

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

Index No.:
Date Purchased:

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BLAKE I. BURG, an infant under the age of 14 by his
parent and natural guardian, PAUL A. BURG and
PAUL A. BURG, Individually,

SUMMONS
Plaintiff designates
Nassau County as the
place of trial.

Plaintiffs,

-against-

The basis of venue is:
Plaintiff's Residence

TRUMP ENDEAVOR 12 LLC, TRUMP ENDEAVOR 12
MANAGER CORP, and THE TRUMP ORGANIZATION,
INC.,

Plaintiff Resides At:
2856 Frankel Blvd.
Merrick NY 11566

Defendants.

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To the above named defendant(s):

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's Attorneys within 20 days after the service of this summons exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: New York, New York
December 19, 2016

KIM I. MCHALE, ESQ.
THE MCHALE LAW FIRM, P.C.
Attorneys for Plaintiff(s)
225 Broadway, Suite 1000
New York, New York 10007
(212) 279-4777

Defendants' Addresses:

TRUMP ENDEAVOR 12 LLC (Via Secretary Of State)	TRUMP ENDEAVOR 12 MANAGER CORP (Via Secretary Of State)
THE TRUMP ORGANIZATION, INC. 725 FIFTH AVE 26TH FLR NEW YORK, NEW YORK, 10022	TRUMP ENDEAVOR 12 LLC (Via Secretary Of State)
TRUMP ENDEAVOR 12 MANAGER CORP 725 5TH AVE NEW YORK, NEW YORK, 10022	

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

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BLAKE I. BURG, an infant under the age of 14 by his
parent and natural guardian, PAUL A. BURG and
PAUL A. BURG, Individually,

Index No.:

VERIFIED COMPLAINT

Plaintiffs,

-against-

TRUMP ENDEAVOR 12 LLC, TRUMP ENDEAVOR 12
MANAGER CORP, and THE TRUMP ORGANIZATION,
INC.,

Defendants.

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Plaintiffs, by their attorneys **THE MCHALE LAW FIRM, P.C.**, complaining of the
defendants herein, respectfully shows to the court and alleges as follows:

1. That at all times hereinafter, the infant plaintiff, BLAKE I. BURG was and is a resident of the county of Nassau, State of New York.
2. That at all the times hereinafter alleged, and upon information and belief, the Defendant, TRUMP ENDEAVOR 12 LLC, was a company organized and existing under and by virtue of the laws of the State of New York.
3. That at all the times hereinafter alleged, and upon information and belief, the Defendant, TRUMP ENDEAVOR 12 LLC was and still is a foreign company authorized to do business under and by virtue of the laws of the State of New York.
4. That at all the times hereinafter alleged, and upon information and belief, the Defendant, TRUMP ENDEAVOR 12 LLC was and still is a domestic company organized and existing under and by virtue of the laws of the State of New York.
5. That at all of the times herein mentioned, and upon information and belief, the Defendant, TRUMP ENDEAVOR 12 LLC was a domestic company with a principal place of business at 725

FIFTH AVE 26TH FLR NEW YORK, NEW YORK, 10022

6. That at all of the times herein mentioned, and upon information and belief, the Defendant, TRUMP ENDEAVOR 12 LLC was a foreign company with a principal place of business at 4400 NW 87th Ave, Doral, FL 33178.

7. That at all of the times herein mentioned, and upon information and belief, the Defendant, TRUMP ENDEAVOR 12 LLC was a company organized and existing under and by virtue of the laws of the State of Delaware with a principal place of business at 4400 NW 87th Ave, Doral, FL 33178.

8. That at all of the times herein mentioned, and upon information and belief, the Defendant, TRUMP ENDEAVOR 12 LLC was a company organized and existing under and by virtue of the laws of the State of Delaware with a principal place of business at 725 FIFTH AVE 26TH FLR NEW YORK, NEW YORK, 10022.

9. That at all the times hereinafter alleged, and upon information and belief, the Defendant, TRUMP ENDEAVOR 12 MANAGER CORP, was a company organized and existing under and by virtue of the laws of the State of New York.

10. That at all the times hereinafter alleged, and upon information and belief, the Defendant, TRUMP ENDEAVOR 12 MANAGER CORP was and still is a foreign company authorized to do business under and by virtue of the laws of the State of New York.

11. That at all the times hereinafter alleged, and upon information and belief, the Defendant, TRUMP ENDEAVOR 12 MANAGER CORP was and still is a domestic company organized and existing under and by virtue of the laws of the State of New York.

12. That at all of the times herein mentioned, and upon information and belief, the Defendant, TRUMP ENDEAVOR 12 MANAGER CORP was a domestic company with a principal place of business at 725 FIFTH AVE 26TH FLR NEW YORK, NEW YORK, 10022.

13. That at all of the times herein mentioned, and upon information and belief, the Defendant,

TRUMP ENDEAVOR 12 MANAGER CORP was a foreign company with a principal place of business at 4400 NW 87th Ave, Doral, FL 33178.

14. That at all of the times herein mentioned, and upon information and belief, the Defendant, TRUMP ENDEAVOR 12 MANAGER CORP was a company organized and existing under and by virtue of the laws of the State of Delaware with a principal place of business at 4400 NW 87th Ave, Doral, FL 33178.

15. That at all of the times herein mentioned, and upon information and belief, the Defendant, TRUMP ENDEAVOR 12 MANAGER CORP was a company organized and existing under and by virtue of the laws of the State of Delaware with a principal place of business at 725 FIFTH AVE 26TH FLR NEW YORK, NEW YORK, 10022.

16. That at all the times hereinafter alleged, and upon information and belief, the Defendant, THE TRUMP ORGANIZATION, INC., was a company organized and existing under and by virtue of the laws of the State of New York.

17. That at all of the times hereinafter mentioned, and upon information and belief, the Defendant, THE TRUMP ORGANIZATION, INC. maintained a principal place of business in the County of NEW YORK, State of New York.

18. That at all the times hereinafter alleged, and upon information and belief, the Defendant, THE TRUMP ORGANIZATION, INC. was and still is a foreign company authorized to do business under and by virtue of the laws of the State of New York.

19. That at all the times hereinafter alleged, and upon information and belief, the Defendant, THE TRUMP ORGANIZATION, INC. was and still is a domestic company organized and existing under and by virtue of the laws of the State of New York.

20. That at all of the times herein mentioned, and upon information and belief, the Defendant, THE TRUMP ORGANIZATION, INC., was a domestic company with a principal place of business at 725 FIFTH AVE 26TH FLR NEW YORK, NEW YORK, 10022.

21. That at all of the times hereinafter mentioned, and upon information and belief, the Defendant, THE TRUMP ORGANIZATION, INC. maintained a principal place of business in the County of New York, State of New York.

AS AND FOR A FIRST CAUSE OF ACTION

22. Plaintiff repeats, reiterates and re-alleges each and every allegation contained in the above paragraphs of this complaint marked and designated “1 through 21”, inclusive with the same force and effect as if herein after set forth more fully at length.

23. At all times mentioned herein, Plaintiffs were and still are residents of the County of Nassau, State of New York.

24. Upon information and belief, that at all times mentioned herein, defendant TRUMP ENDEAVOR 12 LLC, owned a certain resort hotel property with buildings, fixtures, appurtenances and facilities known as TRUMP NATIONAL DORAL MIAMI located at 4400 NW 87th Ave, Doral, FL 33178.

25. Upon information and belief, that at all times mentioned herein, defendant TRUMP ENDEAVOR 12 LLC, operated a certain resort hotel property located at 4400 NW 87th Ave, Doral, FL 33178.

26. Upon information and belief, that at all times mentioned herein, defendant TRUMP ENDEAVOR 12 LLC, maintained a resort hotel property known as TRUMP NATIONAL DORAL MIAMI located at 4400 NW 87th Ave, Doral, FL 33178.

27. Upon information and belief, that at all times mentioned herein, defendant TRUMP ENDEAVOR 12 LLC, managed a resort hotel property known as TRUMP NATIONAL DORAL MIAMI located at 4400 NW 87th Ave, Doral, FL 33178.

28. Upon information and belief, that at all times mentioned herein, defendant TRUMP ENDEAVOR 12 LLC, controlled a certain resort hotel property known as TRUMP NATIONAL DORAL MIAMI located at 4400 NW 87th Ave, Doral, FL 33178.

29. Upon information and belief, that at all times mentioned herein, defendant TRUMP ENDEAVOR 12 MANAGER CORP owned a certain Resort hotel property with buildings and fixtures known as TRUMP NATIONAL DORAL MIAMI located at 4400 NW 87th Ave, Doral, FL 33178.

30. Upon information and belief, that at all times mentioned herein, defendant TRUMP ENDEAVOR 12 MANAGER CORP operated a certain Resort hotel property known as TRUMP NATIONAL DORAL MIAMI located at 4400 NW 87th Ave, Doral, FL 33178.

31. Upon information and belief, that at all times mentioned herein, defendant TRUMP ENDEAVOR 12 MANAGER CORP maintained a Resort hotel property known as TRUMP NATIONAL DORAL MIAMI located at 4400 NW 87th Ave, Doral, FL 33178.

32. Upon information and belief, that at all times mentioned herein, defendant TRUMP ENDEAVOR 12 MANAGER CORP managed a Resort hotel property known as TRUMP NATIONAL DORAL MIAMI located at 4400 NW 87th Ave, Doral, FL 33178.

33. Upon information and belief, that at all times mentioned herein, defendant TRUMP ENDEAVOR 12 MANAGER CORP controlled a certain Resort hotel property known as TRUMP NATIONAL DORAL MIAMI located at 4400 NW 87th Ave, Doral, FL 33178.

34. Upon information and belief, that at all times mentioned herein, defendant THE TRUMP ORGANIZATION, INC., owned a certain resort hotel property with buildings and fixtures known as TRUMP NATIONAL DORAL MIAMI located at 4400 NW 87th Ave, Doral, FL 33178.

35. Upon information and belief, that at all times mentioned herein, defendant THE TRUMP ORGANIZATION, INC. operated a certain resort hotel property known as TRUMP NATIONAL DORAL MIAMI located at 4400 NW 87th Ave, Doral, FL 33178.

36. Upon information and belief, that at all times mentioned herein, defendant THE TRUMP ORGANIZATION, INC. maintained a resort hotel property known as TRUMP NATIONAL

DORAL MIAMI located at 4400 NW 87th Ave, Doral, FL 33178.

37. Upon information and belief, that at all times mentioned herein, defendant THE TRUMP ORGANIZATION, INC. managed a resort hotel property known as TRUMP NATIONAL DORAL MIAMI located at 4400 NW 87th Ave, Doral, FL 33178.

38. Upon information and belief, that at all times mentioned herein, defendant THE TRUMP ORGANIZATION, INC. controlled a certain resort hotel property known as TRUMP NATIONAL DORAL MIAMI located at 4400 NW 87th Ave, Doral, FL 33178.

39. That on or about December 31, 2014, while infant plaintiff was a lawful guest at the aforementioned resort hotel property known as TRUMP NATIONAL DORAL MIAMI, TRUMP ENDEAVOR 12 LLC held said premises out as a safe, properly maintained premises for guests, invitees and members of the general public.

40. That on or about December 31, 2014, while infant plaintiff was a lawful guest at the aforementioned resort hotel property known as TRUMP NATIONAL DORAL MIAMI, TRUMP ENDEAVOR 12 LLC held said premises and its pool area and slide out as safe, properly maintained, properly supervised, and properly safeguarded premises for guests, and invitees.

41. At all times mentioned herein, defendant TRUMP ENDEAVOR 12 LLC had a duty to keep and maintain the aforesaid premises safe and keep them free of hazardous conditions.

42. That on December 31, 2014, the infant plaintiff BLAKE I. BURG, was a lawful guest and patron of the defendants resort hotel property known as TRUMP NATIONAL DORAL MIAMI, premises located 4400 NW 87th Ave, Doral, FL 33178 where he was utilizing the recreational pool and water slide features when he was caused to become injured.

43. That on December 31, 2014, the infant plaintiff BLAKE I. BURG, was a lawful guest and patron of the TRUMP NATIONAL DORAL MIAMI premises located 4400 NW 87th Ave, Doral, FL 33178 where he was utilizing the recreational pool and water slide features when he was caused to become injured due to the negligence of the defendants.

44. That on or about December 31, 2014, while infant plaintiff was a lawful guest at the aforementioned resort hotel property known as TRUMP NATIONAL DORAL MIAMI, TRUMP ENDEAVOR 12 MANAGER CORP held said premises out as a safe, properly maintained premises for guests, invitees and members of the general public.

45. That on or about December 31, 2014, while infant plaintiff was a lawful guest at the aforementioned resort hotel property known as TRUMP NATIONAL DORAL MIAMI, TRUMP ENDEAVOR 12 MANAGER CORP held said premises and its pool area and slide out as safe, properly maintained, properly supervised, and properly safeguarded premises for guests, and invitees.

46. At all times mentioned herein, defendant TRUMP ENDEAVOR 12 MANAGER CORP had a duty to keep and maintain the aforesaid premises safe and keep them free of hazardous conditions.

47. That on December 31, 2014, the infant plaintiff BLAKE I. BURG, was a lawful guest and patron of the defendants resort hotel property known as TRUMP NATIONAL DORAL MIAMI, premises located 4400 NW 87th Ave, Doral, FL 33178 where he was utilizing the recreational pool and water slide features when he was caused to become injured.

48. That on December 31, 2014, the infant plaintiff BLAKE I. BURG, was a lawful guest and patron of the TRUMP NATIONAL DORAL MIAMI premises located 4400 NW 87th Ave, Doral, FL 33178 where he was utilizing the recreational pool and water slide features when he was caused to become injured due to the negligence of the defendants.

49. That on or about December 31, 2014, while infant plaintiff was a lawful guest at the aforementioned Resort hotel property known as TRUMP NATIONAL DORAL MIAMI, THE TRUMP ORGANIZATION, INC. held said premises out as a safe, properly maintained premises for guests, invitees and members of the general public.

50. That on or about December 31, 2014, while infant plaintiff was a lawful guest at the aforementioned Resort hotel property known as TRUMP NATIONAL DORAL MIAMI, THE

TRUMP ORGANIZATION, INC. held said premises and its pool area and slide out as safe, properly maintained, properly supervised, and properly safeguarded premises for guests, and invitees.

51. At all times mentioned herein, defendant THE TRUMP ORGANIZATION, INC. had a duty to keep and maintain the aforesaid premises safe and keep them free of hazardous conditions.

52. That on December 31, 2014, the infant plaintiff BLAKE I. BURG, was a lawful guest and patron of the defendants Resort hotel property known as TRUMP NATIONAL DORAL MIAMI, premises located 4400 NW 87th Ave, Doral, FL 33178 where he was utilizing the recreational pool and water slide features when he was caused to become injured.

53. That on December 31, 2014, the infant plaintiff BLAKE I. BURG, was a lawful guest and patron of the TRUMP NATIONAL DORAL MIAMI premises located 4400 NW 87th Ave, Doral, FL 33178 where he was utilizing the recreational pool and water slide features when he was caused to become injured due to the negligence of the defendants.

54. That on December 31, 2014, infant plaintiff BLAKE I. BURG was severely injured due to the negligence of the defendants and their agents who failed to properly manage and monitor said pool and water slide features, failed to properly regulate said pool and water slide features, failed to keep and maintain the aforesaid premises in a safe well-supervised, properly functioning condition, free of traps, hazards, and unsafe conditions, failed to properly warn patrons and guests as to the pre-existing hazards of the premises or the hazards caused and/or created by the defendants, defendants agents, defendants employees, defendants security personnel, defendants lifeguards, and defendant's supervisors.

55. That the aforesaid pool and pool area which has a waterslide feature was allowed to be unsupervised and/or improperly supervised while infant plaintiff was utilizing said facilities.

56. That said negligence posed a danger to patrons, guests, and the general public and the infant plaintiff BLAKE I. BURG.

57. That as a result of the defendants' negligence in causing, creating and/or permitting this

dangerous and defective condition to exist, the plaintiff BLAKE I. BURG was caused to fall and tumble and become severely injured.

58. Upon information and belief, that at all times hereinafter mentioned, defendants undertook the care and supervision of infant plaintiff.

59. Upon information and belief, that at all times hereinafter mentioned, defendants were responsible for the safety of the infant plaintiff.

60. Upon information and belief, that at all times hereinafter mentioned, defendants failed to adequately provide for the care and safety of infant plaintiff.

61. Upon information and belief, that at all times hereinafter mentioned, defendants negligently failed to provide for the care and safety of infant plaintiff.

62. Upon information and belief, that at all times hereinafter mentioned, defendants negligently supervised the infant plaintiff.

63. Upon information and belief, that at all times hereinafter mentioned, the injuries sustained by infant plaintiff were foreseeably related to the absence of supervision of said infant plaintiff.

64. The defendants failed to act with the reasonable care that a parent would have regarding the supervision and care of infant plaintiff.

65. That the negligence and carelessness of defendants was the proximate cause of the incidents herein.

66. That the aforesaid incident and injuries resulting therefrom were due solely and wholly as a result of the careless and negligent manner in which the defendants owned, operated, managed supervised and controlled their resort premises without the plaintiff in any way contributing thereto.

67. That by reason of the foregoing and the negligence of the defendants, the infant plaintiff, BLAKE I. BURG was severely injured and wounded, suffered, still suffers and will continue to suffer for some time, great physical pain and serious bodily injuries and became sick, sore, lame and disabled,

and suffered grievous psychological pain and mental anguish, and will continue to suffer said pain and anguish for a considerable time to come.

68. That by reason of the foregoing, the infant-plaintiff, BLAKE I. BURG, was compelled to and did necessarily require medical aid and attention, and did necessarily pay and become liable therefore for medicines, treatments, and dental care and reconstruction, and upon information and belief, the infant plaintiff, BLAKE I. BURG, will necessarily incur similar expenses in the future.

69. That be reason of the foregoing, the infant plaintiff, BLAKE I. BURG has been unable to attend to his usual occupations and activities in the manner required, as he had prior to his injury at the Defendant's premises.

70. That by reason of the wrongful, negligent and unlawful actions of the defendants, as aforesaid, the infant plaintiff, BLAKE I. BURG sustained serious injuries.

71. That one or more provisions of the §1602 of the Civil Practice Law and Rules do apply to the within action.

72. That as a result of the foregoing, the infant plaintiff, BLAKE I. BURG, has been damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A SECOND CAUSE OF ACTION

73. Plaintiffs repeat, reiterate and re-allege each and every allegation contained set forth in this complaint numbered "1" through "72", with the same force and effect as though more fully set forth at length herein.

74. That defendants have a duty to insure the safety of its guests and patrons lawfully upon its premises.

75. That on or about December 31, 2014, defendants negligently supervised infant plaintiff.

76. That on or about December 31, 2014, defendants negligently failed to have proper safeguards in place to insure proper supervision of their guests and the infant plaintiff whose care was entrusted to the defendants and failed to take proper safeguarding or proactive measures.

77. Defendants wantonly disregarded the safety of its guests and/or patrons, and the infant plaintiff in particular.

78. That defendants have engaged in a negligent, careless and reckless manner, without regard for the safety of its guests and/or patrons and the infant plaintiff in particular.

79. That by reason of the foregoing, plaintiffs have been damaged in a sum which exceeds the jurisdictional limitations of all lower courts, which would otherwise have jurisdiction.

AS AND FOR A THIRD CAUSE OF ACTION

80. Plaintiffs repeat, reiterate and reallege each and every allegation contained set forth in this complaint numbered “1” through “79”, with the same force and effect as though more fully set forth at length herein.

81. That at all times hereinafter mentioned, plaintiff PAUL A. BURG, is the father and natural guardian of infant plaintiff, and as such is responsible for infant plaintiff’s medical and hospital expenses, x-rays, medicines; and will continue to be further obligated and responsible for same in the future.

82. That as a result of the foregoing, plaintiff has been deprived of the services, society, and companionship of her son, infant plaintiff herein; has suffered mental anguish, sleeplessness and anxiety as a result of her son’s suffering.

83. That upon information and belief, plaintiff PAUL A. BURG has incurred and still is incurring additional expenses which would otherwise be unnecessary but for the negligence of defendants.

84. That as a result of the foregoing, plaintiff has been damaged in the sum of an amount that exceeds the jurisdictional limits of all lower courts, which would otherwise have jurisdiction.

AS AND FOR A FOURTH CAUSE OF ACTION

85. Plaintiff repeats, reiterates and realleges each and every allegation contained in the above paragraphs of this complaint marked and designated "1 through 84", inclusive with the same force and effect as if herein after set forth more fully at length.

86. That on December 31, 2014, while Defendants employees, agents, supervisors, lifeguards, attendants, maintenance, and security personnel managed and operated the waterslide and pool premises in a grossly negligent unsafe manner that was likely to cause grievous injuries to the infant plaintiff.

87. That the causes of the infant plaintiff's harm and damages were as a direct result of the defendants acts and/or omissions in failing to properly, and carefully operate and safeguard the defendants' water slide and pool premises despite knowing they would be frequented and utilized by minor children, and that the defendants' reckless actions in their failure to properly hire, train, inform, instruct, supervise, create safeguards and procedures, and generally operate their water slide and pool premises in a safe and proper manner and method so as to do so without creating a trap, hazard, and attractive nuisance amounted not only to negligence but to gross negligence.

88. That Defendants' employees were hired and supervised by Defendants.

89. That Defendants failed to perform adequate reviews, background checks, investigation or to otherwise adequately monitor their employees and/or agents.

90. That by failing to prevent Defendants employees and/or agents from unsafely operating said waterslide and pool premises, Defendants acted with gross negligence.

91. That as a result of Defendants negligent hiring, supervision and retention of the negligent employees, infant plaintiff became injured.

92. That by reason of the foregoing and the negligence and gross negligence of the defendants, the Plaintiff, BLAKE I. BURG, was severely injured, bruised and wounded, suffered, still suffers and will continue to suffer for some time physical pain and bodily injuries and became sick, sore, lame and disabled and so remained for a considerable length of time.

93. That by reason of the foregoing, the Plaintiff, BLAKE I. BURG, was compelled to and did necessarily require medical aid and attention, and did necessarily pay and become liable therefore for medicines and upon information and belief, the Plaintiff, BLAKE I. BURG, will necessarily incur similar expenses.

94. That by reason of the wrongful, negligent and unlawful actions of the defendants, as aforesaid, the Plaintiff, BLAKE I. BURG, sustained serious injuries as defined in Section 5102(d) of the Insurance Law of The State of New York, and has sustained economic loss greater than basic economic loss as defined in Section 5102 of the said Insurance Law.

95. That one or more of the provisions of §1602 of the Civil Practice Law and Rules do apply to the within action.

96. That as a result of Defendants gross negligence, defendants are in addition liable for punitive damages.

97. That as a result of the foregoing, the Plaintiff BLAKE I. BURG has been damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, the plaintiff demands judgment against the defendants on all Causes of Action in the sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction over all causes of action, as well as punitive damages, together with the costs and disbursements of their action and interest from the date of verdict rendered thereon.

Dated: New York, New York
December 19, 2016,

KIM I. MCHALE, ESQ.
THE MCHALE LAW FIRM
Attorneys for Plaintiff
225 Broadway, Suite 1000
New York, New York 10007
(212) 279-4777

ATTORNEY'S VERIFICATION

KIM I. MCHALE, an attorney duly admitted to practice before the Courts of the State of New York, affirms the following to be true under the penalties of perjury:

I am a member of **THE MCHALE LAW FIRM, P.C.**, attorneys of record for Plaintiffs. I have read the annexed **SUMMONS and COMPLAINT** and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters I believe them to be true. My belief, as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my files.

The reason this verification is made by me and not Plaintiff is that Plaintiff does not reside in the county wherein the attorneys for the plaintiff maintain their offices.

DATED: New York, New York
 December 19, 2016

KIM I. MCHALE

Index No.:
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

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BLAKE I. BURG, an infant under the age of 14 by his
parent and natural guardian, PAUL A. BURG and
PAUL A. BURG, Individually,

Plaintiffs,

-against-

TRUMP ENDEAVOR 12 LLC, TRUMP ENDEAVOR
12 MANAGER CORP, and THE TRUMP ORGANIZATION,
INC.,
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SUMMONS and VERIFIED COMPLAINT

THE MCHALE LAW FIRM, P.C.
Attorneys for Plaintiff
225 Broadway, Suite 1000
New York, New York 10007
(212) 279-4777
