



ILLINOIS STATE  
BAR ASSOCIATION

Illinois State Bar Association  
424 South Second Street, Springfield, IL 62701  
800.252.8908 217.525.1760 Fax: 217.525.0712

# Illinois State Bar Association High School Mock Trial Invitational 2026 Mock Trial Case

***River Knox***

***v.***

***Lincoln Adventure Co., LLC***

None of the characters in this case are real. Any similarity between these characters and living people is coincidental and unintentional.

This problem was prepared and created by the Illinois Bar Association's Standing Committee on Law-Related Education for the Public.

Special thanks to ISBA staff and the ISBA's Standing Committee on Law-Related Education for the Public, and the Mock Trial Coordinator for their work in preparing the problem.

© Copyright 2026 Illinois State Bar Association

## **WITNESSES**

<b>Plaintiff's Witnesses</b>	<b>Defendant's Witnesses</b>
River Knox, Plaintiff, Ultra-Runner Sky Wilder, Outdoor Risk Expert Scout Keen, Drone-Flying HAM Radio Volunteer	Reese Hazard, Race Director Jordan Gale, Race Safety Expert Harper McFinch, Ultra-Runner

## **CASE DOCUMENTS**

### **LEGAL DOCUMENTS**

1. Statement of the Case
2. Complaint and Rule 222 Affidavit
3. Answer and Affirmative Defense
4. Plaintiff's Answer to Affirmative Defenses
5. Pre-Trial Order
6. Jury instructions and verdict forms
7. Affidavits

### **EXHIBITS**

1. Course Map
2. Pre-Race Email to Runners
3. Waiver Form
4. National Weather Service Report
5. U.S. Forest Service Clearance Report
6. Pre-Storm Photo of Scramble Zone
7. Race Volunteer Assignment Roster
8. Rescue Timeline Report
9. Owl Incident Report
10. Race Safety Briefing Handout
11. Medical Report Summary
12. Course Markings Photo
13. Pre-Race Weather Advisory Email
14. Post-Race Statement
15. Runner Feedback Emails
16. Race Completion Statistics

## **Statement of the Case**

During the grueling Lincolnville Ridge 100, a 100-mile ultramarathon through the rugged Shawnee National Forest, veteran trail runner River Knox suffered a catastrophic injury near mile 63, late at night under headlamp light. While navigating a designated “walk-only” talus scramble zone—made especially unstable by severe storms the night before—River Knox dislodged rocks that struck a runner below. Startled and retreating, River Knox was suddenly swooped from behind by a notoriously territorial barred owl causing a misstep off the marked course and a fall into an old logging ravine. The fall resulted in severe injuries and a delayed rescue.

The race, organized by Lincoln Adventure Co., LLC, had issued a waiver warning of terrain hazards, including venomous snakes, flash floods, armadillos, and other wildlife. River Knox contends, however, that Lincoln Adventure Co. failed to re-inspect or reroute the scramble zone after the storm and failed to enforce the mandatory “walk-only” rule. River Knox brings suit alleging that the company was negligent in its wildlife management, course safety decisions, and enforcement of race rules.

The Defendant denies negligence, asserting that all reasonable precautions were taken and that River Knox knowingly assumed the inherent risks of ultramarathon racing. The Defendant further argues that River Knox violated clearly posted and communicated course rules, and under Illinois’ modified comparative fault statute, River Knox cannot recover if found more than 50% at fault.

**IN THE CIRCUIT COURT  
FOR THE TWENTY-SIXTH JUDICIAL CIRCUIT  
LINCOLN COUNTY, ILLINOIS**

RIVER KNOX,	)	
	)	
Plaintiff,	)	
v.	)	2025-L-8675309
	)	
LINCOLN ADVENTURE CO, LLC,	)	<b><u>JURY TRIAL DEMANDED</u></b>
	)	
Defendant.	)	

**PLAINTIFF’S COMPLAINT**

Now comes Plaintiff, RIVER KNOX (hereafter “RIVER KNOX”), by Plaintiff’s undersigned attorney, and for Plaintiff’s COMPLAINT against Defendant, LINCOLN ADVENTURE CO., LLC., (hereafter “Defendant”) states as follows:

**PARTIES**

1. RIVER KNOX is an adult resident of Lincolnville, Lincoln County, Illinois.
2. Defendant is a corporation organized and existing under the laws of the State of Illinois and authorized to do business within the State of Illinois and with its principal place of business in Lincoln County, Illinois.

**JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction over this action and personal jurisdiction over the Defendant.
4. Venue in this judicial district is proper because Defendant has its principal place of business in Lincoln County, Illinois and the acts and/or omissions that form the basis for this Complaint occurred in Lincoln County, Illinois.



## **STATEMENT OF FACTS**

5. RIVER KNOX participated in the Lincolnville Ridge 100 (hereafter “Ridge 100”), which started on August 23, 2025.

6. The Ridge 100 is a 100-mile ultramarathon race through the Shawnee National Forest, with the first 18 miles in Johnson County and the remaining 82 miles in Lincoln County, Illinois, where the incident at issue occurred.

7. Defendant organized the Ridge 100.

8. Defendant, through its employees and agents, including Reese Hazard (hereafter “HAZARD”), its founder and director, organized all aspects of the Ridge 100 which included, but was not limited to, the following: marketing the race, designating and collecting race fees, designing the route, marking the route, providing for safety protocols, marking hazards, assigning volunteers, and enforcing race rules.

9. HAZARD, the founder and director of Defendant, was at all times relevant to the matters alleged herein, acting as agent for Defendant before and during the Ridge 100.

10. At the time of the Ridge 100, and prior thereto, HAZARD designed and marked the course, assigned volunteers, and oversaw safety communications. The night before the race, HAZARD conducted the mandatory safety briefing. On race day, HAZARD coordinated packet pickup and check-in, supervised aid station operations, and kept in continual contact with volunteers through radios and satellite phones, receiving and responding to reports of conditions and emergencies.

11. RIVER KNOX registered for the Ridge 100 on or about May of 2025.

12. RIVER KNOX received a pre-race email on or about July 29, 2025. Among other materials, the race packet contained a map of the race route.

13. Prior to the race, RIVER KNOX reviewed the pre-race email and all of its attachments as well as the race map. RIVER KNOX paid particular attention to the “talus scramble zone” as shown on the race map.

14. RIVER KNOX arrived on the evening prior to the race, August 22, 2025, and attended the pre-race safety meeting which was run by HAZARD.

15. On the morning of August 23, 2025, RIVER KNOX arrived at the staging area for the Ridge 100 at or about 4:45 a.m.. After checking in, RIVER KNOX began to prepare for the start of the race.

16. RIVER KNOX started the race at or about 5:00 a.m..

17. Fairly quickly the race participants began to stretch out, with slower runners falling behind and with RIVER KNOX advancing ahead of a majority of runners.

18. By the time that RIVER KNOX neared the talus scramble, it was night. RIVER KNOX became aware that the recent storm had left the course slick and unstable.

19. No representative of the Ridge 100 advised RIVER KNOX that extra caution was needed for the scramble, and there was no additional signage other than the pink “Walk Only” marker.

20. No race marshals or other representatives from Ridge 100 were on the course near the scramble.

21. RIVER KNOX entered the scramble section of the route with appropriate caution.

22. Suddenly, without warning, RIVER KNOX was struck from behind by a barred owl.

23. The owl’s talons gripped the strap of RIVER KNOX’s headlamp with force.

24. The owl strike, similar to an incident previously reported to Defendant in 2024, caused RIVER KNOX to twist, which led him to slide off the trail and plummet into a previously hidden ravine.

25. RIVER KNOX slid down the wall of the ravine striking his head several times on his descent.

26. RIVER KNOX lost consciousness.

27. RIVER KNOX fell into the ravine sometime between 11:42 p.m. on August 23, 2025 and 12:03a.m. on August 24, 2025.

28. At or about 12:03 a.m. on August 24, 2025, Scout Keen, the assigned safety observer, radioed that a runner had fallen off the trail and into the ravine.

29. It was not until at or about 1:36 a.m. on August 24, 2025, over two hours after the owl strike and fall, that RIVER KNOX was extracted from the ravine.

30. As a direct and proximate result of the fall, RIVER KNOX sustained a C6 spinal injury, multiple fractures, and severe physical trauma.

31. As a direct and proximate result of the fall, RIVER KNOX sustained severe head trauma. As a direct result of that concussion, RIVER KNOX continues to suffer from post-concussion syndrome, including severe headaches and memory loss.

32. As a direct and proximate result of the fall, spinal injury, and head trauma, RIVER KNOX suffered and continues to suffer physical, mental, and emotional trauma.

33. As a direct and proximate result of the fall and blow to the head, RIVER KNOX has incurred medical expenses of more than \$100,000 as of the date of the filing of this Complaint. RIVER KNOX reasonably expects that RIVER KNOX will continue to incur further medical expenses because of the injuries RIVER KNOX suffered.

34. Prior to entering the Ridge 100, RIVER KNOX was an avid ultramarathoner.

35. As a direct and proximate result of the injuries RIVER KNOX received, it is likely that RIVER KNOX will never be able to compete at anywhere near the level RIVER KNOX was capable of prior to the injuries.

**COUNT I – NEGLIGENCE WITH WILLFUL AND WANTON CONDUCT**

36. RIVER KNOX hereby adopts and incorporates by reference paragraphs 1 through 35 of the Statement of Facts as and for paragraph 36.

37. The Ridge 100 owed a duty of care to RIVER KNOX and to the other runners to establish reasonable rules and regulations to minimize the risk of injury to runners participating in the Ridge 100.

38. At all relevant times, HAZARD had a duty of care to RIVER KNOX to supervise, monitor, and take all reasonable and appropriate steps to ensure the safety of RIVER KNOX in all race-sponsored events.

39. Defendant, by and through its agents and/or employees, committed one or more of the following negligent acts or omissions:

a. proceeding with the race over the talus scramble zone without conducting a targeted post-storm inspection despite knowledge of severe weather on August 22, 2025; and

b. knowingly leaving the mile-63 “walk-only” scramble zone unstaffed overnight without active enforcement when runners would be fatigued and using headlamps; and

c. consciously relying on a general U.S. Forest Service clearance rather than performing a focused safety reassessment of high-risk terrain; and

d. disregarding a prior reported owl swooping incident in 2024 at or near the same area and failing to elevate hazard communications or staffing in response; and

e. permitting the course to include a technical talus scramble at night at mile 63 despite the heightened, obvious risks of fatigue, darkness, and storm-loosened footing.

40. By reason of one or more of the acts or omissions of Defendant and its agents alleged in this Complaint, Defendant negligently and recklessly put RIVER KNOX in harm's way.

41. As a direct and proximate result of Defendant's negligent acts or omissions alleged above, RIVER KNOX has experienced, continues to experience, and will continue to experience an assortment of problems associated with the injuries described above, including, but not limited to, pain and suffering, an inability to live independently and engage in normal activities of daily living, limitations in physical activities, loss of memory, depression, cognitive dysfunction, diminished educational achievement, employment impairment, and loss of the pleasures of life.

42. Defendant's acts and omissions as alleged in this Count I were in utter indifference to and in conscious disregard of RIVER KNOX's safety and directly and proximately caused RIVER KNOX to suffer the injuries and damages as herein alleged.

Wherefore, Plaintiff, RIVER KNOX prays for judgment in RIVER KNOX's favor and against the Defendant on Count I of Plaintiff's Complaint and prays that this Court grant RIVER KNOX the following relief:

i. Judgment against the Defendant for compensatory damages in an amount in excess of Fifty-Thousand Dollars (\$50,000.00), a total amount as yet to be determined;

ii. Judgment against the Defendant for punitive damages in an amount to be determined by a jury;

iii. Payment of the costs resulting from this action to be taxed against the Defendant; and

iv. Such other and further relief as this Court may deem just and proper.

## **COUNT II - NEGLIGENCE**

43. RIVER KNOX hereby adopts and incorporates by reference paragraphs 1 through 42 of the Statement of Facts of Count I of Plaintiff's Complaint as and for paragraph 43 of Count II of Plaintiff's Complaint as if fully restated herein.

44. At all times relevant hereto, Defendant had a duty to exercise ordinary care to protect and keep safe all runners in its care, including RIVER KNOX.

45. At all times relevant hereto, Defendant owed a duty of care to RIVER KNOX and the other runners to establish reasonable rules and regulations to minimize the risk of injuries to runners during the event.

46. At all relevant times, HAZARD, acting as an agent for Defendant, owed a duty of care to RIVER KNOX to take all reasonable and appropriate steps to ensure the safety of RIVER KNOX during the Ridge 100.

47. Defendant, by and through its agents and/or employees, committed one or more of the following negligent acts or omissions:

- a. failed to re-inspect the talus scramble zone after the severe storm on August 22, 2025, despite knowing that storms destabilize talus slopes; and
- b. negligently relied on a general U.S. Forest Service clearance instead of conducting their own targeted safety inspection of high-risk areas; and
- c. failed to reroute or modify the course despite feasible alternatives being available (e.g., bypass trails); and

- d. failed to station a volunteer at mile 63 overnight to actively enforce compliance and failed to ensure volunteers were continuously present in the scramble zone; and
- e. failed to establish clear volunteer protocols for monitoring high-risk sections; and
- f. failed to prevent or properly monitor unauthorized drone use by a volunteer; and
- g. failed to acknowledge a prior owl swooping incident reported in 2024 and omitted a known and repeated owl hazard in the area in safety briefings; and
- h. failed to update or expand hazard warnings after new weather-created dangers of talus zone; and
- i. knew rescues in remote zones take two or more hours, yet failed to stage medical personnel or evacuation equipment closer to the scramble; and
- j. did not ensure adequate radio signal coverage — runners and volunteers had to reposition to maintain communication; and
- k. failed to emphasize heightened post-storm risk in the scramble during pre-race safety meeting; and
- l. intentionally included a talus scramble zone at night, at mile 63, when runners would be fatigued and using headlamps, increasing foreseeable risk of injuries; and
- m. structured course in a way that left long distances without safe drop points, increasing risks once hazards were encountered; and

- n. did not follow commonly accepted best practices in ultramarathon safety (e.g. post-storm inspections, chokepoint staffing, clear wildlife warnings); and
- o. fell below reasonable expectations of safety in the trail and ultrarunning community.

48. By reason of one or more of the acts or omissions of Defendant and its agents alleged in this Complaint, Defendant negligently put RIVER KNOX in harm's way.

49. As a direct and proximate result of Defendant's negligent acts or omissions alleged above, RIVER KNOX has experienced, continues to experience, and will continue to experience an assortment of problems associated with the injuries described above, including, but not limited to, pain and suffering, an inability to live independently and engage in normal activities of daily living, limitations in physical activities, loss of memory, depression, cognitive dysfunction, diminished educational achievement, employment impairment, and loss of the pleasures of life.

WHEREFORE, Plaintiff, RIVER KNOX, prays for judgment in Plaintiff's favor and against the Defendant on Count II of Plaintiff's Complaint and prays that this Court grant RIVER KNOX the following relief:

- i. Judgment against the Defendant for compensatory damages in an amount in excess of Fifty-Thousand Dollars (\$50,000.00), a total amount as yet to be determined;
- ii. Payment of the costs resulting from this action to be taxed against the Defendant;  
and
- iii. Such other and further relief as this Court may deem just and proper.

**PLAINTIFF DEMANDS TRIAL BY JURY ON EACH AND EVERY  
COUNT OF PLAINTIFF'S COMPLAINT**



Respectfully submitted,

Taylor Rockford  
One of Plaintiff's Attorneys

**IN THE CIRCUIT COURT  
FOR THE TWENTY-SIXTH JUDICIAL CIRCUIT  
LINCOLN COUNTY, ILLINOIS**

RIVER KNOX,	)	
	)	
Plaintiff,	)	
	)	2025-L-8675309
v.	)	
	)	
LINCOLN ADVENTURE CO, LLC,	)	<b><u>JURY TRIAL DEMANDED</u></b>
	)	
Defendant.	)	

**PLAINTIFF'S RULE 222 AFFIDAVIT**

STATE OF ILLINOIS	)	
	)	SS.
COUNTY OF LINCOLN	)	

The undersigned, being first duly sworn upon oath, deposes and says:

1. I am an adult resident of Lincoln County, Illinois, and under no legal disability.
2. I am the attorney for the Plaintiff in the above-captioned lawsuit.
3. That the total money damages sought by Plaintiff in the above-captioned lawsuit, exclusive of interest and costs, is more than \$50,000.00.

Further Affiant sayeth naught.

Respectfully submitted,

Taylor Rockford  
One of Plaintiff's Attorneys

Signed and sworn before me on  
October 3, 2025.

Betty White



**IN THE CIRCUIT COURT  
FOR THE TWENTY-SIXTH JUDICIAL CIRCUIT  
LINCOLN COUNTY, ILLINOIS**

RIVER KNOX,	)	
	)	
Plaintiff,	)	
v.	)	2025-L-8675309
	)	
LINCOLN ADVENTURE CO, LLC,	)	
	)	
Defendant.	)	

**DEFENDANT’S ANSWER AND AFFIRMATIVE DEFENSES**

Defendant, Lincoln Adventure Co., LLC., by its attorney and for its Answer and Affirmative Defenses to Plaintiff’s Complaint, states as follows:

**ANSWER**

**AS TO THE COMMON ALLEGATIONS**

1. Defendant lacks sufficient knowledge to admit or deny, and therefore denies.
2. Admit.
3. Admit.
4. Admit.
5. Admit.
6. Admit.
7. Admit.
8. Admit.
9. Admit.
10. Admit.
11. Admit.

12. Admit.
13. Defendant lacks sufficient knowledge to admit or deny, and therefore denies.
14. Admit Plaintiff attended the pre-race safety meeting. Otherwise, Defendant lacks knowledge sufficient to form a belief as to the truth of this allegation.
15. Admit Plaintiff arrived in the staging area. Otherwise, Defendant lacks knowledge sufficient to form a belief as to the truth of this allegation.
16. Admit.
17. Defendant lacks knowledge sufficient to form a belief as to the truth of this allegation.
18. Denied.
19. Denied.
20. Denied.
21. Denied.
22. Denied.
23. Denied.
24. Denied.
25. Denied.
26. Denied.
27. Admit.
28. Admit.
29. Defendant lacks knowledge sufficient to form a belief as to the truth of this allegation. Defendant admits Plaintiff was lifted from the ravine at 2:13 AM.
30. Denied.

31. Denied.

32. Denied.

33. Denied.

34. Denied.

35. Denied.

36. Defendant hereby adopts and incorporates by reference its answer to paragraphs 1 through 35 of Plaintiff's Complaint and for its answer to paragraph 36 of Count II of Plaintiff's Complaint as though fully set forth herein.

37. This allegation is not an allegation of fact but a legal conclusion and therefore no answer is required.

38. This allegation is not an allegation of fact but a legal conclusion and therefore no answer is required.

39. Denied.

40. Denied.

41. Denied.

42. Denied.

Wherefore, Defendant, LINCOLN ADVENTURE CO., LLC., prays for judgment in its favor and against Plaintiff on Count I of Plaintiff's Complaint; that the Court deny Plaintiff any relief on Count I of Plaintiff's Complaint; that the Court award Defendant its costs of this action; and grant Defendant such further relief as may be just.

43. Defendant hereby adopts and incorporates by reference its answer to paragraphs 1 through 42 of Plaintiff's Complaint and for its answer to paragraph 43 of Count I of Plaintiff's Complaint as though fully set forth herein.

44. This allegation is not an allegation of fact but a legal conclusion and therefore no answer is required.

45. This allegation is not an allegation of fact but a legal conclusion and therefore no answer is required.

46. This allegation is not an allegation of fact but a legal conclusion and therefore no answer is required.

47. Denied.

48. Denied.

49. Denied.

Wherefore, Defendant, LINCOLN ADVENTURE CO., LLC., prays for judgment in its favor and against Plaintiff on Count II of Plaintiff's Complaint; that the Court deny Plaintiff any relief on Count II of Plaintiff's Complaint; that the Court award Defendant its costs of this action; and grant Defendant such further relief as may be just.

### **AFFIRMATIVE DEFENSES**

#### **FIRST AFFIRMATIVE DEFENSE: Assumption of the risk as to both Counts I and II**

1. Plaintiff, an experienced ultramarathoner, knowingly and voluntarily participated in the Lincolnville Ridge 100, an outdoor endurance race across wilderness terrain.

2. Plaintiff expressly assumed the inherent and obvious risks of ultramarathon participation, including but not limited to unstable footing, weather hazards, fatigue, darkness, and wildlife encounters such as owls.

3. Prior to participation, Plaintiff received a course map identifying the scramble zone, a pre-race email warning of hazards, a safety briefing handout, and signed a waiver acknowledging the inherent risks of ultramarathons.

4. By choosing to participate with full knowledge of these conditions and warnings, Plaintiff assumed the ordinary and foreseeable risks associated with the event, and Defendant cannot be held liable for injuries resulting from such assumed risks.

**SECOND AFFIRMATIVE DEFENSE:  
Contributory negligence as to both Counts I and II**

1. Plaintiff was negligent in failing to comply with clearly posted “Walk Only” rules at the mile-63 scramble zone.

2. Plaintiff moved faster than permitted through the scramble, under conditions of fatigue, darkness, and unstable post-storm terrain, thereby dislodging rocks onto other participants and increasing the risk of losing balance.

3. Plaintiff failed to exercise ordinary care in navigating a known hazardous section despite clear warnings, and such negligence directly and proximately caused or contributed to Plaintiff’s injuries.

4. Assuming *arguendo*, that Defendant’s conduct is found to be negligent, Plaintiff’s conduct was contributorily negligent.

5. Should Plaintiff’s conduct be found to be greater than fifty percent (50%) at fault for the proximate cause of Plaintiff’s own injuries and damages when compared to Defendant’s fault, then Plaintiff should be barred from recovering any damages.

**DEFENDANT DEMANDS TRIAL BY JURY ON EACH AND EVERY  
COUNT OF MERCER’S COMPLAINT**

Respectfully submitted,

Jordan Sangamon  
One of Defendant’s Attorneys

**IN THE CIRCUIT COURT  
FOR THE TWENTY-SIXTH JUDICIAL CIRCUIT  
LINCOLN COUNTY, ILLINOIS**

RIVER KNOX,	)	
	)	
Plaintiff,	)	
	)	2025-L-8675309
v.	)	
	)	
LINCOLN ADVENTURE CO, LLC,	)	
	)	
Defendant.	)	

**DEFENDANT'S AFFIDAVIT  
PURSUANT TO 735 ILCS 5/2-610**

Reese Hazard, being first duly sworn deposes and says:

1. I am an adult resident of Lincoln County, Illinois, and under no legal disability and I make this Affidavit upon my personal belief and upon the information and records contained in the business files of LINCOLN ADVENTURE CO., LLC.
2. I am presently and have been since 2010 the founder and president of LINCOLN ADVENTURE CO., LLC., the defendant in the above-captioned matter.
3. I have reviewed the allegations in Plaintiff's Complaint and state that as to the answers of LINCOLN ADVENTURE CO., LLC. thereto in which it is stated that LINCOLN ADVENTURE CO., LLC. lacks knowledge sufficient to form a belief as to the truth of several of Plaintiff's allegations, I verily believe LINCOLN ADVENTURE CO., LLC.'s lack of knowledge as stated therein to be true.

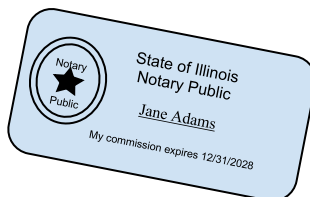
Further Affiant Sayeth Not.

Respectfully submitted,

Reese Hazard

Signed and sworn before me on  
November 3, 2025.

Jane Adams





**IN THE CIRCUIT COURT  
FOR THE TWENTY-SIXTH JUDICIAL CIRCUIT  
LINCOLN COUNTY, ILLINOIS**

RIVER KNOX,	)	
	)	
Plaintiff,	)	
v.	)	2025-L-8675309
	)	
LINCOLN ADVENTURE CO, LLC,	)	
	)	
Defendant.	)	

**PLAINTIFF’S ANSWER TO DEFENDANT’S AFFIRMATIVE DEFENSES**

Plaintiff, River Knox, by and through counsel, and for Plaintiff’s Answer to Defendant’s Affirmative Defenses, states as follows:

**AS TO DEFENDANT’S FIRST AFFIRMATIVE DEFENSE**

1. Admit.
2. Deny.
3. Deny.
4. Deny.

**AS TO DEFENDANT’S SECOND AFFIRMATIVE DEFENSE**

1. Deny.
2. Deny.
3. Deny.
4. This allegation is not an allegation of fact but a legal conclusion and therefore no answer is required.
5. This allegation is not an allegation of fact but a legal conclusion and therefore no answer is required.

WHEREFORE, Plaintiff prays that this Court find that none of Defendant's Affirmative Defenses are proven, find that Plaintiff River Knox is entitled to the relief prayed for in Plaintiff's Complaint, and that Plaintiff River Knox be awarded such further relief as the Court finds warranted by the record in this case.

Respectfully submitted,

Taylor Rockford  
One of Plaintiff's Attorneys

**IN THE CIRCUIT COURT  
FOR THE TWENTY-SIXTH JUDICIAL CIRCUIT  
LINCOLN COUNTY, ILLINOIS**

RIVER KNOX,	)	
	)	
Plaintiff,	)	
v.	)	2025-L-8675309
	)	
LINCOLN ADVENTURE CO, LLC,	)	
	)	
Defendant.	)	

**PRETRIAL ORDER**

This cause having come before the Court for a pretrial conference and the Court having considered all pending pretrial motions and arguments of the parties, and the Court having been informed of various stipulations which the parties have entered into, the Court hereby enters the following PRETRIAL ORDER which shall govern the parties and their witnesses during the jury trial to be held in the above-captioned matter:

1. The only parties to this case are Plaintiff River Knox and Defendant Lincoln Adventure Co., LLC. No other entities or individuals are parties to this litigation.
2. This case is governed by the laws of the State of Illinois. The parties are bound by the law set forth in the Jury Instructions. The parties may not argue or present any statutory or case law other than what is cited in the Jury Instructions in the case materials
3. Jurisdiction, venue, and chain of custody of all evidence are proper and may not be challenged.
4. There are no defects in the pleadings. The Defendant has properly appeared and answered. The Court has jurisdiction over the parties. All questions of fact are being submitted to the jury. Questions of law will be decided by the Court.
5. This case has been bifurcated (separated). The only matter to be decided in this trial is liability. Damages, if any, will be decided at a later proceeding. The sole issue for the jury at this trial is whether Defendant is liable, in whole or in part, for Plaintiff's injuries.
6. At all relevant times, Reese Hazard was an employee of, and acting on behalf of, Lincoln Adventure, Co., LLC. At trial, their acts and omissions will be imputed to Defendant Lincoln Adventure, Co., LLC. Lincoln Adventure, Co., LLC is liable for any acts or omissions of Reese Hazard.
7. All documents, signatures, and exhibits included in the case materials are authentic; no objections to the authenticity of any documents will be entertained. All exhibits referenced in

the case packet are deemed pre-marked for identification. No additional exhibits beyond those provided in the case materials may be introduced at trial. Both parties must still lay proper foundation prior to entering evidence, and both parties reserve the right to dispute any legal or factual conclusions based on these items and to make objections other than to authenticity.

8. The parties have entered into the following stipulations: All witnesses reviewed their affidavits and reports immediately prior to trial and were given an opportunity to revise them. None did so. All witnesses affirm the truthfulness of everything stated in their affidavits. When preparing and reviewing their sworn statements, all witnesses were instructed to include everything that they know may be relevant to their testimony. All witness affidavits have been properly signed and notarized. The signatures on the witness statements and all other documents are authentic and signed under oath by each witness. A copy of any affidavit that does not bear a signature or is not notarized is to be treated as though it is signed and notarized.
9. The parties have waived any objections to the jury instructions, verdict forms, and Exhibit 9. Exhibit 9 may be entered into evidence, by either party, only after opening statements by both parties have concluded and before Plaintiff's initial closing statement.
10. Witnesses who reference exhibits in their affidavits are deemed to be familiar with the contents of the entire exhibit. Witnesses are bound by the facts contained in their affidavits and may not testify inconsistently with them or offer new substantive information outside their affidavits, except for minor background or inconsequential clarifying details.
11. Both parties waive all objections and motions based on the Constitution of the United States. Both parties also waive all objections and motions based on privilege.
12. A witness must be formally tendered to the Court in accordance with Mock Trial Rule of Evidence Rule 702 before testifying in the form of an expert opinion. A party must establish by a preponderance of the evidence that the tendered expert satisfies Rule 702. There is no definitive checklist of what must or must not be presented for admission of expert testimony. The Court will apply Rule 702 based on the totality of the circumstances presented.
13. The Court recognizes that some evidence may only be relevant if some other fact exists. In cases where a party seeks to introduce such evidence, the Court may admit the evidence conditionally, meaning that the party introducing the evidence may lay the foundation after the evidence is admitted. However, during trial, that party must introduce evidence that would allow a jury to find that the contingent fact is more likely than not true. If the party fails to do so, the Court shall strike the conditionally admitted evidence from the record provided that the opposing party renews its objection.
14. If the Court or a party believes that the jurors are likely to use evidence in an improper manner not intended then the Court, on its own initiative or at the request of counsel, may issue a limiting instruction to prohibit improper evidence use. If the Court believes that counsel intends an improper purpose the Court will exclude the evidence entirely.

15. No witness examination or argument may suggest in any manner that there is a missing witness or party to this litigation. Comparative fault arguments are limited strictly to the two parties in this case - Plaintiff River Knox and Defendant Lincoln Adventure Co., LLC. Jurors may not apportion fault to non-parties, including other runners, volunteers, or third parties.
16. Based on pretrial motions and arguments, the court rules as follows: willful, wanton and reckless conduct” is something more than very great or gross negligence. Rather, willful and wanton conduct is regarded as an aggravated form of negligence. Willful and wanton conduct requires a state of mind different from that needed in ordinary and gross negligence. Willful and wanton conduct requires a deliberate intention to harm or a conscious disregard for the plaintiff's welfare. A defendant's "utter indifference" or "conscious disregard" for the safety of others may be inferred from the outrageous nature of the conduct, such as a failure, after knowledge of impending danger, to exercise ordinary care to prevent it or a failure to discover the danger through recklessness, or carelessness when it could have been discovered by ordinary care. The knowledge concerning other persons can be actual or constructive.
17. For purposes of this case, the concept of “gross negligence” shall be taken to mean very great negligence, but something less than willful, wanton, or reckless conduct.
18. All objections during trial must be based on the Mock Trial Rules of Evidence provided in the Appendix to the Handbook of Rules & Procedures.

ENTERED: December 31, 2025

*Christina Briggs*  
Circuit Judge

**[PLEASE NOTE:** In a lawsuit alleging negligence causes of action, it is common for the defense to assert, among other possible affirmative defenses, the affirmative defense of contributory negligence. In doing so, the defendant hopes to prove that the plaintiff's own conduct contributed to the injuries and/or damages that the plaintiff claims were caused by the defendant. In Illinois, if a jury finds that a plaintiff's conduct was equal or less than fifty percent (50%) at fault for the proximate cause of his/her own injuries and/or damages when compared to the defendant's fault, then the jury in rendering its verdict for the plaintiff reduces the amount of damages it awards to the plaintiff by that percentage of fault attributed to the plaintiff. But, if a jury finds that a plaintiff's conduct was greater than 50% at fault for the proximate cause of the plaintiff's claimed injuries or damages when compared to a defendant's fault, then the plaintiff is barred from any recovery and the verdict is to be for the defendant.

For this Mock Trial Problem, since the awarding of damages is not an issue for the trial, the Defendant is asserting a contributory negligence affirmative defense to all counts based on the allegation that the Plaintiff's conduct was greater than fifty percent (50%) at fault for the proximate cause of the Plaintiff's own injuries and damages when compared to the Defendant's fault. If the Defendant proves this affirmative defense, then the verdict would be for the Defendant. For the jury to find in favor of the Plaintiff, the jury must still find both (a) that the Plaintiff has proven that they suffered injuries and/or damages and that the Defendant proximately caused those injuries and/or damages; and (b) that the Plaintiff's contributing fault, if any, was not greater than 50% of the proximate cause of the Plaintiff's asserted injuries and/or damages.]

## **JURY INSTRUCTIONS**

### **Court Instruction No. 1 - Willful/Wanton Conduct – Burden of Proof**

Under Count 1 of the complaint, plaintiff has the burden of proving each of the following propositions by a preponderance of the evidence:

First, that the defendant acted or failed to act in one of the ways claimed by the plaintiff and that in so acting, or failing to act, the defendant was negligent;

Second, that the plaintiff was injured;

Third, that the negligence of the defendant was a proximate cause of the injury to the plaintiff;

Fourth, that defendant showed an utter indifference to or conscious disregard for the welfare of the plaintiff.

If you find from your consideration of all the evidence that plaintiff has failed to prove any of these propositions, then your verdict shall be for the defendant.

On the other hand, if you find from your consideration of all the evidence that plaintiff has proved each of these propositions, then you must consider the defendant's claim that the plaintiff was contributorily negligent.

As to the claim that plaintiff was contributorily negligent, the defendant has the burden of proving both of the following propositions by a preponderance of the evidence:

A: That the plaintiff acted or failed to act in one of the ways claimed by the defendant and that in so acting, or failing to act, the plaintiff was negligent;

B: That the plaintiff's negligence was a proximate cause of plaintiff's injury.

If you find from your consideration of all the evidence that the plaintiff has proved all the propositions required of the plaintiff and that the defendant has not proved both of the propositions required of the defendant, then your verdict shall be for the plaintiff.

If you find from your consideration of all the evidence that the defendant has proved both of the propositions required of the defendant, and if you find that the plaintiff's contributory negligence was more than 50% of the total proximate cause of the injury or damage for which recovery is sought, then your verdict shall be for the defendant.

If you find from your consideration of all the evidence that the plaintiff has proved all the propositions required of the plaintiff and that the defendant has proved both of the propositions required of the defendant, and if you find that the plaintiff's contributory negligence was 50% or less of the total proximate cause of the injury or damage for which recovery is sought, then your verdict shall be for the plaintiff.

## **Court Instruction No. 2 - Negligence - Burden of Proof**

Under Count 2 of the complaint, plaintiff has the burden of proving each of the following propositions by a preponderance of the evidence:

First, that the defendant acted or failed to act in one of the ways claimed by the plaintiff and that in so acting, or failing to act, the defendant was negligent;

Second, that the plaintiff was injured;

Third, that the negligence of the defendant was a proximate cause of the injury to the plaintiff.

If you find from your consideration of all the evidence that plaintiff has failed to prove any of these propositions, then your verdict shall be for the defendant.

On the other hand, if you find from your consideration of all the evidence that plaintiff has proved each of these propositions, then you must consider the defendant's claim that the plaintiff was contributorily negligent.

As to the claim that plaintiff was contributorily negligent, the defendant has the burden of proving both of the following propositions by a preponderance of the evidence:

A: That the plaintiff acted or failed to act in one of the ways claimed by the defendant and that in so acting, or failing to act, the plaintiff was negligent;

B: That the plaintiff's negligence was a proximate cause of plaintiff's injury.

If you find from your consideration of all the evidence that the plaintiff has proved all the propositions required of the plaintiff and that the defendant has not proved both of the propositions required of the defendant, then your verdict shall be for the plaintiff.

If you find from your consideration of all the evidence that the defendant has proved both of the propositions required of the defendant, and if you find that the plaintiff's contributory negligence was more than 50% of the total proximate cause of the injury or damage for which recovery is sought, then your verdict shall be for the defendant.

## **Court Instruction No. 3 - Negligence--Definition**

When I use the word "negligence" in these instructions, I mean the failure to do something which a reasonably careful person would do, or the doing of something which a reasonably careful person would not, under circumstances similar to those shown by the evidence. The law does not say how a reasonably careful person would act under those circumstances. That is for you to decide.

## **Court Instruction No. 4 - Duty To Use Ordinary Care**

It was the duty of the defendant, before and at the time of the occurrence, to use ordinary care for the safety of the plaintiff. That means it was the duty of the defendant to be free from negligence.



### **Court Instruction No. 5 - Ordinary Care--Definition**

When I use the words “ordinary care,” I mean the care a reasonably careful person would use under circumstances similar to those shown by the evidence. The law does not say how a reasonably careful person would act under those circumstances. That is for you to decide.

### **Court Instruction No. 6 - Duty To Use Ordinary Care— Definition of Contributory Negligence**

It was the duty of the plaintiff, before and at the time of the occurrence, to use ordinary care for plaintiff’s own safety. A plaintiff is contributorily negligent if (1) he/she fails to use ordinary care for plaintiff’s own safety and (2) plaintiff’s failure to use such ordinary care is a proximate cause of the alleged injury. The plaintiff’s contributory negligence, if any, which is 50% or less of the total proximate cause of the injury or damage for which recovery is sought, does not bar plaintiff’s recovery. However, the total amount of damages to which he/she would otherwise be entitled is reduced in proportion to the amount of plaintiff’s negligence. This is known as contributory negligence. If the plaintiff’s contributory negligence is more than 50% of the total proximate cause of the injury or damage for which recovery is sought, the defendant shall be found not liable. You will not be considering in this trial the issue of the amount of damages, if any, to award.

### **Court Instruction No. 7 - Concurrent Negligence Other Than Defendant's**

More than one person may be to blame for causing an injury. If you decide that the defendant was negligent and that plaintiff’s negligence was a proximate cause of injury to the plaintiff, it is not a defense that some third person who is not a party to the suit may also have been to blame.

### **Court Instruction No. 8 - Assumption of Risk**

A plaintiff impliedly assumes the risk that is inherent in the nature of an activity where the plaintiff is aware of and appreciates a danger that has been created by a defendant’s negligence, but the plaintiff nevertheless voluntarily proceeds to encounter that risk. This assumption of the risk is another form of plaintiff’s negligence.

### **Court Instruction No. 9 - Proximate Cause--Definition**

When I use the expression “proximate cause,” I mean a cause that, in the natural or ordinary course of events, produced the plaintiff’s injury. It need not be the only cause, nor the last or nearest cause. It is sufficient if it combines with another cause resulting in the injury.

### **Court Instruction No. 10 - Willful and Wanton Conduct--Definition**

When I use the expression “willful and wanton conduct” I mean a course of action which, if not intentional, shows an utter indifference to or conscious disregard for the safety of others.

### **Court Instruction No. 11 - Duty To Refrain From Willful And Wanton Conduct--Plaintiff**

It was the duty of the plaintiff under Count 1 of the complaint, before and at the time of the occurrence, to refrain from willful and wanton conduct that would endanger plaintiff’s person. A plaintiff is contributorily willful and wanton if (1) plaintiff’s conduct is willful and wanton, and

(2) such willful and wanton conduct is a proximate cause of the alleged injury.

The plaintiff's contributory willful and wanton conduct, if any, which is 50% or less of the total proximate cause of the injury or damages for which recovery is sought, does not bar plaintiff's recovery.

If the plaintiff's contributory willful and wanton conduct is more than 50% of the total proximate cause of the injury or damages for which recovery is sought, it bars plaintiff's recovery and your verdict shall be for the defendant.

**Court Instruction No. 12 - Duty To Refrain From Willful And Wanton Conduct--Defendant**

It was the duty of the defendant under Count 1 of the complaint, before and at the time of the occurrence, to refrain from willful and wanton conduct which would endanger the safety of the plaintiff.

**Court Instruction No. 13 - Burden of Proof on the Issues--Affirmative Defenses**

In this case defendant has asserted certain affirmative defenses as follows:

As to both Counts I and II of Plaintiff's Complaint:

First Affirmative Defense – Plaintiff assumed the risk of injury.

Second Affirmative Defense – Plaintiff was contributorily negligent and Plaintiff was more than 50% at fault for proximately causing Plaintiff's injuries, and therefore Plaintiff is barred from recovering any damages from Defendant.

The defendant has the burden of proving these affirmative defenses by a preponderance of the evidence.

**Court Instruction No. 14 - Opinion Testimony**

You have heard a witness give opinions about matters requiring special knowledge or skill. You should judge this testimony in the same way you judge the testimony from any other witness. The fact that such person has given an opinion does not mean that you are required to accept it. Give the testimony whatever weight you think it deserves, considering the reasons given for the opinion, the witness's qualifications, and all of the other evidence in the case.

**Court Instruction No. 15 - Agency**

Reese Hazard was an agent of the defendant Lincoln Adventure Co. LLC, at and before the time of this occurrence. Therefore, any act or omission of the agent at that time that was in the scope of the agent's authority was in law the act or omission of the defendant.

An agent is acting within the scope of the agent's authority if the agent is engaged in an activity which has been assigned to the agent by the agent's principal, or if the agent is doing anything that may reasonably be said to have been contemplated as a part of that activity which benefits the principal. It is not necessary that an act or failure to act must have been expressly authorized by defendant.

### **Court Instruction No. 16 – Use Of Verdict Forms**

When you retire to the jury room you will first select a foreperson. He or she will preside during your deliberations.

Your verdict must be unanimous.

Forms of verdicts are supplied with these instructions. After you have reached your verdict, fill in and sign the appropriate form of verdict and return it to the court. Your verdict must be signed by each of you. You should not write or mark upon this or any of the other instructions given to you by the court.

Verdict Forms A and B pertain to Count 1 of Plaintiff's Complaint.

Verdict Forms C and D pertain to Count 2 of Plaintiff's Complaint.

Use only one verdict form for Count 1 and use only one verdict form for Count 2.

On Count 1 of Plaintiff's Complaint, if you find for Plaintiff and against Defendant and if you further find that Plaintiff was not contributorily negligent or that plaintiff's contributory negligence was 50% or less of the total proximate cause of the injury or damage for which recovery is sought, then you should use Verdict Form A.

On Count 1 of Plaintiff's Complaint, if you find for Defendant and against Plaintiff, or if you find that plaintiff's contributory negligence was more than 50% of the total proximate cause of the injury or damage for which recovery is sought, then you should use Verdict Form B.

On Count 2 of Plaintiff's Complaint, if you find for Plaintiff and against Defendant and if you further find that Plaintiff was not contributorily negligent, or that plaintiff's contributory negligence was 50% or less of the total proximate cause of the injury or damage for which recovery is sought, then you should use Verdict Form C.

On Count 2 of Plaintiff's Complaint, if you find for Defendant and against Plaintiff, or if you find that plaintiff's contributory negligence was more than 50% of the total proximate cause of the injury or damage for which recovery is sought, then you should use Verdict Form D.

**VERDICT FORM A**

On Count 1 of Plaintiff's Complaint, we the jury find in favor of Plaintiff and against Defendant.

---

Foreperson

---

---

**VERDICT FORM B**

On Count 1 of Plaintiff's Complaint, we the jury find in favor of Defendant and against Plaintiff.

---

Foreperson

---

---

**VERDICT FORM C**

On Count 1 of Plaintiff's Complaint, we the jury find in favor of Plaintiff and against Defendant.

---

Foreperson

---

---

**VERDICT FORM D**

On Count 1 of Plaintiff's Complaint, we the jury find in favor of Defendant and against Plaintiff.

---

Foreperson

---

---

**PLAINTIFF WITNESS AFFIDAVIT: RIVER KNOX**

1           My name is River Knox. I'm 46 years old and live in Springfield, Illinois with my goldfish  
2   Squirt. I've been running ultramarathons, or "ultras", for about twelve years now. In our world, an  
3   "ultra" is any footrace longer than the standard 26.2-mile marathon. Some are "short" ultras, like  
4   50 kilometers (31 miles), others are multi-day events covering hundreds of miles.

5           The Lincolnville Ridge 100, where I got injured, is a full 100-mile trail race through the  
6   Shawnee National Forest. The event was held on August 23, 2025. It's the kind of race where you  
7   don't just plan for the day, you plan for the night, the next morning, and every possible way the  
8   weather, terrain, or wildlife might try to ruin your plans.

9           Over the years, I've developed what most runners would call an obsession with "no DNFs."  
10   "DNF" stands for "Did Not Finish," which is how race results mark anyone who drops out, misses  
11   a cutoff, or is pulled for safety reasons. In the ultra world, DNFs aren't necessarily shameful; the  
12   terrain, conditions, and distance can take out even elite runners. But I took pride in keeping my  
13   record clean. My crew and friends knew my mantra: "If you see me leaving a race in anything  
14   other than running shoes, call NASA, because I just got hit by a meteor." Until the Lincolnville  
15   Ridge 100, that streak was intact.

16           I didn't start running seriously until I was 40. Getting bored after running around 16 road  
17   marathons, I signed up for my first 50k as a one-time bucket-list challenge. I figured I'd cross the  
18   finish line, hang up my shoes, and move on. That didn't happen. Somewhere between the first aid  
19   station snacks and the first sunrise after running all night, I realized I'd found my people — the  
20   ones who think a good weekend is climbing ridgelines in the rain, swapping stories about old races,  
21   and seeing how far you can push before your body says no.

22           I've run through hailstorms in Colorado, desert heat in Utah, snow so deep in Minnesota I

23 had to use my hands to pull my legs forward. I've dodged snakes, wild pigs, and, once, a loose  
24 cow that had gotten out of a pasture. I've had gear freeze solid, shoes fall apart mid-race, and food  
25 I thought I loved turn my stomach on mile 70. Trail and ultra running teach you two things fast:  
26 you can't control the course, and the course will never stop trying to surprise you.

27       Ultras are built on a kind of shared suffering. You meet strangers at mile 40 who hand you  
28 their last piece of candy, or someone at mile 80 who duct tapes your shoe back together without a  
29 word. You swap "war stories" about races that went wrong or almost went wrong. In my circle,  
30 my "war stories" had been close calls, but never a true disaster.

31       Until this race. I'd studied the course map (Exhibit 1) before the start and had mile 63  
32 burned into my brain - the "scramble zone." In trail running, a "scramble" is a stretch where you  
33 generally have to use both hands and feet to move forward because the terrain is too steep or  
34 unstable to run. This one is a talus slope - basically a hill made up of broken rock chunks that shift  
35 under your weight. It's like climbing a pile of bowling balls the size of dinner plates. The pre-race  
36 email to runners (Exhibit 2) listed it as "WALK ONLY" zone.

37       I'd run that scramble before without injury; it's not that hard. In 2018, it was dry and loose,  
38 but manageable. In 2020, it was frosty early in the morning, but it melted off quickly. This year,  
39 though, the pre-race weather advisory email (Exhibit 13) told us a severe storm had hammered the  
40 area the night before. That kind of rain doesn't just make things wet - it changes the course. Dirt  
41 turns to mud, stable rock turns slippery, and runoff can loosen the whole slope from underneath.

42       By the time I reached the scramble that night, I could feel the change immediately.  
43 Normally, you expect a little give in talus. Maybe one rock rolls under you every few steps. This  
44 time, every single step shifted. You'd plant your foot, and it felt like the whole hill sighed and  
45 moved with you. The sound is hard to describe - like a quiet crunch mixed with a slow slide. In

46 the dark, with my headlamp beam bouncing off wet rock, it was eerie.

47         No one from the race had warned us about the scramble being worse than normal. I'd seen  
48 other races put up last-minute "Caution" signs or station volunteers at tricky spots. I've even seen  
49 a 100-miler reroute a section because a wasp nest was spotted near the trail. Here, there was  
50 nothing new. No marshal. No caution tape. No detour. I still believe a short reroute could have  
51 avoided the scramble area entirely.

52         The "WALK ONLY" signs were up — the same kind in the course markings photo (Exhibit  
53 12) - but at night, signs don't do much if no one is there to enforce them. It was just me, my  
54 headlamp, and the sound of the rocks shifting somewhere below.

55         I was moving cautiously - for me. In trail running, "cautious" doesn't mean slow. It means  
56 deliberate, keeping your rhythm so you don't freeze and lose balance. I'll admit that to an observer,  
57 my version of cautious might look quick. Years of technical descents have trained me to keep  
58 momentum, even in tough spots. I couldn't say if anyone else was following the walk rule - night  
59 running is isolating, and you rarely see more than a faint glow of another headlamp behind you.  
60 But, for me, I was walking through the scramble zone.

61         I'd read the race safety briefing handout (Exhibit 10) before the start, so I knew about the  
62 listed hazards: venomous snakes, storm hazards, loose footing, wildlife encounters. I've had my  
63 fair share - in Texas, a raccoon stole my drop bag; in Tennessee, I had to step around a rattlesnake;  
64 in Colorado, I got buzzed by a hummingbird so close it felt like a tiny drone. But nothing prepared  
65 me for what came next.

66         The owl hit me out of nowhere — WHUMP — from behind. Big wings brushing my  
67 shoulders, talons catching on my headlamp strap. Later, I learned it was a barred owl, a territorial  
68 bird known to dive-bomb people. Maybe my light startled it. Maybe it didn't like my movement.



69     Either way, the hit was enough to make me twist mid-step.

70             That twist was all it took. My foot skidded off the marked course. Gravity did the rest. I  
71     slid, bounced, tumbled into a ravine I hadn't even noticed from above. The rocks were slick, so  
72     there was nothing to grab onto. I remember flashes - my head hitting something, my arms flailing  
73     - and then nothing.

74             The rescue timeline report (Exhibit 8) shows how long it took them to reach me. I was  
75     drifting in and out - light in my eyes, voices calling my name, straps tightening around me. I woke  
76     in the hospital to the medical report summary (Exhibit 11): C6 spinal injury, severe head trauma,  
77     multiple fractures. The kind of injuries that don't just take you out of a race - they change your  
78     whole life.

79             Recovery for me hasn't been about "when can I race again." It's been "will I walk again."  
80     That's a shift I never imagined making. My "no-DNF" streak ended that night, not because I chose  
81     to quit, but because I had no choice.

82             After the race, I read the post-race statement (Exhibit 14) from the race director. It called  
83     what happened to me an "unexpected wildlife incident" and said the scramble had "challenging  
84     conditions." That's one way to say it. I'd call it predictable.

85             Look, I signed up for the race and I was very excited to participate in what I thought was  
86     going to be a grueling but safe event. But there's a difference between risk you accept and risk  
87     created when basic precautions aren't taken. This crossed that line.

88             I came into the scramble zone with the hazards in mind, following the rules, and moving  
89     with care. The owl took away my control in a split second. The fall ended my race, my streak, and  
90     maybe the part of my life where running was something I could just... do.

91             Further affiant sayeth not.

Respectfully submitted,

92

River Knox

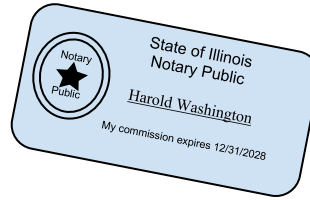
93

Signed and sworn before me on  
November 12, 2025.

94

95

Harold Washington



**PLAINTIFF WITNESS AFFIDAVIT: SKY WILDER**

1           My name is Sky Wilder, and I am 46 years old. I was born in southern Illinois and grew up  
2   in a small farmhouse outside of Makanda. My earliest memories involve tagging along with my  
3   father, who was a volunteer trail steward, and learning the names of local trees before I could spell  
4   my own. I can still remember him pointing out sycamores by their peeling bark and explaining  
5   how to tell hickory nuts from walnuts. To this day, the smell of wet oak leaves after a rain brings  
6   me right back to those hikes.

7           I live today in Carbondale with my partner, two rescue cats named Alder and Juniper, and  
8   an ever-rotating collection of topo maps spread across my kitchen table. The cats are trouble —  
9   Juniper likes to knock compasses off the table, and Alder once chewed through the strap of my  
10   field binoculars — but I wouldn't trade them for anything. I keep the topo maps laid out not  
11   because I need them all the time, but because I like to compare old USGS editions to newer digital  
12   printouts. I'll spend an evening tracing contour lines just for the satisfaction of seeing how the land  
13   folds.

14          I am a lifelong Illinois native not only by birth but also by education. After graduating from  
15   Makanda High School, I earned a bachelor's degree in Forestry from Southern Illinois University  
16   in Carbondale, where I focused on field ecology and outdoor recreation management. I later  
17   completed a master's degree in Environmental Studies at the University of Illinois Springfield,  
18   concentrating on risk communication and public land use policy. While at SIU, I worked as a  
19   student research assistant mapping invasive species in Giant City State Park, which first gave me  
20   hands-on experience balancing public access with conservation. At UIS, I presented my thesis on  
21   how weather advisories are understood by outdoor recreationists in Midwestern state parks. These

academic experiences gave me both a technical grounding in land management and an early appreciation for how education and communication shape public safety in the outdoors.

I hold professional certifications in wilderness safety and trail hazard assessment, and for over 20 years I have worked as a backcountry ranger, outdoor safety trainer, and independent risk management consultant. My work has taken me from the foggy switchbacks of the Pacific Northwest, where I once spent a month camping in persistent drizzle, to the dusty trails of Arizona, where I learned you can't underestimate how quickly a flash flood can turn a dry wash into a torrent. I've logged field hours in dozens of states, but I always find myself drawn back to the Shawnee National Forest. It's not as dramatic as the Rockies or as famous as Yosemite, but it has its own brand of rugged beauty — sandstone bluffs, tangled woods, and sudden ravines that sneak up on you.

I am intimately familiar with its steep, rocky sections, including talus slopes that—much like the ones in this case—tend to loosen dramatically after heavy rain. Once, on a training hike, I put my boot down on what I thought was solid footing and ended up sliding several feet before catching myself on a sapling. That was on a mild spring day, not even after a storm. These experiences are why I emphasize to my clients that talus is never truly stable — it's only waiting for the right conditions to remind you that gravity wins.

Over the years, I have trained race directors, parks departments, and recreation companies on best practices for post-weather inspections, wildlife management, and risk communication. I often use little case studies when I teach: a mountain bike race in Oregon where we had to reroute because of a landslide, a canoe regatta in Kentucky where downed trees created hidden sweepers, a summer camp in North Carolina where black bear sightings forced a temporary trail closure. In

every case, the lesson was the same: severe weather changes the landscape, and ignoring that fact can lead to preventable accidents.

I was retained by the plaintiff in this matter to review the planning and execution of the Lincolnville Ridge 100 ultramarathon, which was held on August 23, 2025. As is customary for expert witnesses, I am being compensated for my time and testimony, just nearing six figures in fees, which is not unusual in my field, and I have testified for plaintiffs in most of my prior cases. I did not inspect the actual racecourse until several weeks after the incident. By then, the autumn leaves had begun to drop, and I recall the air was cool enough that I wore a flannel shirt under my field vest. I carried my standard field kit—a tape measure, soil probe, digital camera, and a notebook I’ve been using since 2019, which still had mud stains from a prior inspection in Tennessee. That notebook has notes on everything from trail washouts in the Smokies to a rare salamander sighting in Missouri. It’s more beat-up than anything else I own, but I keep patching it with duct tape and carrying it with me.

I reviewed the official course map showing the scramble zone (Exhibit 1), the weather report from the night before the race (Exhibit 4), a photograph of the scramble zone taken before the storm (Exhibit 6), and a U.S. Forest Service clearance report (Exhibit 5). I also looked at the owl incident report from a prior training run (Exhibit 9), which reminded me of how layered the risks in outdoor environments can be. In my professional opinion, post-storm course inspections are a standard best practice in organized trail events, and rerouting for unstable terrain is often feasible even on race day, though it may require rapid logistical changes. Severe weather increases rockfall risk in talus zones, and the Shawnee’s talus slopes are particularly susceptible to shifts because the underlying clay layer can lose cohesion when saturated. At many events I’ve worked, placing volunteers at “chokepoint” hazards—like a scramble zone—is an important safety measure

67 both to encourage compliance with rules and to monitor changing conditions. Based on the  
68 materials I reviewed, the race's actions in this instance, which had no such stationed volunteers at  
69 the scramble zone, fell short of the practices I generally recommend and train others to follow.

70 In forming my opinions in this case, I relied on a methodology that I use consistently in  
71 my professional work evaluating outdoor recreation risks. Specifically, I combine document  
72 review with on-site or comparable terrain analysis, drawing on established outdoor safety  
73 frameworks such as hazard identification, likelihood assessment, and consequence evaluation.  
74 This approach is consistent with methods used by other outdoor risk management experts, who  
75 frequently assess the reasonableness of safety decisions by comparing them against both industry  
76 standards and practical field experience. In particular, I emphasize post-weather event risk factors,  
77 trail user compliance, and enforcement of safety rules, which are standard considerations in my  
78 consulting work. This structured process is reasonably relied upon by experts in the field of outdoor  
79 risk management and wilderness safety.

80 That said, I acknowledge that wildlife encounters—such as a swooping barred owl—can  
81 be unpredictable without any prior history of occurrence. I've had one take my hat clean off my  
82 head while I was eating a granola bar on a night hike, and there's simply no way to anticipate the  
83 exact moment such an attack might occur. Another time, during a dawn survey, I mistook a barred  
84 owl's call for a person shouting in the woods until I remembered their "Who cooks for you?"  
85 cadence. The owl incident report from the prior year's training run (Exhibit 9) shows that swooping  
86 behavior had been observed before in this same area, though without documented injury. There is  
87 also no binding national standard that requires post-storm re-inspection before a race proceeds.  
88 While I have advised and trained ultramarathon directors, I have not personally directed such an

89 event. I also concede that the mile 63 scramble zone was an inherently risky section of trail even  
90 without the effects of the storm, and that risk was part of what made the course challenging.

91 Finally, I reviewed the medical report summary of River Knox's injuries (Exhibit 11). The  
92 combination of severe storm conditions, the loosened talus slope, and the lack of targeted safety  
93 measures at the scramble created a situation that, in my opinion, was completely preventable had  
94 industry-standard precautions been followed. In other words, a course reroute was warranted in  
95 this case. I don't take any satisfaction in pointing that out — I've spoken at enough conferences to  
96 know these discussions can feel harsh after someone gets hurt — but the reason best practices exist  
97 is to reduce tragedies like this. In my experience, they only work if they are followed consistently.

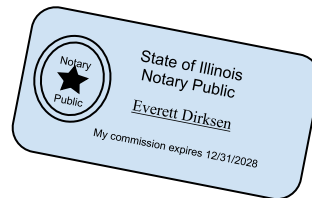
98 Further affiant sayeth not.

Respectfully submitted,

99 *Sky Wilden*

100 Signed and sworn before me on  
101 November 17, 2025.

102 *Everett Dirksen*



**PLAINTIFF WITNESS AFFIDAVIT: SCOUT KEEN**

1           My name is Scout Keen, I am 24 years old. I grew up in southern Illinois and still live not  
2   far from where I was raised. "Lincolnville, born and raised" - that's what my folks always said.  
3   My parents took pride in making their own way here and I carry that same pride in giving back.  
4   Even now, I sometimes volunteer to pick up trash along the roads, because I think a lot of people  
5   take for granted just how beautiful Lincolnville and the Shawnee National Forest are.

6           I've always been fascinated by gadgets and radios. From the time I was about 8 years old,  
7   I built a radio using a potato, some aluminum foil, two paper clips, and a computer speaker. (But  
8   really it started even earlier, at age 7; I took apart my dad's alarm clock radio because I wanted to  
9   see where the voices were coming from. My parents weren't thrilled I ruined the clock, but it got  
10   me hooked on electronics.) Anyways, using the knobs on the speaker, I was somehow able to  
11   change the frequency of the potato and pick up on local communications. I once overheard Mrs.  
12   Daley from church on the phone talking about her husband's gout; talk about embarrassing. I can  
13   remember sitting in my room at age 12 with a cheap handheld scanner I picked up at a yard sale,  
14   flipping through static until I caught the faint voice of someone on the local fire dispatch. Around  
15   that same age, I also built my own simple radio from spare parts. Once my dad, a retired trucker,  
16   saw my interest, he helped me build a working HAM radio in high school.

17           That moment hooked me, and by high school I was studying for my amateur radio license  
18   instead of paying attention in algebra. I joined Lincolnville's amateur HAM radio club and signed  
19   up for Dispatchers Today, which was like the radio version of the Lincolnville Explorers.

20           Today, I am an active member of a local amateur HAM radio club. On Tuesday nights we  
21   hold net check-ins, which is basically a roll call over the airwaves. We also set up "field days"  
22   where we string antennas in parks or cornfields and see how far across the world we can make



23 contact. Sometimes we place antennas around town and experiment to see how far we can send a  
24 signal. I once logged a connection with someone in New Zealand using nothing but a battery, a  
25 wire antenna, and a folding table under a pavilion. Last year, I even hacked into an AI party bot  
26 application and really messed with people throwing a party in an abandoned mansion for sport!

27       Because of this hobby, I often volunteer for events that need communications support. I've  
28 worked everything from county fairs to charity bike rides, and when the Lincolnville Ridge 100  
29 ultramarathon, held on August 23, 2025, announced they needed volunteers, I signed up right  
30 away; they basically just asked for my name. Part of it was my love of radios, but also my pride in  
31 supporting Lincolnville's outdoors and community. I love these races. Sometimes, while in a daze,  
32 I tell myself I could get out there too, but I know better. It takes me 22 minutes to complete a mile  
33 using various tactics, and I'd like to tell you that "running" isn't the most widely used one.

34       Anyways, on the night of the race, I was stationed near the talus scramble zone to monitor  
35 the race and relay safety information as part of the official communications network; this was  
36 shown on the volunteer roster (Exhibit 7). At first, I didn't even know what a 'talus scramble zone'  
37 was, but someone from the prep team explained it to me. During our pre-race session, walking-  
38 only sections were mentioned, and I was told runners would already know how to handle those  
39 safely at night. I was given a handheld radio, a set of spare batteries, and instructions on which  
40 channel to monitor. I also brought along my thermos, my potato radio (I keep it around to remind  
41 me of where I started), my personal drone, and my own headset. I prefer an earpiece because it  
42 keeps my hands free, though some people in the HAM club insist handheld mics are more reliable.  
43 My drone is a mid-range quadcopter with a camera, about the size of a shoebox, which I usually  
44 fly in more open areas.

45           That night was long and a little surreal. The air had that damp smell after the big storm the  
46 night before the race, August 22, 2025, and the headlamps of runners bobbed through the trees like  
47 moving constellations. Lingering clouds blocked out the moonlight most of the night, which made  
48 everything feel even darker. From my spot near the scramble, I saw multiple runners struggling  
49 with loose rocks. Some slipped a bit or had to steady themselves with their hands, while others  
50 managed to pick careful lines and got through without much trouble. I also saw that some runners  
51 ignored the signs and moved faster than I would have expected, but at the time of the incident, I  
52 did not see any volunteers enforcing the “walk-only” rule in that section. Since I wasn’t told to  
53 enforce the walking rule myself, I assumed the runners knew what to do.

54           Now, this is the part where my love of gadgets got the better of me. While on duty, I  
55 operated my personal drone without notifying race officials or receiving permission. Did I mention  
56 it’s a mid-range quadcopter that I usually fly in open fields, nothing professional? Anyways, flying  
57 it in the forest was more on a whim; I like to review the camera footage later and see what I capture.  
58 My purpose was to capture video footage of conditions and runners in the scramble zone. I admit  
59 it was partly curiosity and partly to show off to my HAM radio club later; we swap a lot of tech  
60 stories.

61           Operating the drone required me to take my attention away from radio duties at times. It’s  
62 hard to keep one eye on the controller screen and one ear on the radio, and I know I missed at least  
63 one radio check-in while I was repositioning the drone. I apologized after missing that check-in  
64 and tried to stay focused on radio duties afterwards. I was later informed by a race safety expert  
65 that I was not permitted to fly my drone during the race at all. That was embarrassing, especially  
66 since I pride myself on following rules when I volunteer. It was a mistake I take responsibility for.

67 I knew drones could be flown in the park generally, but it didn't cross my mind that the race might  
68 have a stricter rule against it; no one told me until later.

69 Anyways, while a runner, who seemed to be moving slowly, approached the talus zone that  
70 night, I was adjusting the brightness on my drone screen and I took one hand off the controls to  
71 steady the radio. I figured the drone would hover where it was, but it suddenly lurched mid-air and  
72 dipped toward the treetops. Before I could correct it, the feed went black. The drone crashed a  
73 moment later, destroying all the footage I'd captured. Almost immediately after, I noticed  
74 movement near the ravine and realized something had gone very wrong. At approximately 12:03  
75 a.m. on August 24, 2025, I radioed to all channels that the same runner who was approaching the  
76 talus zone had fallen off the trail and into the ravine. I later learned this runner was River Knox.

77 I want to be clear that I don't have formal training in evaluating the safety of course design.  
78 I'm good with radios and gadgets, not geology or biology. I can tell you the difference between  
79 VHF and UHF frequencies, and I can probably fix a fried circuit board with a soldering iron, but  
80 I am not the person to determine whether talus is stable or whether an animal is nesting nearby. I  
81 can only report what I saw and what happened. And while I think something big must have  
82 knocked my drone out of the sky, I honestly couldn't tell you for certain what it was.

83 I also acknowledge that after the drone incident, I interacted with River Knox a bit. River  
84 Knox was shaken and injured, and I spoke with River Knox briefly as the rescue crews extracted  
85 him; I was trying to keep radio contact open. River Knox kept repeating that they were attacked  
86 by an owl! I admit I felt sympathy toward Knox.

87 As for the communications network, I do have firsthand knowledge of the setup and race  
88 safety protocols. We had a primary and backup channel, with designated volunteers assigned to  
89 each major checkpoint. The system worked overall, but when the incident happened, things grew

90 chaotic. I later reviewed the rescue timeline report (Exhibit 8), which accurately reflects that it  
91 took almost two hours for the rescue to be completed due to the remote location. At times I had to  
92 move around to less obstructed areas in the woods to get my signal through. That matches what I  
93 experienced; I relayed messages back and forth about medical response, though I had to repeat  
94 myself more than once when signals were weak. In fact, I had to step onto a ridge at one point just  
95 to get my radio signal to bounce correctly, something HAM operators call “working the angle.”

96 If I can add a small personal note: volunteering at these events is something I do because I  
97 like being part of the community. That comes from my family’s pride in Lincolnville, and my own  
98 love of its outdoors and natural beauty. I could spend a Saturday night at home tinkering with  
99 antennas or being in some boring community theater, but, instead, I choose to stand in the woods  
100 in the dark with a radio because it makes me feel like I’m useful. I may have made mistakes, flying  
101 the drone, missing a call or two, but I was there, trying to help. I still remember sipping lukewarm  
102 instant coffee from my thermos at 3:00 a.m., listening to static, watching runners file past with  
103 headlamps glowing, and thinking: this is exactly why I love radio work. You’re a tiny piece of a  
104 bigger puzzle, keeping the lines open. Not just in tech, but in nature too - both parts working  
105 together.

106 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
107 knowledge.

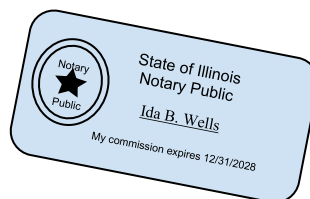
108 Further affiant sayeth not.

Respectfully submitted,

109 Scout Keen

110 Signed and sworn before me on  
111 November 10, 2025.

112 Ida B. Wells



**DEFENSE WITNESS AFFIDAVIT: REESE HAZARD**

1           My name is Reese Hazard, and I am 39 years old. I have been a dedicated distance runner  
2 my entire life. I was a top-level cross-country runner in high school and began running marathons  
3 and eventually ultramarathons starting my first year of college. In fact, one of my proudest  
4 memories is finishing my first marathon in under three hours on a chilly November morning,  
5 wearing shoes that in hindsight were far too worn down. From that point forward, distance running  
6 wasn't just an interest — it became the rhythm of my life.

7           My passion for ultra-endurance athletics and not wanting to work at Lincolnville Pizza  
8 Palace my whole life, led me to found Lincoln Adventure Co., LLC. I have been directing  
9 ultramarathons and endurance trail events for over fifteen years. Over the course of my career, I  
10 have successfully organized and overseen numerous races, including the Lincolnville Ridge 100,  
11 most recently held on August 23, 2025, which my company has operated safely for more than eight  
12 years. Running a race company is not glamorous work — I often spend more time loading water  
13 jugs, coordinating porta-potty deliveries, and troubleshooting last-minute crises than actually  
14 running. But it's work I care about deeply.

15           For the Lincolnville Ridge 100, I was personally responsible for designing the course,  
16 creating the race fee of \$455.00 per runner, marking hazards, assigning volunteers, and enforcing  
17 race rules. The scramble zone — an area designated as “walk-only” — was clearly marked on the  
18 official course map (Exhibit 1), in the pre-race email to runners that included rules and hazard  
19 warnings (Exhibit 2), a course markings photo (Exhibit 12), and reiterated during the mandatory  
20 safety briefing (Exhibit 10). At those briefings, such as on August 22, 2025 the evening before the  
21 race starts, I typically stand in front of tired but excited runners the evening before the race, holding  
22 up laminated maps, going over hazards, and reminding everyone that “finishing upright is better

23 than finishing fast.” The pre-race waiver warned participants of wildlife, rough terrain, and  
24 inherent risks (Exhibit 3), and weather alerts and updates were provided before the race through a  
25 weather advisory email (Exhibit 13).

26 In the days leading up to the race, I coordinated volunteer assignments (Exhibit 7), ensured  
27 that hazard markers were placed along the course (Exhibit 12), reviewed emergency protocols, and  
28 communicated safety information to participants (Exhibit 2). I like to walk volunteers through their  
29 duties personally, and I usually keep a binder with color-coded tabs for each aid station and  
30 checkpoint. I personally checked the scramble zone prior to the storm, as reflected in a pre-storm  
31 photo of that section (Exhibit 6). However, I did not re-inspect it after the severe weather on August  
32 22, 2025, the night before the event (Exhibit 4). The U.S. Forest Service conducted a general  
33 clearance of the course (Exhibit 5), and based on time, resources, and the potential risk of  
34 unmarked hazards on alternate paths, I made the decision not to reroute the scramble.

35 On race day, staff and volunteers were equipped with satellite phones and trained in first  
36 aid (Exhibit 7). The walk-only zone was monitored in accordance with our safety plan, but it was  
37 not continuously staffed overnight. Race mornings are always hectic — radios crackling, coffee  
38 percolating in big thermoses, volunteers nervously clutching their clipboards. My role shifts from  
39 organizer to problem-solver, answering questions about parking one minute and double-checking  
40 emergency contacts the next.

41 When an incident occurred involving runner River Knox in the scramble zone during the  
42 August 23, 2025 race, our emergency protocols were followed. I remember the first radio call  
43 coming through garbled, and for a moment I thought it was another runner reporting a twisted  
44 ankle. Once the message became clear, I immediately directed resources to the site. Due to the  
45 remoteness of the location, the rescue took over two hours to complete (Exhibit 8). That is not

unusual in these back-country settings; I have been involved in rescues during other races where extraction times stretched even longer. I directed staff to create a rescue timeline (Exhibit 8), which we do after any incident that requires a runner to be carried out of the course.

Regarding wildlife, the waiver (Exhibit 3) included a general warning. Although an owl had swooped at runners during a training run the year before (Exhibit 9), there had never been any prior documented injuries or serious incidents with owls in this race. Personally, as a runner, I've encountered snakes, deer, even a charging armadillo once, but never an owl strike. It remains one of the most unusual hazards I have ever heard reported. To be honest, after seeing it before the race I sort of ignored all of Exhibit 9. Still, I understand that River Knox was an experienced ultra runner and I think Knox should have known to watch out for wildlife.

After the race, I issued a public statement in the post-race statement (Exhibit 14), reviewed the official rescue timeline (Exhibit 8), and collected feedback from participants. I usually set aside a day after each event to answer emails — everything from thank-yous to complaints about aid station snacks. Some runners described the scramble as “sketchy” or “loose,” but no other competitor reported injury or filed a complaint. In fact, we received multiple positive runner feedback emails (Exhibit 15) and compiled race completion statistics showing the event's overall success (Exhibit 16). Specifically, a participant named Harper McFinch indicated that River Knox may not have walked the scramble zone as required by race rules.

Directing these races means making judgment calls under pressure. I know every decision is subject to scrutiny after the fact, and I accept that responsibility. Still, I know that all reasonable measures were taken to ensure runner safety in accordance with accepted practices in the trail and ultramarathon community, including establishing the walk-only rule. And while no event is

68 perfect, I believe the Lincolnville Ridge 100 was conducted with care, professionalism, and the  
69 level of diligence our community expects.

70 Further affiant sayeth not.

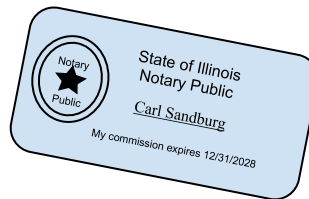
Respectfully submitted,

71

Reese Hazard

72 Signed and sworn before me on  
73 November 21, 2025.

74 Carl Sandburg





**DEFENSE WITNESS AFFIDAVIT: JORDAN GALE**

1           My name is Jordan Gale, and I am 41 years old. I work as an independent consultant  
2 specializing in safety planning and risk management for endurance and trail events. I was born and  
3 raised in Illinois, and I completed all of my education in this state. I earned my undergraduate  
4 degree in Environmental Science from Southern Illinois University in Carbondale, where I spent  
5 long afternoons mapping stream beds in the Shawnee Forest for class credit. Later, I completed a  
6 master's in Recreation, Sport, and Tourism at the University of Illinois in Urbana-Champaign. I  
7 also pursued additional coursework at Illinois State University in Normal, where I studied program  
8 evaluation and outdoor leadership. My entire professional training and career have been rooted in  
9 Illinois institutions, and I remain proud of that connection.

10           Over the past fifteen years, I have advised race organizers nationwide, from desert ultras  
11 in Arizona to alpine courses in Colorado. My work has included drafting safety protocols,  
12 designing volunteer assignments, and preparing contingency plans for severe weather. Sometimes  
13 my consulting is as simple as helping a small-town 5K get their volunteers organized; other times  
14 it's coordinating with search-and-rescue teams in mountain states. I have not personally directed  
15 a race in the Shawnee National Forest, but I am familiar with industry standards for ultramarathon  
16 safety and risk management. My travel journals are filled with notes about hazards in different  
17 regions — cactus spines in Arizona, fog banks in Oregon, and loose shale in Utah — but Illinois'  
18 sandstone bluffs and talus slopes are still some of the trickiest.

19           I was retained by the defense in this case and am being compensated for my time and  
20 testimony. The compensation I am receiving is substantial — well into six figures for my review  
21 and trial appearance — which I recognize may be considered an astronomical amount for an expert

witness, but it is usual in my field. I have testified in prior cases, most often on behalf of defendants, though I occasionally consult for municipalities and nonprofit races as well.

Outside of work, I am a lifelong birder and a devoted fan of the board game Wingspan. It's a strategy game about attracting birds to your wildlife preserves, and I can't recommend it enough. I play a couple of times a week, often with a rotating game group that meets at a coffee shop in Springfield. I admit that I tend to measure a lot of things in terms of Wingspan trivia. For example, in Wingspan, the barred owl card has a wingspan value of 107 centimeters — which is slightly off, since the real barred owl (*Strix varia*) actually has a wingspan closer to 100 to 125 centimeters. They're also known for their haunting call that sounds like "Who cooks for you? Who cooks for you-all?" I've heard that call while camping in Illinois, and it still gives me chills.

Barred owls are fascinating birds: unlike some raptors, they fly almost silently thanks to specialized wing feathers that muffle sound, making their swoops startlingly sudden. One game night, I joked that if Wingspan wanted to be truly realistic, the barred owl card should allow you to roll secretly and jump-scare your opponent. I once had a barred owl swoop at me while birding in Wisconsin, and I have to say, it feels just as startling in real life as it must have for Mr. Knox in this case. But, as any Wingspan player could tell you, owl encounters are always unpredictable — in the game and in nature.

In my opinion, industry standards in ultramarathon events accept that there are inherent risks that cannot be eliminated. Hazards such as loose footing, night running, weather shifts, and occasional wildlife encounters are part of the expected conditions of the sport. The rules for the Lincolnville Ridge 100, held on August 23, 2025, were adequate and communicated to runners through pre-race materials and briefings. The weather report from August 22, 2025, the night before (Exhibit 4) was circulated, and the U.S. Forest Service issued a clearance of the course

(Exhibit 5). While a post-storm inspection “might” have helped identify loosened talus, no national rule or binding standard requires a second inspection once a pre-race clearance has been obtained. Many races operate with fewer resources than Lincolnville Ridge 100 had available, and the procedures used were consistent with accepted practices in the field.

I also reviewed the medical report summary of River Knox’s injuries (Exhibit 11). While the injuries were severe, it is my opinion that they were triggered by an unforeseeable and extraordinary event during the August 23, 2025 race: a barred owl strike. Barred owls are territorial, especially during nesting season, and will sometimes swoop silently at perceived intruders. In Wingspan, barred owls are a “predator bird” card, meaning they have a special dice roll to see if they catch prey — a neat touch, since in real life they hunt small mammals at night. But the important point is that their swoops are not predictable or preventable in the context of a 100-mile trail race. In my view, the owl was a superseding cause that no reasonable race plan could have anticipated.

In forming my opinions in this case, I applied the same methodology that I routinely use when consulting on endurance event safety. Specifically, I conducted a document-based risk assessment, which involves reviewing official race materials, weather and environmental data, hazard assessments, and participant reports in order to identify whether the procedures followed align with industry norms. This approach is consistent with methods reasonably relied upon by other professionals in my field, who often evaluate races after the fact without the opportunity to directly observe the event. My review emphasized comparison with recognized practices in ultramarathon risk management, including pre-race clearances, hazard communication protocols, and contingency planning. This structured review process is the same one I use in both my

consulting work and in my prior expert testimony, and it is widely accepted among risk management consultants as a reliable basis for forming expert opinions.

When I travel for consulting, I always pack my binoculars and at least one bird field guide — I’ve got editions for every region of the country. On the Illinois prairie I’ve spotted bobolinks and meadowlarks; in Chicago, peregrine falcons nesting on skyscrapers; and in southern Illinois, barred owls in deep ravines. It is part of who I am: I can’t separate my professional risk assessments from my love of noticing the nonhuman world around us.

I did not interview runners who reported difficulty in the scramble, and I did not review drone footage from the incident. My conclusions are instead based on the official race documentation, the weather report (Exhibit 4), the U.S. Forest Service clearance (Exhibit 5), and the race completion statistics (Exhibit 16), which show that the overwhelming majority of runners finished the event safely.

In sum, I believe the race rules were reasonable, the hazards fell within expected conditions, and Lincolnville Ridge 100 operated in line with industry norms for ultramarathons. And if you’ll permit me one more nerdy Wingspan fact: the game’s designer, Elizabeth Hargrave, said she wanted people to love birds as much as she does. I’d say the same thing about running these events. Risk is part of the package, but it’s also part of the beauty.

Further affiant sayeth not.

Respectfully submitted,

Jordan Gale

Signed and sworn before me on  
November 19, 2025.

Gwendolyn Brooks



**DEFENSE WITNESS AFFIDAVIT: HARPER MCFINCH**

1           My name is Harper McFinch and I am 28 years old. I grew up in Logan City, Illinois, and  
2   now I live there with my dog, a Lab-mix named Pearl. I graduated from the local community  
3   college with an associate's degree and started working at Ackerley Insurance Company in my  
4   hometown. Six years later, I am proud to be an account manager there. It's a stressful job that  
5   requires attention to detail and focus, and there is a lot of pressure not to make a mistake. After a  
6   few years on the job, I started getting a little burned out. In addition to the stress, I was sitting all  
7   the time and starting to feel really out of shape. I used to run for fitness in high school, so I decided  
8   to get back into running on the weekends with my dog.

9           Once I got back in shape, I started running in local races, and it was so much fun, I started  
10   running in longer races, and now I am an ultra-marathon runner! I love running to reduce stress  
11   and stay in shape, but I also get to meet new people, so I like the social aspects of hanging out with  
12   my fellow runners. Most of them are really great people. I take running seriously. I spend a lot of  
13   time reading running articles and researching shoes and the best ways to avoid blisters. I also make  
14   sure to carefully review the rules and procedures before every race. I highlight the key parts of the  
15   rules so I can remember them later. People call me a "Rule Follower," which I take as a  
16   compliment!

17          Outside of work and running, I have a lot of small hobbies that help me unwind. I've always  
18   been someone who enjoys routines — I make the same breakfast almost every morning, oatmeal  
19   with blueberries and black coffee, and I track my mileage in a spiral-bound notebook even though  
20   I also have it all synced to my watch and phone. There's just something about seeing the numbers  
21   written down in pen that feels more real to me. I've also gotten into baking sourdough bread over  
22   the past couple of years. I'm not great at it, but my coworkers at the insurance company love when

23 I bring in a loaf on Mondays. Pearl, my Lab-mix, always waits under the counter hoping I'll drop  
24 flour or a crust.

25 I also like to travel, though I don't go far very often. Last year I drove up to Wisconsin for  
26 a half marathon and made a point of stopping at every roadside cheese store I saw. I came home  
27 with so much cheese that my refrigerator was packed for weeks. It wasn't practical, but it was  
28 memorable. When I think back on trips, I often remember the food more than the race itself.

29 Even around Logan City, I make small "adventures" for myself. Pearl and I sometimes run  
30 loops around the high school track at night just for the novelty of running under the stadium lights.  
31 Other times, I'll bring headphones and run on the levee trail by the river, where the sunsets can be  
32 surprisingly beautiful. I know people sometimes joke that Illinois is flat and boring, but I think you  
33 just have to look a little closer.

34 These little routines and side interests don't change anything about my testimony in this  
35 case, but they're part of who I am. Running is important to me, but so is having a life outside of it  
36 — one that includes good food, good company, and plenty of time with my dog.

37 Last year, I heard about the Lincolnville Ridge 100, which is a 100-mile course through the  
38 Shawnee National Forest in Southern Illinois, which was held on August 23, 2025. I had run  
39 similar "rugged" races before, but never on this course. I had never even been to Southern Illinois  
40 before and was amazed to learn there was a national forest and hills there.

41 The race was scheduled for August 23, 2025. I had some vacation time, so I signed up,  
42 ponied up the \$455.00 entry fee, and meticulously read and followed all of the race rules (Exhibit  
43 2). I specifically remember reading about the walk-only restriction in the talus scramble zone,  
44 which was also marked on the course map (Exhibit 1) and explained again during the safety

briefing (Exhibit 10). I thought it was made pretty clear that this was an area where we would need to be particularly careful.

This was a tough race and the conditions were challenging, but fair. We received pre-race weather advisories warning us of the storm on August 22, 2025, the night before the race (Exhibit 13), so I knew the course could be slick. The trails wound through woods, climbed ridges, and cut across rocky sections where footing mattered. The talus scramble was definitely one of the trickiest spots, but the signs and markings (Exhibit 12) made it very clear we had to slow down and walk.

I know River Knox from prior races, and in my opinion, River Knox is a good runner who is a bit cocky and tends to take unnecessary risks to win. We have competed against each other in two or three ultras in the past couple of years. In this race, we started out running neck and neck, but as the race progressed, I started to edge ahead of River. I was so excited because River Knox beat me by a nose in the last two races we were in together. I am not super competitive but I was hoping to even things up with River Knox this time.

As we got near the walk-only zone, I saw several runners moving more quickly than the rules allowed. It makes me mad when runners don't follow the rules. Rules are there for a reason! I saw the signs marking the walk-only zone (Exhibit 12), and I slowed to a walk, just like the rules said. I went right through the talus with no issues. I glanced behind me and saw that River Knox was just running a little way back. I did not see River Knox enter the scramble area, but something made me look back again and I did see River Knox lose control on the loose rocks and fall. I think I heard a weird noise, but I did not see an owl or any other birds. I personally didn't have any problems with wildlife, though I know wildlife was mentioned in the safety materials (Exhibit 2).

I admit that the talus scramble was one of the sketchier parts of the race, but I slowed down and had no problems and so did lots of other runners. Based on what I saw, I am sure River Knox

could not have been walking when the fall happened. The storm could have made the rocks looser, and we did pass the area at slightly different times, so the conditions and lighting could have varied. I remember very clearly that the walk-only zone was marked with a sign that said “walk-only zone” (Exhibit 12), and there were other course markings. I also remember that there were volunteers stationed in that general area, though I don’t recall seeing any of them actually enforcing the rules at night. I don’t have special training in evaluating course safety — I just know what I experienced as a runner.

I heard later that River Knox was hurt badly in the fall and is saying they walked in the scramble and that the trail was dangerous. I’m sorry River Knox got hurt, but I thought the walk-only zone was passable with care. I don’t think River Knox slowed down like the rules said. River Knox is very competitive and has a reputation for skirting rules. I even filed a complaint against River Knox in a prior race for not following the race rules, but officials didn’t act on it. River Knox won that race and I placed second. I was mad at the time, but that has no effect on me today.

I finished the race and did pretty well. After the race, I shared honest feedback with the organizers about the event as a whole but I do not see my comments in Exhibit 15. Despite the scramble being tough, I thought the course was marked fairly and the conditions were challenging but manageable.

Further affiant sayeth not.

Respectfully submitted,

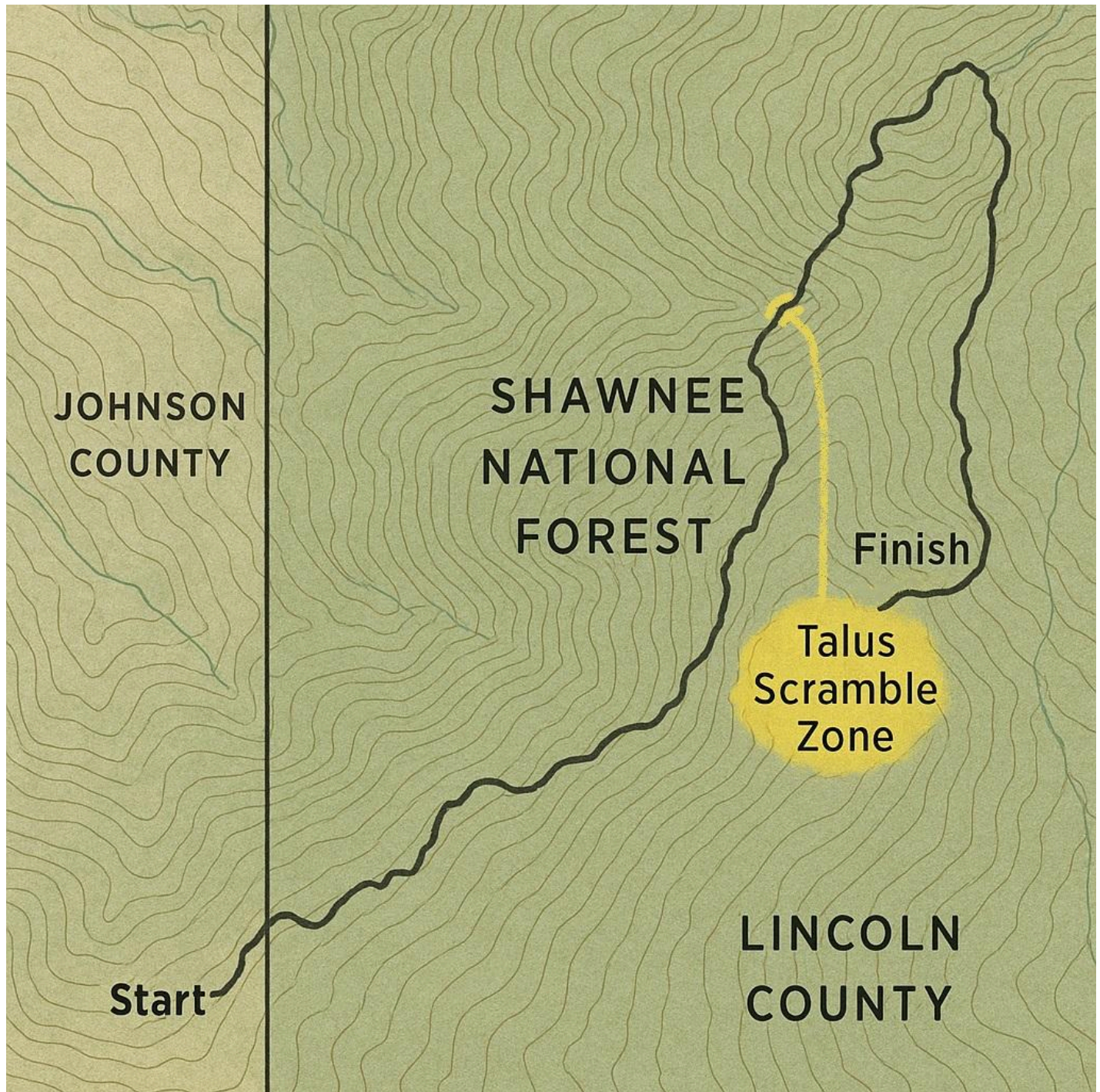
Harper McFinch

Signed and sworn before me on  
November 26, 2025.

Florence Kelly







**From:** Lincoln Adventure Co. info@lincolnadventureco.com  
**To:** 2025 Lincolnville Ridge 100 Runners  
**Date:** July 29, 2025 – 9:12 AM  
**Subject:** 2025 Lincolnville Ridge 100 – Pre-Race Notes (T-minus 25 days!)

Dear Ridge Runners,

All systems go on our end. T-minus 25 days until blastoff! The nights are cooling down here in southern Illinois, and it's starting to feel like Lincolnville Ridge season. The 2025 race is coming in hot (and humid), and we couldn't be more excited. Let's dig in!

---

### **1. LR100 Facebook Group**

If you've got questions, need GPX files, crew info, or just want to talk gear and training, join our group. Nearly 1,000 runners and alumni are already in there swapping stories and advice.

### **2. Race Manual & Logistics Docs**

Please download the *2025 Race Manual* and the *Aid Station Spreadsheet*. These cover course walkthrough, crew/pacer rules, cutoff times, and emergency procedures. Save them on your phone — service is sketchy on the ridges, so offline access is key.

### **3. Aid Stations**

Every 5–7 miles. Cutoffs and crew points listed in the spreadsheet. Drop bags allowed at mile 40 and 75. Please thank our volunteers — they'll be out there for 30+ hours keeping you moving.

### **4. Walk-Only Talus Scramble (Mile 63)**

This is the *signature hazard* of the course. All runners must WALK this section. Running, jogging, or power-hiking is prohibited. It's on the course map, in the manual, and will be reiterated at the briefing. Violations risk penalty or DQ. Trust us: the slope is unforgiving when wet.

### **5. Weather & Course Conditions**

Illinois summer storms can be sudden and severe. Expect slick ridges and shifting talus after rainfall. Volunteers are checking for downed trees, but expect mud, roots, and surprises. The storm season has been active — stay conservative in your pacing through the technical sections.

### **6. Wildlife Notes**

The Shawnee is full of critters — copperheads, cottonmouths, timber rattlers, armadillos, deer, coyotes, and bats. Most will give you space if you give them space. Keep your headlamps high and your wits about you.

### **7. DNF & Cutoff Logistics**

If you drop, *you walk out*. Aid station captains must log every DNF formally. If you leave Aid 40, the next safe crew exit isn't until Aid 61. After that, you're committing to nearly 12 miles of ridge running before another easy exit. Please study this — it's a burden on volunteers when runners push past their limit and need extraction from remote terrain.

**8. Volunteers**

We've got an amazing crew lined up — HAM radio operators, sweepers, medics, and local scouts. If your friends/family want in, we can always use extra hands. Email us at [info@lincolnadventureco.com](mailto:info@lincolnadventureco.com).

**9. Fire & Air Quality**

No current concerns in Shawnee, but humidity + storms mean bugs and heat will be bigger issues than smoke. Pack electrolytes and plan accordingly.

**10. Course Readiness**

Most trails are race-ready. A few notes:

- Mile 28–30: downed tree removal pending, expect some scrambles.
- Mile 63 scramble: flagged clearly in pink, but rocks are loose. WALK ONLY.
- Mile 75–80: tall grass until the local herd clears it (likely by mid-August).

---

That's all for now. More info will come through Ultrasignup and the Facebook group. Study the manual. Prep your crews. This race is tough on runners and even tougher on unprepared crews.

See you in a few weeks,  
Reese Hazard, Race Director  
Lincoln Adventure Co.



# Lincolnvile Ridge 100 Waiver

When you submit this form, it will not automatically collect your details like name and email address unless you provide it yourself.

## Required

### 1. Runner's First & Last Name

### 2. Runner's Email

### 3. Runner's Phone Number

### 4. Emergency Contact Name

### 5. Emergency Contact Phone Number

### 6. Age on Race Day

### 7. Liability Waiver

In consideration of you accepting this entry, I, the participant, intending to be legally bound do hereby waive and forever release any and all rights and claims for damages or injuries that I may have against the Event Director, Lincoln Adventure Co., Shawnee National Forest, and all of their agents assisting with the event, sponsors and their representatives, volunteers, and employees for any and all injuries to me or my personal property.

This release includes all injuries and/or damages suffered by me before, during, or after the event. I recognize, intend, and understand that this release is binding on my heirs, executors, administrators, or assignees.

I know that running a 100-mile trail race is a potentially hazardous activity. I should not enter unless I am medically able to do so and properly trained. I assume all risks associated with participating in this event including, but not limited to: falls, contact with other participants, the effects of weather, wildlife hazards, and course conditions, and waive any and all claims which I might have based on any of those and other risks typically found in ultramarathons.

I agree to abide by all decisions of any race official relative to my ability to safely complete the race. I certify as a material condition to my being permitted to enter this event that I am physically fit and sufficiently trained for the completion of this race.

In the event of an illness, injury, or medical emergency arising during the event I hereby authorize and give my consent to the Event Director to secure from any accredited hospital, clinic, and/or physician any treatment deemed necessary for my immediate care. I agree that I will be fully responsible for payment of any and all medical services and treatment rendered to me including but not limited to medical transport, medications, treatment, and hospitalization.

Further, I grant permission to all the foregoing to use my name, voice, and images of myself in any photographs, motion pictures, results, publications, or any other print, videographic, or electronic recording of this event for legitimate purposes.

☐ I agree

#### **8. Runner Rules Acknowledgment**

By initialing below, I understand all Runner Rules and acknowledge that if I fail to comply with 100% of them, I can be disqualified.

- Runners must follow the marked course at all times.
- No outside assistance except at official aid stations.
- No muling (no one may carry gear, water, or food for a runner).
- Pacers are only allowed under the specific rules of the race.
- Runners must check in and out of all aid stations.
- Runners must wear a visible race bib at all times.
- Any runner impeding, being rude to other runners, or being rude to volunteers is subject to disqualification.
- Runners must carry required safety gear as outlined in the race briefing.

Initials: \_\_\_\_\_

#### **9. Today's Date**

--



# NATIONAL WEATHER SERVICE

Southern Illinois Forecast Office

August 22, 2025 (Evening through overnight)

Shawnee National Forest - Lincolnville Ridge Area

---

## SUMMARY OF CONDITIONS (1800 hrs - 0600 hrs)

- **Severe Thunderstorm Activity:**

- A line of severe thunderstorms moved through Southern Illinois between 9:16 PM - 12:45AM.
- Multiple reports of wind gusts between 40-55 mph across Union and Jackson counties.
- Frequent lightning and heavy rainfall occurred along the ridge system where the Lincolnville Ridge 100 course is located.

A yellow rectangular sign with black text that reads "SEVERE THUNDERSTORM WARNING".

**SEVERE  
THUNDERSTORM  
WARNING**

- **Rainfall Totals:**

- Rain gauges in the forecast area recorded 1.6 to 2.2 inches of precipitation between 7PM-2AM.
- Localized flash flooding in low lying creek beds and washouts along forecast service roads near Jackson Falls.

A yellow rectangular sign with black text that reads "FLASH FLOOD WATCH".

**FLASH FLOOD  
WATCH**

A blue rectangular sign with white text that reads "Hazardous Weather Outlook".

**Hazardous  
Weather  
Outlook**

- **Ground and Trail Conditions:**

- Talus slopes and scramble zones experienced runoff, loose rock, and unstable footing likely.
- Mud accumulation on ridge trails and creek crossings noted by early-morning hikers and Forest Service rangers.

A yellow rectangular sign with black text that reads "Unstable trail conditions possible due to overnight storms".

**Unstable  
trail conditions  
possible due to  
overnight storms**

- **Temperature and Humidity:**

- Evening temperatures fell from 72°F to 63°F.
- Humidity rose to over 95% by 4 AM with dense fog forming in valleys and hollows.

- **Warnings Issued:**

- Severe Thunderstorm Warning



## FOREST SERVICE CLEARANCE REPORT

Date: August 23, 2025 – 06:45 AM

Location: Shawnee National Forest – Lincolnville Ranger District

### Inspection Summary

Following the severe weather event on the night of August 22, 2025, a field inspection was conducted at dawn on August 23, 2025. The objective was, under the legal duties provided within the above-referenced office's enabling statute, to observe, determine, and report on trail safety and accessibility for the scheduled Lincolnville Ridge 100 ultramarathon.

### Findings

- Storm Damage: Several downed branches and minor debris observed along the course. No large trees obstructing primary trails.
- Trail Surface Conditions: Trails are wet with isolated muddy sections. One talus scramble zone observed to have unstable footing and is significantly more hazardous than under normal conditions. Additional volunteer spotters or course marshals are recommended to monitor the passage of participants. Runners should be required to walk this segment without exception; organizers should strongly consider re-routing.
- Signage and Course Markings: All race signage inspected remained intact. Reflective course markings visible.
- Access Roads: Service roads remain open with minor washouts but passable for emergency and support vehicles.

### Clearance Decision

The Shawnee National Forest authorizes the Lincolnville Ridge 100 race to proceed as scheduled. Trail conditions require caution and additional volunteer support in the talus scramble zone. Event organizers are advised to reinforce safety protocols for participants.

Prepared by:

Forest Ranger Caleb Whitford

*Caleb Whitford*

Approved by:

District Supervisor Marjorie Lane *ML*



**EXHIBIT  
6**







## **LINCOLNVILLE RIDGE 100 – RACE VOLUNTEER ASSIGNMENT ROSTER**

Date: August 23–24, 2025

Volunteer Name	Assignment Area	Location / Aid Station	Duties
Reese Hazard	Race Director	Start/Finish	Race operations, course safety decisions, communications.
Scout Keen	Hams Radio	Talus Scramble Zone (Mile 63)	Pre-race terrain checks, monitor scramble zone, report storm hazards.
Jordan Ellis	Aid Station Captain	Aid 15 – Ridge Overlook	hydration, food distribution, and runner check-ins.
Riley Shaw	Aid Station Crew	Aid 40 – Hollow Creek	Stock supplies, coordinate drop bags, radio check-ins.
Alex Morgan	Aid Station Captain	Aid 61 – Talus Scramble Base	night-shift volunteers, medical station.
Taylor Finch	Aid Station Crew	Aid 80 – River Crossing	Record bib numbers, assist with runner safety checks.
Dr. Casey Robin	Medical Tent Lead	Start/Finish	Provide first aid and triage for incoming/outgoing runners.
Taylor Blake	Parking & Logistics	Start/Finish	Direct crew vehicles, coordinate traffic flow.
Jamie Lake	Communications	Race Headquarters	Radio dispatch, track runner progress via timing system.
Avery Cross	Runner Tracking	Finish Line Timing Tent	Log times, maintain official race clock.
Dylan Hart	Sweep Team Lead	Mile 80–100	Follow last runners, clear course markings.
Morgan Field	Sweep Team	Mile 60–80	Collect discarded items, confirm no runners left on trail.



## LINCOLNVILLE RIDGE 100 – RESCUE TIMELINE REPORT

Date: August 24, 2025

Prepared by: Lincoln Adventure Co., LLC – Race Operations

### Incident Summary

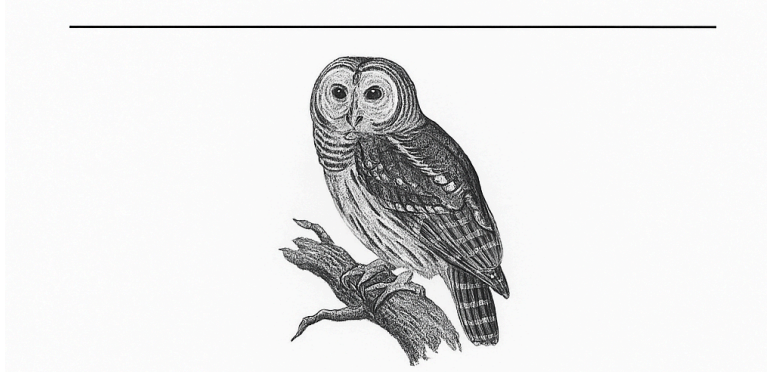
During the 2025 Lincolnville Ridge 100 ultramarathon, a runner (River Knox) sustained injuries near Mile 63 in the Talus Scramble Zone. The following timeline summarizes events as reported by race staff, volunteers, and emergency personnel.

### Rescue Timeline

Time	Action / Event
11:42 PM – Aug 23, 2025	Runner Knox enters Talus Scramble Zone accompanied by other participants. Weather conditions: humid, dense fog.
11:56 PM	Multiple runners report unstable footing and a rockslide in the scramble zone.
12:03 AM – Aug 24, 2025	Scout Keen, stationed as safety observer, radios Race HQ that a runner has fallen into a ravine off-course.
12:08 AM	Reese Hazard (Race Director) dispatches sweep team and nearby aid station volunteers toward Mile 63.
12:19 AM	First responders from Aid Station 61 arrive on scene. Runner found with suspected fractures and head injury.
12:27 AM	Communications relay made to Forest Service and county EMS requesting technical rescue support.
12:48 AM	Forest Service ranger unit and EMS begin coordinated extraction with ropes and stretcher.
1:36 AM	Runner safely lifted from ravine and transferred to EMS vehicle staged at Forest Service Road 217.
1:50 AM	EMS departs for Lincolnville Regional Hospital with injured runner.

Prepared by: Lincoln Adventure Co., LLC – Race Operations

Filed: August 24, 2025 – 08:15 AM.



Submitted by: Kevin Holloway

Date of Incident: July 2, 2024

Location: Training run, Shawnee National Forest

#### **Description of the Incident**

I was conducting a training run at about 6:00 PM on July 2, 2024. A barred owl, probably the infamous Judge Hootsworth, flew down near me and made contact momentarily with my head before veering off. It took me by surprise while I was running through a dense section of the woods near the talus zone where they hold the Shawnee 100. No further description, or justification for the behavior of the bird.

Signature: *Kevin Holloway*



## **Lincolnville Ridge 100 – Race Safety Briefing Handout** *(Distributed to all registered runners prior to the race start)*

**Event:** Lincolnville Ridge 100 – 100 Mile Ultramarathon

**Date:** August 23–24, 2025

**Location:** Shawnee National Forest, Illinois

---

### **General Safety Expectations**

- All runners must sign the event waiver and wear visible bib numbers at all times.
- Pacers allowed beginning at Aid Station 40 (mile 61). Only one pacer may accompany a runner at a time.
- Littering is strictly prohibited. Violations may result in disqualification.

---

### **Course Hazards**

- **Wildlife:** Copperheads, cottonmouths, and timber rattlesnakes are native. Also, deer, coyotes, armadillos, and territorial owls.
- **Weather:** August conditions may include heat, humidity, storms, and flash flooding.
- **Talus Scramble Zone (Mile 63–64):** *WALK ONLY.* Course volunteers will monitor compliance. This section is especially unstable after rain. Running is prohibited.
- Other technical terrain includes steep ridgelines, creek crossings, and low-light forest areas.

---

### **Emergency Procedures**

- Medical personnel are stationed at major aid stations.
- If you encounter an injured runner, provide assistance and notify the nearest aid station captain.
- Cell service is limited; carry a whistle or emergency beacon if available.
- In case of evacuation, follow volunteer or ranger instructions.

---

### **Cutoffs & DNF Policy**

- Runners must meet all posted time cutoffs or risk removal from the course.
- If you drop, notify an aid station captain immediately so volunteers can log your DNF.
- After Aid Station 40, extraction options are limited — dropping requires significant hike-out.



## Medical Report Summary (Injury Types and Timing)

Patient: River Knox

Date of Incident: August 23, 2025

Location: Lincolnville Ridge 100, Mile 63

Admitting Facility: Lincoln Community Hospital ER

### Injury Summary:

- Severe Head Trauma – Sustained at approximately 11:42 PM. CT scan confirms concussion with intracranial bleeding.
- Compound Fracture – Left Tibia/Fibula, sustained at the time of fall (approx. 11:42 PM).
- Closed Fracture – Right Radius and Ulna, sustained during fall attempt to brace impact.
- Closed Fracture – Left Humerus, consistent with blunt impact against ravine rock surface.
- Right Clavicle Fracture – Likely from direct trauma at fall site.

### Treatment Timeline:

- 11:42 PM – 12:03 AM – Injury sustained; fall reported by pacers/runners on course.
- 12:43 AM – Volunteer First Responders locate patient, stabilize airway, immobilize cervical spine.
- 1:36 AM – Patient extricated from ravine using rope-assisted litter evacuation.
- 1:50 AM – Ambulance transport initiated; IV fluids and oxygen administered en route.
- 3:05 AM – Arrival at Lincoln Community Hospital Emergency Department.
- 3:15 AM – CT scan performed; orthopedic consult initiated.
- 5:30 AM – Patient admitted for surgical intervention on leg and arm fractures.

*Dr. Jamie Cruz*

Prepared by: Dr. Jamie Cruz, M.D.

Attending Emergency Physician

Lincoln Community Hospital



**EXHIBIT  
12**



**From:** Lincoln Adventure Co. info@lincolnadventureco.com  
**To:** 2025 Lincolnville Ridge 100 Runners  
**Date:** August 22, 2025 – 8:15 PM  
**Subject:** Lincolnville Ridge 100 Severe Weather Plan

Hi Runners,

One of the first things our Race Directors and organizing team do during race week is closely monitor the weather forecast. This year was no exception. Our crew has been tracking forecasts for days leading into race weekend, noting the shifting timing of rain and thunderstorms. We've also been reviewing our Severe Weather Plan to keep everyone as safe as possible.

As of now, the race is still scheduled to proceed on time. Rain itself is not a concern — it's part of the ultrarunning experience. Our primary weather risk is **lightning**, especially given the exposed ridgelines and talus scramble zone around mile 63.

**If lightning occurs before the start:** we may delay or, if necessary, cancel the race depending on severity and duration.

**If lightning is observed during the race:** we may pause or stop the event. HAM radio operators will be stationed at multiple points on course to relay information directly to the Start/Finish. Aid Station Captains will also communicate updates.

If conditions become dangerous mid-race and we must pull runners or seek shelter, instructions will be communicated through both HAM operators and Aid Station Captains. Please follow their directions immediately.

**Designated Weather Shelters & Locations:**

- **Start/Finish Base (Crew Staging): Mile 0**
- **Hickory Ridge Aid (Shelter/Fire Tower): Mile 12**
- **Pine Hollow Aid (Community Shelter/Church Pavilion): Mile 25**
- **Eagle Bluff Aid (Trailhead Bathrooms): Mile 39**
- **Talus Scramble Zone – No Shelter (Caution Zone): Mile 61**
- **Bear Creek Aid (Ranger Station/Storm Shelter): Mile 74**
- **Shawnee Lake Campground (Bathrooms/Cabin Shelter): Mile 88**
- **Finish Line: Mile 100**

Thank you for your attention to these precautions. We'll keep a close eye on radar and sky conditions throughout the race weekend.

Stay safe,  
Reese Hazard  
Lincolnville Ridge 100

**From:** Lincoln Adventure Co. info@lincolnadventureco.com  
**To:** 2025 Lincolnville Ridge 100 Runners  
**Date:** August 25, 2025 – 11:32 AM  
**Subject:** Lincolnville Ridge 100 Wrap Up

Hi Runner,

Another year of the Lincolnville Ridge 100 is in the books, and without question this was one of the most challenging years yet.

Trail and ultra runners know that no matter how much you prepare, sometimes conditions shift and you have to adapt, push forward, and overcome. This year's pre-race storm made trails slick, the talus scramble especially tough, and the ridgeline humid and heavy. While it wasn't the plan we drew up, it was incredible to see so many of you adapt and still do amazing things out there.

### **Results Recap**

The numbers only tell part of the story. Finish rates were lower than usual this year, with many forced to DNF due to conditions — but the determination on display was remarkable.

Highlights:

- 100M Overall Male: Cameron Holt - 18:47:52
- 100M Overall Female: Riley Stone 21:15:34

Congratulations to all finishers — and to those who did not make it this year, remember that even toeing the line at the Ridge is an accomplishment.

### **Acknowledging Incidents**

We must also acknowledge that this year included an “unexpected wildlife incident” near the mile 63 talus scramble zone. The scramble presented challenging conditions following the storm, and emergency response teams, aid station captains, and volunteer HAM operators worked together to coordinate a difficult rescue. The injured runner was transported safely to Lincoln Community Hospital.

We are in contact with the runner's family, and our thoughts are with them during recovery.

### **Photos**

Our volunteer photographers captured unforgettable moments — from sunrise on the ridgeline to the grit on every muddy finisher's face. Free downloads will be available soon on our race website.



## **Final Wrap-Up & Thank-Yous**

Events like this only happen because of the dedication of many:

- **Volunteers:** From course marking to aid stations, radio operators, sweep runners, and medical staff — your tireless work made this event possible.
- **Partners:** Thank you to the Shawnee National Forest Service for permitting use of the trails and to our local sponsors who provided supplies, gear, and food.
- **Rescue & Safety Teams:** Special thanks to Lincolnville Fire & EMS and our HAM radio operators for their rapid response and coordination under pressure.

## **Looking Ahead**

Next year's **Lincolnville Ridge 100** is scheduled for **August 22–23, 2026**.

Registration will open February 14, 2026 at 12:00 PM.

We can't wait to welcome you back for another unforgettable year.

Thank you all again for your courage, grit, and support of the Lincolnville Ridge 100 community.

See you on the trails,

Reese Hazard

Lincolnville Ridge 100

**From:** Jordan M.

**To:** Race Director

**Subject:** Thanks!

Just wanted to say thanks for putting on an awesome event. The volunteers were amazing, and the aid stations were stocked perfectly. Already looking forward to next year!

---

**From:** Casey T.

**To:** Lincolnville Ridge 100 Team

**Subject:** Incredible Experience

That scramble section was no joke, but the course was well-marked and the views were unforgettable. Appreciate all the hard work that went into making the race safe and fun.

---

**From:** Avery L.

**To:** Race Staff

**Subject:** Great Event

Thanks for sticking it out through the storms and getting the race going. I loved the energy at each aid station — kept me moving all the way to the finish!

---

**From:** Drew P.

**To:** Race Director

**Subject:** Grateful Runner

First 100-miler for me, and I couldn't have asked for a better community. The volunteers and crew support were top-notch. Please thank everyone involved!



# Race Completion Statistics

Prepared by: Reese Hazard

Entrants	147	100%
Finishers	78	53%
Did Not Finish (DNF)	64	44%
Did Not Start (DNS)	5	3%

## Finishers (78)

- |                                                       |                                |                                   |
|-------------------------------------------------------|--------------------------------|-----------------------------------|
| 1. Cameron Holt — 18:05:45<br>(Overall Male Winner)   | 26. Casey Miles — 22:32:45     | 53. Madison Ferrell — 28:01:39    |
| 2. Alex James — 18:21:00                              | 27. Taylor Brooks — 22:44:20   | 54. Elizabeth Perez — 28:09:04    |
| 3. John Thornton — 18:47:31                           | 28. Riley Quinn — 22:55:28     | 55. Michael Foster — 29:20:04     |
| 4. Ethan Cole — 18:47:52                              | 29. Jennifer White — 23:02:08  | 56. Bianca Dixon — 29:13:38       |
| 5. Brad Peterson — 19:05:25                           | 30. Morgan Ellis — 23:05:57    | 57. Taylor Jordan — 29:48:30      |
| 6. Jacob Schultz — 19:08:00                           | 31. Matthew Parker — 23:12:05  | 58. Mary Costa — 30:18:37         |
| 7. Martin Diaz — 19:11:00                             | 32. Shannon Grant — 23:13:56   | 59. Ezra Austin — 30:38:12        |
| 8. Joseph O'Brien — 19:26:09                          | 33. Nicholas Hops — 23:14:22   | 60. Kristen Zimmerman — 31:03:15  |
| 9. Keith Williams — 19:43:58                          | 34. Jacob Hall — 23:15:16      | 61. Dr. Jeffrey Singh — 31:32:16  |
| 10. Michael Rowe — 19:45:47                           | 35. Dr. Mel Barrera — 23:22:09 | 62. Thomas Johnson — 31:45:30     |
| 11. Ben Banks — 19:56:23                              | 36. Jamie Rivers — 23:11:40    | 63. Peyton Reed — 31:48:42        |
| 12. Shedear Bryant — 20:03:50                         | 37. Nina Huber — 23:36:13      | 64. Robert Reilly — 31:57:10      |
| 13. Gallon Lopez — 20:05:03                           | 38. Peter Montoya — 23:38:00   | 65. Christina Stevens — 33:23:13  |
| 14. Richard Grimes — 20:30:02                         | 39. Ashlee Jones — 23:54:08    | 66. Mary Barrett — 33:16:53       |
| 15. Adam Koch — 20:57:00                              | 40. Drew Jordan — 23:56:11     | 67. John Allen — 33:17:38         |
| 16. Tristan Jones — 21:01:55                          | 41. Brenda Tyler — 24:06:05    | 68. Audrey Murphy — 33:08:56      |
| 17. Avery Ryan — 21:08:39                             | 42. Johnny Matthews — 24:27:3  | 69. Jeffrey Reynolds — 33:32:42   |
| 18. Riley Stone — 21:15:34<br>(Overall Female Winner) | 43. Marisa Shep — 24:29:16     | 70. Aaron Saunders — 33:37:07     |
| 19. Kelly Gray — 21:22:41                             | 44. Olivia Foster — 24:35:06   | 71. Anthony Ellis — 33:50:52      |
| 20. Susan Simmons — 21:28:49                          | 45. Susan Phillips — 25:22:23  | 72. Jennifer Castaneda — 33:58:48 |
| 21. Amanda John — 21:47:00                            | 46. Jordan Morrison — 25:24:33 | 73. Sharon Clements — 32:53:32    |
| 22. Cameron Smith — 22:15:38                          | 47. Michael Henderson — 25:51  | 74. Scott Glover — 32:45:51       |
| 23. Grace Mills — 22:16:09                            | 48. Vanessa Powell — 25:56:38  | 75. Stanley Morgan — 32:40:04     |
| 24. Harper McFinch — 22:12:10                         | 49. Francisco Brown — 26:08:44 | 76. Ricky Saunders — 32:34:25     |
| 25. Finch Cutter — 22:19:04                           | 50. Hannah Harper — 26:30:16   | 77. Sam Saunders — 32:34:28       |
|                                                       | 51. Jennifer Spence — 27:06:46 | 78. Ed Flanders — 33:34:25        |
|                                                       | 52. Alexis Gregory — 27:34:37  |                                   |

**DNFs (64)**

1. Bailey, Jeremiah – Mile 89 – Fatigue
2. Ball, Peter – Mile 66 – Injury
3. Bartlett, Anna – Mile 9 – Injury
4. Becker, Teresa – Mile 17 – Injury
5. Bennett, Richard – Mile 10 – Medical
6. Bridges, Shelby – Mile 38 – Injury
7. Carpenter, Cheryl – Mile 52 – Fatigue
8. Carter, Karen – Mile 42 – Injury
9. Carter, Lee – Mile 28 – Injury
10. Casey, Robert – Mile 74 – Missed cutoff
11. Castillo, Mary – Mile 20 – Injury
12. Cohen, Kylie – Mile 68 – Injury
13. Durham, Jennifer – Mile 32 – Injury
14. Finch, Jessie – Mile 43 – Missed cutoff
15. Floyd, Chelsea – Mile 47 – Fatigue
16. Fowler, James – Mile 50 – Injury
17. Fowler, Michael – Mile 65 – Medical
18. Garcia, Rebecca – Mile 37 – Fatigue
19. Goodman, Cameron – Mile 32 – Missed cutoff
20. Gould, Victoria – Mile 52 – Missed cutoff
21. Green, Kelly – Mile 9 – Medical
22. Guzman, Stephanie – Mile 94 – Missed cutoff
23. Haller, Sam – Mile 55 – Injury
24. Hernandez, Tanya – Mile 93 – Missed cutoff
25. Hunter, Kenneth – Mile 21 – Injury
26. Hunt, Deborah – Mile 33 – Missed cutoff
27. Johnson, Juan – Mile 69 – Medical
28. Keating, Parker – Mile 82 – Missed cutoff
29. Knox, River – Mile 63 – Injury (talus scramble incident)
30. Lamb, Caroline – Mile 21 – Missed cutoff
31. Mason, Kit – Mile 60 – Injury
32. Mcgrath, Zachary – Mile 38 – Injury
33. McLaughlin Jr., Jonathan – Mile 91 – Medical
34. Mejia, Tina – Mile 69 – Injury
35. Mendoza, Jay – Mile 49 – Missed cutoff
36. Miller, Kimberly – Mile 24 – Injury
37. Miller, Paul – Mile 33 – Fatigue
38. Nolan, Rachel – Mile 25 – Missed cutoff
39. Oconnell, Guy – Mile 22 – Missed cutoff

40. Parker, Sam – Mile 55 – Medical
41. Pierce, Barbara – Mile 46 – Missed cutoff
42. Richardson, Brenda – Mile 63 – Injury
43. Rivera, Emma – Mile 38 – Fatigue
44. Roberts, Amanda – Mile 88 – Fatigue
45. Robinson, Adrian – Mile 77 – Medical
46. Rose, Bryan – Mile 75 – Medical
47. Ruiz, Robin – Mile 10 – Medical
48. Sharp, Jennifer – Mile 88 – Missed cutoff
49. Spector, Charlie – Mile 68 – Injury
50. Sutton, Jeremy – Mile 76 – Medical
51. Tanner, Emily – Mile 6 – Medical
52. Taylor, Jeffrey – Mile 35 – Injury
53. Thomas, Zachary – Mile 59 – Missed cutoff
54. Turner, Alex – Mile 40 – Fatigue
55. Velasquez, Brian – Mile 29 – Injury
56. Villarreal, Curtis – Mile 94 – Medical
57. Walker, Ian – Mile 35 – Fatigue
58. Wallace, Roy – Mile 45 – Medical
59. Weber, Paula – Mile 17 – Injury
60. West, Jordan – Mile 72 – Missed cutoff
61. Wright, Victoria MD – Mile 53 – Medical
62. York, Jacob – Mile 68 – Injury
63. Young, James – Mile 93 – Injury
64. Zuniga, Samantha – Mile 34 – Fatigue

**DNSs (5)**

1. Adams, Zachary
2. Beach, Neal
3. Cathcher, Catie
4. Deil, Karen
5. Hollis, Rory