

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

TATUM M. CAMPBELL,)	
)	
Plaintiff,)	JURY DEMAND
)	
vs.)	Case No.: See Top of Page
)	
HSSB, LLC, T.C. RESTAURANT)	
GROUP, LLC d/b/a LUKE’S 32)	
BRIDGE FOOD + DRINK, and)	
CHRIS BULLARD,)	
)	
Defendants.)	

COMPLAINT

Introduction

1. This complaint is being filed to recover compensation for the injuries and damages sustained by Ms. Tatum Campbell that were caused by Defendants’ negligence at Luke’s 32 Bridge Food + Drink on February 29, 2020.

Parties

- 2. Plaintiff Tatum Campbell is an adult citizen and resident of Arizona.
- 3. Defendant HSSB, LLC (“HSSB”) is an Ohio limited liability company.
- 4. Defendant T.C. Restaurant Group, LLC (“TCRG”) is an Ohio limited liability company.
- 5. Defendant Chris Bullard is an adult citizen and resident of Tennessee.

Pertinent Facts

6. On Friday, February 28 and Saturday, February 29, 2020, Defendants HSSB and TCRG operated a restaurant, bar, and entertainment venue under the name of “Luke’s 32 Bridge Food + Drink,” which was located at 301 Broadway, Nashville,

Tennessee (for simplicity, both HSSB and TCRG and their joint business venture will be referred to hereinafter as “Luke’s”).

7. On Friday, February 28, 2020, at approximately 10:50 p.m., Ms. Campbell walked into Luke’s along with some friends; they were celebrating her birthday.

8. A little over an hour later, on Saturday, February 29, 2020, Ms. Campbell and her friends were on the first floor of Luke’s watching Defendant Chris Bullard perform for the crowd up on the stage.

9. Mr. Bullard asked the crowd if anyone was celebrating a birthday so that he could ostensibly recognize them.

10. Hearing Mr. Bullard’s request, and seeing as she was there celebrating her birthday, Ms. Campbell walked up to him.

11. Despite having security guards on the premises, not one of them attempted to stop Ms. Campbell from getting on the stage. (Even though it was entirely reasonable and foreseeable that someone might approach the stage and even get up on it in response to Mr. Bullard’s request.)

12. Upon seeing Ms. Campbell up on stage, Mr. Bullard tried to escort her off of it and unintentionally let her fall to the ground, where she hit her head and suffered a concussion and other injuries.

13. Ms. Campbell received treatment for her injuries upon returning to Arizona shortly thereafter.

What Luke's and Mr. Bullard Did Wrong

14. Luke's assumed a duty to manage and protect patrons on its premises by having security guards working then as described herein.

15. Luke's breached that duty by allowing through its security guards, who were operating in the course and course of their employment of agency (or as apparent agents), a patron like Ms. Campbell to make it up on stage as described herein.

16. Mr. Bullard also assumed a duty to escort Ms. Campbell off of the stage was negligent in doing that as described herein.

17. Defendants' negligence as described herein was the factual and legal cause of Ms. Campbell's injuries and damages.

Luke's Vicarious Liability

18. Based upon *respondeat superior* and all other forms of vicarious liability, Luke's is liable for the negligent acts and omissions of its agents and employees committed in the course and scope of their agency and employment as described herein.

Prayer for Relief

19. As required by applicable law, Ms. Campbell respectfully demands a judgment against Defendants via a jury's verdict representing a reasonable sum of compensatory damages not to exceed \$75,000.00 exclusive of interest and costs, plus all other remedies that she is entitled to under applicable law.

Respectfully submitted,

TONY DUNCAN LAW

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