

NO. _____
17C102804

JEFFERSON CIRCUIT COURT
DIVISION _____
JUDGE _____

TRACEY BRADSHAW

PLAINTIFF
JEFFERSON CIRCUIT COURT
DIVISION FOUR (4)

v.

UNITED AIRLINES, INC.
233 S. Wacker Drive
HDQCT – 14th Floor
Chicago, IL 60606

DEFENDANTS

Serve: C T Corporation System
306 W. Main Street
Suite 512
Frankfort, KY 40601

REPUBLIC AIRLINE, INC.
8909 Purdue Rd.
Suite 300
Indianapolis, IN 46268

Serve: Corporation Service Company
421 W. Main Street
Frankfort, KY 40601

UNKNOWN DEFENDANT
Defendant "Michael"

FILED IN CLERK'S OFFICE
DAVID L. NICHOLSON, CLERK
JUN 02 2017
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DEPUTY CLERK

COMPLAINT

* * * * *

Comes the Plaintiff, Tracey Bradshaw, by and through undersigned counsel, and for her cause of action against Defendants United Airlines, Inc. (hereinafter, "United"), Republic Airline, Inc. (hereinafter, "Republic") and an unknown defendant, at this time only known as Michael (hereinafter, "Michael") hereby states as follows:

1. The incident giving rise to this action occurred in part in Louisville, Jefferson County, Kentucky.

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2. At all times relevant hereto, the Plaintiff, Tracey Bradshaw, resided in Clifton, New Jersey.

3. At all times relevant hereto, Defendant United is a foreign corporation with its principal office located in Chicago, Illinois. Defendant United's registered agent is C T Corporation System located at 306 W. Main Street, Suite 512, Frankfort, Kentucky 40601. Defendant has the required minimum contacts in Jefferson County, Kentucky to be subject to the jurisdiction of this Court.

4. At all times relevant hereto, Defendant Republic was the operator of the United flight on which the injury occurred. The flight attendants on the flight were directly employed by Defendant Republic.

5. At all times relevant hereto, Defendant Republic is a foreign corporation located in Indianapolis, Indiana. Defendant Republic's registered agent is Corporation Service Company which is located at 421 West Main Street, Frankfort, KY 40601. Defendant has the required minimum contacts to be subject to the jurisdiction of this Court.

6. Upon information and belief, unknown Defendant "Michael" was an employee and agent of Defendant Republic at all times relevant hereto. Defendant has the required minimum contacts to be subject to the jurisdiction of this Court.

COUNT I – ASSAULT AND BATTERY BY DEFENDANT MICHAEL

7. Plaintiff repeats allegations from all preceding paragraphs.

8. On or about June 18, 2016, Plaintiff was a patron of Defendant United, as she purchased a ticket to fly out of Louisville International Airport (SDF) located in Louisville, Jefferson County, Kentucky.

9. While the Plaintiff was waiting on her flight Plaintiff was verbally accosted by unknown Defendant "Michael," who was an on-duty flight attendant working for Defendants, directly through Defendant Republic.

10. While the Plaintiff was onboard the plane, and the plane was in flight, Plaintiff continued to be verbally accosted, subjected to sexual advances and was physically assaulted by unknown Defendant "Michael."

11. As a result of the assault, Plaintiff suffered pain and anguish of body and mind, including bruising of her arm. Plaintiff's damages are in an amount in excess of the minimum dollar amount necessary to invoke the jurisdiction of this Court.

COUNT II – NEGLIGENT HIRING OR RETENTION

12. Plaintiff repeats the allegations in all preceding paragraphs.

13. Defendants United and Republic had a duty to exercise ordinary care in hiring retaining an employee.

14. Defendants failed to exercise ordinary care in hiring and retaining unknown Defendant "Michael" as he created a foreseeable risk of harm to a third person.

15. Unknown Defendant "Michael" committed a tort against Plaintiff.

16. As a direct and proximate result of Defendants' failure to exercise ordinary care, Plaintiff suffered damages including mental and physical pain and anguish.

WHEREFORE, the Plaintiff, by and through undersigned counsel, respectfully demands judgment against the Defendants as follows:

1. For an amount of compensatory damages that is fair and reasonable as established by the evidence;

2. For prejudgment interest from the date of injury until such time as judgment is paid;
3. For her costs herein expended;
4. Punitive damages; and
5. For any and all other relief to which she may be entitled.

Respectfully submitted,

Alex R. White, PLLC

A handwritten signature in black ink, appearing to read 'Alex White', is written over a horizontal line.

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Counsel for Plaintiff