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SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

YVETTE BENAVIDEZ, individually, and
as Personal Representative of the Estate of
Eloy Benavidez,

Plaintiff,

vs.

WASHINGTON STATE DEPARTMENT
OF TRANSPORTATION, a Washington
state agency; CENTRAL WASHINGTON
ASPHALT, INC., a Washington
corporation; PR SYSTEMS LLC, a
Washington limited liability company;
QUALITY PAVING, INC., a Washington
corporation; CONSTRUCTION AHEAD,
INC., dba PAVEMENT SURFACE
CONTROL, a Washington corporation;
SHAMROCK TRAFFIC, INC., a
Washington corporation; NORTH STAR
ENTERPRISES I, INC., a Washington
corporation; DOE 1; DOE 2; DOE 3; DOE
4; DOE 5,

Defendants.

No. **22201013-32**

COMPLAINT FOR DAMAGES FOR
WRONGFUL DEATH, FOR SURVIVAL
ACTION, AND FOR LOSS OF
CONSORTIUM

Plaintiff, Yvette Benavidez, individually, and as Personal Representative of the Estate
of Eloy Benavidez, complains and alleges as follows:



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1 **INTRODUCTION**

2 1. This is a wrongful death case arising from the Defendants’ negligent conduct
3 that caused Eloy Benavidez’s death in May 2019 due to injuries he sustained in a motor
4 vehicle crash. Yvette Benavidez, as Personal Representative for the Estate of Eloy
5 Benavidez, brings this wrongful death and survival action on behalf of the Estate and the
6 Estate’s Beneficiaries.

7
8 **PARTIES**

9 2. Eloy Benavidez (“Eloy”), deceased, prior to his death, resided in Fort Worth,
10 Tarrant County, Texas.

11 3. Yvette Benavidez (“Yvette”) is a citizen of Texas residing in Fort Worth,
12 Tarrant County, Texas.

13 4. Yvette is the appointed Personal Representative of the Estate of Eloy
14 Benavidez (“Estate”) and is qualified to administer the Estate. On November 9, 2021, Yvette
15 was granted Letters Testamentary by the Probate Court of Tarrant County, Texas.

16 5. Defendant Washington State Department of Transportation (“Defendant
17 WSDOT”) is an agency of the State of Washington located in Thurston County.

18 6. Defendant Central Washington Asphalt, Inc. is a corporation operating in the
19 State of Washington and headquartered in Grant County.

20 7. Defendant PR Systems LLC is a limited liability company operating in the
21 State of Washington and headquartered in Thurston County.

22 8. Defendant Quality Paving, Inc. is a corporation operating in the State of
23 Washington and headquartered in Grant County.

24 9. Defendant Construction Ahead, Inc., doing business as Pavement Surface
25 Control, is a corporation operating in the State of Washington and headquartered in Benton
26 County.

27 10. Defendant Shamrock Traffic, Inc. is a corporation operating in the State of
28 Washington and headquartered in Spokane County.

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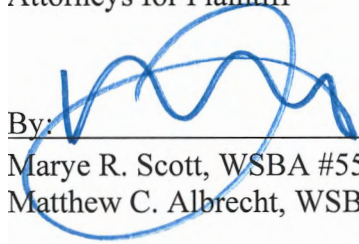
RELIEF REQUESTED

49. Based on the foregoing allegations, Plaintiff respectfully asks the Court to aware compensation to the Estate, to the beneficiaries of the Estate, and to Yvette for the following:

- a. The Estate’s Beneficiaries’ economic and noneconomic damages;
- b. The Estate’s Beneficiaries’ loss of service, affection, love, care, companionship, and consortium from the death of Eloy;
- c. Eloy’s economic and noneconomic damages;
- d. Economic losses to the Estate;
- e. Eloy’s pain and suffering, anxiety, emotional distress, and/or humiliation prior to death;
- f. Yvette’s loss of consortium;
- g. Legal fees and costs as allowed by law; and
- h. Any further relief the Court deems just and equitable.

DATED April 4, 2022.

ALBRECHT LAW PLLC
Attorneys for Plaintiff

By: 
Marye R. Scott, WSBA #55540
Matthew C. Albrecht, WSBA #36801