

EXHIBIT "A"

CIVIL DOCKET

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[illegible]

STATE OF TEXAS
COUNTY OF SHELBY
I, _____, Clerk of the County of Shelby, Texas, do hereby certify that _____ is the true and correct copy of the _____ of _____ of _____.

STATE OF TEXAS
COUNTY OF SHELLEY
I, Lori Oliver, District Clerk of
County, Texas, do hereby certify that
forgoing is a true and correct copy
original record, now in my lawful cus-
possession, as appears of record in Vol. _____
Page _____ Minutes of said court on
my office.

Witness my official hand and seal of office
this 8-14-2020 day of _____, 2020.

LORI OLIVER, DISTRICT CLERK
SHELLEY COUNTY, TEXAS

For Book

vs.

Jason Orsak, Erica Anthony, and Maria Cruz,

Defendants

273RD TH JUDICIAL DISTRICT

ORIGINAL PETITION

Rolandette Glenn ("Plaintiff") complains of Jason Orsak, Erica Anthony, and Maria Cruz (collectively "Defendants") and will respectfully show the Court the following:

I.

NATURE OF ACTION

1. This is an action to recover damages after Plaintiff contracted COVID-19 while working at Tyson's meatpacking plant in Center, Texas.

II.

DISCOVERY

2. Discovery in this matter may be conducted under Level 2 of the Texas Rules of Civil Procedure.

III.

JURISDICTION AND VENUE

3. Plaintiff's claims arise under the laws of Texas.
4. The Court has jurisdiction over this case because Plaintiff seeks damages within the jurisdictional limits of this Court. Further, this case is not removable because Plaintiff has not



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of business in this County. Venue is also proper under Texas Civil Practice and Remedies Code Section 15.002(a)(1) because the acts or omissions giving rise to this suit occurred in this County.

IV.

PARTIES

6. Plaintiff is a resident of Texas.
7. Defendant Jason Orsak is a resident of Texas and was the Complex Safety Manager for the Tyson facility in Center, Texas. Mr. Orsak can be served with process at his home address of 445 FM 699 Center, Texas 75935 or wherever he may be found.
8. Defendant Erica Anthony is a resident of Texas and was one of the Safety Coordinators for the Tyson facility in Center, Texas. Ms. Anthony can be served with process at her home address of 217 Parrott Drive, Ste. 205, Nacogdoches, Texas 75965 or wherever she may be found.
9. Defendant Maria Cruz is a resident of Texas and was one of the Safety Coordinators for the Tyson facility in Center, Texas. Ms. Cruz can be served with process at her home address of 3438 N. U.S. Highway 271, Mount Pleasant, Texas 75455 or wherever she may be found.



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began implementing proactive safety measures to prevent the spread of COVID-19.

11. In Texas, Governor Abbott issued a stay-at-home order for the State of Texas that took effect on April 2, 2020. Despite the stay-at-home order, Plaintiff was required to continue working at the Tyson meatpacking plant in Center, Texas after April 2, 2020. Plaintiff also worked at the Center, Texas meatpacking plant prior to April 2, 2020.

12. Both prior to April 2, 2020, and after April 2, 2020, Tyson failed to take adequate precautions to protect the workers at its meatpacking facilities, including the Center, Texas meatpacking facility. Even when the rest of the country and the State of Texas were taking significant precautions to prevent the spread of COVID-19 even prior to April 2, 2020, Tyson did not do the same thing. And even after April 2, 2020, Tyson still required its employees to come to work and did not provide adequate precautions or protections to help protect its employees from COVID-19.

13. Defendants Jason Orsak (the complex safety manger), Erica Anthony (safety coordinator), and Maria Cruz (safety coordinator) were directly responsible for implementing a safe work environment at Tyson's Center, Texas meatpacking plant.¹ These Defendants were also directly responsible for implementing and enforcing adequate safety measures to prevent the spread of COVID-19 to the Tyson employees working at the Center, Texas meatpacking plant.

¹ Tyson Foods chose not to obtain workers compensation insurance in the State of Texas. Thus, Tyson and its agents (the named Defendants in this lawsuit) are liable to Plaintiff for her personal injuries sustained in the course and scope of her employment.



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