

RAYMOND J. MCKOSKI

STATE OF ILLINOIS)
)
COUNTY OF LAKE)

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FILED

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Raymond J. McKoski
CIRCUIT CLERK

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS

JESSICA LAUNDERVILLE,)

Plaintiff,)

vs.)

KRISTOF'S ENTERTAINMENT CENTER, INC.,)

Defendant.)

09 L 1166
No.

JURY DEMAND

COMPLAINT AT LAW

COUNT I

(Negligence – Lauderdale v. Kristof's Entertainment Center, Inc.)

NOW COMES the Plaintiff, JESSICA LAUNDERVILLE, by and through her attorneys, DUDLEY & LAKE, LLC, complaining of the Defendant, KRISTOF'S ENTERTAINMENT CENTER, INC (hereinafter referred to as "KRISTOF'S") and in support thereof, states as follows:

1. On October 18, 2008, and at all times material, the defendant KRISTOF'S owned, operated, managed and/or maintained the premises located at 421 W. Rollins Road City of Round Lake Beach, Lake County, Illinois.

2. That on or about October 18, 2008, and at all times material, KRISTOF'S operated, managed and/or maintained a haunted house otherwise known as the "Realm of Terror" on its premises and open to the public.

NOTICE
BY LOCAL RULE 3.12
THIS CASE IS HEREBY SET FOR A SCHEDULING
CONFERENCE IN COURTROOM 309 ON 4/27

3. On October 18, 2008, and at all times material, the Defendant, KRISTOF'S, was responsible for maintaining the public common areas, as well as the public means of ingress and egress from its Realm of Terror haunted house in a reasonably safe condition.

4. On or before October 18, 2008, and at all times material, there were black rubber mats located at and around the exit of the Realm of Terror haunted house at KRISTOF'S, located at 421 W. Rollins Road, City of Round Lake Beach, Lake County, Illinois.

5. On or about October 18, 2008, and at all times material, the Realm of Terror haunted house employed and/or contracted with individuals to work said haunted house.

6. On or about October 18, 2008, and at all times material, an agent and/or employee of defendant, KRISTOF'S, as an act of the haunted house chased occupants of the Realm of Terror towards the exit with a chainsaw.

7. On or about October 18, 2009, and at all times material, Plaintiff, JESSICA LAUNDERVILLE, attended the Realm of Terror haunted house and was chased out of the exit by an agent and/or employee with a chainsaw as a scare tactic.

8. That as a result of the scare tactic, Plaintiff, JESSICA LAUNDERVILLE, exited the haunted house.

9. That when Plaintiff, JESSICA LAUNDERVILLE exited the haunted house, her feet became entangled in the black rubber mats.

10. On and before October 18, 2008, the black rubber mats at or near the exit to KRISTOF'S Realm of Terror haunted house was in an unkept improper condition making ingress and egress dangerous to all customers.

11. On or about October 18, 2008, and at all times material, the Plaintiff, JESSICA LAUNDERVILLE, was lawfully upon the aforementioned premises of defendant, KRISTOF'S.

12. On October 18, 2008, while the Plaintiff, JESSICA LAUNDERVILLE, was moving through aforementioned exit, she slipped and fell to the ground suffering severe and debilitating injuries as a result of the poorly kept and dangerous conditions.

13. On and before October 18, 2008, the Defendant, KRISTOF'S, had a duty to maintain the exit, in a condition of good repair, and had a duty to keep the aforementioned exit in a reasonably safe condition. Additionally, the Defendant had a duty to provide a safe means of egress and ingress to and from its haunted house.

14. On October 18, 2008, in derogation of its aforementioned duty, the Defendant, KRISTOF'S, was negligent in one or more of the following respects:

- (a) Failed to maintain the exit of its haunted house in a reasonably safe condition;
- (b) Failed to provide adequate lighting at or near the exit of the haunted house;
- (c) Failed to provide a safe ingress and egress to the haunted house for individuals lawfully on the property;
- (c) Improperly chased individuals in the haunted house towards the exit;
- (d) Failed to warn occupants of the haunted house, including plaintiff, of the unsafe condition of the exit and its rubber mats;
- (e) Failed to inspect the exit and rubber mats and remove the hazardous condition of the aforementioned premises; and
- (f) Was otherwise negligent in the maintenance of their property.

15. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of the Defendant, KRISTOF'S, the Plaintiff, JESSICA LAUNDERVILLE, suffered severe and debilitating injuries of a personal and pecuniary nature.

WHEREFORE, the Plaintiff, JESSICA LAUNDERVILLE, demands judgment against the Defendant, KRISTOF'S ENTERTAINMENT CENTER, INC. in an amount of money in excess of \$50,000.00.

Respectfully submitted,



Attorneys for the Plaintiff

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