

IN THE CIRCUIT COURT OF GREENE COUNTY, MISSOURI
DIVISION 1

STACEY BARFIELD)
c/o RANSIN INJURY LAW)
1650 E. BATTLEFIELD RD, #140)
SPRINGFIELD, MISSOURI 65804)

and)

MARKUS RYAN OWENS)
c/o RANSIN INJURY LAW)
1650 E. BATTLEFIELD RD, #140)
SPRINGFIELD, MISSOURI 65804)

Plaintiffs,)

vs.)

CRAIG MICHAEL WOOD)
1538 E. STANFORD)
SPRINGFIELD, MISSOURI 65804)

SERVICE TO:)
GREENE COUNTY JAIL)
JAIL ID#104957)
POD A)
1000 N. BOONEVILLE)
SPRINGFIELD, MISSOURI 65802)

Defendant.)

Case No: 1431-CC00377

PETITION FOR DAMAGES
WRONGFUL DEATH
JURY TRIAL REQUESTED

COME NOW, Plaintiffs through their attorney David W. Ransin, of Ransin Injury Law, and for their petition against defendant Craig Michael Wood, state as follows:

1. Stacey Barfield (Mrs. Barfield) is the surviving natural mother of Hailey Owens, age 10, deceased, and a resident of Greene County, Springfield, Missouri.
2. Markus Ryan Owens (Mr. Owens) is the surviving natural father of Hailey Owens, age 10, deceased and resides in Webster County, Marshfield, Missouri.
3. There are no other known individuals as defined in Section 537.080 R.S.Mo. who are entitled to bring or join in a wrongful death action arising from the injuries to and resulting wrongful death of Hailey Owens.
4. Craig Michael Wood (Defendant Wood) is a resident of Greene County, Springfield, Missouri.
5. Proper service of process may be had upon Craig Michael Wood by service on him at the Greene County Jail, Jail ID # 104957, Pod A, 1000 N. Booneville Ave., Springfield, Missouri 65802.
6. The place of the first injury was in Greene County, Missouri.
7. The amounts of recovery requested by Plaintiffs herein exceed the minimum jurisdictional requirements of this Court.
8. This Court has proper jurisdiction and venue is proper in this case.
9. On February 18, 2014, witnesses observed Defendant Wood abduct Hailey Owens as she was walking in the area of the 3200 block of West Lombard Street in Springfield, Missouri, causing her to suffer physical harm and extreme fright and anxiety.
10. On February 19, 2014, the body of Hailey Owens was found at the residence of Defendant Wood with a gunshot wound to the back of her head.

11. On February 19, 2014, crime scene technicians located a spent .22 caliber shell casing in the basement of Defendant Wood's residence.

12. On February 19, 2014, Felony charges were filed against Defendant Wood for the kidnapping and murder of Hailey Owens.

COUNT I
WRONGFUL DEATH

Plaintiffs incorporate by reference each and every allegation contained within paragraphs 1 through 12 of this Petition as if fully set out herein.

13. Defendant Wood was negligent in his possession, handling and/or care of the loaded weapon.

14. Alternatively, Defendant Wood intentionally caused injuries to and the death of Hailey Owens.

15. Such negligence, or such intentional acts, of Defendant Wood directly caused or directly contributed to cause injuries to and the death of Hailey Owens, and in addition to such damages as Hailey Owens may have suffered between the time of her injury and the time of her death which would have entitled her to recover damages in respect thereof had death not ensued, Plaintiffs have suffered severely and in the future will suffer, by reason of the injuries sustained by and from Hailey Owens' death, in addition to funeral and burial expenses, and the reasonable value of her services, companionship, comfort, instruction, guidance, counsel, training and support of which her parents have been deprived by reason of her death.

WHEREFORE, Plaintiffs request this Court for its judgment in their favor against Defendant Wood under Count I of this claim for damages due the wrongful death of Hailey Owens in such sum that is fair and reasonable to make up for all the harms and losses suffered by Hailey Owens and her parents, in the past and in the future, with their costs expended herein, with lawful pre-judgment and post-judgment interest on the full judgment until paid in full, and for such further relief as the Court may deem just under the circumstances.

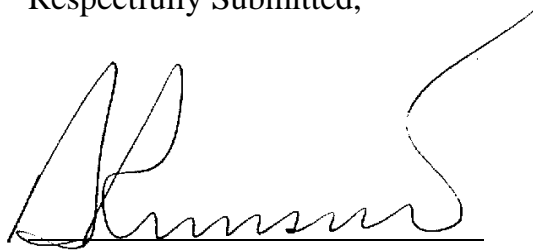
COUNT II
DAMAGES FOR PUNITIVE DAMAGES DUE TO AGGRAVATING
CIRCUMSTANCES FOR THE WRONGFUL DEATH OF HAILEY OWENS

16. Plaintiffs incorporate by reference each and every allegation contained within paragraphs 1 through 15 of this Petition as if fully set out herein.

17. Defendant Wood's actions were grossly negligent, reckless, intentional, and/or outrageous, making no effort to mitigate the damages or avoid the harm to Hailey Owens or Plaintiffs, and acting with evil motive and reckless indifference to the rights of Hailey Owens and her parents, which thereby showed complete indifference and/or conscious disregard for the rights, safety and well being of Hailey Owens and her parents, therefore, due to such aggravating circumstances, in addition to any actual damages which the jury may find Plaintiffs are entitled to recover, the jury should determine and award an additional amount as punitive damages in such sum as will serve to punish Defendant Wood and to deter him and others from like conduct.

WHEREFORE, Plaintiffs request this Court for its judgment in their favor against Defendant Wood under Count II of this claim for damages for punitive damages due to the aggravating circumstances in such sum as will serve to punish Defendant Wood and to deter him and others from like conduct in the future, with their costs expended herein, in addition to lawful pre-judgment and post-judgment interest on the full judgment until paid in full, and for such further relief as the Court may deem just under the circumstances.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ransin", written over a horizontal line.

RANSIN
INJURY LAW

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