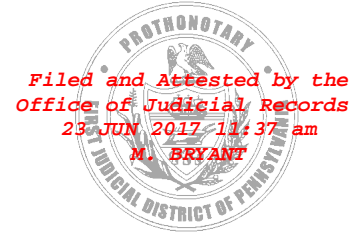


MESSA & ASSOCIATES, P.C.
BY: Joseph L. Messa, Esquire
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123 South 22nd Street
Philadelphia, PA. 19103
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Attorneys for Plaintiff

Erno Ilyes, as Parent and Natural Guardian of J.I. and S.I., minors, and Erno Ilyes individually and in his own right,

Plaintiff,

v.

Deutsche Lufthansa Aktiengesellschaft, et al

Defendants

**COURT OF COMMON PLEAS
PHILADELPHIA COUNTY, PA**

JUNE TERM, 2017

No. _____

JURY TRIAL DEMANDED

NOTICE TO PLEAD

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.
YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP."

Philadelphia Bar Association
Lawyer Referral
and Information Service
One Reading Center
Philadelphia, PA 19107
(215) 238-6333 | TTY (215) 451-6197

Le han demando a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL."

Asociacion de Licenciados de Filadelfia
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Attorney for Plaintiff

Erno Ilyes, as Parent and Natural Guardian of J.I.
and S.I., minors, and Erno Ilyes individually and
in his own right,
1717 Stanwood Street
Philadelphia, PA 19152,

Plaintiffs,

v.

Deutsche Lufthansa Aktiengesellschaft a/k/a
Deutsche Lufthansa AG d/b/a Lufthansa German
Airlines
1640 Hempstead Turnpike
East Meadow, NY 11554

and

Lufthansa Technik North American Holding
Company
3515 N. Sheridan Road
Tulsa, OK 74115

and

Travel Leaders Wide World
2467 Grant Avenue
Philadelphia, PA 19114

and

Wide World Travel Services, Inc.
7300 Bustleton Avenue, Suite 225
Philadelphia, PA 19152

and

Carlson Wagonlit Travel

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY, PA

JUNE TERM, 2017

No. _____

JURY TRIAL DEMANDED

609 Laramie Place
Philadelphia, PA 19115

and

Carlson Wagonlit Travel, Inc.
701 Carlson Pkwy Ms 8250
Minnetonka, MN 55305

and

Karen Klingman
3443 Norwood Place
Holland, PA 18966

and

Lionel Lauer
7300 Bustleton Avenue, Suite 225
Philadelphia, PA 19152

and

Dorothy Polikoss a/k/a Dorothy Polikoff
6506 Frankford Avenue
Philadelphia, PA 19135

and

Lisa Follmer
1017 Hoffnagle Place
Apartment 2
Philadelphia, PA 19111,

Defendants.

CIVIL ACTION COMPLAINT

I. INTRODUCTION

1. This case involves the failure of one of the world's largest commercial airlines to follow its own corporate policies resulting in the international abduction of two minor American children from the United States to Austria.

2. Lufthansa Airlines, which operates by and through the business and jural entities identified in paragraphs 15 and 16 of this Complaint, publicly promulgates on its website that for minors traveling from the United States, “[i]f a child or teenager is travelling with only one parent or guardian[,] the notarized consent letter from the parent/guardian who is not travelling with them is required.” See Lufthansa Country-Specific Regulations for Traveling with Children, attached hereto as Exhibit “A” (emphasis added).

3. In adopting and publicizing this corporate policy, Lufthansa voluntarily assumed the duty to ensure that American children could not be kidnapped from the United States on its planes.

4. On July 7, 2015, however, Lufthansa negligently failed to enforce its own corporate policy and permitted Plaintiff Erno Ilyes’ minor children J.I. and S.I. to board, with one-way tickets, a nonstop flight from Newark, New Jersey to Vienna, Austria without the required “notarized consent letter” from the children’s father.

5. For the small sum of \$6,011.61, Lufthansa negligently looked the other way as two American children were kidnapped from U.S. soil.

6. Lufthansa negligently failed to enforce its own well-known and well-publicized policy, causing Plaintiff’s American children to be abducted from him.

7. Through this action, Plaintiff seeks damages resulting from Lufthansa’s negligence which has directly caused Plaintiff to lose the love, society and comfort of his children, who are now trapped in a foreign country and separated from their father by the Atlantic Ocean.

8. Lufthansa’s negligence was enhanced by the Travel Leaders Wide World, Wide World Travel Services, Inc., Carlson Wagonlit Travel, Carlson Wagonlit Travel, Inc., Karen

Klingman, Lionel Lauer, Dorothy Polikoss a/k/a Dorothy Polikoff, and Lisa Follmer, employers and/or friends of the children's mother, who conspired with the mother and/or negligently enabled the mother to kidnap the children and to avoid the constraints of the Order of Philadelphia Court of Common Pleas, which were put in place to restrict the children's travel and to prevent their unwarranted, unlawful, and unauthorized separation from their father.

II. JURISDICTION AND VENUE

9. Plaintiff asserts claims exclusively under common law.

10. Plaintiff does not assert any federal claim nor suggest that any duty or obligation is imposed by federal law or regulation. Accordingly, nothing in this Complaint should be construed as a claim under any federal law or regulation.

11. To the extent any of Plaintiff's claims or factual allegations herein may be construed to have stated any claim under federal law or regulation, Plaintiff undeniably disavows and disclaims any such claim.

12. Moreover, to the extent that any Defendant suggests that any of Plaintiff's claims are stated under federal law, Plaintiff expressly disavows such claims or allegations and reserves the right to modify this Complaint to conform his claims.

13. Venue is proper in Philadelphia County because Lufthansa regularly conducts business in Philadelphia County, substantial events occurred within the City and County of Philadelphia, Defendants Travel Leaders Wide World, Wide World Travel Services, Inc., Carlson Wagonlit Travel, Lionel Lauer, Dorothy Polikoss a/k/a Dorothy Polikoff, and Lisa Follmer reside in the City and County of Philadelphia, and Defendants Travel Leaders Wide World, Wide World Travel Services, Inc., Carlson Wagonlit Travel, Carlson Wagonlit Travel,

Inc., Karen Klingman, Lionel Lauer, Dorothy Polikoss a/k/a Dorothy Polikoff, and Lisa Follmer regularly conduct business within the City and County of Philadelphia.

III. PARTIES

14. Plaintiff Erno Ilyes, is an adult resident of the City and County of Philadelphia, Pennsylvania and the father and natural guardian of minor plaintiffs J.I. and S.I, both of whom are citizens of the United States and residents of the City and County of Philadelphia.

15. Defendant, Deutsche Lufthansa Aktiengesellschaft a/k/a Deutsche Lufthansa AG d/b/a Lufthansa German Airlines is a corporation, business or other jural entity with a principal office at 1640 Hempstead Turnpike, East Meadow, N.Y. 11554, which provides passenger airline services at various locations within the Commonwealth of Pennsylvania, throughout and at its location at Terminal A of the Philadelphia International Airport, Philadelphia, PA 19153, as well as through ticket sales locations within the City of Philadelphia.

16. Lufthansa Technik North America Holding, Corp. is, upon information and belief, is a corporation, business or other jural entity with a principal office at 3515 N. Sheridan Road, Tulsa, Oklahoma 74115, which provides passenger airline services at various locations within the Commonwealth of Pennsylvania, throughout and at its location at Terminal A of the Philadelphia International Airport, Philadelphia, PA 19153, as well as through ticket sales locations within the City of Philadelphia.

17. Defendant Lufthansa at all times material hereto acted through its officers, directors, managers, members, partners, departments, systems, divisions, agents, servants, employees, ostensible agents, and staff, for whose acts and omissions Lufthansa is responsible.

18. Defendant Travel Leaders Wide World is a corporation, business or other jural entity with an address at 2467 Grant Avenue, Philadelphia, PA 19114, which provides travel agency services within the Commonwealth of Pennsylvania.

19. Travel Leaders Wide World acts through its officers, principals, directors, employees, agents and servants, to provide travel agent services including airline ticket reservations, acquisition and purchase.

20. Wide World Travel Services, Inc. is a Pennsylvania corporation, business or other jural entity with an address at 7300 Bustleton Avenue, Suite 225, Philadelphia, PA 19152, which provides travel agency services within the Commonwealth of Pennsylvania.

21. Wide World Travel Services, Inc. acts through its officers, principals, directors, employees, agents and servants, to provide travel agent services including airline ticket reservations, acquisition and purchase.

22. Carlson Wagonlit Travel is a Pennsylvania corporation, business or other jural entity with an address at 609 Laramie Place, Philadelphia, PA 19115, which provides travel agency services within the Commonwealth of Pennsylvania.

23. Carlson Wagonlit Travel acts through its officers, principals, directors, employees, agents and servants, to provide travel agent services including airline ticket reservations, acquisition and purchase.

24. Carlson Wagonlit Travel, Inc. is a corporation, business or other jural entity with a principal address at 701 Carlson Pkwy Ms 8250, Minnetonka, Minnesota 55305, which provides travel agency services within the Commonwealth of Pennsylvania.

25. Carlson Wagonlit Travel Inc. acts through its officers, principals, directors, employees, agents and servants, to provide travel agent services including airline ticket reservations, acquisition and purchase.

26. Defendant Karen Klingman, upon information and belief, is an adult individual and friend of Claudia Ilyes, as well as the manager of, a principal in, and/or the President of Travel Leaders Wide World, Wide World Travel Services, Inc., Carlson Wagonlit Travel, and/or Carlson Wagonlit Travel, Inc., and maintains an address at 3443 Norwood Place, Holland, PA 18966.

27. Defendant Lionel Lauer, upon information and belief, is an adult individual and friend of Claudia Ilyes, the President of and/or a principal in and/or owner of Travel Leaders Wide World, Wide World Travel Services, Inc., Carlson Wagonlit Travel, and/or Carlson Wagonlit Travel, Inc., and maintains an address at 7300 Bustleton Avenue, Suite 225, Philadelphia, PA 19152.

28. Defendant Dorothy Polikoss a/k/a Dorothy Polikoff (hereinafter Dorothy Polikoff), upon information and belief, is an adult individual and friend of Claudia Ilyes, and an officer, director, owner and/or a principal in Travel Leaders Wide World, Wide World Travel Services, Inc., Carlson Wagonlit Travel, and/or Carlson Wagonlit Travel, Inc., and maintains an address at 6506 Frankford Avenue, Philadelphia, PA 19135.

29. Defendant Lisa Follmer, upon information and belief, is an adult individual and friend of Claudia Ilyes and maintains an address at 1017 Hoffnagle Place, Apartment 2, Philadelphia, PA 19111.

IV. FACTUAL BACKGROUND

A. Lufthansa's Corporate Policy Requiring Written Permission from Non-Traveling Parent for Children Traveling Outside of the United States

30. At all times material hereto, Defendant voluntarily adopted and implemented corporate policies regarding the international travel of children.

31. Lufthansa devotes a specific section on its website to its own country specific regulations for traveling with children as follows:



<http://www.lufthansa.com/us/en/Countryspecific-travelregulations-children>

32. At all times material hereto, Defendant voluntarily adopted and implemented these corporate policies to protect the safety and well-being of minor children traveling internationally without both parents, as well as for the benefit, protection, and safety of the parent not present at the time of travel.

33. Defendant's regulations for traveling with children applicable to travel from the USA and Canada provide in pertinent part that "[i]f a child or teenager is travelling with only one parent or guardian[,] the notarized consent letter from the parent/guardian who is not travelling with them is required." Exhibit "A."

34. At all times material hereto, Defendant voluntarily assumed the duty to protect children traveling without both parents as well as their parents from the danger of unauthorized separation of the children from the parents.

35. At all times material hereto, Defendant was required to exercise reasonable care to implementing, applying and enforcing its voluntary undertaking.

B. The Philadelphia Court of Common Pleas Limited International Travel of J.I. and S.I. from June 12, 2015 until July 6, 2015

36. In 2014, Erno Ilyes and Claudia Ilyes began divorce and child custody proceedings in the Philadelphia Court of Common Pleas, Family Division.

37. On December 8, 2014, the Court entered an Order which provided, “[n]o party may make a change in the residence of any child which significantly impairs the ability of the other party to exercise custodial rights without first complying with all the applicable provisions of 23 PA.C.S. § 5337 and Pa.R.C.P. 1915.17 regarding relocation.” A copy of the December 8, 2014 Order is attached hereto as Exhibit “B.”

38. On April 28, 2015, the Honorable Doris A. Pechkurow of the Philadelphia Court of Common Pleas, Family Division, entered an Order providing that mother Claudia M. Ilyes and father, Erno Ilyes “shall share legal custody” of the minor children J.I. and S.I. A copy of the April 28, 2015 Order is attached hereto as Exhibit “C.”

39. The Court further provided father Erno Ilyes with physical custody of both minor children on alternating weekends and every Thursday, and entrusting to father Erno Ilyes the custody of his minor children’s passports. *Id.*

40. On April 28, 2015, the Court also permitted Claudia Ilyes to travel to Austria with the children J.I. and S.I. for the limited time period of June 12, 2015 to July 6, 2015 to visit their maternal grand-parents and to celebrate the 90th birthday of maternal great-grandmother. *Id.*

41. The Court also required that the Custody Order be registered with the Austrian Courts in the event that intervention of the Austrian Court should become necessary. *Id.*

42. On April 28, 2015, the Court reiterated the same change in residency restrictions set forth in the December 8, 2014 Order. *Id.*

43. On May 13, 2015, Dr. Gerd Mitter, Judge of the Leoben District Court of the Republic of Austria, recognized the Order of the Philadelphia Court of Common Pleas. A copy of the May 13, 2015 Order is attached hereto as Exhibit "D."

44. Judge Mitter stated:

In this matter of custody, the court confirms, as a competent guardianship court, that it is aware of the pending custody proceedings in America, that minor [J.I.], born 8/10/2001 and minor [S.I.], born 8/21/04, will stay in Austria for the period of June 12, 2015 to July 6, 2015 together with their mother Claudia Ilyes.

Id.

45. Upon information and belief, before boarding the flight to Austria, Claudia Ilyes supplied a copy of the Philadelphia Court Order to Lufthansa.

46. Upon information and belief, Lufthansa enforced its policy regarding international travel outside of the United States and required Claudia Ilyes to produce the documentation from the Philadelphia Court of Common Pleas which permitted her to travel on June 12, 2015 outside of the United States with her children without Plaintiff being present.

47. Upon information and belief, on June 12, 2015, Claudia Ilyes traveled to Austria with her children J.I and S.I. aboard a Lufthansa flight.

48. Upon information and belief, on July 6, 2015, Claudia Ilyes returned to the United States with her children J.I and S.I. aboard a Lufthansa flight.

C. Lufthansa Sells One-Way Ticket to Claudia Ilyes Back to Austria

49. On July 7, 2015, a few hours after she returned to the United States in accordance with the April 28, 2015 Order of the Philadelphia Court of Common Pleas and the May 13, 2015 Order of the Leoben District Court of the Republic of Austria, Claudia Ilyes, accessed Defendant Lufthansa's website from a location in Philadelphia, Pennsylvania to purchase three one-way airline tickets for travel later that day back to Austria from the United States.

50. On July 7, 2015, 11:23 Zulu Time, Lufthansa issued three one-way tickets to Claudia Ilyes and her two minor children, J.I. and S.I., for travel from Newark, New Jersey to Vienna, Austria.

51. Lufthansa records indicate that at the time of the purchase, Claudia Ilyes purchased these tickets from Philadelphia, Pennsylvania via Lufthansa's internet portal.

52. The one-way flight on Lufthansa's Austrian Airlines departed later that day on July 7, 2015 from Newark Liberty Airport.

53. At the time of the booking, Lufthansa failed to recognize that Claudia Ilyes listed her minor son J.I. as an adult for the July 7, 2015 flight from Newark.

54. Lufthansa records indicate that one of the travelers for whom Claudia Ilyes booked travel was identified as "(CHD/21AUG04)," i.e. a minor child with a birth date of August 21, 2004.

55. Lufthansa accepted payment and issued the tickets as requested by Claudia Ilyes, in violation of Lufthansa's own corporate policy regarding travel with minor children, which restricts online bookings for minor children and requires that tickets for minor children be booked through the Lufthansa Service Center, a travel agency, or at the Lufthansa ticket desk at the airport.

56. On July 7, 2015, Defendant Lufthansa permitted Claudia Ilyes and the two minor children, J.I and S.I. to board Defendant's aircraft for a flight from Newark, New Jersey to Vienna Austria without their father Erno Ilyes and without presentation of a notarized consent letter from Erno Ilyes.

57. On July 7, 2015, Defendant Lufthansa permitted Claudia Ilyes and the two minor children, J.I and S.I. to board Defendant's aircraft for a flight from Newark, New Jersey to Vienna Austria without proof that Claudia Ilyes had sole custody of the minor children, in violation of Defendant's own voluntary regulations and policies.

58. Erno Ilyes, the father of minor children J.I and S.I. who had partial custody of the minor children under Order of Court, had no knowledge of the booking of airline tickets for travel for his children on July 7, 2015, did not consent to any travel by his minor children on July 7, 2015, and at no time was asked to provide written consent to permit travel his children to travel without him on July 7, 2015.

59. Claudia Ilyes never returned home to the United States with the children, and Erno Ilyes has not been able to find them or care for them since they departed from Newark on Defendant's airline on July 7, 2015.

D. Travel Leaders Wide World, Wide World Travel Services, Inc., Carlson Wagonlit Travel, Carlson Wagonlit Travel, Inc., Karen Klingman, Lionel Lauer, Dorothy Polikoff, and Lisa Follmer Conspired with Claudia Ilyes to Enable the Kidnapping of Minor Children J.I. and S.I. and the Separation from their Father

60. At all times pertinent hereto, Claudia Ilyes was employed at Travel Leaders Wide World, Wide World Travel Services, Inc., Carlson Wagonlit Travel, and/or Carlson Wagonlit Travel, Inc., where her work was supervised by the managers, principals, and/or officers of those business entities, which included Karen Klingman, Lionel Lauer, and Dorothy Polikoff.

61. Karen Klingman, Lionel Lauer, and Dorothy Polikoff developed a friendship with Claudia Ilyes.

62. Karen Klingman, Lionel Lauer, and Dorothy Polikoff upon information and belief, were aware of the divorce and child custody proceedings between Erno Ilyes and Claudia Ilyes, including the Order entered by the Philadelphia Family Court restricting travel of the minor children J.I. and S.I.

63. Karen Klingman, Lionel Lauer, and Dorothy Polikoff upon information and belief, were aware of Claudia Ilyes' plan to unlawfully remove the minor children from the United States without the knowledge or consent of the father, Erno Ilyes, and thereafter assisted and aided Claudia Ilyes to commit the unlawful actions.

64. Travel Leaders Wide World, Wide World Travel Services, Inc., Carlson Wagonlit Travel, and/or Carlson Wagonlit Travel, Inc., as well as Karen Klingman, Lionel Lauer, and Dorothy Polikoff upon information and belief, were aware of Lufthansa's voluntary corporate policies regarding international travel with children including the requirement of a notarized consent letter from the parent not traveling with the minor children as well as the restrictions regarding the online purchase of tickets for minor children.

65. Upon information and belief, Travel Leaders Wide World, Wide World Travel Services, Inc., Carlson Wagonlit Travel, and/or Carlson Wagonlit Travel, Inc., as well as Karen Klingman, Lionel Lauer, and Dorothy Polikoff permitted Claudia Ilyes to utilize the Travel Agency credentials and/or computer system to purchase airline tickets for herself and the minor children, and advised Claudia Ilyes to purchase an adult ticket for the male minor child so to avoid the enforcement of Lufthansa's voluntary policies, restricting the travel of minor children

without the consent of a non-traveling parent as well as the restriction regarding the online purchase of air travel tickets for unaccompanied minor children.

66. Travel Leaders Wide World, Wide World Travel Services, Inc., Carlson Wagonlit Travel, and/or Carlson Wagonlit Travel, Inc., as well as Karen Klingman, Lionel Lauer, and Dorothy Polikoff knew or should have known that aiding Claudia Ilyes in arranging for the minor children J.I. and S.I. to leave the United States on one way airline tickets without the consent of Erno Ilyes, the father of J.I. and S.I. would cause severe physical, mental, and emotional pain and suffering to Erno Ilyes and his children, yet proceeded with reckless disregard to assist and enable the kidnapping of J.I. and S.I.

67. Defendant Lisa Follmer, upon information and belief, is a friend of both Claudia Ilyes and Karen Klingman, and encouraged Claudia Ilyes to kidnap the minor children J.I. and S.I.

68. Defendant Lisa Follmer, upon information and belief, was aware of the Order of the Philadelphia Court of Common Pleas restricting and prohibiting the foreign travel of the minor children J.I. and S.I.

69. Upon information and belief, Lisa Follmer offered to and did assist Claudia Ilyes in kidnapping the minor children J.I. and S.I. by offering and agreeing to assist in the sale and disposition of personal property of Erno Ilyes and Claudia Ilyes to obtain funds to enable the purchase of airline tickets as well as in offering and agreeing to coordinate the shipping of personal belongings Claudia Ilyes and of minor children J.I. and S.I. to Austria where Claudia Ilyes, unlawfully intended to and did take the minor children and not return.

70. Upon information and belief, Lisa Follmer agreed with Claudia Ilyes to approach Karen Klingman and solicit Klingman's assistance in arranging for the sale, disposition and/or

shipping to Austria of the personal possessions of Claudia Ilyes and of the minor children J.I. and S.I. so as to enable Claudia Ilyes to kidnap the minor children and to remove them to Austria without notice to nor consent of Erno Ilyes and to avoid detention by the Philadelphia Court of Common Pleas, which had issued an Order restricting the travel of the minor children.

71. Upon information and belief, Lisa Follmer together with Karen Klingman packaged and shipped to Austria personal belongings of Claudia Ilyes and the minor children J.I. and S.I. so as to permit Claudia Ilyes to arrange to quickly purchase airline tickets and to abscond with the minor children without any notice to Erno Ilyes, and depriving Erno Ilyes of any opportunity to prevent the removal of the children from the United States in violation of Order of the Philadelphia Court of Common Pleas.

72. Upon information and belief, Lisa Follmer together with Karen Klingman arranged for the sale of Claudia Ilyes' automobile and sent the proceeds to Claudia Ilyes in furtherance of their purpose, that is, the unlawful removal of the minor children J.I. and S.I. from the United States without the consent of their father, Erno Ilyes.

73. Lisa Follmer knew or should have known that in assisting Claudia Ilyes and in conspiring with Claudia Ilyes and Karen Klingman to encourage and enable the kidnapping of the minor children, great physical, mental and emotional injury would be suffered by Erno Ilyes and the minor children J.I. and S.I., yet proceeded with reckless, and callous disregard for the safety and well-being of Erno Ilyes as well as of Erno Ilyes' minor children.

V. PHYSICAL, MENTAL, AND EMOTIONAL INJURIES

74. As a result of the negligence and outrageous and reckless conduct of the Defendants, jointly and severally, Plaintiff Erno Ilyes, and his minor children J.I. and S.I.,

suffered, and will continue to suffer from, severe and excruciating physical, mental, and emotional pain and suffering.

75. As a result of the negligence and outrageous and reckless conduct of the Defendants, Plaintiff Erno Ilyes, suffered, and will continue to suffer, physical separation from his two children, J.I. and S.I., a loss of the society and comfort of his children, as well as nausea, sleep disturbance, nightmares, anxiety, nervousness, stress, depression, and flashbacks.

76. As a result of the negligence and outrageous and reckless conduct of the Defendants, minor children J.I. and S.I. suffered, and will continue to suffer from, loss of their family, friends, and home in the United States, physical separation from their loving father, Erno Ilyes, a loss of their father's future financial support, services, guidance, aid, comfort, companionship, and advise, as well as nausea, sleep disturbance, nightmares, anxiety, nervousness, fear of occupying an aircraft carriers, stress, depression, and flashbacks.

COUNT I
NEGLIGENCE
Erno Ilyes, Individually, v. Lufthansa

77. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

78. At all times relevant and material hereto, Defendant Lufthansa had a duty to render reasonable, adequate, and appropriate services to ensure the safety and well-being of its passengers and to avoid harm.

79. At all times relevant and material hereto, Defendant voluntarily assumed a duty to protect minor children and absent third-party parents by requiring a notarized consent letter from a parent/guardian who is not travelling with children, when a child or teenager is travelling with only one parent or guardian. Exhibit "A".

80. The pain, suffering, injuries, and losses of Plaintiff were directly and proximately caused by the negligence and carelessness of the Defendant, Lufthansa, acting by and through its agents, servants, workmen and/or employees, which negligence and carelessness included the following:

- a. Failing to properly perform and enforce its voluntarily assumed duty to protect minor children and absent third-party parents;
- b. Failing to enforce voluntary corporate travel policies and regulations regarding minor children and their guardians;
- c. Failing to exercise reasonable care to ensure the safety and well-being of minor passengers and their absent third-party parents;
- d. Failing to request a notarized consent letter signed by Erno Ilyes; and
- e. Failing to obtain a notarized consent letter signed by Erno Ilyes.

81. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to suffer severe and excruciating physical, mental and emotional pain and suffering.

82. It was foreseeable to Defendant that the failure to exercise reasonable care in enforcing its voluntarily assumed duty to protect minor children and absent third-party parents, could cause serious injury to minor children and absent third-party parents, and expose them and their close family members to severe physical, mental, and emotional pain and suffering.

83. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by Plaintiff Erno Ilyes.

84. As a direct and proximate result of the negligent conduct and omissions of the Defendant, Erno Ilyes suffered, and will continue to suffer, severe physical, mental and emotional pain and suffering.

85. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate his children and to attempt to return his children to their home in the United States, which efforts to date have been unsuccessful.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT II
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Lufthansa

86. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

87. At all times relevant and material hereto, Defendant Lufthansa had a duty to render reasonable, adequate, and appropriate services to ensure the safety and well-being of its passengers and to avoid harm.

88. At all times relevant and material hereto, Defendant voluntarily assumed the duty to protect minor children and absent third-party parents by requiring a notarized consent letter from a parent/guardian who is not travelling with children, when a child or teenager is travelling with only one parent or guardian. Exhibit "A".

89. The pain, suffering, injuries, and losses of minor Plaintiff, J.I., were directly and proximately caused by the negligence and carelessness of the Defendant, Lufthansa, acting by and through its agents, servants, workmen and/or employees, which negligence and carelessness included the following:

- a. Failing to properly perform and enforce its voluntarily assumed duty to protect minor children and absent third-party parents;
- b. Failing to enforce corporate travel policies and regulations;
- c. Failing to exercise reasonable care to ensure the safety and well-being of minor passengers and their absent third-party parents;
- d. Failing to request a notarized consent letter signed by Erno Ilyes; and
- e. Failing to obtain a notarized consent letter signed by Erno Ilyes.

90. As a direct and proximate result of the Defendant's negligence, J.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

91. It was foreseeable to Defendant that the failure to exercise reasonable care in enforcing its voluntarily assumed duty to protect minor children and absent third-party parents, could cause serious injury to minor children and absent third-party parents, and expose them and their close family members to severe physical, mental, and emotional pain and suffering.

92. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by J.I.

93. As a direct and proximate result of the negligent conduct and omissions of the Defendant, J.I. suffered, and will continue to suffer, severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of J.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT III
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I. v. Lufthansa

94. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

95. At all times relevant and material hereto, Defendant Lufthansa had a duty to render reasonable, adequate, and appropriate services to ensure the safety and well-being of its passengers and to avoid harm.

96. At all times relevant and material hereto, Defendant voluntarily assumed the duty to protect minor children and absent third-party parents by requiring a notarized consent letter from a parent/guardian who is not travelling with children, when a child or teenager is travelling with only one parent or guardian. Exhibit "A".

97. The pain, suffering, injuries, and losses of minor Plaintiff, S.I., were directly and proximately caused by the negligence and carelessness of the Defendant, Lufthansa, acting by and through its agents, servants, workmen and/or employees, which negligence and carelessness included the following:

- a. Failing to properly perform and enforce its voluntarily assumed duty to protect minor children and absent third-party parents;
- b. Failing to enforce corporate travel policies and regulations;

- c. Failing to exercise reasonable care to ensure the safety and well-being of minor passengers and their absent third-party parents;
- d. Failing to request a notarized consent letter signed by Erno Ilyes; and
- e. Failing to obtain a notarized consent letter signed by Erno Ilyes.

98. As a direct and proximate result of the Defendant's negligence, S.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

99. It was foreseeable to Defendant that the failure to exercise reasonable care in enforcing its voluntarily assumed duty to protect minor children and absent third-party parents, could cause serious injury to minor children and absent third-party parents, and expose them and their close family members to severe physical, mental, and emotional pain and suffering.

100. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by S.I.

101. As a direct and proximate result of the negligent conduct and omissions of the Defendant, S.I. suffered, and will continue to suffer, severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of S.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT IV
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, Individually, v. Lufthansa

102. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

103. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in implementing and enforcing its voluntarily assumed duty to protect minor children and absent third-party parents, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering and distress.

104. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

105. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

106. As a direct and proximate result of the Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT V
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I. v. Lufthansa

107. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

108. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in enforcing its voluntarily assumed duty to protect minor children and absent third-party parents, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering and distress.

109. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

110. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and his minor children, J.I. and S.I., suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of J.I., hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT VI
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I. v. Lufihansa

111. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

112. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in enforcing its voluntarily assumed duty to protect minor children and absent third-party parents, Defendant acted outrageously, with the intention to

cause, or with reckless disregard of the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering and distress.

113. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering and distress.

114. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and his minor children, J.I. and S.I., suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of S.I., hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT VII
NEGLIGENCE

Erno Ilyes, Individually, v. Travel Leaders Wide World

115. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

116. At all times relevant and material hereto, Defendant Travel Leaders Wide World had a duty to operate the travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by its services.

117. At all times relevant and material hereto, Defendant had a duty to act reasonably in its professional capacity so as to not place others at risk of harm.

118. Defendant knew, or should have known, that its failure to exercise due care in the operation of its travel agency services would cause injury to Plaintiffs, Erno Ilyes and his minor children.

119. Defendant knew, or should have known, that its failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental and emotional injuries to Plaintiffs.

120. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate the travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through its travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, the company's services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children; and
- g. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent.

121. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to suffer, and will continue to suffer from severe and excruciating physical, mental and emotional pain and suffering.

122. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by Plaintiff Erno Ilyes.

123. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT VIII
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Travel Leaders Wide World

124. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

125. At all times relevant and material hereto, Defendant Travel Leaders Wide World had a duty to operate its travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by its services.

126. At all times relevant and material hereto, Defendant had a duty to act reasonably in its professional capacity so as to not place others at risk of harm.

127. Defendant knew, or should have known, that its failure to exercise due care in the operation of its travel agency services would cause injury to Plaintiffs, Erno Ilyes and his minor children.

128. Defendant knew, or should have known, that its failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental and emotional injuries to Plaintiffs.

129. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate its travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through its travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, its services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children; and
- g. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent.

130. As a direct and proximate result of the Defendant's negligence, J.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

131. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by J.I.

132. As a direct and proximate result of the negligent conduct and omissions of the Defendant, J.I. suffered, and will continue to suffer, severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of J.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT IX
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Travel Leaders Wide World

133. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

134. At all times relevant and material hereto, Defendant Travel Leaders Wide World had a duty to operate its travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by its services.

135. At all times relevant and material hereto, Defendant had a duty to act reasonably in its professional capacity so as to not place others at risk of harm.

136. Defendant knew, or should have known, that its failure to exercise due care in the operation of its travel agency services would cause injury to Plaintiffs, Erno Ilyes and his minor children.

137. Defendant knew, or should have known, that its failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental and emotional injuries to Plaintiffs.

138. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate its travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through its travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, its services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children; and
- g. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent.

139. As a direct and proximate result of the Defendant's negligence, S.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

140. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by S.I.

141. As a direct and proximate result of the negligent conduct and omissions of the Defendant, S.I. suffered, and will continue to suffer, severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of S.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT X
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, Individually, v. Travel Leaders Wide World

142. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

143. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in operating its travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing injury to Plaintiff Erno Ilyes and his minor children, J.I. and S.I.

144. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain and suffering

145. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain and suffering.

146. As a direct and proximate result of the Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XI
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Travel Leaders Wide World

147. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

148. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in operating its travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing injury to Plaintiff Erno Ilyes and his minor children, J.I. and S.I.

149. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

150. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of J.I., hereby demands judgment against Defendant for compensatory damages in excess

of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Travel Leaders Wide World

151. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

152. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in operating its travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing injury to Plaintiff Erno Ilyes and his minor children, J.I. and S.I.

153. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

154. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of S.I., hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XIII
NEGLIGENCE

Erno Ilyes, Individually, v. Wide World Travel Services, Inc.

155. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

156. At all times relevant and material hereto, Defendant Wide World Travel Services, Inc. had a duty to operate the travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by its services.

157. At all times relevant and material hereto, Defendant had a duty to act reasonably in its professional capacity so as to not place others at risk of harm.

158. Defendant knew, or should have known, that its failure to exercise due care in the operation of its travel agency services would cause injury to Plaintiffs, Erno Ilyes and his minor children.

159. Defendant knew, or should have known, that its failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental and emotional injuries to Plaintiffs.

160. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate the travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through its travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, the company's services;

- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children; and
- g. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent.

161. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to suffer, and will continue to suffer from severe and excruciating physical, mental, and emotional pain and suffering.

162. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by Plaintiff Erno Ilyes.

163. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XIV
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Wide World Travel Services, Inc.

164. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

165. At all times relevant and material hereto, Defendant Wide World Travel Services, Inc. had a duty to operate its travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by its services.

166. At all times relevant and material hereto, Defendant had a duty to act reasonably in its professional capacity so as to not place others at risk of harm.

167. Defendant knew, or should have known, that its failure to exercise due care in the operation of its travel agency services would cause injury to Plaintiffs, Erno Ilyes and his minor children.

168. Defendant knew, or should have known, that its failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental and emotional injuries to Plaintiffs.

169. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate its travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through its travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, its services;

- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children; and
- g. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent.

170. As a direct and proximate result of the Defendant's negligence, J.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

171. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by J.I.

172. As a direct and proximate result of the negligent conduct and omissions of the Defendant, J.I. suffered, and will continue to suffer, severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of J.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XV
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Wide World Travel Services, Inc.

173. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

174. At all times relevant and material hereto, Defendant Wide World Travel Services, Inc. had a duty to operate its travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by its services.

175. At all times relevant and material hereto, Defendant had a duty to act reasonably in its professional capacity so as to not place others at risk of harm.

176. Defendant knew, or should have known, that its failure to exercise due care in the operation of its travel agency services would cause injury to Plaintiffs, Erno Ilyes and his minor children.

177. Defendant knew, or should have known, that its failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental and emotional injuries to Plaintiffs.

178. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate its travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through its travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, its services;

- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children; and
- g. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent.

179. As a direct and proximate result of the Defendant's negligence, S.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

180. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by S.I.

181. As a direct and proximate result of the negligent conduct and omissions of the Defendant, S.I. suffered, and will continue to suffer, severe physical, mental and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of S.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XVI
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, Individually, v. Wide World Travel Services, Inc.

182. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

183. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in operating its travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing injury to Plaintiff Erno Ilyes and his minor children, J.I. and S.I.

184. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

185. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

186. As a direct and proximate result of the Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XVII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Wide World Travel Services, Inc.

187. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

188. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in operating its travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing injury to Plaintiff Erno Ilyes and his minor children, J.I. and S.I.

189. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

190. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of J.I., hereby demands judgment against Defendant for compensatory damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XVIII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Wide World Travel Services, Inc.

191. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

192. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in operating its travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing injury to Plaintiff Erno Ilyes and his minor children, J.I. and S.I.

193. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

194. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of S.I., hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XIX
NEGLIGENCE

Erno Ilyes, Individually, v. Carlson Wagonlit Travel

195. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

196. At all times relevant and material hereto, Defendant Carlson Wagonlit Travel had a duty to operate the travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by its services.

197. At all times relevant and material hereto, Defendant had a duty to act reasonably in its professional capacity so as to not place others at risk of harm.

198. Defendant knew, or should have known, that its failure to exercise due care in the operation of its travel agency services would cause injury to Plaintiffs, Erno Ilyes and his minor children.

199. Defendant knew, or should have known, that its failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental and emotional injuries to Plaintiffs.

200. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate the travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through its travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, the company's services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children; and
- g. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent.

201. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to suffer, and will continue to suffer from severe and excruciating physical, mental, and emotional pain and suffering.

202. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by Plaintiff Erno Ilyes.

203. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XX
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Carlson Wagonlit Travel

204. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

205. At all times relevant and material hereto, Defendant Carlson Wagonlit Travel had a duty to operate its travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by its services.

206. At all times relevant and material hereto, Defendant had a duty to act reasonably in its professional capacity so as to not place others at risk of harm.

207. Defendant knew, or should have known, that its failure to exercise due care in the operation of its travel agency services would cause injury to Plaintiffs, Erno Ilyes and his minor children.

208. Defendant knew, or should have known, that its failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental and emotional injuries to Plaintiffs.

209. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate its travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through its travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, its services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children; and
- g. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent.

210. As a direct and proximate result of the Defendant's negligence, J.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

211. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by J.I.

212. As a direct and proximate result of the negligent conduct and omissions of the Defendant, J.I. suffered, and will continue to suffer, severe physical, mental and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of J.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXI
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Carlson Wagonlit Travel

213. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

214. At all times relevant and material hereto, Defendant Carlson Wagonlit Travel had a duty to operate its travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by its services.

215. At all times relevant and material hereto, Defendant had a duty to act reasonably in its professional capacity so as to not place others at risk of harm.

216. Defendant knew, or should have known, that its failure to exercise due care in the operation of its travel agency services would cause injury to Plaintiffs, Erno Ilyes and his minor children.

217. Defendant knew, or should have known, that its failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental and emotional injuries to Plaintiffs.

218. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate its travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through its travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, its services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children; and
- g. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent.

219. As a direct and proximate result of the Defendant's negligence, S.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

220. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by S.I.

221. As a direct and proximate result of the negligent conduct and omissions of the Defendant, S.I. suffered, and will continue to suffer, severe physical, mental and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of S.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, Individually, v. Carlson Wagonlit Travel

222. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

223. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in operating its travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing injury to Plaintiff Erno Ilyes and his minor children, J.I. and S.I.

224. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental and emotional injury.

225. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain and suffering.

226. As a direct and proximate result of the Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXIII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Carlson Wagonlit Travel

227. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

228. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in operating its travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing injury to Plaintiff Erno Ilyes and his minor children, J.I. and S.I.

229. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental and emotional injury.

230. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of J.I., hereby demands judgment against Defendant for compensatory damages in excess

of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXIV

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Carlson Wagonlit Travel

231. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

232. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in operating its travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing injury to Plaintiff Erno Ilyes and his minor children, J.I. and S.I.

233. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental and emotional injury.

234. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of S.I., hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXV
NEGLIGENCE

Erno Ilyes, Individually, v. Carlson Wagonlit Travel, Inc.

235. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

236. At all times relevant and material hereto, Defendant Carlson Wagonlit Travel, Inc. had a duty to operate the travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by its services.

237. At all times relevant and material hereto, Defendant had a duty to act reasonably in its professional capacity so as to not place others at risk of harm.

238. Defendant knew, or should have known, that its failure to exercise due care in the operation of its travel agency services would cause injury to Plaintiffs, Erno Ilyes and his minor children.

239. Defendant knew, or should have known, that its failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental and emotional injuries to Plaintiffs.

240. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate the travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through its travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, the company's services;

- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children; and
- g. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent.

241. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to suffer, and will continue to suffer from severe and excruciating physical, mental, and emotional pain and suffering.

242. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by Plaintiff Erno Ilyes.

243. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXVI
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Carlson Wagonlit Travel, Inc.

244. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

245. At all times relevant and material hereto, Defendant Carlson Wagonlit Travel, Inc. had a duty to operate its travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by its services.

246. At all times relevant and material hereto, Defendant had a duty to act reasonably in its professional capacity so as to not place others at risk of harm.

247. Defendant knew, or should have known, that its failure to exercise due care in the operation of its travel agency services would cause injury to Plaintiffs, Erno Ilyes and his minor children.

248. Defendant knew, or should have known, that its failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental and emotional injuries to Plaintiffs.

249. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate its travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through its travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, its services;

- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children; and
- g. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent.

250. As a direct and proximate result of the Defendant's negligence, J.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

251. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by J.I.

252. As a direct and proximate result of the negligent conduct and omissions of the Defendant, J.I. suffered, and will continue to suffer, severe physical, mental and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of J.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXVII
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Carlson Wagonlit Travel, Inc.

253. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

254. At all times relevant and material hereto, Defendant Carlson Wagonlit Travel Inc. had a duty to operate its travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by its services.

255. At all times relevant and material hereto, Defendant had a duty to act reasonably in its professional capacity so as to not place others at risk of harm.

256. Defendant knew, or should have known, that its failure to exercise due care in the operation of its travel agency services would cause injury to Plaintiffs, Erno Ilyes and his minor children.

257. Defendant knew, or should have known, that its failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental and emotional injuries to Plaintiffs.

258. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate its travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through its travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, its services;

- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children; and
- g. Providing travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent.

259. As a direct and proximate result of the Defendant's negligence, S.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

260. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by S.I.

261. As a direct and proximate result of the negligent conduct and omissions of the Defendant, S.I. suffered, and will continue to suffer, severe physical, mental and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of S.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXVIII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, Individually, v. Carlson Wagonlit Travel, Inc.

262. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

263. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in operating its travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing injury to Plaintiff Erno Ilyes and his minor children, J.I. and S.I.

264. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

265. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

266. As a direct and proximate result of the Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXIX

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Carlson Wagonlit Travel, Inc.

267. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

268. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in operating its travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing injury to Plaintiff Erno Ilyes and his minor children, J.I. and S.I.

269. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

270. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of J.I., hereby demands judgment against Defendant for compensatory damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXX

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Carlson Wagonlit Travel, Inc.

271. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

272. By the Defendant's conduct alleged above, in which Defendant breached its duty and failed to exercise reasonable care in operating its travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing injury to Plaintiff Erno Ilyes and his minor children, J.I. and S.I.

273. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

274. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of S.I., hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXXI
NEGLIGENCE

Erno Ilyes, Individually, v. Karen Klingman

275. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

276. At all times relevant and material hereto, Defendant Ms. Klingman had a duty to operate her travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by her services.

277. At all times relevant and material hereto, Defendant Ms. Klingman had a duty to act reasonably in her professional capacity so as to not place others at risk of harm.

278. Defendant Ms. Klingman knew, or should have known, that her failure to exercise due care in the operation of her travel agency services would cause Plaintiffs, Erno Ilyes and his minor children, severe physical, mental, and emotional pain and suffering.

279. Defendant Ms. Klingman knew, or should have known, that her failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental, and emotional pain and suffering to Plaintiffs.

280. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, Ms. Klingman, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate her travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through her travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, her services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing her travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children;
- g. Providing her travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent; and

h. Enabling Claudia Ilyes to leave with Plaintiff's minor children by agreeing to package and ship the personal belongings of Claudia and the children to Austria.

281. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to suffer, and will continue to suffer from severe and excruciating physical, mental, and emotional pain and suffering.

282. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by Plaintiff Erno Ilyes.

283. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXXII
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Karen Klingman

284. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

285. At all times relevant and material hereto, Defendant Ms. Klingman had a duty to operate her travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by her services.

286. At all times relevant and material hereto, Defendant Ms. Klingman had a duty to act reasonably in her professional capacity so as to not place others at risk of harm.

287. Defendant Ms. Klingman knew, or should have known, that her failure to exercise due care in the operation of her travel agency services would cause Plaintiffs, Erno Ilyes and his minor children, severe physical, mental, and emotional distress.

288. Defendant Ms. Klingman knew, or should have known, that her failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental, and emotional pain and suffering to Plaintiffs.

289. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, Ms. Klingman, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate her travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through her travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, her services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing her travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children;
- g. Providing her travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent; and

h. Enabling Claudia Ilyes to leave with Plaintiff's minor children by agreeing to package and ship the personal belongings of Claudia and the children to Austria.

290. As a direct and proximate result of the Defendant's negligence, J.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

291. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by J.I.

292. As a direct and proximate result of the negligent conduct and omissions of the Defendant, J.I. suffered, and will continue to suffer, severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of J.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXXIII
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Karen Klingman

293. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

294. At all times relevant and material hereto, Defendant Ms. Klingman had a duty to operate her travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by her services.

295. At all times relevant and material hereto, Defendant Ms. Klingman had a duty to act reasonably in her professional capacity so as to not place others at risk of harm.

296. Defendant Ms. Klingman knew, or should have known, that her failure to exercise due care in the operation of her travel agency services would cause Plaintiffs, Erno Ilyes and his minor children, severe physical, mental, and emotional pain and suffering.

297. Defendant Ms. Klingman knew, or should have known, that her failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe severe physical, mental, and emotional pain and suffering to Plaintiffs.

298. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, Ms. Klingman, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate her travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through her travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, her services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing her travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children;

- g. Providing her travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent; and
- h. Enabling Claudia Ilyes to leave with Plaintiff's minor children by agreeing to package and ship the personal belongings of Claudia and the children to Austria.

299. As a direct and proximate result of the Defendant's negligence, S.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

300. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by S.I.

301. As a direct and proximate result of the negligent conduct and omissions of the Defendant, S.I. suffered, and will continue to suffer, severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of S.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXXIV
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Erno Ilyes, Individually, v. Karen Klingman

302. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

303. By the Defendant's conduct alleged above, in which Defendant breached her duty and failed to exercise reasonable care in operating her travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of

the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering and distress.

304. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

305. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

306. As a direct and proximate result of the Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXXV

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Karen Klingman

307. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

308. By the Defendant's conduct alleged above, in which Defendant breached her duty and failed to exercise reasonable care in operating her travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of

the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering and distress.

309. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

310. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of J.I., hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXXVI

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Karen Klingman

311. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

312. By the Defendant's conduct alleged above, in which Defendant breached her duty and failed to exercise reasonable care in operating her travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering and distress.

313. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

314. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of S.I., hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXXVII
NEGLIGENCE

Erno Ilyes, Individually, v. Lionel Lauer

315. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

316. At all times relevant and material hereto, Defendant Ms. Lauer had a duty to operate his travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by her services.

317. At all times relevant and material hereto, Defendant Ms. Lauer had a duty to act reasonably in his professional capacity so as to not place others at risk of harm.

318. Defendant Mr. Lauer knew, or should have known, that his failure to exercise due care in the operation of his travel agency services would cause Plaintiffs, Erno Ilyes and his minor children, severe physical, mental, and emotional pain and suffering.

319. Defendant knew, or should have known, that his failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental, and emotional pain and suffering to Plaintiffs.

320. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate his travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through his travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, his services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing his travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children;
- g. Providing his travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent; and
- h. Enabling Claudia Ilyes to leave with Plaintiff's minor children by agreeing to package and ship the personal belongings of Claudia and the children to Austria.

321. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to suffer, and will continue to suffer from severe and excruciating mental and emotional pain and suffering.

322. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by Plaintiff Erno Ilyes.

323. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXXVIII
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Lionel Lauer

324. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

325. At all times relevant and material hereto, Defendant had a duty to operate his travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by his services.

326. At all times relevant and material hereto, Defendant had a duty to act reasonably in his professional capacity so as to not place others at risk of harm.

327. Defendant knew, or should have known, that his failure to exercise due care in the operation of his travel agency services would cause Plaintiffs, Erno Ilyes and his minor children, severe physical, mental, and emotional pain and suffering.

328. Defendant knew, or should have known, that his failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental, and emotional pain and suffering to Plaintiffs.

329. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate his travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through his travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, his services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing his travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children;
- g. Providing his travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent; and
- h. Enabling Claudia Ilyes to leave with Plaintiff's minor children by agreeing to package and ship the personal belongings of Claudia and the children to Austria.

330. As a direct and proximate result of the Defendant's negligence, J.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

331. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by J.I.

332. As a direct and proximate result of the negligent conduct and omissions of the Defendant, J.I. suffered, and will continue to suffer severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of J.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XXXIX
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Lionel Lauer

333. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

334. At all times relevant and material hereto, Defendant Ms. Lauer had a duty to operate his travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by his services.

335. At all times relevant and material hereto, Defendant had a duty to act reasonably in his professional capacity so as to not place others at risk of harm.

336. Defendant knew, or should have known, that his failure to exercise due care in the operation of his travel agency services would cause Plaintiffs, Erno Ilyes and his minor children, severe physical, mental, and emotional pain and suffering.

337. Defendant knew, or should have known, that his failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental, and emotional pain and suffering to Plaintiffs.

338. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate his travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through his travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, his services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing his travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children;
- g. Providing his travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent; and
- h. Enabling Claudia Ilyes to leave with Plaintiff's minor children by agreeing to package and ship the personal belongings of Claudia and the children to Austria.

339. As a direct and proximate result of the Defendant's negligence, S.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

340. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by S.I.

341. As a direct and proximate result of the negligent conduct and omissions of the Defendant, S.I. suffered, and will continue to suffer, severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of S.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XL
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, Individually, v. Lionel Lauer

342. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

343. By the Defendant's conduct alleged above, in which Defendant breached his duty and failed to exercise reasonable care in operating his travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering and distress.

344. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

345. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

346. As a direct and proximate result of the Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XLI
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Lionel Lauer

347. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

348. By the Defendant's conduct alleged above, in which Defendant breached his duty and failed to exercise reasonable care in operating his travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering and distress.

349. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

350. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of J.I., hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XLII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Lionel Lauer

351. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

352. By the Defendant's conduct alleged above, in which Defendant breached his duty and failed to exercise reasonable care in operating his travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering and distress.

353. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

354. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of S.I., hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XLIII
NEGLIGENCE

Erno Ilyes, Individually, v. Dorothy Polikoff

355. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

356. At all times relevant and material hereto, Defendant Ms. Polikoff had a duty to operate her travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by her services.

357. At all times relevant and material hereto, Defendant had a duty to act reasonably in her professional capacity so as to not place others at risk of harm.

358. Defendant knew, or should have known, that her failure to exercise due care in the operation of her travel agency services would cause Plaintiffs, Erno Ilyes and his minor children, severe physical, mental, and emotional pain and suffering.

359. Defendant knew, or should have known, that her failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental, and emotional pain and suffering to Plaintiffs.

360. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate her travel agency;

- b. Failing to provide reasonable, safe, or appropriate services through her travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, her services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing her travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children;
- g. Providing her travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent; and
- h. Enabling Claudia Ilyes to leave with Plaintiff's minor children by agreeing to package and ship the personal belongings of Claudia and the children to Austria.

361. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to suffer, and will continue to suffer from severe physical, mental, and emotional pain and suffering.

362. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by Plaintiff Erno Ilyes.

363. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XLIV
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Dorothy Polikoff

364. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

365. At all times relevant and material hereto, Defendant Ms. Polikoff had a duty to operate her travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by her services.

366. At all times relevant and material hereto, Defendant had a duty to act reasonably in her professional capacity so as to not place others at risk of harm.

367. Defendant knew, or should have known, that her failure to exercise due care in the operation of her travel agency services would cause Plaintiffs, Erno Ilyes and his minor children, severe physical, mental, and emotional pain and suffering.

368. Defendant knew, or should have known, that her failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental, and emotional pain and suffering to Plaintiffs.

369. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate her travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through her travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, her services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing her travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children;
- g. Providing her travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent; and
- h. Enabling Claudia Ilyes to leave with Plaintiff's minor children by agreeing to package and ship the personal belongings of Claudia and the children to Austria.

370. As a direct and proximate result of the Defendant's negligence, J.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

371. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by J.I.

372. As a direct and proximate result of the negligent conduct and omissions of the Defendant, J.I. suffered, and will continue to suffer, severe physical, mental and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of J.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XLV
NEGLIGENCE

Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Dorothy Polikoff

373. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

374. At all times relevant and material hereto, Defendant Ms. Polikoff had a duty to operate her travel agency in a reasonable, adequate, and appropriate way to ensure the safety and well-being of those utilizing, traveling through, and affected by her services.

375. At all times relevant and material hereto, Defendant had a duty to act reasonably in her professional capacity so as to not place others at risk of harm.

376. Defendant knew, or should have known, that her failure to exercise due care in the operation of her travel agency services would cause Plaintiffs, Erno Ilyes and his minor children, severe physical, mental, and emotional pain and suffering.

377. Defendant knew, or should have known, that her failure to act reasonably by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children would cause severe physical, mental, and emotional pain and suffering to Plaintiffs.

378. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, which negligence and carelessness included the following:

- a. Failing to properly, reasonably, or safely operate her travel agency;
- b. Failing to provide reasonable, safe, or appropriate services through her travel agency; and
- c. Failing to exercise reasonable care to ensure the safety and well-being of those utilizing, and affected by, her services;
- d. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- e. Providing help and assistance to Claudia Ilyes in ordering Lufthansa plane tickets;
- f. Providing her travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulation prohibiting on-line ticket purchases for unaccompanied children;
- g. Providing her travel agency services to assist Claudia Ilyes in circumventing Lufthansa's regulations requiring a notarized consent of the absent parent; and
- h. Enabling Claudia Ilyes to leave with Plaintiff's minor children by agreeing to package and ship the personal belongings of Claudia and the children to Austria.

379. As a direct and proximate result of the Defendant's negligence, S.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

380. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by S.I.

381. As a direct and proximate result of the negligent conduct and omissions of the Defendant, S.I. suffered, and will continue to suffer, severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of S.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XLVI
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, Individually, v. Dorothy Polikoff

382. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

383. By the Defendant's conduct alleged above, in which Defendant breached her duty and failed to exercise reasonable care in operating her travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering and distress.

384. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

385. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

386. As a direct and proximate result of the Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XLVII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Dorothy Polikoff

387. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

388. By the Defendant's conduct alleged above, in which Defendant breached her duty and failed to exercise reasonable care in operating her travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering and distress.

389. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

390. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of J.I., hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XLVIII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Dorothy Polikoff

391. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

392. By the Defendant's conduct alleged above, in which Defendant breached her duty and failed to exercise reasonable care in operating her travel agency and providing travel services, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering and distress.

393. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering and distress.

394. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering and distress.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of S.I., hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT XLIX
NEGLIGENCE

Erno Ilyes, Individually, v. Lisa Follmer

395. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

396. At all times relevant and material hereto, Defendant Ms. Follmer voluntarily assumed a duty Erno Ilyes and his minor children, J.I and S.I., when she agreed to package and ship the personal belongings of Claudia Ilyes and Plaintiff's minor children to Austria.

397. Defendant Ms. Follmer knew, or should have known, that her failure to act reasonably, by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children, would cause severe physical, mental, and emotional pain and suffering to Plaintiffs.

398. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, Ms. Follmer, which negligence and carelessness included the following:

- a. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- b. Encouraging Claudia Ilyes to flee from the country with Plaintiff's minor children; and

- c. Aiding and abetting Claudia Ilyes in fleeing the country with Plaintiff's minor children by agreeing to package and ship the personal belongings of Claudia and the children to Austria.

399. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to suffer, and will continue to suffer from severe and excruciating physical, mental, and emotional pain and suffering.

400. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by Plaintiff Erno Ilyes.

401. As a direct and proximate result of the Defendant's negligence, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT L
NEGLIGENCE

Erno Ilyes, as Parent and Natural Guardian on Behalf of J.I., v. Lisa Follmer

402. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

403. At all times relevant and material hereto, Defendant Ms. Follmer voluntarily assumed a duty Erno Ilyes and his minor children, J.I and S.I., when she agreed to package and ship the personal belongings of Claudia Ilyes and Plaintiff's minor children to Austria.

404. Defendant Ms. Follmer knew, or should have known, that her failure to act reasonably, by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children, would cause severe physical, mental, and emotional pain and suffering to Plaintiffs.

405. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, Ms. Follmer, which negligence and carelessness included the following:

- a. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- b. Encouraging Claudia Ilyes to flee from the country with Plaintiff's minor children; and
- c. Aiding and abetting Claudia Ilyes in fleeing the country with Plaintiff's minor children by agreeing to package and ship the personal belongings of Claudia and the children to Austria.

406. As a direct and proximate result of the Defendant's negligence, J.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

407. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by J.I.

408. As a direct and proximate result of the negligent conduct and omissions of the Defendant, J.I. suffered, and will continue to suffer, severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of J.I. hereby demands judgment against Defendant for compensatory damages and punitive damages

in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT LI
NEGLIGENCE

Erno Ilyes, as Parent and Natural Guardian on Behalf of S.I., v. Lisa Follmer

409. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

410. At all times relevant and material hereto, Defendant Ms. Follmer voluntarily assumed a duty Erno Ilyes and his minor children, J.I and S.I., when she agreed to package and ship the personal belongings of Claudia Ilyes and Plaintiff's minor children to Austria.

411. Defendant Ms. Follmer knew, or should have known, that her failure to act reasonably, by assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children, would cause severe physical, mental, and emotional pain and suffering to Plaintiffs.

412. The pain, suffering, injuries, and losses of Plaintiffs were directly and proximately caused by the negligence and carelessness of the Defendant, Ms. Follmer, which negligence and carelessness included the following:

- a. Enabling and assisting Claudia Ilyes in absconding from the country with Plaintiff's minor children;
- b. Encouraging Claudia Ilyes to flee from the country with Plaintiff's minor children; and
- c. Aiding and abetting Claudia Ilyes in fleeing the country with Plaintiff's minor children by agreeing to package and ship the personal belongings of Claudia and the children to Austria.

413. As a direct and proximate result of the Defendant's negligence, S.I. was caused to suffer severe and excruciating physical, mental, and emotional pain and suffering.

414. The foregoing negligent acts and omissions of the Defendant increased the risk of harm and were a cause in fact of the harm suffered by S.I.

415. As a direct and proximate result of the negligent conduct and omissions of the Defendant, S.I. suffered, and will continue to suffer, severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of S.I. hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT LII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, Individually, v. Lisa Follmer

416. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

417. By the Defendant's conduct alleged above, in which Defendant failed to act reasonably by aiding, abetting, and encouraging Claudia Ilyes to abscond from the country with Plaintiff's minor children, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering, and distress.

418. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering, and distress.

419. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering, and distress.

420. As a direct and proximate result of the Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT LIII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Lisa Follmer

421. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

422. By the Defendant's conduct alleged above, in which Defendant failed to act reasonably by aiding, abetting, and encouraging Claudia Ilyes to abscond from the country with Plaintiff's minor children, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering, and distress.

423. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering, and distress.

424. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering, and distress.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of J.I., hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT LIV
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Lisa Follmer

425. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

426. By the Defendant's conduct alleged above, in which Defendant failed to act reasonably by aiding, abetting, and encouraging Claudia Ilyes to abscond from the country with Plaintiff's minor children, Defendant acted outrageously, with the intention to cause, or with reckless disregard of the probability of causing Plaintiff Erno Ilyes and his minor children, J.I. and S.I. severe physical, mental, and emotional pain, suffering, and distress.

427. This conduct actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental, and emotional pain, suffering, and distress.

428. As a result of Defendant's extreme and outrageous conduct, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain, suffering, and distress.

WHEREFORE, Plaintiff Erno Ilyes, individually, and as parent and natural guardian on behalf of S.I., hereby demands judgment against Defendant for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT LV
CIVIL CONSPIRACY

Erno Ilyes, Individually, v. Travel Leaders Wide World, Wide World Travel Services, Inc., Carlson Wagonlit Travel, Carlson Wagonlit Travel, Inc., Karen Klingman, Lionel Lauer, Dorothy Polikoff, and Lisa Follmer

429. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

430. At all times material hereto, defendants agreed by and between themselves to assist Claudia Ilyes in her effort to abscond from the country with Plaintiff's minor children, and acted with the intention of causing intentional and malicious injury to Plaintiffs in their personal and family affairs.

431. In furtherance of this conspiratorial agreement, defendants committed the overt, tortious acts described above.

432. The actions of defendants constituted an attempt to illegally and improperly remove Plaintiff's minor children, J.I. and S.I., from the United States, without Plaintiff, Erno Ilyes' consent and against his wishes.

433. This conspiratorial agreement actually and proximately caused Plaintiff Erno Ilyes and his minor children, J.I. and S.I. to suffer severe physical, mental and emotional injuries.

434. As a result of Defendants' conspiracy, Plaintiff Erno Ilyes and minor children, J.I. and S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain and suffering.

435. As a direct and proximate result of the Defendants' conspiracy, Plaintiff Erno Ilyes was caused to incur expenses and costs of attempting to locate and return his children to their home in the United States.

WHEREFORE, Plaintiff Erno Ilyes, individually, hereby demands judgment against Defendants for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT LVI
CIVIL CONSPIRACY

Erno Ilyes, as Parent as Natural Guardian on Behalf of J.I., v. Travel Leaders Wide World, Wide World Travel Services, Inc., Carlson Wagonlit Travel, Carlson Wagonlit Travel, Inc., Karen Klingman, Lionel Lauer, Dorothy Polikoff, and Lisa Follmer

436. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

437. At all times material hereto, defendants agreed by and between themselves to assist Claudia Ilyes in her effort to abscond from the country with Plaintiff's minor children, and acted with the intention of causing intentional and malicious injury to Plaintiffs in their personal and family affairs.

438. In furtherance of this conspiratorial agreement, defendants committed the overt, tortious acts described above.

439. The actions of defendants constituted an attempt to illegally and improperly remove minors, J.I. and S.I., from the United States, without their father's consent and against his wishes.

440. This conspiratorial agreement actually and proximately caused Plaintiff J.I. to suffer severe physical, mental, and emotional injuries.

441. As a result of Defendants' conspiracy Plaintiff J.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of J.I., hereby demands judgment against Defendants for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

COUNT LVII
CIVIL CONSPIRACY

Erno Ilyes, as Parent as Natural Guardian on Behalf of S.I., v. Travel Leaders Wide World, Wide World Travel Services, Inc., Carlson Wagonlit Travel, Carlson Wagonlit Travel, Inc., Karen Klingman, Lionel Lauer, Dorothy Polikoff, and Lisa Follmer

442. Plaintiff incorporates the preceding and succeeding paragraphs as though fully set forth herein at length.

443. At all times material hereto, defendants agreed by and between themselves to assist Claudia Ilyes in her effort to abscond from the country with Plaintiff's minor children, and acted with the intention of causing intentional and malicious injury to Plaintiffs in their personal and family affairs.

444. In furtherance of this conspiratorial agreement, defendants committed the overt, tortious acts described above.

445. The actions of defendants constituted an attempt to illegally and improperly remove minors, J.I. and S.I., from the United States, without their father's consent and against his wishes.

446. This conspiratorial agreement actually and proximately caused Plaintiff S.I. to suffer severe physical, mental, and emotional injuries.

447. As a result of Defendants' conspiracy, Plaintiff S.I. suffered, and will continue to suffer from severe physical, mental, and emotional pain and suffering.

WHEREFORE, Plaintiff Erno Ilyes, as parent and natural guardian on behalf of S.I., hereby demands judgment against Defendants for compensatory damages and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars, together with interests and costs of the suit as permitted under the applicable law.

MESSA & ASSOCIATES, P.C.

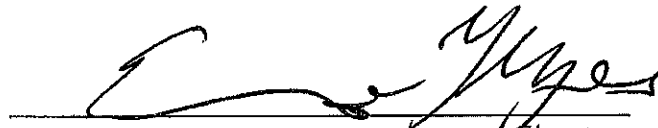
By: /s/ Richard J. Heleniak
Joseph L. Messa, Esquire
Richard J. Heleniak, Esquire
Thomas N. Sweeney, Esquire
Attorneys for Plaintiff

Date: June 23, 2017

VERIFICATION

I, Erno Ilyes, Plaintiff herein,
make this Verification and state that the statements made in the foregoing are true and correct to
the best of my knowledge, information, and belief.

I, the undersigned, understand that the statements therein are made subject to the
penalties of 18 Pa. C.S.A. §4904, relating to unsworn falsification to authorities.


Signature

June 23, 2017
Date

EXHIBIT “A”

**Lufthansa**

Nonstop you

Flights & Deals

My Bookings

Information & Service

Corporate Customers

Login



United States of America

English

Help & Contact

Miles & More

How can we help?

Country-specific regulations for travelling with children



It is the passenger's responsibility to find out about current entry and exit requirements and to carry the required documents with them. Lufthansa is not responsible at this point.

It is your obligation and your sole responsibility to obtain the necessary travel documentation and visas for your trip for yourself and your children and to comply with all the regulations of the countries which you will be flying over or to or from; the same applies to our rules and instructions in this regard. Your travel documentation and visas must be valid for the entire duration of your trip including any breaks. We bear no responsibility in this respect, especially as we are not obliged to check the validity of documents.

We are not liable for the consequences that may result from your failure to obtain the necessary papers or from your failure to comply with the relevant regulations or instructions.

In a number of countries specific entry and exit requirements apply to children who are travelling alone or who are only accompanied by one parent or guardian or by someone who is neither a parent nor a legal guardian.

Travel from UK

Air Passenger Duty* (APD) for children and youth

UK Air Passenger Duty has been abolished for children aged 2 to 11 years when travelling in economy class, on all flights departing from UK airports on or after 1 May 2016. The Lufthansa booking system has already been updated with this information and no Air Passenger Duty will be charged. If you have booked a ticket already on LH.com for your child, kindly contact your [Lufthansa Service Center](#) for refunding the APD tax.

In addition to this, UK Air Passenger Duty has been abolished for young persons aged between 12 and 16 years when travelling in economy class, on all flights departing the UK on or after 1 March 2016. Lufthansa is currently in the process of updating the systems so that the website in the future will display the correct APD for young persons aged 12 to 16 years travelling in economy class from the 1 March 2016 onwards. While Lufthansa is working on the system, please call your [Lufthansa Service Center](#) when making an economy class booking for young passengers aged 12 to 16 years for travel 1 March 2016.

Air Passenger Duty still applies to all bookings in Premium Economy Class, Business Class and First Class.

If you have made a booking or a ticket has been issued by a travel agent, you will need to contact that travel agent.

*The Air Passenger Duty is a UK Government tax levied on air travel from UK airports.

Travel from Italy

Every child of Italian nationality, who is under 14 years old and is travelling alone or accompanied by persons who are not their parents or legal guardians, must hold a fully completed declaration, the so-called Dichiarazione di affido (Law No. 1185/67), which can be obtained from the local police station (Questura) (not from the airport police). In the case of children travelling alone this PROCEDURE IS OBLIGATORY FOR UNACCOMPANIED MINORS.

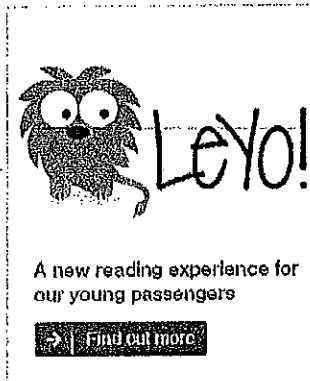
Help & Contact

Review our FAQ section or contact a Lufthansa representative.

JetFriends

Become a JetFriends Club member and learn all about flying

[Find out more](#)



A new reading experience for our young passengers

[Find out more](#)

This declaration must be carried together with the child's passport. If the documentation is incomplete, the child may be refused boarding.
You can find further information on the website of the Polizia di Stato, the Italian National Police (in Italian only).

Travel from the USA and Canada

Children and teenagers under the age of 18 travelling to/from an airport in the USA, and under the age of 19 travelling to/from an airport in Canada, require a notarized consent letter from their parents or legal guardians. If a child or teenager is travelling with only one parent or guardian the notarized consent letter from the parent/guardian who is not travelling with them is required, if a parent/legal guardian has sole custody, then proof of sole custody must be presented.

Children and teenagers who cannot produce proper consent letters may be refused boarding.

Please contact the nearest Consulate of the country to which you are traveling for information regarding additional documents that may be required. Further information is also available at travel.state.gov for the United States and travel.gc.ca for Canada.

Travel from Romania

Minors - Romanian nationals - under 18 years of age, holding a Romanian passport or Romanian ID card (for travel within EU)

travelling alone from a Romanian airport, must carry a written, officially authorized declaration of consent for travel from parent(s) or legal guardian(s), issued by a notary. This also applies if the children are travelling accompanied by adults other than parents or legal guardians. On request, "unaccompanied minors service" may be provided by the airline.

travelling from a Romanian airport accompanied only by one of their parents, should be holding an officially authorized (issued by a notary) declaration of consent for travel from the other parent.

The official declaration of consent issued by a notary should be authorized before the date of departure, it cannot be authorized or issued by the airport border police.

The minor passenger may be refused boarding if the required paperwork is not provided before embarkation. For detailed information please contact the [LH Service Center Romania](#).

You may find further information at www.politiedefroniera.ro (Condiții de călătorie -> Minor) or calling the Bucharest Border Police local number + 40 21 9590.

Travel from Moldova

Minors - Moldova nationals - under 18 years of age, holding a passport issued by the Republic of Moldova may travel ex Moldova only accompanied by adults - their parent(s) or legal guardian(s).

Under special conditions, minors travelling to/from place of study may be accepted on board flights departing from Moldova, after mandatory written consent is provided. There is no possibility to grant travel authorization on departure, at the airport.

Important: the minor may be refused boarding if the required paperwork is not provided to responsible authorities. For detailed information please contact the [LH Service Center Moldova](#).

You may find further information at <http://www.airport.md/children-en/>

Travel from South Africa

On entering and leaving the country, children and teenagers under 18 travelling alone must, among other documentation, present a declaration of consent from their parents or single parent or legal guardian that confirms that the child may enter and leave the Republic of South Africa.

In addition, the parents' contact details, a letter including the home address, contact details and residence permit of the person who will be meeting the child in the Republic of South Africa and a copy of this person's ID card must be presented.

Should the child or teenager be travelling with only one parent or legal guardian, the notarised consent of the parent/legal guardian who is not travelling with the child must be brought along.

If a single parent/legal guardian has sole custody of the child, evidence of this sole custody must be produced.

You will find further information on the Republic of South Africa's entry and exit regulations under [Entry of children to, or their exit from, the Republic of South Africa](#).

Related topics

Flying with children: all topics

EXHIBIT “B”



IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
FAMILY COURT DIVISION

ERNO ILYES
PETITIONER

VS.

CASE ID. 0C1400844

CLAUDIA M. ILYES
RESPONDENT

ORDER

~~AND NOW, THIS 8TH DAY OF DECEMBER, 2014,~~ IT IS HEREBY ORDERED AS FOLLOWS:

MOTHER, CLAUDIA M. ILYES SHALL RETAIN PRIMARY PHYSICAL CUSTODY OF THE MINOR CHILDREN JUSTIN ILYES BORN AUGUST 10, 2001 AND SAMANTHA ILYES BORN AUGUST 21, 2004.

MOTHER AND FATHER, ERNO ILYES SHALL SHARE LEGAL CUSTODY.

~~EFFECTIVE DECEMBER 13, 2014 FATHER SHALL HAVE PARTIAL PHYSICAL OF THE CHILD JUSTIN EVERY SATURDAY FROM 9:00 A.M. TO 7:00 P.M. AND FATHER SHALL HAVE PARTIAL PHYSICAL OF THE CHILD SAMANTHA EVERY SUNDAY FROM 9:00 A.M. TO 7:00 P.M.~~

FATHER SHALL HAVE PARTIAL PHYSICAL OF BOTH CHILDREN FROM 6:00 P.M. DECEMBER 26TH TO 6:00 P.M. DECEMBER 28TH.

FOR JANUARY 2015, THE WEEKEND SCHEDULE SHALL CONTINUE AS SET FORTH ABOVE.

EFFECTIVE FEBRUARY 7, 2015 FATHER SHALL HAVE PARTIAL PHYSICAL CUSTODY OF BOTH CHILDREN ON ALTERNATING WEEKENDS FROM 9:00 A.M. SATURDAY TO 6:00 P.M. SUNDAY.

FATHER SHALL HAVE ADDITIONAL PARTIAL PHYSICAL EVERY THURSDAY WITH BOTH CHILDREN FROM 6:00 P.M. TO 8:00 P.M.


FATHER MAY ATTEND THE CHILDREN'S PRACTICES AND/OR ATHELETIC GAMES.

ON OR BEFORE DECEMBER 29, 2014 FATHER SHALL SUBMIT THE NAMES AND CONTACT INFORMATION OF FIVE (5) POTENTIAL COUNSELORS COVERED UNDER HIS INSURANCE PLAN, WHO CAN PROVIDE COUNSELING TO FATHER AND THE CHILDREN. MOTHER'S PARTICIPATION SHALL BE AS RECOMMENDED BY THE THERAPIST.

COMPLAINT FOR CUSTODY FILED BY FATHER ON JUNE 24, 2014 IS RELISTED FOR STATUS. DATE CERTAIN APRIL 6, 2015 AT 9:00 A.M. IN COURTROOM #3-D BEFORE THE HONORABLE DORIS A. PECHKUROW, 1501 ARCH STREET, PHILADELPHIA, PA, 19102.

NOTICE OF INTENT TO RELOCATE: NO PARTY MAY MAKE A CHANGE IN THE RESIDENCE OF ANY CHILD WHICH SIGNIFICANTLY IMPAIRS THE ABILITY OF THE OTHER PARTY TO EXERCISE CUSTODIAL RIGHTS WITHOUT FIRST COMPLYING WITH ALL THE APPLICABLE PROVISIONS OF 23 PA.C.S. 5337 AND PA.R.C.P. NO. 1915.17 REGARDING RELOCATION.

BY THE COURT:



HONORABLE DORIS A. PECHKUROW J.

EXHIBIT “C”

9-13



IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
FAMILY COURT DIVISION

ERNO ILYES
PETITIONER

VS.

CASE ID. OC1400844

CLAUDIA M. ILYES
RESPONDENT

ORDER

~~AND NOW, THIS 28TH DAY OF APRIL, 2015,~~ IT IS HEREBY ORDERED AS FOLLOWS:

INTERIM ORDER IS ENTERED:

MOTHER, CLAUDIA M. ILYES SHALL RETAIN PRIMARY PHYSICAL CUSTODY OF THE MINOR CHILDREN JUSTIN ILYES BORN AUGUST 10, 2001 AND SAMANTHA ILYES BORN AUGUST 21, 2004.

~~MOTHER AND FATHER, ERNO ILYES SHALL SHARE LEGAL CUSTODY.~~

FATHER SHALL HAVE PARTIAL PHYSICAL CUSTODY OF BOTH CHILDREN ON ALTERNATING WEEKENDS FROM 9:00 A.M. SATURDAY TO 6:00 P.M. SUNDAY.

FATHER SHALL HAVE ADDITIONAL PARTIAL PHYSICAL EVERY THURSDAY WITH BOTH CHILDREN FROM 6:00 P.M. TO 8:00 P.M.

FOR 2015, FATHER SHALL HAVE TWO (2) NON-CONSECUTIVE WEEKS OF VACATION WITH THE CHILDREN, FROM FRIDAY TO THE FOLLOWING FRIDAY, BEGINNING ON ONE OF HIS REGULARLY SCHEDULED WEEKENDS, WITH THIRTY (30) DAYS NOTICE TO MOTHER.

FATHER MAY ATTEND THE CHILDREN'S PRACTICES AND/OR ATHELETIC GAMES.

MOTHER MAY TRAVEL WITH THE CHILDREN TO AUSTRIA TO VISIT WITH MATERNAL GRANDPARENTS AND TO CELEBRATE THE 90TH BIRTHDAY OF MATERNAL GREAT-GRANDMOTHER, KAROLINE AURACHER.

THE TRIP SHALL OCCUR ~~FROM JUNE 12 TO JULY 6, 2015~~ PROVIDED THAT THIS CUSTODY ORDER BE REGISTERED WITH THE COURT OF APPROPRIATE JURISDICTION IN

AUSTRIA FOR ENFORCEMENT PURPOSES, IN THE EVENT THAT INTERVENTION OF THE AUSTRIAN COURT SHOULD BECOME NECESSARY.

PROOF OF SAID REGISTRATION MUST BE SENT TO OPPOSING COUNSEL AND THIS COURT ON OR BEFORE JUNE 5, 2015.

THE AMERICAN PASSPORTS OF THE CHILDREN SHALL BE RETURNED TO FATHER TODAY, AND FATHER AND MOTHER SHALL JOINTLY APPEAR TO RENEW THE PASSPORTS OF THE CHILDREN. THE RENEWED PASSPORTS SHALL BE GIVEN TO FATHER, TO BE KEPT BY HIS ATTORNEY UNTIL ON OR BEFORE JUNE 5, 2015, AFTER COUNSEL RECEIVES PROOF OF REGISTRATION OF THIS ORDER IN AUSTRIA. PASSPORTS SHALL THEN BE RETURNED TO FATHER'S ATTORNEY TO BE FORWARDED FOR SAFE KEEPING WITH THE CLERK OF FAMILY COURT.

~~MOTHER'S INTEREST IN THE MARITAL PROPERTY~~, TO BE DETERMINED AT EQUITABLE DISTRIBUTION, SHALL BE POSTED AS BOND TO SECURE THE RETURN OF THE CHILDREN AND SHALL BE FORFEITED SHOULD THE CHILDREN NOT BE RETURNED ON JULY 6, 2015.

THE PARTIES AND CHILDREN SHALL CONTINUE TO PARTICIPATE IN FAMILY THERAPY. BY COPY OF THIS ORDER TO THE THERAPIST PAULINA NAISTETER, AS PROVIDED BY THIS COURT VIA FACSIMILE AT 215-673-5240, THE THERAPIST IS ADVISED THAT THE COURT WILL NOT REQUEST ANY INFORMATION OR REPORT FROM THE THERAPIST, OTHER THAN RECORDS OF ATTENDANCE, SO AS TO INSURE CONFIDENTIALITY AND CANDOR WHICH ARE ESSENTIAL FOR PROGRESS IN THE MATTER.

CURRENT AND/OR FUTURE COUNSEL ARE PRECLUDED FROM CONTACTING THE THERAPIST AND/OR FROM REQUESTING INFORMATION FROM HER.

MATTERS ARE RELISTED FOR STATUS. DATE CERTAIN OCTOBER 8, 2015 AT 9:00 A.M. IN COURTROOM #3-D BEFORE THE HONORABLE DORIS A. PECHKUROW, 1501 ARCH STREET, PHILADELPHIA, PA, 19102.

MOTION FOR APPOINTMENT OF GUARDIAN ~~IS WITHDRAWN~~ THIS RESOLVES ALL OUTSTANDING PETITIONS EXCEPT FOR CROSS-COMPLAINTS FOR CUSTODY FILED IN JUNE 2014.

NOTICE OF INTENT TO RELOCATE; NO PARTY MAY MAKE A CHANGE IN THE RESIDENCE OF ANY CHILD WHICH SIGNIFICANTLY IMPAIRS THE ABILITY OF THE OTHER PARTY TO EXERCISE CUSTODIAL RIGHTS WITHOUT FIRST COMPLYING WITH ALL THE APPLICABLE PROVISIONS OF 23 PA.C.S. 5337 AND PA.R.C.P. NO. 1915.17 REGARDING RELOCATION.

BY THE COURT

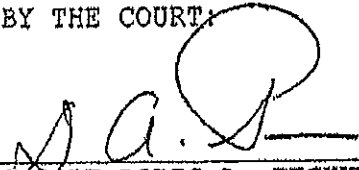

HONORABLE DORIS A. PECHKUROW J.

EXHIBIT “D”

JUSTICE REPUBLIC OF AUSTRIA
LEOBEN DISTRICT COURT

1 Nc 9/15d /3
(Please cite in all submissions)

Dr. Hanns-Groß-Straße 7
8700 Leoben

Tel.: 03842 404

RECEIVED
MAY 19 2015
DR. JILEK
OFFICIAL CERTIFICATE

MATTER OF CUSTODY:

minor Justin Ilyes, born 08/10/2001
minor Samantha Ilyes, born 08/21/2004

Kent T. Lloyd Esquire GRAFF &
ASSOCIATES, LLC
410 Old York Road
PA-19046 Jenkintown

In this matter of custody, the court confirms, as a competent guardianship court, that it is aware of the pending custody proceedings in America, that minor Justin Ilyes, born 8/10/2001 and minor Samantha Ilyes, born 8/21/2004, will stay in Austria from the period of June 12, 2015 to July 6, 2015 together with their mother Claudia Ilyes.

GROUND:

Divorce proceedings are currently pending between the parents of the parties concerned at the family court in Philadelphia.

Claudia Ilyes intends to enter Austria for the period of June 12 to July 6, 2015 together with both of her children in order to visit her relatives here in Niklasdorf.

Leoben District Court, Department 1
Leoben, May 13, 2015
Dr. Gerd Mitter, Judge

DISTRICT COURT
LEOBEN