

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

Angela Pickard, Individually and as
Executor of the Estate of Archie Pickard,
deceased, Dustin Pickard, Wendy Elmore,
Joni Thompson and Wayne Pickard,

Plaintiffs

v.

Amazon.com, Inc.; Amazon.com, LLC;
Amazon.com Services LLC; Amazon.com
Services LLC formerly known as
Amazon.com Services, Inc.; Amazon.com
Services, Inc.; Amazon.com Services, Inc.
formerly known as Amazon Fulfillment
Services, Inc.; Amazon Fulfillment
Services, Inc.; and Amazon.com Sales,
Inc.,

Defendants

Civil Action No.:

Assigned to Judge:

TRIAL BY JURY REQUESTED

PLAINTIFFS’ ORIGINAL COMPLAINT AND JURY DEMAND

COME NOW Plaintiffs Angela Pickard, Individually and as Executor of the Estate of Archie Pickard, deceased, Dustin Pickard, Wendy Elmore, Joni Thompson and Wayne Pickard (“Plaintiffs”), and file this Original Complaint complaining of Amazon.com, Inc., Amazon.com, LLC, Amazon.com Services LLC, Amazon.com Services LLC formerly known as Amazon.com Services, Inc., Amazon.com Services, Inc., Amazon.com Services, Inc. formerly known as Amazon Fulfillment Services, Inc., Amazon Fulfillment Services, Inc., and Amazon.com Sales, Inc. and for cause of action would respectfully show this Honorable Court the following:

I.

PARTIES

1. Plaintiff Angela Pickard, Individually and as Executor of the Estate of Archie Pickard, deceased, is a citizen and resident of Louisiana.
2. Plaintiff Dustin Pickard is a citizen and resident of Louisiana.
3. Plaintiff Wendy Elmore is a citizen and resident of Louisiana.
4. Plaintiff Joni Thompson is a citizen and resident of Louisiana.
5. Plaintiff Wayne Pickard is a citizen and resident of Colorado.
6. Defendant Amazon.com, Inc. is a corporation that is incorporated in the state of Delaware and has its principal place of business in Washington. Defendant is doing business in the State of Louisiana and caused an injury through its act or omission in the State of Louisiana. Defendant does not have a registered agent for service of process in the state of Louisiana. Service of Process on Defendant may be made according to the laws of the state of Louisiana, pursuant to LSA-R.S. 13:3201 and LSA-R.S. 13:3204 by either serving its registered agent for service in Washington: Corporation Service Company, 300 Deschutes Way SW Ste 208 M; C-CSC1, Tumwater, Washington 98501, or by service on any employee of suitable age and discretion at 410 Terry Avenue, Seattle, WA 98109, the place where the business of the corporation is regularly conducted.
7. Defendant Amazon.com, LLC is a limited liability company that is organized under the laws of the state of Delaware and has its principal place of business in Washington. Defendant is doing business in the State of Louisiana and caused an injury through its act or omission in the State of Louisiana. Defendant does not have a registered

agent for service of process in the state of Louisiana. Service of Process on Defendant may be made according to the laws of the state of Louisiana, pursuant to LSA-R.S. 13:3201 and LSA-R.S. 13:3204 by serving its registered agent for service in Washington: Corporation Service Company, 300 Deschutes Way SW Ste 208 M; C-CSC1, Tumwater, Washington 98501, or by service on any employee of suitable age and discretion at 410 Terry Avenue, Seattle, WA 98109, the place where the business of the corporation is regularly conducted.

8. Defendant Amazon.com Services LLC is a Delaware limited liability company with its principal place of business in the state of Washington. Such Defendant is registered to do business in the State of Louisiana and can be served through its designated agent for service in the State of Louisiana: Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, Louisiana 70802.

9. Defendant Amazon.com Services LLC formerly known as Amazon.com Services, Inc. is a Delaware limited liability company with its principal place of business in the state of Washington. Such Defendant is registered to do business in the State of Louisiana and can be served through its designated agent for service in the State of Louisiana: Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, Louisiana 70802.

10. Defendant Amazon.com Services, Inc. is a Delaware corporation with its principal place of business in the state of Washington. Such Defendant is registered to do business in the State of Louisiana and can be served through its designated agent for service in the State of Louisiana: Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, Louisiana 70802.

11. Defendant Amazon.com Services, Inc. formerly known as Amazon Fulfillment Services, Inc. is a Delaware corporation with its principal place of business in the state of Washington. Such Defendant is registered to do business in the State of Louisiana and can be served through its designated agent for service in the State of Louisiana: Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, Louisiana 70802.

12. Defendant Amazon Fulfillment Services, Inc. is a Delaware corporation with its principal place of business in the state of Washington. Such Defendant is registered to do business in the State of Louisiana and can be served through its designated agent for service in the State of Louisiana: Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, Louisiana 70802.

13. Defendant Amazon.com Sales, Inc. is a Delaware corporation with its principal place of business in the state of Washington. Such Defendant is registered to do business in the State of Louisiana and can be served through its designated agent for service in the State of Louisiana: Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, Louisiana 70802.

14. Hereinafter, Defendants Amazon.com, Inc., Amazon.com, LLC, Amazon.com Services LLC, Amazon.com Services LLC formerly known as Amazon.com Services, Inc., Amazon.com Services, Inc., Amazon.com Services, Inc. formerly known as Amazon Fulfillment Services, Inc., Amazon Fulfillment Services, Inc., and Amazon.com Sales, Inc. will be referred to collectively as “Amazon” and/or “Defendants.”

II.

JURISDICTION AND VENUE

15. This Court has jurisdiction over this case under 28 U.S.C. § 1332. There is a complete diversity of parties and the amount in controversy is over \$75,000.

16. Plaintiffs are citizens of Louisiana and Colorado.

17. The Amazon entities are citizens of Delaware with their principal place of business in Washington.

18. This Court has specific personal jurisdiction over Amazon. Amazon had a pecuniary interest in and facilitated the transaction underlying this litigation, involving a purchase by a Louisiana resident of a product made available for sale in Louisiana and shipped to Louisiana by use of Amazon's website and, upon information and belief, Amazon collected Louisiana sales tax on behalf of the seller for the transaction.

19. Plaintiffs believe that jurisdiction and venue is proper in the Shreveport Division of the Western District of Louisiana, because a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred at 3535 Colquitt Rd, Shreveport, Louisiana 71118-4207, where Plaintiffs' decedent, Archie Pickard, was killed as a result of using the unreasonably dangerous product that was shipped to him at that address after he purchased it through Amazon's website.

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