

CUYAHOGA COUNTY, OHIO

Defendants.

Jury Demand Endorsed Hereon

4. On September 6, 2013, Plaintiff, Natasha Thompson, attended a Cleveland Indians game at 2401 Ontario Street, Cleveland, Ohio 44115. During the course of said game, employees of the Cleveland Indians and/or Ballpark Operations threw souvenirs into the stands. As a result, Plaintiff, Natasha Thompson, was caused to fall forward by another fan and tumbled down 7 rows of seats causing her to sustain personal injury.

5. Plaintiff, Natasha Thompson, further states that Defendants, The Cleveland Indians and/or Ballpark Operations, were negligent and thereby caused injury to her.

6. Plaintiff, Natasha Thompson, further states that as a direct and proximate result of the negligence of the Defendants, she incurred medical and hospital expenses.

7. Plaintiff, Natasha Thompson, further states that as a direct and proximate result of the negligence of the Defendants, lost income from her employment.

8. Plaintiff, Natasha Thompson, further states that as a direct and proximate result of the negligence of the Defendants, she was unable to go about and perform her daily activities in a normal manner, free from pain and discomfort

COUNT TWO

9. Plaintiff, Natasha Thompson, restates the allegations set forth in Paragraphs 1 through 8 of Count One as if fully rewritten herein.

10. Plaintiff, Natasha Thompson, further states that after she was injured on September 6, 2013, she was taken to the First Aid Station located within Progressive Field.

11. Plaintiff, Natasha Thompson, further states that she did not want to go to the hospital at that time since she did not have health insurance and she did not want to incur expensive medical bills.

12. Plaintiff, Natasha Thompson, further states that employees and/or agents of The Cleveland Indians and/or Ballpark Operations advised the Plaintiff that she should go to the hospital for care and treatment of her injuries and further advised the Plaintiff that The Cleveland Indians and/or Ballpark Operations would pay for her medical bills.

13. Plaintiff, Natasha Thompson, further states that she relied upon the representations of the employees and/or agents of The Cleveland Indians and/or Ballpark Operations that her medical bills would be paid by them and went by ambulance to the emergency room at MetroHealth Medical Center in Cleveland, Ohio for medical care and treatment.

14. Plaintiff, Natasha Thompson, further states that as a direct result of relying upon the representations of the employees and/or agents of The Cleveland Indians and/or Ballpark Operations, she incurred the following medical expenses:

A. Donald Martin & Sons Ambulance Services, Inc. in the amount of \$907.00;

B. MetroHealth Medical Center in the amount of \$22,547.00.

15. Plaintiff, Natasha Thompson, further states that The Cleveland Indians and/or Ballpark Operations are liable to the Plaintiff for the medical expenses she incurred on September 6, 2013 under the Doctrine of Promissory Estoppel.

WHEREFORE, Plaintiff, Natasha Thompson, prays for judgment against the Defendants, The Cleveland Indians and Ballpark Operations, in an amount in excess of \$25,000.00, together with the costs of the within action.

TRIAL BY JURY IS HEREBY DEMANDED.

/s/ Gary T. Mantkowski
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