

IN THE CIRCUIT COURT OF CARROLL COUNTY, TENNESSEE

JOHN DAVIS and JESSICA DAVIS )  
on behalf of their minor child )  
ZOE DAVIS, )  
 )  
Plaintiffs, )

vs. )

SABRINA DUCKSWORTH and )  
CLARKSVILLE MONTGOMERY )  
COUNTY SCHOOL SYSTEM, )  
 )  
Defendants. )

CASE NO. 26CV8

JURY DEMAND FILED

CASE # \_\_\_\_\_  
A.M. APR 02 2026 P.M. 2:36

SARAH BRADBERRY  
CARROLL CO. CIRCUIT COURT  
BY Boyd

COMPLAINT

Come now Plaintiffs, John Davis and Jessica Davis, on behalf of their minor child, Zoe Davis, by and through their undersigned counsel, and respectfully submit this Complaint and state as follows:

PARTIES

1. Plaintiff John Davis, on behalf of his minor child Zoe Davis, is a resident and citizen of Clarksville, Montgomery County, Tennessee.
2. Plaintiff Jessica Davis, on behalf of her minor child Zoe Davis, is a resident and citizen of Clarksville, Montgomery County, Tennessee.
3. Plaintiff Zoe Davis was a minor resident of Clarksville, Montgomery County, Tennessee at the time of the crash that forms the basis of this lawsuit.
4. Plaintiff Zoe Davis passed away on March 27, 2026, as a result of this collision.
5. Upon information and belief, Sabrina Ducksworth is a resident and citizen of Clarksville, Montgomery County, Tennessee.

6. Upon information and belief, Defendant Clarksville Montgomery County School System is a public corporation with a principal place of business located at 621 Gracey Avenue, Clarksville, Tennessee 37040 and can be served through the Director of Schools, Dr. Jean Luna-Vedder, 621 Gracey Avenue, Clarksville, Tennessee 37040, or wherever she may be found.

#### **JURISDICTION AND VENUE**

7. All events which form the basis of this Complaint for Damages occurred in Carroll County, Tennessee.

8. Venue is properly situated in Carroll County pursuant to Tenn. Code Ann. § 20-4-101.

9. This Court has general jurisdiction of this matter pursuant to Tenn. Code Ann. § 16-10-101.

#### **FACTS**

10. On or about March 27, 2026, Defendant Sabrina Ducksworth was driving a school bus owned by Defendant Clarksville Montgomery County School System on Highway 70 at or near Cedar Grove in Carroll County, Tennessee.

11. Minor Plaintiff Zoe Davis was a passenger in the school bus owned by Defendant Clarksville Montgomery County School System that Defendant Sabrina Ducksworth was operating in Carroll County, Tennessee.

12. While Defendant Sabrina Ducksworth was operating Defendant Clarksville Montgomery County School System's bus, she veered from her lane of travel, over a solid double yellow line, and struck a Tennessee Department of Transportation dump truck traveling in the opposite lane head on.

13. Upon information and belief, Defendant Clarksville Montgomery County School System's bus was not equipped with seat belts for the passengers.

14. Defendant Sabrina Ducksworth failed to maintain a proper lookout.

15. Defendant Sabrina Ducksworth failed to keep in her proper lane.

16. Defendant Sabrina Ducksworth operated a Clarksville Montgomery County School System school bus while fatigued and/or without proper rest.

17. Defendant Sabrina Ducksworth failed to pay proper attention.

18. Defendant Sabrina Ducksworth operated a Clarksville Montgomery County School System school bus while distracted.

19. Defendant Sabrina Ducksworth failed to keep the Clarksville Montgomery County School System school bus she was driving under proper control.

20. Defendant Sabrina Ducksworth failed to use reasonable and due care in the operation of the school bus she was driving so as to avoid injury to other persons, including minor Plaintiff Zoe Davis.

## **CAUSES OF ACTION**

### **NEGLIGENCE**

21. Plaintiffs reincorporate the allegations contained in the preceding paragraphs as though set forth verbatim.

22. Plaintiffs aver that Defendant Sabrina Ducksworth, was operating Defendant Clarksville Montgomery County School System's bus with Defendant Clarksville Montgomery County School System's authority, consent, and/or knowledge pursuant to Tennessee Code § 55-10-311.

23. Defendant Sabrina Ducksworth was, at all times pertinent to this Complaint, an employee, agent, and/or independent contractor of Defendant Clarksville Montgomery County School System.

24. Plaintiffs rely upon the doctrines of agency, respondeat superior, and aver that Defendant Clarksville Montgomery County School System is liable for the negligence of its employee, agent, and/or independent contractor, Defendant Sabrina Ducksworth.

25. Defendant Sabrina Ducksworth had a duty to operate the school bus in a safe and prudent manner in accordance with her training as a school bus driver and so as not to endanger the life and welfare of minor Plaintiff Zoe Davis and the motoring public. This duty included keeping a proper lookout, paying attention to the roadway in front of her, not operating a school bus while fatigued and/or not properly rested, keeping the school bus in the proper lane, keeping the school bus under proper control, and operating the school bus at a reasonable and prudent speed in accordance with the conditions of the roadway and all traffic laws and regulations.

26. Defendant Sabrina Ducksworth acted with less than and/or failed to act with ordinary and reasonable care in the operation of the school bus.

27. At all times relevant to this cause of action, Defendant Sabrina Ducksworth had a duty to drive in conformance with the Federal Motor Carrier Safety Administration and Tennessee law as well as the industry and corporate standards and guidelines emanating from these safety regulations and Tennessee law, including but not limited to, the required knowledge and skills set forth in 49 CFR § 383.11 and § 383.113 as well as the mandates of 49 CFR 390-395.

28. At all times relevant to this cause of action, Defendant Clarksville Montgomery County School System and Defendant Sabrina Ducksworth were subject to and required to obey the minimum safety standards established by the Federal Motor Carrier Safety Administration (49

CFR §§ 301-309), either directly, or as adopted by the Tennessee Department of Transportation Safety Rules & Regulations 1340-6-1-.20 and pursuant to T.C.A. §§ 65-2-102 and 65-15-113.

29. Plaintiffs aver that all of the acts and/or omissions of common law negligence of the driver, Defendant Sabrina Ducksworth, are imputed to the owner of the school bus, Defendant Clarksville Montgomery County School System.

30. Defendant Sabrina Ducksworth is guilty of the following acts of common law negligence, which are the direct and proximate cause of the injuries complained of herein, to wit:

- a. Negligently failing to use that degree of care and caution in the operation of his vehicle as required of a reasonable and prudent person under the same or similar circumstances existing at the time and place of the aforementioned collision;
- b. Negligently failing to maintain a proper lookout for other vehicles and persons;
- c. Negligently failing to keep the school bus she was operating under proper control;
- d. Negligently and recklessly failing to warn minor Plaintiff Zoe Davis;
- e. Negligently failing to devote her full time and attention to the operation of the vehicle;
- f. Negligently failing to bring and/or keep the vehicle she was operating under proper control when she saw or should have seen, in the exercise of reasonable care, that a collision was imminent;
- g. Negligently operating a school bus while fatigued and/or not properly rested;
- h. Negligently failing to prevent the accident and resulting injuries and losses of minor Plaintiff Zoe Davis when she knew or in the exercise of ordinary care, should have known that a collision was imminent;
- i. Negligently veering off the interstate and roadway; and

j. Negligently and recklessly changing lanes improperly.

31. Defendant Clarksville Montgomery County School System was independently negligent in the following ways:

- a. Negligently hiring or contracting with Defendant Sabrina Ducksworth to drive the school bus at issue;
- b. Negligently entrusting Defendant Sabrina Ducksworth to drive a school bus professionally;
- c. Negligently training Defendant Sabrina Ducksworth in the inspection of the school bus;
- d. Negligently retaining Defendant Sabrina Ducksworth to drive the school bus at issue;
- e. Negligently failing to conduct proper and required checks on the background of its employee, agent and/or contractor, Defendant Sabrina Ducksworth;
- f. Negligently failing to supervise its employee, agent and/or contractor, Defendant Sabrina Ducksworth;
- g. Negligently allowing Defendant Sabrina Ducksworth to operate its school bus while fatigued and/or not properly rested;
- h. Negligently failing to exercise ordinary care to determine its employees, agents, and/or contractors fitness for the task of driving a school bus;
- i. Negligently failing to have or enforce an appropriate policy on properly and safely changing or merging lanes;
- j. Negligently failing to have or enforce an appropriate policy on operating a school bus while fatigued and/or not properly rested;

- k. Negligently failing to properly maintain the school bus at issue in this case;
- l. Negligently routing Defendant Sabrina Ducksworth and/or negligently allowing Defendant Sabrina Ducksworth to change lanes improperly;
- m. Otherwise violating state laws and federal regulations governing school bus operations; and
- n. Otherwise failing to act as a reasonably prudent entity under the circumstances.

32. As a direct and proximate result of Defendant Clarksville Montgomery County School System's and Defendant Sabrina Ducksworth's negligence, minor Plaintiff Zoe Davis sustained fatal injuries, which would not have otherwise occurred.

33. The above-referenced acts of negligence of Defendant Clarksville Montgomery County School System and Defendant Sabrina Ducksworth were the direct and proximate cause of the incident described in this Complaint, which resulted in minor Plaintiff Zoe Davis sustaining fatal injuries.

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#### **NEGLIGENCE PER SE**

35. Plaintiffs reincorporate the allegations contained in the preceding paragraphs as though set forth verbatim.

36. Plaintiffs aver that Defendant Sabrina Ducksworth was guilty of violating one or more of the following statutes of the State of Tennessee, each and every such statute being in full force and effect at the time and place of the collision complained of, each and every such violation

constituting a separate and distinct act of negligence per se, and each and every such act constituting a direct and proximate cause of minor Plaintiff Zoe Davis's fatal injuries to-wit:

- a. Tenn. Code Ann. § 55-8-136: Drivers to exercise due care.
- b. Tenn. Code Ann. § 55-8-103: Required obedience to traffic laws.
- c. Tenn. Code Ann. § 55-8-123: Failure to keep in proper lane.

37. At all times relevant, the school bus driven by Defendant Sabrina Duckworth was being operated and used with authority, consent and knowledge and/or as an agent for Defendant Clarksville Montgomery County School System for its use and benefit and/or as an agent for Defendant Clarksville Montgomery County School System for business purposes.

38. Defendant Clarksville Montgomery County School System is liable to Plaintiffs for the negligence and negligence per se of Defendant Sabrina Duckworth pursuant to the principles of respondeat superior, agency, bailment, and/or under the presumptions set forth in Tenn. Code Ann. § 55-10-311 and § 55-10-312.

#### **IMPUTED LIABILITY**

39. Plaintiffs reincorporate the allegations contained in the preceding paragraphs as though set forth verbatim.

40. At the time of the subject collision, Defendant Sabrina Duckworth was operating a school bus on behalf of Defendant Clarksville Montgomery County School System.

41. Defendant Clarksville Montgomery County School System is responsible for the actions of Defendant Sabrina Duckworth in regard to the subject collision described in this complaint under the doctrine of lease liability, agency, and/or apparent agency.

#### **NEGLIGENT ENTRUSTMENT**

42. Plaintiffs reincorporate the allegations contained in the preceding paragraphs as though set forth verbatim.

43. Upon information and belief, Defendant Clarksville Montgomery County School negligently entrusted, furnished, and/or gave permission to Defendant Sabrina Ducksworth to operate its school bus, which was the direct and proximate cause of minor Plaintiff Zoe Davis's fatal injuries.

44. At all times relevant to this cause of action, the school bus operated by Defendant Sabrina Ducksworth was negligently and recklessly entrusted to her by Defendant Clarksville Montgomery County School System in spite of Defendant Sabrina Ducksworth's incompetence to operate its school bus and Defendant Clarksville Montgomery County School System's knowledge of Defendant Sabrina Ducksworth's incompetence.

45. Defendant Clarksville Montgomery County School System's negligent entrustment of its school bus to Defendant Sabrina Ducksworth is the direct and proximate cause of the collision and minor Plaintiff Zoe Davis's fatal injuries.

#### **NEGLIGENT HIRING, TRAINING, RETENTION, AND SUPERVISION**

46. As the employer of Defendant Sabrina Ducksworth, Defendant Clarksville Montgomery County School System's had a duty to investigate Defendant Sabrina Ducksworth's fitness for employment prior to hiring.

47. Defendant Clarksville Montgomery County School System negligently failed to conduct an adequate pre-employment inquiry into Defendant Sabrina Ducksworth's fitness for employment as a school bus driver.

48. As the employer of Defendant Sabrina Ducksworth, Defendant Clarksville Montgomery County School System had an ongoing duty to provide training and supervision to Defendant Sabrina Ducksworth for the duration of her continued employment.

49. Defendant Clarksville Montgomery County School System's hiring practices fell below the applicable standard of care, and negligently resulted in a breach of duty to the other drivers on the road by negligently allowing untrained and/or unqualified drivers to operate its school buses.

50. Defendant Clarksville Montgomery County School System negligently failed to conduct adequate training for Defendant Sabrina Ducksworth, including but not limited to instruction of the Federal Motor Carrier Safety Administration standards, the Commercial Driver License guidelines, or the policies and procedures authored by Defendant Clarksville Montgomery County School System.

51. Defendant Clarksville Montgomery County School System negligently failed to conduct supervision of Defendant Sabrina Ducksworth sufficiently to ensure that Defendant Sabrina Ducksworth followed all applicable rules, statutes, guidelines, or other regulations governing the operation of the school bus entrusted to Defendant Sabrina Ducksworth by Defendant Clarksville Montgomery County School System for use in the course and scope of her employment with Defendant Clarksville Montgomery County School System.

52. Based on the conduct described herein, Defendant Clarksville Montgomery County School System negligently hired, trained, retained, and/or supervised Defendant Sabrina Ducksworth, which was a direct and proximate cause of the collision and of minor Plaintiff Zoe Davis's fatal injuries.

#### **DAMAGES**

53. Plaintiffs reincorporate the allegations contained in the preceding paragraphs as though set forth verbatim.

54. Plaintiffs have suffered losses as a direct and proximate result of the collision.

55. Plaintiffs have incurred medical bills and other expenses as a direct and proximate result of the collision.

56. Plaintiffs have endured physical pain and mental suffering as a direct and proximate result of the collision.

57. Minor Plaintiff Zoe Davis suffered loss of life as a direct and proximate result of the collision.

58. Plaintiffs have suffered loss of enjoyment of life as a direct and proximate result of the collision.

59. Plaintiffs have suffered lost wages, loss of earning capacity, or other out of pocket expenses, or some combination thereof, as a direct and proximate result of the collision.

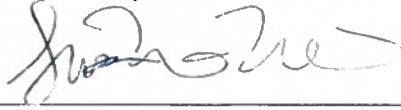
60. Plaintiffs seek to recover for all of their damages allowed under Tennessee law.

#### **RELIEF SOUGHT**

**WHEREFORE**, Plaintiffs respectfully request.

1. That a jury be empaneled to hear their cause.
2. That they be awarded compensatory damages in an amount deemed appropriate by the jury.
3. Since Tennessee law requires a person bringing suit to state the maximum amount of damages sought, Plaintiffs state that they seek whatever amount a jury decides is fair and reasonable, but not to exceed \$5,000,000.00, plus costs and post-judgment interest as allowed by law, and such further relief as the Court may deem just and equitable.

Respectfully Submitted,



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