

ASSIGNED TO *Waughey*

IN THE DISTRICT COURT OF DOUGLAS COUNTY, NEBRASKA

LEANNE PARAGAS-KNOTT, an Individual,)	DOC.	PAGE
)	<i>C116-2432</i>	
Plaintiff,)		
)		
vs.)	COMPLAINT	
)		
WESTROADS MALL L.L.C., d/b/a)		
WESTROADS MALL,)		
)		
Defendants.)		



I. PRELIMINARY STATEMENT

1. This is a civil action in which Plaintiff seeks to recover damages as a result of personal injuries arising out of a slip and fall which occurred on March 28, 2012 at Westroads Malls at 10000 California Street in Omaha, Douglas County, Nebraska.

II. JURISDICTION

2. Jurisdiction is conferred upon this Honorable Court pursuant to the Nebraska Code Section 24-302, Neb. R.R.S. 1943. Furthermore, venue is conferred pursuant to Nebraska Statute Section 25-403.01.

III. PARTIES

3. Plaintiff, Leanne Paragas-Knott was, at all times material hereto, a citizen of the United States, a resident of Omaha, Douglas County, Nebraska. Ms. Paragas-Knott was 65 years of age and had a life expectancy of 19.24 more years under the CSO mortality tables.

4. Defendant, Westroads Mall L.L.C d/b/a Westroads Mall, (hereinafter referred to as Westroads), was at all times material hereto both licensed to do business and actively doing business in the State of Nebraska.

#26 **FILED**
 IN DISTRICT COURT
 DOUGLAS COUNTY NEBRASKA
 MAR 24 2016
 JOHN M. FRIEND
 CLERK DISTRICT COURT

IV. STATEMENT OF THE CLAIM

5. On March 28, 2012, Leanne Paragas-Knott was injured in the parking lot of the Westroads Mall when she fell in a pot hole on a poorly maintained and poorly lit section of the parking lot.

6. Each of the acts of the negligence on the part of the Defendant, either singularly or in combination with another caused the damages and injuries suffered by Plaintiff.

V. INJURIES

7. As a direct and proximate result of the negligence of the Defendant, Plaintiff, has sustained severe and permanent injuries.

VI. DAMAGES

8. That as a direct and proximate result of the negligence of the Defendant, Plaintiff, Leanne Paragas-Knott has suffered and incurred damages in the past and will continue to suffer and incur damages in the future, that include but are not limited to medical and hospital expenses, past and future; loss of income and earning capacity, past and future; physical and mental pain and suffering, past and future; loss of full mind and body, past and future; and permanent injury and impairment, all to her damage and detriment.

VII. PRAYER FOR RELIEF

WHEREFORE, the Plaintiff, respectfully prays for judgment against the Defendant in an amount that will reasonably compensate her for her damages, with interest and costs as provided by law and any other and further relief as this Court deems just and equitable.

VIII. JURY DEMAND

9. Plaintiff does hereby request a trial by jury in the above captioned matter.

LEANNE PARAGAS-KNOTT, an Individual,

By: 
THOMP J. PATTERMANN, #20606
300 West Broadway, Suite 145
Council Bluffs, Iowa 51503
(712) 323-0999 Telephone
(712) 323-0814 Facsimile
tjpatternn@sgallnerlaw.com
ATTORNEY FOR PLAINTIFF