

14 CV 5448

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LINDA COHN

Plaintiff,

COMPLAINT

-against-

SOUTHEAST SPORTS COMPLEX LLC;  
PLAYERS CLUB AT BREWSTER ICE ARENA, INC;  
STEVE SANTINI

Defendant

JUDGE KARAS

2014 JUL 18 11:28

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Plaintiff, through her attorney, JONATHAN SILVER ESQ., complaining of

Defendants, alleges as follows:

**NATURE OF THE ACTION.**

1. The plaintiff brings this action as against the defendants to obtain a monetary judgment in compensation for personal injuries and other damages arising out of an accident which occurred on March 27, 2014.

**JURISDICTION AND VENUE**

2. This Court has subject matter jurisdiction over the claims in this action pursuant to the provisions of 28 U.S.C. Section 1332.

3. Venue is proper in this district pursuant to the provisions of 28 U.S.C. section 1391 and the defendants are either corporations or an individual that are subject to personal jurisdiction at the time for this action in this district when this action is being commenced.

**PARTIES**

4. The plaintiff is a resident of the State of Connecticut with address 124 S. Georges Road Southbury Conn 06488.

5. Upon information and belief, defendants SOUTHEAST SPORTS COMPLEX LLC. and PLAYERS CLUB AT BREWSTER ICE ARENA, INC are corporations created and organized under the law of the State of New York with principal places of business in the County of Putnam, State of New York.

6. Upon information and belief, defendant STEVE SANTINI is an individual residing in the State of New York where he is engaged in the conduct of business and as such is subject to personal jurisdiction in the State of New York and within this district.

**CLAIMS**

7. Upon information and belief, on March 27, 2014 defendant, SOUTHEAST SPORTS COMPLEX LLC. was the owner of premises being known as Brewster Ice Arena with street address 63 Fields Lane Brewster New York 10509.

8. Upon information and belief, on March 27, 2014 defendant, SOUTHEAST SPORTS COMPLEX LLC. its employees, agents, servants and assigns operated the aforesaid premises.

9. Upon information and belief, on March 27, 2014 defendant, SOUTHEAST SPORTS COMPLEX LLC. its employees, agents, servants and assigns operated and were responsible for the management, maintenance, inspection, supervision,

repair, cleaning of the aforesaid premises.

10. Upon information and belief, on March 27, 2014 defendant, SOUTHEAST SPORTS COMPLEX LLC its employees, agents, servants and assigns were in possession of, used, occupied or were otherwise in control of said premises.

11. Upon information and belief, on March 27, 2014 defendant, PLAYERS CLUB AT BREWSTER ICE ARENA, INC. was the owner of premises being known as Brewster Ice Arena with street address 63 Fields Lane Brewster New York 10509.

12. Upon information and belief, on March 27, 2014 defendant, PLAYERS CLUB AT BREWSTER ICE ARENA, INC its employees, agents, servants and assigns operated the aforesaid premises.

13. Upon information and belief, on March 27, 2014 defendant, PLAYERS CLUB AT BREWSTER ICE ARENA, INC its employees, agents, servants and assigns operated and were responsible for the management, maintenance, inspection, supervision, repair, cleaning of the aforesaid premises.

14. Upon information and belief, on March 27, 2014 defendant, PLAYERS CLUB AT BREWSTER ICE ARENA, INC its employees, agents, servants and assigns were in possession of, used, occupied or were otherwise in control of said premises.

15. Upon information and belief, on March 27, 2014 defendant, STEVE SANTINI was the owner of premises being known as Brewster Ice Arena with street address 63 Fields Lane Brewster New York 10509.

16. Upon information and belief, on March 27, 2014 defendant, STEVE SANTINI his employees, agents, servants and assigns operated the aforesaid premises.

17. Upon information and belief, on March 27, 2014 defendant, STEVE SANTINI his employees, agents, servants and assigns operated and were responsible for the management, maintenance, inspection, supervision, repair, cleaning of the aforesaid premises.

18. Upon information and belief, on March 27, 2014 defendant, STEVE SANTINI his employees, agents, servants and assigns were in possession of; used, occupied or were otherwise in control of said premises.

19. On March 27, 2014 plaintiff was an occupant of the above described premises, in particular, the Brewster Ice Arena and on that date and while on those premises was injured when a heavy, large coin change machine fell upon her.

20. The accident described above caused the plaintiff to sustain injuries and damages hereinafter described.

21. The aforesaid accident with resulting injuries and damage to the plaintiff was the result of the negligence, carelessness and recklessness of the defendants their respective employees, agents, servants and assigns.

22. As a result to the above, plaintiff continues to suffer severe and disabling injuries; continues to endure great pain and suffering; continues to expend sums for medical care and treatment; continues to be prevented from engaging in productive work; continues to be unable to engage in and attend to all daily activities, pursuits and

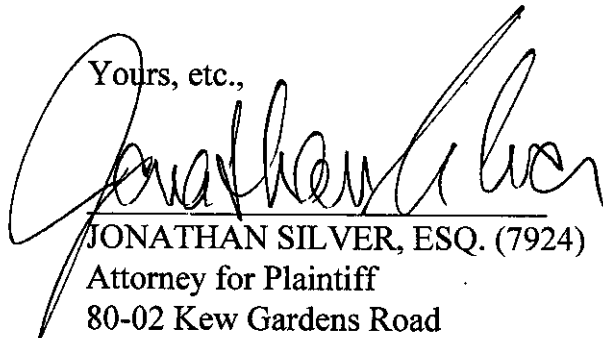
pleasures associated with plaintiff's person and station in life; and remains otherwise rendered sick, sore and lame and disabled all to his damage in a sum within the jurisdictional limits of this Court.

WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:

- a. An award of monetary damages in favor of the plaintiff as against the defendants jointly and severally under the facts and circumstances together with applicable interest.
- b. An award of costs and expenses of this action together with reasonable attorney's and expert fees; and
- c. Plaintiff demands a trial by a jury
- d. Such other and further relief as this Court deems just and proper.

Dated: Kew Gardens, New York  
July 14, 2014

Yours, etc.,



JONATHAN SILVER, ESQ. (7924)  
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