IN THE COMMON PLEAS COURT, DELAWARE COUNTY, OHIO
CIVIL DIVISION

COURTNEY BROOKE FREDERICK, ET AL.,	:	
	:	**CASE NO. 25 cv c 12 1394**
Plaintiffs,	:	
	:	**JUDGE MARIANNE T. HEMMETER**
v.	:	
	:	
BUGI JUNG, ET AL,	:	
	:	
Defendants.	:	

ENTRY

Upon motion of the Plaintiff's and for good cause shown, the Court hereby grants Plaintiff's motion, for Authorizing Service of Process of Defendant Bugi Jung, by Alternative means under Civ.R. 4.5 (B)(6).

signed by mhemmeter 10/26/2026 10:52:08 7yiL6H8q

Judge Marianne T. Hemmeter

Prepared and Approved by:

/s/ Jedidiah I. Bressman
Jedidiah I. Bressman (0096637)
David A. Bressman (0047128)
Richard P. Bogetich , III (0105143)
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ATTORNEY'S FOR PLAINTIFFS

Natalie Fravel, Clerk
Common Pleas Courts, Delaware County, OH
25 CV C 12 1394
FILED: 10/26/2026 11:00 AM

IN THE COURT OF COMMON PLEAS DELAWARE COUNTY, OHIO

SUMMONS

Case Number: **25 CV C 12 1394**

Plaintiff(s):		**Defendant(s):**
COURTNEY BROOKE FREDERICK 3891 FRY ROAD OSTRANDER, OH 43061	VS	BUGI JUNG 9503 WAYNE BROWN DRIVE POWELL, OH 43065

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned that a complaint (a copy of which is hereto attached and made a part hereof) has been filed against you in this court by the plaintiff(s) named herein.

You are required to serve upon the plaintiff(s) attorney, or upon the plaintiff(s) if he/she/they have/has no attorney of record, a copy of your answer to the complaint within twenty-eight (28) days after service of this summons upon you, exclusive of the day of service. Said answer must be filed with this court within three (3) days after service on plaintiff(s) attorney.

The name and address of the plaintiff(s) attorney is as follows:

JEDIDIAH BRESSMAN
LAW OFFICE OF DAVID A BRESSMAN
2727 TULLER PARKWAY
SUITE 100
DUBLIN, OH 43017

COPY

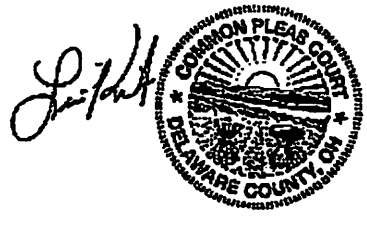
If you fail to appear and defend, judgment by default will be taken against you for the relief demanded in the complaint.

Date: December 4, 2025

Certified Article Number
9414 7266 9904 2243 9493 87
SENDER'S RECORD

Natalie Fravel
Delaware County Clerk of Courts
117 North Union Street
Delaware, OH 43015

By Deputy Clerk:



In the Court of Common Pleas, Delaware County, Ohio

Courtney Brooke Frederick
3891 Fry Road
Ostrander, OH 43061-9412

Case No.:

And

Judge:

Christopher Scott Frederick
3891 Fry Road
Ostrander, OH 43061-9412

And

Courtney Brooke Frederick, as parent
and natural guardian of
Jaquelin Gabrielle Frederick
3891 Fry Road
Ostrander, OH 43061-9412

And

Courtney Brooke Frederick, as parent
and natural guardian of
Patsy Elizabeth Frederick
3891 Fry Road
Ostrander, OH 43061-9412

Plaintiff,

Vs

Bugi Jung
9503 Wayne Brown Drive
Powell, OH 43065-7723

And

Erie Insurance Company
c/o EI Service Corp.
100 Erie Insurance Place

Clerk of Common Pleas Courts, Delaware County, OH
25 CV C 12 1394 - HEMMETER, MARIANNE T
FILED: 12/03/2025 05:15 PM

Erie, PA 16530

and

Anthem Blue Cross Blue Shield
c/o Carelon
PO Box 659940
San Antonio, TX 78265-9939

and

XYZ Corporations, 1-10,
Name/Address Unknown

and

John Does, 1-10
Name/Address Unknown

Defendants.

COMPLAINT

FIRST CLAIM

1. Plaintiff Courtney Brooke Frederick states that on or about July 27, 2024, she was operating a motor vehicle northbound on SR-745, in the Township of Concord, Delaware County, Ohio when the vehicle being operated by Plaintiff was struck by the vehicle being operated by Defendant Bugi Jung [the "collision"].
2. Plaintiffs Christopher Scott Frederick and, through their parent and natural guardian, Jaquelin Gabrielle Frederick and Patsy Elizabeth Frederick were passengers in the vehicle operated by Plaintiff Courtney Brook Frederick.
3. The collision was a direct and proximate result of the negligence of Defendant Bugi Jung.

4. The collision was caused through no action, or inaction, of Plaintiff Courtney Frederick.

5. As a direct and proximate result of the negligence of Defendant Bugi Jung, Plaintiffs were caused to suffer both economic and non-economic injuries.

6. As a direct and proximate result of the above, Plaintiff has been injured in an amount exceeding $25,000.00 but which cannot be stated with specificity.

SECOND CLAIM

7. Plaintiffs hereby incorporate the allegations of the above Claims.

8. Plaintiffs bring this action against Defendants John Does 1-10 and XYZ Corporations 1-10 whose names and addresses are currently unknown to Plaintiff but who may be responsible for Plaintiffs injuries as alleged herein. Plaintiffs will amend this Complaint once such John Does and XYZ Corporations are identified.

9. Defendants John Does 1-10 and XYZ Corporations 1-10 identities are currently unknown and cannot, presently, be reasonably ascertained with due diligence. Ohio Civ. R. 15 is expressly referenced and, by such reference, incorporated herein.

10. As a direct and proximate result of the negligence of Defendants, Plaintiff was caused to suffer those injuries described in the above ¶'s.

11. As a direct and proximate result of the above, Plaintiffs have been injured in an amount exceeding $25,000.00 but which cannot be stated with specificity.

THIRD CLAIM

12. Plaintiffs hereby incorporate the allegations of the above Claims.

13. To the extent the evidence establishes that Defendant Bugi Jung was:

a. using any electronic devices immediately prior to the collision including but not limited to cellular devices, radio, GPS, DVD player, gaming system, ETC., and/or

b. was otherwise engaged in distracted driving immediately prior to the collision including but not limited to eating or drinking, smoking, talking to other passengers, grooming, reading (including maps), ETC., then Defendant Bugi Jung's conduct may merit the imposition of punitive damages.

14. As a direct and proximate result of the above, Plaintiffs has been injured in an amount exceeding $25,000.00 but which cannot be stated with specificity.

FOURTH CLAIM

15. Plaintiff hereby incorporates the allegations of the above Claims.

16. Defendant Anthem Blue Cross Blue Shield is a health insurance company joined pursuant to O.R.C.P. 19 because such entity claims to have, or may claim to have, a subrogation interest arising from the collision.

17. Plaintiff demands that Anthem Blue Cross Blue Shield protect its own interests and incur its own attorney's fees and expenses in relation to protection of any asserted subrogation interests.

18. Defendant Anthem Blue Cross Blue Shield is subject to the mandates of ORC 2323.44 "Rights of subrogee."

19. Plaintiff further advises that if Anthem Blue Cross Blue Shield does not defend itself that said Defendant may be subject to a motion requesting that it be deemed to have waived and/or forfeited any rights it may have had for subrogation and/or reimbursement for

monies issued to pay any Plaintiffs' medical bills arising from the collision.

FIFTH CLAIM

20. Plaintiffs hereby incorporate the allegations of the above Claims.

21. At all times, Plaintiffs were an insured, or considered an insured, as defined by the applicable policy issued by Defendant Erie Insurance Company.

22. Defendant Erie Insurance Company is an insurance company licensed by the Ohio Department of Insurance to conduct business in the State of Ohio which such business includes the sale of motor vehicle insurance policies.

23. Plaintiffs, always, was covered for the collision under a policy of motor vehicle insurance issued to Plaintiff by Defendant Erie Insurance Company, policy #: Q078107128.

24. Plaintiff has completely complied with all conditions contained in the above-referenced policy of motor vehicle insurance issued by Defendant Erie Insurance Company.

25. Defendant Erie Insurance Company is joined herein because Defendant Bugi Jung may be declared to be uninsured or may be determined to be underinsured. Therefore, Defendant Erie Insurance Company is a necessary party to the within litigation.

26. Defendant Erie Insurance Company is joined herein because it claims, or may claim, a right of subrogation in relation to medical expenses paid on behalf of Plaintiff. Therefore, Defendant Erie Insurance Company is a necessary party to the within litigation.

27. Defendant Erie Insurance Company is joined herein because the insurance policy limits of other Defendants are presently unknown and, therefore, Plaintiffs may present uninsured or underinsured claims. See *Sarmiento v. Grange Mut. Cas. Co.* 106 Ohio St. 3d 403. Therefore, Defendant Erie Insurance Company is a necessary party to the within

litigation.

28. Plaintiffs demand all rights accorded to him under the subject Erie Insurance Company policy of insurance should an uninsured, underinsured, or medical payments claim be presented.

29. Defendant Erie Insurance Company is subject to the mandates of ORC 2323.44 "Rights of subrogee."

30. Plaintiffs further advise that if Defendant Erie Insurance Company does not defend itself that said Defendant may be subject to a motion requesting that it be deemed to have waived and/or forfeited any rights it may have had for subrogation and/or reimbursement for monies issued to pay any Plaintiffs' medical bills arising from the collision.

WHEREFORE, Plaintiffs demands judgment:

1. Against Defendants Bugi Jung for economic and non-economic damages, punitive damages [if appropriate] and fees, costs and expenses incurred, herein.
2. Against any party claiming a right of recovery/subrogation/reimbursement against Plaintiffs should they be awarded money damages arising from the collision unless such parties set forth their claims and otherwise act to enforce and support same.
3. Against Erie Insurance Company should an uninsured, underinsured or medical payments claim become necessary.
4. For all other relief which the facts of this cause merits

Respectfully submitted,

/s/ Jedidiah I. Bressman
Jedidiah I. Bressman (0096637)
David A. Bressman (0047128)
Richard "Tre" P. Bogetich (0105143)
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