

NO. DC-24-05389

EDVARD PETROVSKIY AND IRINA	\$	IN THE DISTRICT COURT
GROMOVA	\$	
Plaintiffs,	\$	162nd
	\$	
V.	\$	_____ JUDICIAL DISTRICT
	\$	
RASHEE RICE AND THEODORE KNOX	\$	
	\$	
Defendants.	\$	OF DALLAS COUNTY, TEXAS

PLAINTIFFS' ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COME Edvard Petrovskiy and Irina Gromova, hereinafter called Plaintiffs, complaining of and about Rashee Rice and Theodore Knox, hereinafter called Defendants, and for cause of action show unto the Court the following:

A. DISCOVERY CONTROL PLAN LEVEL

1. Plaintiffs intend that the discovery in this case be conducted under Discovery Level 3.

B. PARTIES AND SERVICE

2. Plaintiff, Edvard Petrovskiy, is an individual whose address is in Dallas County, Texas.

3. The last three numbers of Edvard Petrovskiy's driver's license number are XXX. Edvard Petrovskiy has a social security number that ends in XXXX.

4. Plaintiff, Irina Gromova, is an individual whose address is in Dallas County, Texas.

5. The last three numbers of Irina Gromova's driver's license number are XXX. Irina Gromova has a social security number that ends in XXXX.

6. Defendant Rashee Rice, an individual who may be found and served in Texas. The service of said Defendant, as described above, can be effected by personal delivery.

7. Defendant Theodore Knox, an individual who may be found and served in Texas. The service of said Defendant, as described above, can be effected by personal delivery.

C. JURISDICTION AND VENUE

8. The subject matter in controversy is within the jurisdictional limits of this court.

9. Plaintiffs seek:

a. monetary relief of over \$1,000,000.

10. This court has jurisdiction over the parties because the Defendants are Texas residents or meet minimum contacts.

11. Venue in Dallas County is proper in this cause under Section 15.002(a)(1) of the Texas Civil Practice and Remedies Code because all or a substantial part of the events or omissions giving rise to this lawsuit occurred in this county.

D. FACTS

12. Rashee Rice, Defendant in this cause, is a famous American football player. Rice plays with the Kansas City Chiefs as a wide receiver in the National Football League. Rice was selected by the Chiefs in the second round of the 2023 NFL draft and won Super Bowl LVIII over the San Francisco 49ers. Rice also holds the NFL record for most playoff receptions by a rookie, catching 26 passes during the Super Bowl run. Rice has amassed both fame and wealth. With that good fortune also comes responsibility. However, Rice did not abide by the principles of prudence and responsibility on March 30, 2024. Despite his physical abilities and responsibilities as a public figure, Rice raced a high-powered vehicle through the public roads of Dallas County, Texas, lost control, and injured several innocent people including the Plaintiffs in this cause.

13. On March 30, 2024, Rice was the leaseholder of a Lamborghini Urus. Rice leased the Lamborghini through "The Classic Lifestyle," a Dallas-based exotic car rental company. Rice was also a leaseholder of a late-model Chevrolet Corvette Stingray, which Rice leased through D&M Leasing, a Fort-Worth-based leasing company. Rice provided the Corvette to Theodore Knox, Co-Defendant in this cause, with the intent of operating

the Lamborghini alongside Knox in the Corvette at the same time and along the same path of travel.

14. At around 6:15 p.m. on March 30, 2024, Rice was operating the Lamborghini Urus, a vehicle which is described as a "Super Sport Utility Vehicle" that has over six-hundred-forty (640) horsepower, can accelerate from zero to sixty miles an hour in less than 3.5 seconds and is capable of a top speed of 190 miles per hour. While Knox was operating a Chevrolet Corvette Stingray, LT, a "Super Sports Car," which has four-hundred-ninety-five (495) horsepower, can accelerate from zero to sixty miles an hour in 2.9 seconds and is capable of a top speed of 194 miles per hour. The two drivers operating their respective cars challenged one another to a high-speed race knowing that the public road upon which they were racing, U.S. 75 North, was heavily trafficked with commuters.

15. Despite awareness of multiple innocent commuters and their families occupying the public streets of Dallas County, Texas, Rice and Knox tested the full power of their sports cars. Rice and Knox deliberately raced the cars at extreme speeds well over the speed limit. Rice and Knox outpaced the commuters, traveling at speeds of 70 miles per hour, as if they were standing still. Whilst at the limits of their sports cars, and

whilst weaving around traffic, Rice and Knox misjudged a maneuver to evade traffic on the left side of the road into an emergency lane and hit a median. The high speeds of the vehicles caused a rotation that demolished cars in their path and set off a high-speed chain reaction of other commuter cars being struck and spun into each other. The resulting chain reaction of violent collisions impacted the vehicle in which the Plaintiffs were commuting. The resulting force to the Plaintiffs' vehicle, a 2022 white Lexus 350 SUV, caused it to rotate into the middle of the road at high speed and eventually crash to a standstill.

16. Following the collisions caused by multiple commuter vehicles, Rice's Lamborghini and Knox's Corvette came to rest. The Defendants were traveling with other passengers. Defendants and their passengers had the opportunity to witness the carnage of the vehicles, and the severely injured, bleeding, and visibly distressed commuters that were in plain sight. Despite innocent victims calling for emergency help and desperately trying to exit their destroyed vehicles in a state of shock, Defendants intentionally, knowingly evaded assisting injured commuters and absconded from the scene. Defendants exited their exotic "supercars," gathered their companions, and briskly

walked past their victims toward an exit ramp. The victims and bystanders of the carnage tried to engage the Defendants, but they were ignored in the Defendants' attempt to flee without responsibility.

17. Following the incident, Defendant Rice, through counsel, made a public statement of responsibility and goodwill. However, it is abundantly evident that no goodwill was displayed at the scene. Moreover, it is obvious that by the time Rice had his moral awakening, the opportunity to gather evidence about Rice's and Knox's mental state and level of intoxication from any intoxicating substances would be forever diminished or lost. The Defendants' flight from the scene creates circumstances that could only be motivated by collusion to conceal the whole truth and evade full accountability.

18. On the other hand, and in contrast to the complete lack of responsibility displayed by the Defendants, Plaintiff Irinia Gromova, was prudently operating the Plaintiffs' vehicle and was properly restrained in her seatbelt. Plaintiff Edvard Petrovskiy was riding innocently in the front passenger seat of the Plaintiffs' vehicle and was properly restrained in his seatbelt. Despite the Plaintiffs' safety precautions and prudent operation of their vehicle, they were

severely injured by the tremendous force of the high-speed impact. Plaintiffs' injuries include trauma to the brain, lacerations to the face requiring stitches, multiple contusions about the body, disfigurement, internal bleeding, and other internal and external injuries that may only be fully revealed over the course of medical treatment. As victims of negligence, gross negligence, negligence per se and criminal conduct, Plaintiffs now sue.

E. CAUSES OF ACTION

19. Plaintiffs hereby sue both Defendants in this cause for the following causes of action and their corresponding joint and several liability.

COUNT I. PLAINTIFFS' CLAIM OF NEGLIGENCE

Plaintiffs incorporate by reference paragraphs 1 through 19 herein as if set forth in full.

20. Defendants had a duty to exercise the degree of care that a reasonably careful person would use to avoid harm to others under circumstances similar to those described herein.

21. Plaintiffs' injuries were proximately caused by Defendants negligent, careless, and reckless disregard of said duty.

22. The negligent, careless, and reckless disregard of duty of Defendants consisted of, but is not limited to, the following acts and omissions:

- A. In that Defendants failed to keep a proper lookout for Plaintiffs' safety that would have been maintained by a person of ordinary prudence under the same or similar circumstances;
- B. In that Defendants failed to turn its motor vehicle to the left or right in an effort to avoid the collision complained of;
- C. In that Defendants operated their vehicle in Plaintiffs' lane of traffic and failed to give Plaintiffs at least one-half of the roadway;
- D. In that Defendants failed to keep such distance away from Plaintiffs' motor vehicle as a person using ordinary prudent care would have done;
- E. In that Defendants were operating their motor vehicle at a rate of speed which was greater than that would have been operated by a person of ordinary prudence under the same or similar circumstances;
- F. In that Defendants failed to apply their brakes to their motor vehicles in a timely and prudent manner and/or wholly failed to apply their brakes in order to avoid the collision in question;
- G. In that Defendants failed to obey traffic laws in effect at the time and place in maintaining a single lane of traffic [Tex. Trans. Code 545.060], not using the emergency and shoulder lanes to pass vehicles [Tex. Trans. Code 545.060], maintaining speed under the posted speed limit [Tex. Trans. Code 545.351], using signals to indicate lane changes [Tex. Trans. Code 545.106].

COUNT II.
PLAINTIFFS' CLAIM OF
NEGLIGENCE PER SE AGAINST DEFENDANTS

Plaintiffs incorporate by reference paragraphs 1 through 22 herein as if set forth in full.

23. Defendants' conduct described herein constitutes an un-excused breach of duty imposed by Texas Transportation Code Sections 545.060; 545.351; 545.106.

24. The statutes contained herein impose a duty on the operator of a vehicle to enter into and maintain their lane of traffic, obey posted speed limits, and use their signal to indicate a lane change.

25. Plaintiffs are members of the class that Texas Transportation Code Sections 545.060; 545.351; and 545.106; were designed to protect.

26. Defendants' un-excused breach of the duty imposed by the Texas Transportation Code cited, proximately caused the Plaintiffs' injuries described herein.

COUNT III.
DAMAGES FOR INJURED PLAINTIFFS

Plaintiffs incorporate by reference paragraphs 1 through 26 herein as if set forth in full.

27. As a direct and proximate result of the occurrence made the basis of this lawsuit, the subject of this lawsuit, Plaintiffs were caused to suffer severe injuries to their bodies, which include but are not limited to, trauma to the brain, lacerations to the face requiring stitches, multiple contusions about the body, disfigurement, internal bleeding, and other internal and external injuries which may only fully be revealed over the course medical treatment, and to incur the following damages:

- A. Reasonable medical care and expenses in the past. These expenses were incurred by the subject of this lawsuit for the necessary care and treatment of the injuries resulting from the accident complained of herein and such charges are reasonable and were usual and customary charges for such services in Dallas County, Texas;
- B. Reasonable and necessary medical care and expenses which will in all reasonable probability be incurred in the future;
- C. Physical pain and suffering in the past;
- D. Physical pain and suffering in the future;
- E. Physical impairment in the past;

- F. Physical impairment which, in all reasonable probability, will be suffered in the future;
- G. Loss of earning capacity which will, in all probability, be incurred in the future;
- H. Disfigurement in the past;
- I. Disfigurement in the future;
- J. Mental anguish in the past;
- K. Mental anguish in the future;
- L. Fear of future disease or condition;
- M. Cost of medical monitoring and prevention in the future.
- N. Loss of earnings in the past;
- O. Loss of earning capacity which will, in all probability, be incurred in the future;
- P. Property damage in the amount of \$71,122.69.

**COUNT IV.
EXEMPLARY DAMAGES**

Plaintiffs incorporate by reference paragraphs 1 through 27 herein as if set forth in full.

28. Defendants acts or omissions described above, when viewed from the standpoint of Defendants at the time of the act or omission, involved an extreme degree of risk, considering the probability and magnitude of the potential harm to Plaintiffs and others. Defendants had actual, subjective awareness of the risk involved in the above-described acts or omissions, but

nevertheless proceeded with conscious indifference to the rights, safety, or welfare of Plaintiffs and others.

29. Based on the facts stated herein, the Plaintiffs request exemplary damages be awarded to Plaintiffs from Defendants.

**COUNT V.
CAP-EXEMPT EXEMPLARY DAMAGES**

Plaintiffs incorporate by reference paragraphs 1 through 29 herein as if set forth in full.

30. Due to the criminally reckless and/or tortious conduct of the Defendants as set forth above, Plaintiffs herein sue for punitive damages in all amounts that are recoverable under the law.

31. Plaintiffs would show that Defendants engaged in conduct that amounted to the commission of criminal offenses. The actions of the Defendants set forth above violate the following sections of the Texas Penal Code, as follows:

Texas Penal Code 22.02(a)(1), et seq., Assault:

(a) A person commits an offense if the person:

(1) intentionally, knowingly, or recklessly causes bodily injury to another, including the person's spouse;

Texas Penal Code 22.02, et seq., Aggravated Assault:

(a) A person commits an offense if the person commits assault as defined in § 22.01 and the person:

- (1) causes serious bodily injury to another, including the person's spouse; or
- (2) uses or exhibits a deadly weapon during the commission of the assault.

32. As a consequence of the Defendants' unlawful conduct as described above, any and all statutory caps on punitive damages proposed under Section 41.008 of the Texas Civil Practice and Remedies Code do not apply since the Defendants' conduct, being criminal in nature, violated the Texas Penal Code sections set forth above, which said sections are specifically enumerated carve-outs under Section 41.008 of the Texas Civil Practice and Remedies Code.

33. As a consequence, Plaintiffs herein sue Defendants for punitive damages in the amount not less than ten million dollars (\$10,000,000.00).

F. PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs, Edvard Petrovskiy and Irina Gromova, respectfully pray that the Defendants be cited to appear and answer herein and that upon a final hearing of the cause, judgment be entered for the Plaintiffs against Defendants, jointly and severally, for damages in an amount within the jurisdictional limits of the Court; exemplary damages, as addressed to each Defendant per

Section 41.006, Chapter 41, Texas Civil Practice and Remedies Code, excluding interest, and as allowed by Sec. 41.008, Chapter 41, Texas Civil Practice and Remedies Code, together with pre-judgment interest (from the date of injury through the date of judgment) at the maximum rate allowed by law; post-judgment interest at the legal rate, costs of court; and such other and further relief to which the Plaintiffs may be entitled at law or in equity.

Respectfully submitted,

Mathur Law Offices, P.C.

By: */s/ Sanjay S. Mathur*

Sanjay S. Mathur

Texas Bar No. 00794245

Email:

service@mathurlawoffices.com

2989 N. Stemmons Freeway

Suite 1000

Dallas, TX 75247

Tel. (214) 378-8880

Fax. (214) 378-8890

Attorney for Plaintiffs

Edvard Petrovskiy and Irina
Gromova

PLAINTIFFS HEREBY DEMAND TRIAL BY JURY