

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION

Danisha Warren, Personal Representative)	Cause No.:
of the Estate of Dachena Warren-Hill,)	
Deceased,)	
Plaintiff,)	
)	
v.)	
)	
City of Fort Wayne, Former Chief of)	
Police Steve Reed, solely in his official)	
capacity as Chief of Police for the)	
Fort Wayne Police Department, Officer)	
Mark A. Guzman, solely in his official)	
Capacity, Cedric Griffin,)	
Defendants.)	

COMPLAINT

COMES NOW Plaintiff, Danisha Warren, as Personal Representative of the Estate of Dachena Warren-Hill, deceased, by counsel, D. Eric Neff, of the Law Offices of D. Eric Neff P.C., and for her cause of action against Defendants, the City of Fort Wayne, Former Fort Wayne Chief of Police Steve Reed, solely in his official capacity as Chief of Police for the Fort Wayne Police Department, Mark A. Guzman, individually and as a police officer for the Fort Wayne Police Department, and Cedric Griffin alleges as follows:

JURISDICTION AND VENUE

1. This action is premised on violations of the Fourth, Fifth, Eighth, and Fourteenth Amendments of Constitution of the United States of America; for violations of 42 U.S.C. § 1983; and for conduct rendered actionable under the statutes and common laws of the State of Indiana.
2. This Court is vested with original jurisdiction under 28 U.S.C. §§ 1331 and 1343. This Court has supplemental jurisdiction over Plaintiff’s state law claims based on 28 U.S.C. § 1367.
3. Venue is proper in the United States District Court for the Northern District of Indiana, Fort Wayne Division, pursuant to 28 U.S.C. § 1391(b), as all the wrongful conduct alleged herein occurred within this Court’s District.

PARTIES

1. Plaintiff, Danisha Warren (hereinafter “Warren”) has been appointed the Personal Representative of the Estate of Dachena Warren-Hill deceased, by the Allen Superior Court, Probate Division, under cause number 45D02-2402-ES-000005, on March 19, 2024.
2. Dachena Warren-Hill, decedent, was a twenty (20) year old black female, who was five (5) feet tall and weighed one hundred (100) pounds; and, she was a citizen of the United States, whose domicile was the City For Wayne, County of Allen, State of Indiana.
3. Defendant City of Fort Wayne is organized under the laws of Indiana.
4. Defendant Steve Reed, (“Chief Reed”) for all times relevant hereto, was the Chief of Police for the Fort Wayne, Indiana, which remains a political subdivision, and under the

control of Defendant City of Fort Wayne; Chief Reed is being sued in his official capacity only.

5. At all times relevant hereto, Chief Reed employed Defendant, Mark A. Guzman, an Officer for the Fort Wayne Police Department.
6. At all times relevant hereto, Chief Reed was the Chief of Police for the Fort Wayne Police Department. As such, he was the commanding officer of Defendant Mark A. Guzman, and Chief Reed was responsible for the training, supervision, and conduct of Defendant Mark A. Guzman as more fully set forth below.
7. At all times relevant hereto, Chief Reed was responsible for enforcing the rules and regulations of the Fort Wayne Police Department and for ensuring that the Fort Wayne Police Department obeyed the laws of the State of Indiana and the United States of America.
8. At all times relevant hereto Defendant Mark A. Guzman was a police officer with the Fort Wayne Police Department, acting under the color of law, and as an agent for Defendant City of Fort Wayne and Defendant Chief Reed.
9. Defendant, Cedric Griffin is a citizen of the United States, whose domicile was the City of Fort Wayne, County of Allen, State of Indiana.

INDIANA TORT CLAIMS ACT PREREQUISITES

10. On or about April 12, 2024, and pursuant to Indiana Code § 34-13-3-8, Warren filed a Tort Claim Notice with the Fort Wayne Police Department.
11. On or about April 12, 2024, and pursuant to Indiana Code § 34-13-3-8, Warren filed a Tort Claim Notice with the City Clerk of Fort Wayne.

12. On or about April 12, 2024, and pursuant to Indiana Code § 34-13-3-8, Warren filed a Tort Claim Notice with the then Acting Mayor of Fort Wayne, Karl Bandemer.
13. On or about April 12, 2024, and pursuant to Indiana Code § 34-13-3-8, Warren filed a Tort Claim Notice with the Police Chief Reed of the Fort Wayne Police Department.
14. On or about April 12, 2024, and pursuant to Indiana Code § 34-13-3-8, Warren filed a Tort Claim Notice with Police officer Mark A. Guzman of the Fort Wayne Police Department.
15. On or about April 12, 2024, and pursuant to Indiana Code § 34-13-3-8, Warren filed a Tort Claim Notice with the City of Fort Wayne Law Department.

FACTS COMMON TO ALL COUNTS

16. On or about the 19th day of November, 2023, while at the residence of 5144 Winchester Road near the corner of Babcock in Fort Wayne, Indiana the Defendant, Cedric Brown began assaulting the deceased, Dachena Warren-Hill.
17. During the assault, the Defendant, Cedric Brown repeatedly struck the deceased, Dachena Warren-Hill.
18. In an attempt to flee the attack perpetrated by the Defendant, Cedric Brown, the deceased, Dachena Warren-Hill, ran to a vehicle, started it, and attempted to drive away from the attack.
19. Prior to November 19, 2023 the Fort Wayne Police Department had been dispatched multiple times to the residence of 5144 Winchester Road near the corner of Babcock in

Fort Wayne, Indiana to address allegations they received regarding domestic abuse/disturbances.

20. On November 19, 2023, at approximately 11:51 a.m., the Fort Wayne Police Department was dispatched to 5144 Winchester Road near the corner of Babcock in Fort Wayne, Indiana to address a domestic disturbance claim.
21. Sometime after 11:51 a.m. on November 19, 2023, Defendant Officer Mark A. Guzman arrived at the location commonly known as 5144 Winchester Road Fort Wayne, Indiana.
22. When Defendant, Officer Mark A. Guzman arrived at the residence of 5144 Winchester Road Fort Wayne, Indiana, deceased Dachena Warren-Hill, was attempting to flee the property in a vehicle, and she did not pose a serious threat to the safety of Defendant Officer, Mark A. Guzman, nor did she pose a serious threat to the safety of herself or any other person.
23. When Officer Mark A. Guzman arrived at the residence, he made no attempt to effectively communicate with anyone at the scene to determine what had happened prior to his arrival, including the deceased Dachena Warren-Hill.
24. Without any attempt to use less lethal weapons to subdue the decedent, Dachena Warren-Hill, Defendant Officer Mark A. Guzman drew his service firearm, and fired multiple gunshots into the vehicle being driven by the deceased Dachena-Warren Hill.
25. On November 19, 2023, the decedent, Dachena Warren-Hill, was pronounced dead.

COUNT I

FEDERAL CIVIL RIGHTS CLAIM UNREASONABLE SEIZURE & EXCESSIVE FORCE IN VIOLATION OF 42 U.S.C. § 1983

COMES NOW Warren, as Personal Representative of the Estate of Dachena Warren-Hill, deceased, by counsel, and for Count I against Officer, Mark A. Guzman, alleges the following:

26. Warren hereby re-alleges and reincorporates paragraphs 1 through 25 as though fully set forth herein.

27. That Defendant Officer Mark A. Guzman lacked probable cause to believe that the decedent, Dachena Warren-Hill, posed a threat of serious harm to others, or herself, as demonstrated by the fact that she was attempting to flee the property where she was being battered.

28. That Defendant Officer Mark A. Guzman did not reasonably believe that the use of deadly force against the decedent, Dachena Warren-Hill, prevented her from escaping.

29. That Defendant Officer Mark A. Guzman did not reasonably believe that the use of deadly force against the decedent, Dachena Warren-Hill, prevented the decedent from confronting and advancing upon the public or the police officer.

30. That Defendant officer Mark A. Guzman failed to give any adequate warning to the decedent of his imminent decision to use deadly force, even though Defendant Officer had ample opportunities to warn regarding the same, as demonstrated by the extremely short time between when the initial call was received by the dispatcher and when the decedent was pronounced dead.

31. That Defendant Officer Mark A. Guzman had less lethal weapons at his disposal, such as, but not limited to disabling the vehicle as opposed to shooting into it.
32. That Defendant Officer Mark A. Guzman instead relied on the deadliest weapon within his arsenal to arrest the decedent, Dachena Warren-Hill with a police officer issued firearm.
33. The Defendant Officer Mark A. Guzman's willful, malicious, and intentional act of shooting the decedent, Dachena Warren-Hill was an unreasonable seizure of her person, and an unconstitutional use of deadly force intended to punish the decedent, Dachena Warren-Hill, without due process of law.
34. Prior to using deadly force on the decedent, Dachena Warren-Hill, Defendant Officer Mark A. Guzman did not attempt to subdue the vehicle driven by decedent.
35. Before using deadly force on the decedent, Dachena Warren-Hill, the Defendant Officer Mark A. Guzman did not attempt to communicate with the decedent or anyone else to ascertain the nature of the situation.
36. Before using deadly force on the decedent, Dachena Warren-Hill, Defendant Officer Mark A. Guzman failed to call for additional help.
37. At all times relevant herein, Defendant Officer, Mark A. Guzman, as a law enforcement officer, had the duty to use deadly force only when authorized and permitted by the Constitution of the United States of America.
38. As a direct and proximate result of the aforementioned conduct of one or more of Defendants, the decedent, Dachena Warren-Hill, was deprived of rights, privileges, and

immunities secured to her under the Constitution and laws of the United States, including her rights secured to her under the Fourth, Fifth, Eighth, and Fourteenth Amendments to the United States Constitution, which secures the right of the individual to be secure in his person, to be free from the use of deadly force, to be free from punishment without due process, and guarantees equal protection of the laws.

WHEREFORE, Warren, as Personal Representative of the Estate of Dachena Warren-Hill, deceased, by counsel, and as is her right under 42 U.S.C. § 1983, seeks the following relief against Defendant Mark A. Guzman individually and as an officer and agents for the City of Fort Wayne: (a) compensatory and punitive damages in an amount commensurate with the loss of life and liberty of the decedent Dachena-Warren Hill,; (b) pursuant to U.S.C. § 1988, attorney's fees; (c) and any other relief this Court deems just and proper in the premises.

COUNT II

FAILURE TO TRAIN/SUPERVISE RESULTING IN VIOLATIONS OF 42 U.S.C. § 1983.

COMES NOW Warren, as Personal Representative of the Estate of Dachena Warren-Hill, deceased, by counsel, and for Count II against the City of Fort Wayne and Chief Reed, solely in his official capacity, states the following:

39. Warren hereby re-alleges and reincorporates paragraphs 1 through 38 as though fully set forth herein.

40. That when Defendant Officer fired shots into the vehicle driven by the decedent, Dachena Warren-Hill, the Fort Wayne Police Department, by and through the actions of Defendant Chief Reed, had a regulation in effect regarding the use of deadly force by police officers when on duty.

41. That said regulation is, was, and remains unconstitutional, as demonstrated by the fact that Defendant Officer, pursuant to said regulation, shot and killed the decedent, without ever attempting to neutralize the situation by other means.
42. That said regulation is, was, and remains unconstitutional, as demonstrated by the fact that Defendant Officer pursuant to said regulation, shot and killed decedent who was attempting to flee from the residence where she was being assaulted and battered.
43. That Defendant City of Fort Wayne's policy, as demonstrated by the aforementioned conduct of said named Defendant Officer, is an unconstitutional policy.
44. That the unconstitutional policy adopted and employed by Defendants Chief Reed and the City of Fort Wayne fails to pass Constitutional muster, as the firing of multiple gunshots into a vehicle question ignores the due process rights of those being shot without first being afforded the opportunity to explain oneself.
45. Defendants Chief Reed and the City of Fort Wayne had a duty and obligation to train and supervise its police officers in the proper usage of force.
46. Defendants Chief Reed and the City of Fort Wayne had a duty and obligation to train and supervise its police officers in the proper usage of deadly force.
47. That Defendants Chief Reed and the City of Fort Wayne failed to train and supervise its police officers in the proper usage of force, as demonstrated by the numerous documented incidents in recent past, to include the present, in which Fort Wayne Police Officers have used substantially greater force to address seemingly harmless situations such as, but not limited to:

- a. Excessive force claim during the 2020 downtown protests used on 19 year old, Lucas Williams by the City of Fort Wayne and Officer Ballinger.
 - b. Twenty-Two (22) year old Black male shot by police at a traffic stop on July 3, 2024.
 - c. That excessive force claims has been brought to the attention of the NAACP, article in Journal Gazette dated August 7, 2024.
48. That Defendants Chief Reed and the City of Fort Wayne failed to train and supervise its police officers in the proper usage of deadly force, as demonstrated by the aforementioned conduct of the named Defendant Officers herein, in which said Defendant(s) improperly resorted to deadly force in a situation that did not require the use of deadly force.
49. That Defendant City of Fort Wayne and Defendant Chief Reed's failure to train and/or supervise its police officers as to how to properly use force, and force in general, directly, and proximately caused the Constitutional violations complained of herein.
50. That Defendant City of Fort Wayne and Defendant Chief Reed's policy regarding the use of deadly force is unconstitutional, and said policy, as applied to the decedent, Dachena-Warren Hill, caused the Constitutional violations complained of herein.

WHEREFORE, Warren, as Personal Representative of the Estate of Dachena Warren-Hill, deceased, by counsel, and as is her right under 42 U.S.C. § 1983, seeks the following relief against Defendant Chief Reed, solely in his official capacity, and the City of Fort Wayne: (a) compensatory and punitive damages in an amount commensurate with the loss of life and liberty

of the decedent, Dachena Warren-Hill ; (b) pursuant to U.S.C. § 1988, attorney's fees; (c) and any other relief this Court deems just and proper in the premises.

COUNT III

STATE LAW CLAIMS OF ASSAULT AND BATTERY AND WRONGFUL DEATH UNDER INDIANA CODE § 34-23-1-1

COMES NOW Warren, as Personal Representative of the Estate of Dachena Warren-Hill deceased, by counsel, and for Count III against Defendant Officer Mark A. Guzman, Defendant City of Fort Wayne and Former Chief of Police, Steve Reed and the Defendant Cedric Brown, states the following:

51. Warren hereby re-alleges and reincorporates paragraphs 1 through 50 as though fully set forth herein.
52. That on November 19, 2023 prior to the Police officer's arrival at 5144 Winchester Road Fort Wayne, Indiana the Defendant, Cedric Brown owed the decedent, Dachena Warren-Hill the duty to her not to touch her in a rude, insolent and angry manner.
53. That on November 19, 2023 prior to the Police officer's arrival at 5144 Winchester Road Fort Wayne, Indiana the Defendant, Cedric Brown breached his duty by striking, grabbing and hitting her repeatedly in a rude, insolent and angry manner.
54. That as a direct and proximate result of the actions of the Defendant, Cedric Brown the decedent, Dachena Warren-Hill tried to escape from him by running to a vehicle to leave the residence.

55. That as a direct and proximate result of the actions of the Defendant, Cedric Brown the decedent, Dachena Warren-Hill suffered injuries to her person.

56. That as a direct and proximate result of the actions of the Defendant, Cedric Brown the police were called to the scene.

57. That as a direct and proximate result of the actions of the Defendant, Cedric Brown the decedent Dachena Warren-Hill was killed by the police.

58. That Defendant Officer Mark A Guzman shot and killed the decedent, Dachena Warren-Hill.

59. The shooting of the decedent, Dachena Warren-Hill, done by Defendant Officer was conducted willfully, wantonly, maliciously, carelessness, and negligence and that such conduct displayed by Defendant Officer or Officers constitutes battery and wrongful death and battery under Indiana Code § 34-23-1-1.

60. As a direct and proximate cause of the wrongful death and battery of the decedent, Dachena Warren-Hill, damages, such as, but not limited to:

- a. hospital expenses,
- b. funeral and burial expenses,
- c. lost earnings,
- d. loss of love and companionship

were sustained.

WHEREFORE, Warren, as Personal Representative of the Estate of Dachena Warren-Hill, deceased, by counsel, seeks the following relief against the Defendant Cedric Brown for her Damages as a result of his intentional tort of battery and his contributory negligence to her death and against the Defendant Mark A. Guzman, individually and as an officer and agent for the City of Fort Wayne and Chief Reed for: (a) any and all damages authorized under Indiana Code § 34-23-1-2; (b) and any other relief this Court deems just and proper in the premises.

JURY DEMAND

COMES NOW Warren, as Personal Representative of the Estate of Dachena Warren-Hill, deceased, by counsel, and pursuant to Fed. R. Civ. P. 38, hereby demands a trial by jury on all issues so triable.

Respectfully,

/s/ D. Eric Neff

D. Eric Neff, 10153-45
Attorney for Plaintiff
Law Offices of D. Eric Neff P.C.
1186 E. Summit Street
Crown Point, IN 46307
(219) 663-0300
(219) 663-8530 fax
dericneff@sbcglobal.net

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. PLAINTIFFS

Danisha Warren, Personal Representative of the Estate of Dachena Warren-Hill, Deceased,

(b) County of Residence of First Listed Plaintiff Allen (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) D. Eric Neff, 10153-45 Law Offices of D. Eric Neff P.C. 1186 E. Summit Street Crown Point, IN 46307 (219) 663-0300

DEFENDANTS

City of Fort Wayne, Former Chief of Police Steve Reed, solely in his official capacity as Chief of Police for the Fort Wayne Police Department, Officer Mark A. Guzman, solely in his official Capacity, Cadric Griffin

County of Residence of First Listed Defendant Allen (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
3 Federal Question (U.S. Government Not a Party)
2 U.S. Government Defendant
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
1 1 Incorporated or Principal Place of Business In This State
2 2 Incorporated and Principal Place of Business In Another State
3 3 Foreign Nation
4 4
5 5
6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Insurance, Personal Injury, Real Estate, etc.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation - Transfer
8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 42 U.S.C. § 1983

Brief description of cause: violations of the Fourth, Fifth, Eighth, and Fourteenth Amendments

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: X Yes [] No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE 08/04/2025 SIGNATURE OF ATTORNEY OF RECORD /s/ D. Eric Neff

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

USDC IN/ND case 1:25-cv-00419-ALT document 1-1 filed 08/04/25 page 2 of 2
INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

UNITED STATES DISTRICT COURT

for the

Northern District of Indiana

Danisha Warren, Personal Representative
of the Estate of Dachena Warren-Hill,
Deceased,

Plaintiff(s)

v.

City of Fort Wayne, Former Chief of
Police Steve Reed, solely in his official
capacity as Chief of Police for the
Fort Wayne Police Department, Officer
Mark A. Guzman, solely in his official
Capacity, Cedric Griffin,

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

City of Fort Wayne
200 East Berry Street, Suite 110
Fort Wayne, IN 46802

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

D. Eric Neff
Law Office of D. Eric Neff P.C.
1186 East Summit Street
Crown Point, IN 46307

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

▫ I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

▫ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

▫ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

▫ I returned the summons unexecuted because _____; or

▫ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Northern District of Indiana

Danisha Warren, Personal Representative
of the Estate of Dachena Warren-Hill,
Deceased,

Plaintiff(s)

v.

City of Fort Wayne, Former Chief of
Police Steve Reed, solely in his official
capacity as Chief of Police for the
Fort Wayne Police Department, Officer
Mark A. Guzman, solely in his official
Capacity, Cedric Griffin,

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Former Chief of Police Chief Steven Reed
c/o Fort Wayne Police Department
1 East Main St. #108
Fort Wayne, IN 46802

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

D. Eric Neff
Law Office of D. Eric Neff P.C.
1186 East Summit Street
Crown Point, IN 46307

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

▫ I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

▫ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

▫ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

▫ I returned the summons unexecuted because _____; or

▫ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Northern District of Indiana

Danisha Warren, Personal Representative
of the Estate of Dachena Warren-Hill,
Deceased,

Plaintiff(s)

v.

City of Fort Wayne, Former Chief of
Police Steve Reed, solely in his official
capacity as Chief of Police for the
Fort Wayne Police Department, Officer
Mark A. Guzman, solely in his official
Capacity, Cedric Griffin,

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Police Officer Mark A. Guzman
c/o Fort Wayne Police Department
1 East Main St. #108
Fort Wayne, IN 46802

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

D. Eric Neff
Law Office of D. Eric Neff P.C.
1186 East Summit Street
Crown Point, IN 46307

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

▫ I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

▫ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

▫ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

▫ I returned the summons unexecuted because _____; or

▫ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Northern District of Indiana

Danisha Warren, Personal Representative
of the Estate of Dachena Warren-Hill,
Deceased,

Plaintiff(s)

v.

City of Fort Wayne, Former Chief of
Police Steve Reed, solely in his official
capacity as Chief of Police for the
Fort Wayne Police Department, Officer
Mark A. Guzman, solely in his official
Capacity, Cedric Griffin,

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Cedric Griffin
449 Clermont Dr.
Fort Wayne, IN 46814

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

D. Eric Neff
Law Office of D. Eric Neff P.C.
1186 East Summit Street
Crown Point, IN 46307

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. _____

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_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

▫ I served the summons on *(name of individual)* _____, who is
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_____ on *(date)* _____; or

▫ I returned the summons unexecuted because _____; or

▫ Other *(specify)*: _____

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I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: