

**IN THE CIRCUIT COURT OF WASHINGTON COUNTY, ARKANSAS  
CIVIL DIVISION**

**KHRISTAN URAN**

**PLAINTIFF**

**v.**

**Case No. 72CV-23-**

**DOUGLAS RAMSEY**

**DEFENDANT**

**COMPLAINT**

Plaintiff, Khristan Uran, for his Complaint against Defendant, Douglas Ramsey, states:

**Introduction**

1. On September 17, 2022—following an Arkansas Razorbacks football game in Fayetteville—Defendant smashed his fist through Plaintiff’s car window, Defendant repeatedly struck Plaintiff, Defendant viciously bit Plaintiff’s nose, and Defendant threatened to kill Plaintiff.

2. Plaintiff seeks damages for Assault, Battery, Outrage, and Civil Action by a Crime Victim.

**Parties**

3. Plaintiff resides in Washington County, Arkansas.

4. Defendant resides in Washington County, Arkansas.

**Jurisdiction**

5. This Court has personal and subject matter jurisdiction.

**Venue**

6. This Court is the proper venue.

## **Facts**

7. On September 17, 2022, Plaintiff attended the Arkansas v. Missouri State football game with his fiancé's parents, Matthew Woolard and Cindy Woolard (together, "WOOLARDS").

8. After the game, Plaintiff and the Woolards returned to Plaintiff's vehicle in the Stadium Drive Parking Garage.

9. Plaintiff let Matthew Woolard drive Plaintiff's vehicle because Matthew Woolard's is familiar with post-game traffic patterns and routes.<sup>1</sup>

10. Despite it being Plaintiff's "turn" to enter the line of cars exiting the parking garage, Defendant attempted to prevent Matthew Woolard from pulling out of the parking space.

11. When Matthew Woolard successfully entered the line of cars, Defendant—in a fit of rage—exited his vehicle and smashed through Plaintiff's rear window with his fist.

12. The police report contains the following description of Defendant's actions from an eyewitness: "[Defendant] advanced immediately toward the rear passenger side of the hatchback. [Defendant] did not stop to inspect the front of his vehicle as I expected. [Defendant] then said in a loud voice something to the effect of 'You hit my truck!' and simultaneously struck the hatchback sloped rear glass area with a clenched right fist. . . . The blow was struck with great force and a significant impact was audible."

13. The loud crash shocked Plaintiff, and he exited his vehicle to determine what Defendant had done.

14. Defendant—under the mistaken belief that Matthew Woolard had bumped into Defendant's car—said Plaintiff's car had hit Defendant's car.<sup>2</sup>

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<sup>1</sup> To eliminate speculation, Plaintiff was not intoxicated.

<sup>2</sup> The police report indicated that the reporting officer "saw no damage or signs of contact to the tire or surrounding area."

15. Defendant then grabbed Plaintiff by the collar of his shirt such that Plaintiff could not get away.

16. The police report contains the following description of Defendant's actions from an eyewitness: "Then I could only see [Defendant] start to talk angrily and start throwing punches at another person . . . . I did not see [Defendant] retreat or back away as he threw multiple punches at the head area of the other person."

17. The Police Report contains the following statement from Sergeant David Robertson, "West Fork Officer Kathy Gilliam told me several people had informed her the male later identified as Mr. Douglas Ramsey was aggressor in the incident."

18. Defendant began to violently strike Plaintiff with Defendant's fists.

19. Plaintiff began to swing back at Defendant in an attempt to protect himself and to get away.

20. Then, Defendant savagely bit into Plaintiff's nose.

21. Plaintiff felt as Defendant slowly increased the pressure.

22. Plaintiff was helpless as Defendant's teeth ripped Plaintiff's tissue and tore Plaintiff's septum.

23. Plaintiff experienced immense fear and terror as Defendant was latched onto Plaintiff's face in an uncontrollable rage.

24. This fear and terror continued for what felt like a lifetime.

25. After Defendant finally released his bite, Defendant threatened to kill Plaintiff. This threat was credible given the extreme violence Defendant had exhibited.

26. The police report contains the following description of Defendant's actions from an eyewitness: "I heeded my wife's advice to stay in the vehicle as [Defendant] was obviously muscular and in an uncontrollable rage. I felt I would be in risk of bodily injury if I tried to intervene. My

granddaughter was crying in the back seat from witnessing the violent scene and my wife told her to cover her head and lay down on the floor. I saw several men arrive and start to restrain and verbally de-escalate [Defendant]. I clearly heard [Defendant] shout in a loud angry manner directed at [Plaintiff] ‘I am going to kill you...!’ I was shocked.”

27. The police report contains the following recount of Defendant’s actions from an eyewitness: “Mr. Carr then said he heard [Defendant] say to [Plaintiff], while looking and pointing at him, ‘I will kill you’ or ‘I’m going to kill you.’”

28. Plaintiff sustained bodily harm as a result of Defendant’s conduct including, but not limited to, a closed head injury, an open wound to the face, a nasal laceration, and a contusion of hand.

29. Plaintiff was admitted to the emergency room and is receiving ongoing medical treatment as a result of Defendant’s conduct.

30. Plaintiff is sustaining emotional distress as a result of Defendant’s conduct including, but not limited to, fear, loss of sleep, humiliation, and embarrassment.

31. Plaintiff experienced immense pain and suffering as a result of Defendant’s actions.

32. Plaintiff was particularly traumatized by Defendant biting into Plaintiff’s face. Plaintiff is a practicing pharmacist and knows that the human bite is the most complicated non-venomous bite there is. Plaintiff knew that human bite wounds tend to become infected as this one ultimately did.

33. Defendant knew or ought to have known, in the light of the surrounding circumstances, that his conduct would naturally and probably result in injury and damage, and he continued such conduct with malice and/or in reckless disregard of the consequences.

34. Defendant intentionally pursued a course of conduct for the purpose of causing injury and damage.

35. Defendant is rightfully facing the following felony charges as a result of his actions:

- i. Battery;
- ii. Criminal Mischief; and
- iii. Terroristic Threatening.

36. Pictures of Plaintiff's injuries are attached hereto as Exhibit A.

37. A picture of Plaintiff's vehicle is attached hereto as Exhibit B.

#### **COUNT I: ASSAULT**

38. Plaintiff incorporates the previous paragraphs.

39. Defendant acted in such a manner as to create a reasonable apprehension of immediate harmful and offensive contact upon the person of Plaintiff.

40. Defendant intended to cause that apprehension.

41. Plaintiff was put in that apprehension.

42. Plaintiff is entitled to compensatory, special, and punitive damages in an amount to be established at trial.

#### **COUNT II: BATTERY**

43. Plaintiff incorporates the previous paragraphs.

44. Defendant acted with intent to cause harmful and offensive contact with Plaintiff.

45. Harmful and offensive contact with Plaintiff resulted.

46. Plaintiff is entitled to compensatory, special, and punitive damages in an amount to be established at trial.

#### **COUNT III: OUTRAGE**

47. Plaintiff incorporates the previous paragraphs.

48. Plaintiff sustained damages.

49. Defendant willfully and wantonly engaged in extreme and outrageous conduct.

50. Defendant's conduct proximately caused damage to Plaintiff in the nature of emotional distress and bodily harm.

51. Plaintiff is entitled to compensatory, special, and punitive damages in an amount to be established at trial.

#### **COUNT IV: CIVIL ACTION BY A CRIME VICTIM**

52. Plaintiff incorporates the previous paragraphs.

53. "Any person injured or damaged by reason of conduct of another person that would constitute a felony under Arkansas law may file a civil action to recover damages based on the conduct." Ark. Code Ann. § 16-118-107.

54. "A person commits the offense of terroristic threatening in the first degree if . . . [w]ith the purpose of terrorizing another person, the person threatens to cause death or serious physical injury or substantial property damage to another person; . . ." Ark. Code Ann. § 5-13-301.

55. "Terroristic threatening in the first degree is a Class D felony." *Id.*

56. Defendant—with the purpose of terrorizing Plaintiff—threatened to cause death to Plaintiff.

57. "A person commits battery in the second degree if . . . [w]ith the purpose of causing physical injury to another person, the person causes serious physical injury to another person; . . ." Ark. Code Ann. § 5-13-202.

58. "[B]attery in the second degree is a Class D felony." Ark. Code Ann. *Id.*

59. Defendant—with the purpose of causing physical injury to Plaintiff—caused serious physical injury to Plaintiff.

60. Plaintiff is entitled to compensatory, special, and punitive damages in an amount to be established at trial.

61. Plaintiff is entitled to his attorneys' fees.

## JURY TRIAL DEMAND

62. Plaintiff incorporates the previous paragraphs.

63. Plaintiff demands a jury trial.

WHEREFORE, Plaintiff prays for a judgment against Defendant in an amount far more than required for federal court jurisdiction in diversity of citizenship cases, for his attorneys' fees, for his costs, and for all other relief to which he is entitled.

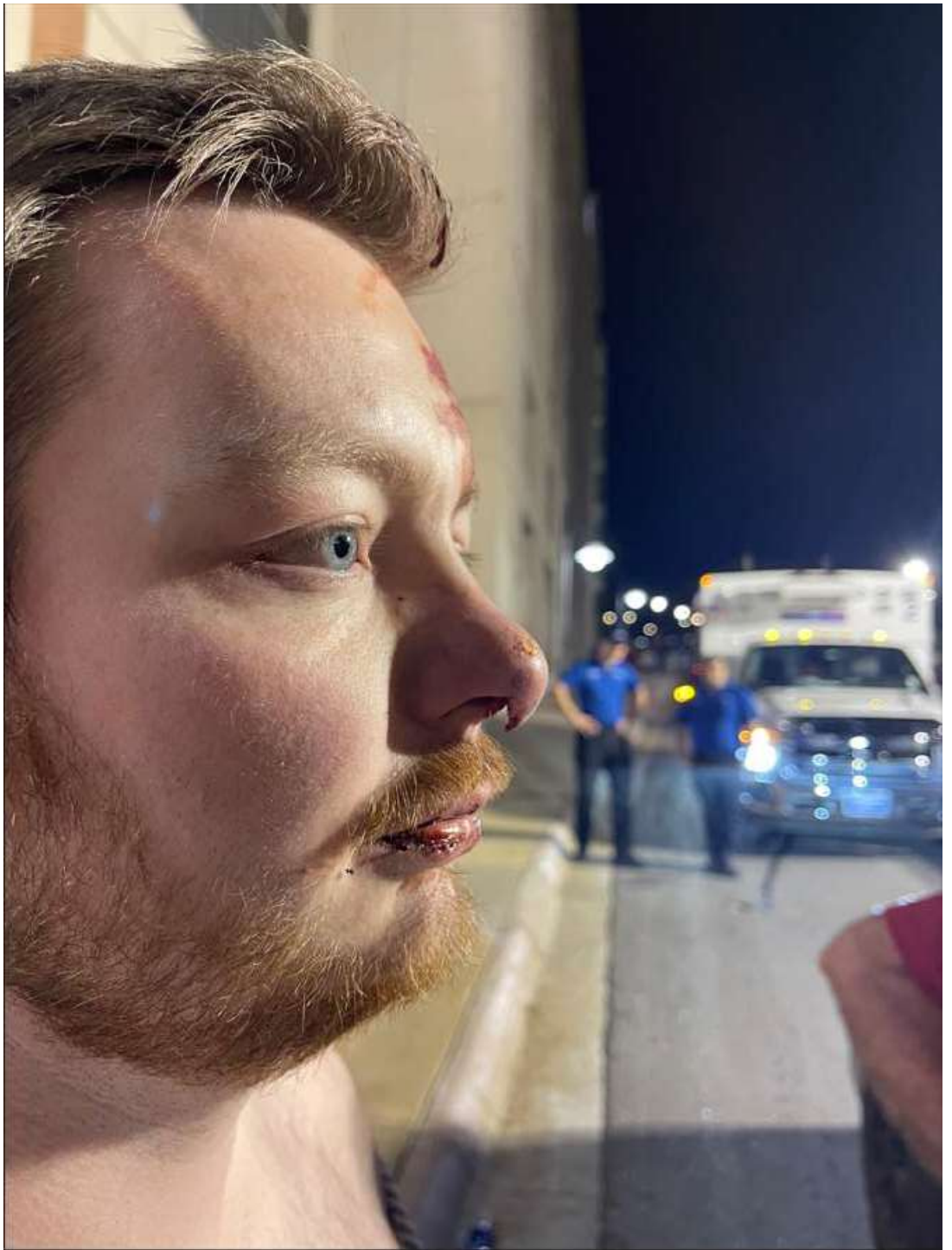
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# EXHIBIT A







# EXHIBIT B





Arkansas  
[Redacted]

CROSSTREK