbox"/> Environment</p> <p><input type="checkbox"/> Error Coram Nobis</p> <p><input type="checkbox"/> Habeas Corpus</p> <p><input type="checkbox"/> Mandamus</p> <p><input type="checkbox"/> Prisoner Rights</p> <p><input type="checkbox"/> Public Info. Act Records</p> <p><input type="checkbox"/> Quarantine/Isolation</p> <p><input type="checkbox"/> Writ of Certiorari</p> <p>EMPLOYMENT</p> <p><input type="checkbox"/> ADA</p> <p><input type="checkbox"/> Conspiracy</p> <p><input type="checkbox"/> EEO/HR</p> <p><input type="checkbox"/> FLSA</p> <p><input type="checkbox"/> FMLA</p> <p><input type="checkbox"/> Workers' Compensation</p> <p><input type="checkbox"/> Wrongful Termination</p> <p>INDEPENDENT PROCEEDINGS</p> <p><input type="checkbox"/> Assumption of Jurisdiction</p> <p><input type="checkbox"/> Authorized Sale</p> <p><input type="checkbox"/> Attorney Appointment</p> <p><input type="checkbox"/> Body Attachment Issuance</p> <p><input type="checkbox"/> Commission Issuance</p>	<p><input type="checkbox"/> Constructive Trust</p> <p><input type="checkbox"/> Contempt</p> <p><input type="checkbox"/> Deposition Notice</p> <p><input type="checkbox"/> Dist Ct Mtn Appeal</p> <p><input type="checkbox"/> Financial</p> <p><input type="checkbox"/> Grand Jury/Petit Jury</p> <p><input type="checkbox"/> Miscellaneous</p> <p><input type="checkbox"/> Perpetuate Testimony/Evidence</p> <p><input type="checkbox"/> Prod. of Documents Req.</p> <p><input type="checkbox"/> Receivership</p> <p><input type="checkbox"/> Sentence Transfer</p> <p><input type="checkbox"/> Set Aside Deed</p> <p><input type="checkbox"/> Special Adm. - Atty</p> <p><input type="checkbox"/> Subpoena Issue/Quash</p> <p><input type="checkbox"/> Trust Established</p> <p><input type="checkbox"/> Trustee Substitution/Removal</p> <p><input type="checkbox"/> Witness Appearance-Compel</p> <p>PEACE ORDER</p> <p><input type="checkbox"/> Peace Order</p> <p>EQUITY</p> <p><input type="checkbox"/> Declaratory Judgment</p> <p><input type="checkbox"/> Equitable Relief</p> <p><input type="checkbox"/> Injunctive Relief</p> <p><input type="checkbox"/> Mandamus</p> <p>OTHER</p> <p><input type="checkbox"/> Accounting</p> <p><input type="checkbox"/> Friendly Suit</p> <p><input type="checkbox"/> Grantor in Possession</p> <p><input type="checkbox"/> Maryland Insurance Administration</p> <p><input type="checkbox"/> Miscellaneous</p> <p><input type="checkbox"/> Specific Transaction</p> <p><input type="checkbox"/> Structured Settlements</p>
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IF NEW OR EXISTING CASE: RELIEF (Check All that Apply)

- | | | | |
|--|---|--|---|
| <input type="checkbox"/> Abatement | <input type="checkbox"/> Earnings Withholding | <input type="checkbox"/> Judgment-Interest | <input type="checkbox"/> Return of Property |
| <input type="checkbox"/> Administrative Action | <input type="checkbox"/> Enrollment | <input type="checkbox"/> Judgment-Summary | <input type="checkbox"/> Sale of Property |
| <input type="checkbox"/> Appointment of Receiver | <input type="checkbox"/> Expungement | <input type="checkbox"/> Liability | <input type="checkbox"/> Specific Performance |
| <input type="checkbox"/> Arbitration | <input type="checkbox"/> Findings of Fact | <input type="checkbox"/> Oral Examination | <input type="checkbox"/> Writ-Error Coram Nobis |
| <input type="checkbox"/> Asset Determination | <input type="checkbox"/> Foreclosure | <input type="checkbox"/> Order | <input type="checkbox"/> Writ-Execution |
| <input type="checkbox"/> Attachment b/f Judgment | <input type="checkbox"/> Injunction | <input type="checkbox"/> Ownership of Property | <input type="checkbox"/> Writ-Garnish Property |
| <input type="checkbox"/> Cease & Desist Order | <input type="checkbox"/> Judgment-Affidavit | <input type="checkbox"/> Partition of Property | <input type="checkbox"/> Writ-Garnish Wages |
| <input type="checkbox"/> Condemn Bldg | <input type="checkbox"/> Judgment-Attorney Fees | <input type="checkbox"/> Peace Order | <input type="checkbox"/> Writ-Habeas Corpus |
| <input type="checkbox"/> Contempt | <input type="checkbox"/> Judgment-Confessed | <input type="checkbox"/> Possession | <input type="checkbox"/> Writ-Mandamus |
| <input checked="" type="checkbox"/> Court Costs/Fees | <input type="checkbox"/> Judgment-Consent | <input type="checkbox"/> Production of Records | <input type="checkbox"/> Writ-Possession |
| <input checked="" type="checkbox"/> Damages-Compensatory | <input type="checkbox"/> Judgment-Declaratory | <input type="checkbox"/> Quarantine/Isolation Order | |
| <input checked="" type="checkbox"/> Damages-Punitive | <input type="checkbox"/> Judgment-Default | <input type="checkbox"/> Reinstatement of Employment | |

If you indicated **Liability** above, mark one of the following. This information is not an admission and may not be used for any purpose other than Track Assignment.

- Liability is conceded. Liability is not conceded, but is not seriously in dispute. Liability is seriously in dispute.

MONETARY DAMAGES (Do not include Attorney's Fees, Interest, or Court Costs)

- Under \$10,000 \$10,000 - \$30,000 \$30,000 - \$100,000 Over \$100,000

- Medical Bills \$ _____ Wage Loss \$ _____ Property Damages \$ _____

ALTERNATIVE DISPUTE RESOLUTION INFORMATION

Is this case appropriate for referral to an ADR process under Md. Rule 17-101? (Check all that apply)

- | | | | |
|----------------|--|--------------------------|--|
| A. Mediation | <input type="checkbox"/> Yes <input type="checkbox"/> No | C. Settlement Conference | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| B. Arbitration | <input type="checkbox"/> Yes <input type="checkbox"/> No | D. Neutral Evaluation | <input type="checkbox"/> Yes <input type="checkbox"/> No |

SPECIAL REQUIREMENTS

- If a Spoken Language Interpreter is needed, **check here and attach form CC-DC-041**
- If you require an accommodation for a disability under the Americans with Disabilities Act, **check here and attach form CC-DC-049**

ESTIMATED LENGTH OF TRIAL

*With the exception of Baltimore County and Baltimore City, please fill in the estimated **LENGTH OF TRIAL**.*

(Case will be tracked accordingly)

- | | |
|---|---|
| <input type="checkbox"/> 1/2 day of trial or less | <input type="checkbox"/> 3 days of trial time |
| <input type="checkbox"/> 1 day of trial time | <input type="checkbox"/> More than 3 days of trial time |
| <input type="checkbox"/> 2 days of trial time | |

BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM

For all jurisdictions, if Business and Technology track designation under Md. Rule 16-308 is requested, attach a duplicate copy of complaint and check one of the tracks below.

- | | |
|---|---|
| <input type="checkbox"/> Expedited - Trial within 7 months of Defendant's response | <input type="checkbox"/> Standard - Trial within 18 months of Defendant's response |
|---|---|

EMERGENCY RELIEF REQUESTED

**COMPLEX SCIENCE AND/OR TECHNOLOGICAL CASE
MANAGEMENT PROGRAM (ASTAR)**

*FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO ASTAR RESOURCES JUDGES under
Md. Rule 16-302, attach a duplicate copy of complaint and check whether assignment to an ASTAR is requested.*

- Expedited** - Trial within 7 months of Defendant's response **Standard** - Trial within 18 months of Defendant's response

**IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, OR BALTIMORE COUNTY,
PLEASE FILL OUT THE APPROPRIATE BOX BELOW.**

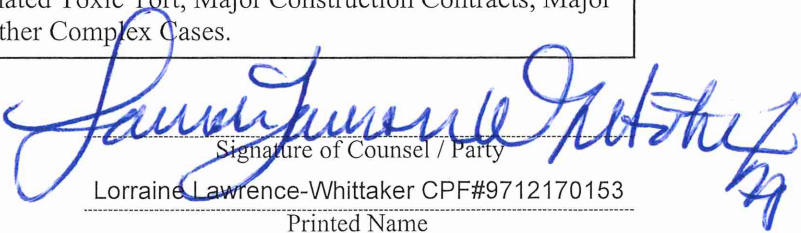
CIRCUIT COURT FOR BALTIMORE CITY (CHECK ONLY ONE)

- Expedited Trial 60 to 120 days from notice. Non-jury matters.
- Civil-Short Trial 210 days from first answer.
- Civil-Standard Trial 360 days from first answer.
- Custom Scheduling order entered by individual judge.
- Asbestos Special scheduling order.
- Lead Paint Fill in: Birth Date of youngest plaintiff
- Tax Sale Foreclosures Special scheduling order.
- Mortgage Foreclosures No scheduling order.

CIRCUIT COURT FOR BALTIMORE COUNTY

- Expedited (Trial Date-90 days) Attachment Before Judgment, Declaratory Judgment (Simple), Administrative Appeals, District Court Appeals and Jury Trial Prayers, Guardianship, Injunction, Mandamus.
- Standard (Trial Date-240 days) Condemnation, Confessed Judgments (Vacated), Contract, Employment Related Cases, Fraud and Misrepresentation, International Tort, Motor Tort, Other Personal Injury, Workers' Compensation Cases.
- Extended Standard (Trial Date-345 days) Asbestos, Lender Liability, Professional Malpractice, Serious Motor Tort or Personal Injury Cases (medical expenses and wage loss of \$100,000, expert and out-of-state witnesses (parties), and trial of five or more days), State Insolvency.
- Complex (Trial Date-450 days) Class Actions, Designated Toxic Tort, Major Construction Contracts, Major Product Liabilities, Other Complex Cases.

August 6, 2020
Date
5300 Dorsey Hall Drive, Suite 100
Address
Ellicott City MD 21042
City State Zip Code


Signature of Counsel / Party
Lorraine Lawrence-Whittaker CPF#9712170153
Printed Name

**IN THE CIRCUIT COURT OF MARYLAND FOR PRINCE GEORGES' COUNTY
Civil Division**

EBONY BATES *
6324 Suitland Rd. *
Suitland, MD 20746 *
Plaintiff *

* CASE NO:

v. *

RICHMOND MURAGURI *
4509 Blackbirds Folly Lane *
Bowie, MD 20720 *
Defendant. *

RITE AID CORPORATION *
30 Hunter Lane *
Camp Hill, PA 17011 *
Serve on Resident Agent: *
The Corporation Trust, Inc. *
2405 York Road, Suite 201 *
Lutherville-Timonium, MD 21093 *
Defendant. *

WALGREEN CO. *
300 Wilmot Road *
Deerfield, IL 60015 *
Serve On Resident Agent: *
CSC Lawyers Incorporating Co. *
7 St. Paul Street, Suite 820 *
Baltimore, MD 21202 *
Defendant. *

* * * * *

COMPLAINT

COMES NOW Plaintiff, Ebony Bates, by her attorneys Lorraine
Lawrence-Whittaker, PC, and **LAWRENCE WHITTAKER, PC**, and sues Richmond
Muraguri, Rite Aid Corporation, and Walgreen Co., and says:

1. Plaintiff, Ebony Bates (hereinafter "Plaintiff" or "Bates") is a resident of the State of Maryland and resides at the address noted above.

2. Defendant, Richmond Muraguri (hereinafter, "Defendant Muraguri"), is a resident of the State of Maryland and resides at the address noted above.

3. At all times relevant hereto, Defendant, Rite Aid Corporation (hereinafter, "Defendant Rite Aid"), was an entity incorporated under the laws of Maryland and operated a retail establishment located at 5741 Silver Hill Road, District Heights, MD 20747.

4. That on March 27, 2018, Defendant Walgreen Co. (hereinafter, "Defendant Walgreen"), acquired the retail establishment located at 5741 Silver Hill Road, District Heights, MD 20747, through a corporate merger with Rite Aid Corporation.

5. The battery and false imprisonment upon which the Complaint is based occurred in Prince George's County, Maryland where venue is claimed.

6. On or about August 10, 2017, Plaintiff went to the drive-through at the Rite Aid Pharmacy located at 5741 Silver Hill Road, District Heights, MD 20747, to retrieve a prescription for her wife, which had been dropped off on August 9, 2017.

7. That the Plaintiff was told by Defendant Muraguri that the prescription could not be filled as they did not have it.

8. That Defendant Muraguri told the Plaintiff to pull her car around out of the drive-through because he could not help her, basically telling Plaintiff to go away.

9. Plaintiff rang the “bell” at the drive-through in an attempt to discuss the situation further with the Defendant, but the Defendant refused to speak to her.

10. That the Plaintiff then parked her car and came into the Rite Aid Pharmacy to get back the aforesaid prescription, and told the Defendant Muraguri that she wanted to know his full name because she wanted to report the incident to Rite Aid.

11. That the Defendant refused to give Plaintiff his name, and kept covering up his name tag to prevent the Plaintiff from obtaining his name.

12. That the Plaintiff then attempted to take a series of pictures of the Defendant Muraguri with her cell phone, at which point Defendant Muraguri violently attempted to wrest Plaintiff’s cell phone from her hand.

13. That Defendant Muraguri grabbed Plaintiff’s hand and attempted to wrest her cell phone from her hand, causing pain and injury to the Plaintiff’s right thumb in the process.

14. Plaintiff Bates sought medical treatment for the injuries to her right thumb.

COUNT I
Ebony Bates v. Richmond Muraguri
BATTERY

Plaintiff hereby incorporates paragraphs one through fourteen herein and further alleges as follows:

15. Defendant Muraguri’s conduct constituted an intentional touching of Plaintiff Bates by Defendant Muraguri, without Plaintiff Bates’ consent, and was undertaken deliberately and with actual malice.

16. As a result of Defendant Muraguri's conduct, Plaintiff Bates has suffered and will continue to suffer severe and permanent injury including but not limited to a sprain to her right thumb; the Plaintiff was caused to incur medical bills and expenses; and was caused to endure pain, suffering, humiliation, mental and physical distress and severe monetary losses. Furthermore, the Plaintiff was precluded from enjoying her usual avocations. The Plaintiff also suffered loss of income.

WHEREFORE, Plaintiff Ebony Bates demands judgment against Defendant Richmond Muraguri in excess of Seventy-Five Thousand Dollars (\$75,000.00) in compensatory damages and Two Million Dollars (\$2,000,000.00) in punitive damages, plus interest, cost of this suit and such other and further relief as the Court may find appropriate.

COUNT II
Ebony Bates v. Richmond Muraguri
FALSE IMPRISONMENT

Plaintiff hereby incorporates paragraphs one through sixteen herein and further alleges as follows:

17. That when Defendant Muraguri assaulted the Plaintiff, the Defendant told her that he was going to call the police, at which time Defendant Muraguri requested over the public address system for other employees to lock the doors.

18. That at that time, the doors to the Rite Aid store were locked, thereby restraining Plaintiff from leaving the store.

19. That such action by Defendant Muraguri caused the Plaintiff to be unlawfully deprived of her liberty to leave the store.

20. That Plaintiff was detained against her will for several minutes.

21. That as a result of the actions by Defendant Muraguri, Plaintiff suffered damage by being unlawfully held against her will for an extended period of time.

22. By all of his behavior, Defendant Muraguri's actions toward Plaintiff Bates demonstrated actual malice.

WHEREFORE, Plaintiff Ebony Bates demands judgment against Defendant Richmond Muraguri in excess of Seventy-Five Thousand Dollars (\$75,000.00) in compensatory damages and One Million Dollars (\$1,000,000.00) in punitive damages, plus interest, cost of this suit and such other and further relief as the Court may find appropriate.

COUNT III
Ebony Bates v. Rite Aid Corporation
RESPONDEAT SUPERIOR

Plaintiff hereby incorporates paragraphs one through twenty-two herein and further alleges as follows:

23. That the Defendant Muraguri, at all times relevant hereto, was employed by Rite Aid Corporation at 5741 Silver Hill Road, District Heights, MD 20747, in Prince George's County, Maryland.

24. That the Defendant Richmond Muraguri, at all times relevant hereto, was also employed by Walgreen Co., the parent/subsequent entity to Rite Aid Corporation.

25. On August 10, 2017, Defendant Richmond Muraguri, while on duty as an employee of Defendant Rite Aid Corporation, without provocation, intentionally grabbed and twisted Plaintiff's right thumb inside the Rite Aid pharmacy at 5741 Silver Hill Road, District Heights, MD 20747, in Prince George's County, Maryland, causing Plaintiff to sustain severe injuries, and thereafter falsely imprisoning the Plaintiff.

26. That the above described acts of the Defendant Richmond Muraguri were committed within the scope of his employment with Rite Aid Corporation, in that he committed them while on duty, inside Defendant Rite Aid Corporation's place of business, and in furtherance of Defendant Rite Aid Corporation's interests.

27. As the Defendant Richmond Muraguri's employer, Rite Aid Corporation is responsible for all of the acts committed by Defendant Richmond Muraguri within the scope of his employment.

WHEREFORE, Plaintiff Ebony Bates demands judgment against Defendant Rite Aid Corporation in the amount of Seventy-Five Thousand Dollars (\$75,000.00) in compensatory damages and Two Million Dollars (\$2,000,000.00) in punitive damages, plus interest, cost of this suit and such other and further relief as the Court may find appropriate.

COUNT V
Ebony Bates v. Walgreen Co.
RESPONDEAT SUPERIOR

Plaintiff hereby incorporates paragraphs one through twenty-six herein and further alleges as follows:

27. That at all times relevant hereto, Defendant Richmond Muraguri was employed by Rite Aid Corporation at 5741 Silver Hill Road, District Heights, MD 20747, in Prince George's County, Maryland.

28. That the Defendant Richmond Muraguri, at all times relevant hereto, was also employed by Walgreen Co., the parent/subsequent entity to Rite Aid Corporation.

29. On August 10, 2017, Defendant Richmond Muraguri, while on duty as an employee of Defendant Rite Aid Corporation, without provocation, intentionally grabbed and twisted Plaintiff's right thumb inside the Rite Aid pharmacy at 5741 Silver

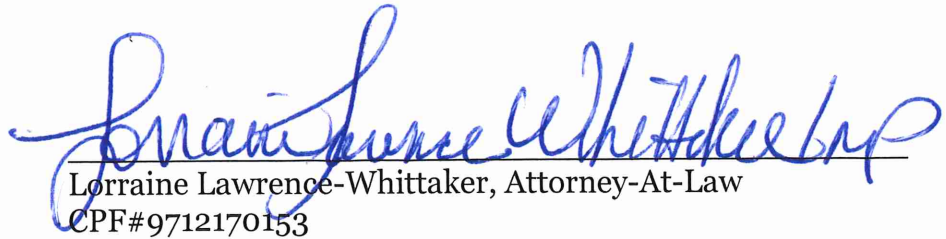
Hill Road, District Heights, MD 20747, in Prince George's County, Maryland, causing Plaintiff to sustain severe injuries, and falsely imprisoned the Plaintiff.

29. That the above described acts of the Defendant Richmond Muraguri were committed within the scope of his employment with Rite Aid Corporation, in that he committed them while on duty, inside Defendant Rite Aid Corporation's place of business, and in furtherance of Defendant Rite Aid Corporation's interests.

30. As the Defendant Muraguri's employer, Walgreen Co. is responsible for all of the acts committed by Defendant Richmond Muraguri within the scope of his employment.

WHEREFORE, Plaintiff Ebony Bates demands judgment against Defendant Walgreen Co. in the amount of Seventy-Five Thousand Dollars (\$75,000.00) in compensatory damages and Two Million Dollars (\$2,000,000.00) in punitive damages, plus interest, cost of this suit and such other and further relief as the Court may find appropriate.

Respectfully submitted,

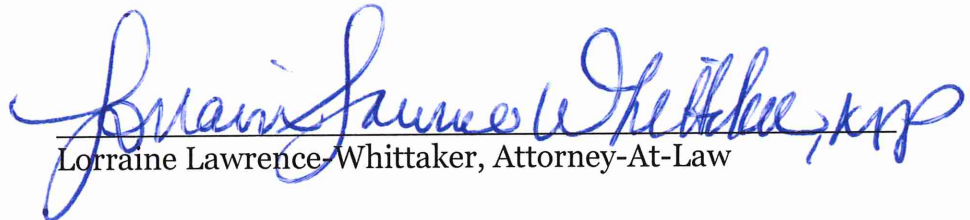


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JURY DEMAND

Plaintiff Ebony Bates, by and through her undersigned counsel hereby demands
that this matter be heard by a jury.



Lorraine Lawrence-Whittaker, Attorney-At-Law