

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

INJURED CHILD,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
RESPONSIBLE PARTIES,	)	
	)	No.
Defendants.	)	
	)	
	)	
	)	
	)	
	)	

**COMPLAINT AT LAW**

NOW COME the Plaintiffs, MOTHER, as Mother and Next Friend of INJURED CHILD, complaining of the Defendants, RESPONSIBLE PARTIES, for their Complaint at Law, pleading hypothetically and in the alternative, state as follows:

**COUNT ONE**  
**NEGLIGENCE**

1. On and before August 24, 2010, Plaintiff, MOTHER, along with her daughter, INJURED CHILD, a minor, resided at a residential apartment building located at 956 West Garfield Boulevard, in the City of Chicago, County of Cook, and State of Illinois.
  
2. On and before August 24, 2010, the Defendant, RESPONSIBLE PARTIES, owned, leased, possessed, operated, maintained and managed or had a duty to possess, operate, manage or control, both directly and indirectly through its agents, servants, contractors and/or employees, the apartment building located at 956 West Garfield Boulevard, in the City of Chicago, County of Cook, and State of Illinois (hereinafter, the “APARTMENT BUILDING.”)

3. On and before August 24, 2010, the Defendant RESPONSIBLE PARTIES, both directly and indirectly through its agents, servants, contractors and/or employees, retained the right to control and/or manage the common areas in and immediately surrounding the aforementioned APARTMENT BUILDING, including but not limited to the exterior walkways, fixtures and equipment, and areas of ingress and egress, including but not limited to the rear porch and rear staircase located at the rear of the APARTMENT BUILDING.

4. On and before August 24, 2010, Defendant, RESPONSIBLE PARTIES, through its agents, servants, contractors and/or employees, performed maintenance work at the APARTMENT BUILDING using sulfuric acid, a hazardous chemical.

5. On and before August 24, 2010, Defendant, RESPONSIBLE PARTIES, through its agents, servants, contractors and/or employees, caused and permitted a container of sulfuric acid, a hazardous chemical, to remain on the second floor rear porch common area at the APARTMENT BUILDING.

6. Upon information and belief, the container of sulfuric acid, a hazardous chemical, remained on the second floor rear porch common area at the APARTMENT BUILDING for a prolonged period of time.

7. On and before, August 24, 2010, it was commonly known or should have been known by Defendant, RESPONSIBLE PARTIES, that minors often spent time playing in and around the rear porch common area at the APARTMENT BUILDING.

8. On and before August 24, 2010, Defendant, RESPONSIBLE PARTIES, through its agents, servants, contractors and/or employees, by leaving a container of sulfuric acid at the rear porch common area at the APARTMENT BUILDING, caused the premises to become and remain

in a dangerous condition for persons using the premises although Defendant knew or in the exercise of ordinary care, should have known of the dangerous condition it created on its property.

9. On and before August 24, 2010, Defendant, RESPONSIBLE PARTIES, through its agents, servants, contractors and/or employees, had actual and/or constructive knowledge of the aforesaid dangerous condition on its property.

10. On August 24, 2010, [INJURED CHILD](#), a minor, was playing with her friends on the first floor of the rear porch at the APARTMENT BUILDING and at all times was exercising ordinary care for her own safety.

11. On August 24, 2010, a fellow minor who was lawfully upon the property at the APARTMENT BUILDING, came upon the container of sulfuric acid, a hazardous chemical, left on the second floor rear porch by Defendant, RESPONSIBLE PARTIES, through its agents, servants, contractors and/or employees, and caused the sulfuric acid to spill below upon INJURED CHILD, a minor, on the first floor of the rear porch.

12. On August 24, 2010, INJURED CHILD, a minor, was severely injured by the sulfuric acid that spilled onto her which was left on the second floor rear porch by Defendant, RESPONSIBLE PARTIES, through its agents, servants, contractors and/or employees.

13. On and before August 24, 2010, it was the duty of RESPONSIBLE PARTIES, to insure that the APARTMENT BUILDING remained in a reasonably safe condition for its tenants, including INJURED CHILD, a minor.

14. That notwithstanding the aforesaid duty, the Defendant, RESPONSIBLE PARTIES, by and through its respective agents, servants, contractors and/or employees in the course and scope of their agency, servitude and/or employment, prior to and at the time of this occurrence, committed one or more of the following negligent acts and/or omissions:

- a. Failed to properly maintain the premises including the common areas at the APARTMENT BUILDING;
- b. Caused and permitted a container of sulfuric acid, a hazardous chemical, to remain on the second floor rear porch common area at the APARTMENT BUILDING;
- c. Caused and permitted a container of sulfuric acid, a hazardous chemical, to remain in an area where minors were known to be present;
- d. Improperly operated, managed, maintained and controlled the common areas and premises at the APARTMENT BUILDING so that as a direct and proximate result, INJURED CHILD, a minor, was injured;
- e. Allowed a known dangerous condition to exist for a prolonged period of time on its property;
- f. Failed to remove or secure a container of sulfuric acid, a hazardous chemical, from the second floor rear porch common area at the APARTMENT BUILDING;
- g. Failed to properly supervise maintenance work being performed at the APARTMENT BUILDING;
- h. Failed to warn the tenants of the APARTMENT BUILDING, including INJURED CHILD, a minor, of the dangerous condition it created in the rear common area of the APARTMENT BUILDING; and
- i. Was otherwise careless and negligent.

15. Injury to INJURED CHILD, a minor, was a direct and proximate result of one or more of these acts and/or omissions of Defendant.

16. As a direct result of her injuries, INJURED CHILD, a minor, has been injured, damaged, and incapacitated; has in the past and will in the future, incur legal obligations for hospital, medical, nursing, rehabilitative, and related services of treatment; has in the past and will in the future lose profits, wages, and earnings, which she would have otherwise made and acquired;

has been caused to suffer pain, disability, disfigurement, scarring, and inconvenience; all of which injuries and conditions are permanent.

WHEREFORE, the Plaintiff, MOTHER, as Mother and Next Friend of INJURED CHILD, a minor, demands judgment against Defendant, RESPONSIBLE PARTIES, for a sum in excess of Fifty Thousand Dollars (\$50,000), plus cost of suit.

**COUNT TWO**  
**NEGLIGENCE**

1-16. Plaintiff adopts and re-alleges Paragraphs One (1) through Sixteen (16) of Count One of this Complaint at Law as Paragraphs One (1) through Sixteen (16) inclusive of this Count Two, as though fully set forth herein.

17. On and before August 24, 2010, the Defendant, RESPONSIBLE PARTIES, was the owner, manager, and/or president of Defendant, RESPONSIBLE PARTIES.

18. On and before August 24, 2010, the Defendant, RESPONSIBLE PARTIES, owned, leased, possessed, operated, maintained and managed or had a duty to possess, operate, manage or control, both directly and indirectly through its agents, servants, contractors and/or employees, the APARTMENT BUILDING.

WHEREFORE, MOTHER & DAUGHTER, as Mother and Next Friend of INJURED CHILD, a minor, demands judgment against Defendant, RESPONSIBLE PARTIES, for a sum in excess of Fifty Thousand Dollars (\$50,000), plus cost of suit.

**COUNT THREE**  
**NEGLIGENCE**

1. On and before August 24, 2010, Plaintiff, MOTHER, along with her daughter, INJURED CHILD, a minor, resided at a residential apartment building located at 956 West Garfield Boulevard, in the City of Chicago, County of Cook, and State of Illinois.

2. On and before August 24, 2010, the Defendant, PROPERTY OWNER, owned, leased, possessed, operated, maintained and managed or had a duty to possess, operate, manage or control, both directly and indirectly through her agents, servants, contractors and/or employees, the APARTMENT BUILDING located at 956 West Garfield Boulevard, in the City of Chicago, County of Cook, and State of Illinois (hereinafter, the “APARTMENT BUILDING.”)

3. On and before August 24, 2010, the Defendant, PROPERTY OWNER, both directly and indirectly through her agents, servants, contractors and/or employees, retained the right to control and/or manage the common areas in and immediately surrounding the aforementioned APARTMENT BUILDING, including but not limited to the exterior walkways, fixtures and equipment, and areas of ingress and egress, including but not limited to the rear porch and rear staircase located at the rear of the APARTMENT BUILDING.

4. On and before August 24, 2010, Defendant, PROPERTY OWNER, through her agents, servants, contractors and/or employees, performed maintenance work at the APARTMENT BUILDING using sulfuric acid, a hazardous chemical.

5. On and before August 24, 2010, Defendant, PROPERTY OWNER, through her agents, servants, contractors and/or employees, caused and permitted a container of sulfuric acid, a hazardous chemical, to remain on the second floor rear porch common area at the APARTMENT BUILDING.

6. Upon information and belief, the container of sulfuric acid, a hazardous chemical, remained on the second floor rear porch common area at the APARTMENT BUILDING for a prolonged period of time.

7. On and before, August 24, 2010, it was commonly known or should have been known by Defendant, PROPERTY OWNER, that minors often spent time playing in and around the rear porch common area at the APARTMENT BUILDING.

8. On and before August 24, 2010, Defendant, PROPERTY OWNER, through her agents, servants, contractors and/or employees, by leaving a container of sulfuric acid at the rear porch common area at the APARTMENT BUILDING, caused the premises to become and remain in a dangerous condition for persons using the premises although Defendant knew or in the exercise of ordinary care, should have known of the dangerous condition it created on its property.

9. On and before August 24, 2010, Defendant, PROPERTY OWNER, through her agents, servants, contractors and/or employees, had actual and/or constructive knowledge of the aforesaid [dangerous condition on its property](#).

10. On August 24, 2010, INJURED CHILD, a minor, was playing with her friends on the first floor of the rear porch at the APARTMENT BUILDING and at all times was exercising ordinary care for her own safety.

11. On August 24, 2010, a fellow minor who was lawfully upon the property at the APARTMENT BUILDING, came upon the container of sulfuric acid, a hazardous chemical, left on the second floor rear porch by Defendant, PROPERTY OWNER, through her agents, servants, contractors and/or employees, and caused the sulfuric acid to spill below upon INJURED CHILD, a minor, on the first floor of the rear porch.

12. On August 24, 2010, INJURED CHILD, a minor, was severely injured by the sulfuric acid that spilled onto her which was left on the second floor rear porch by Defendant, PROPERTY OWNER, through her agents, servants, contractors and/or employees.

13. On and before August 24, 2010, it was the duty of PROPERTY OWNER to insure that the APARTMENT BUILDING remained in a reasonably safe condition for its tenants, including INJURED CHILD, a minor.

14. That notwithstanding the aforesaid duty, the Defendant, PROPERTY OWNER, by and through her respective agents, servants, contractors and/or employees in the course and scope of their agency, servitude and/or employment, prior to and at the time of this occurrence, committed one or more of the following negligent acts and/or omissions:

- a. Failed to properly maintain the premises including the common areas at the APARTMENT BUILDING;
- b. Caused and permitted a container of sulfuric acid, a hazardous chemical, to remain on the second floor rear porch common area at the APARTMENT BUILDING;
- c. Caused and permitted a container of sulfuric acid, a hazardous chemical, to remain in an area where minors were known to be present;
- d. Improperly operated, managed, maintained and controlled the common areas and premises at the APARTMENT BUILDING so that as a direct and proximate result, INJURED CHILD, a minor, was injured;
- e. Allowed a known dangerous condition to exist for a prolonged period of time on its property;
- f. Failed to remove or secure a container of sulfuric acid, a hazardous chemical, from the second floor rear porch common area at the APARTMENT BUILDING;
- g. Failed to properly supervise maintenance work being performed at the APARTMENT BUILDING;
- h. Failed to warn the tenants of the APARTMENT BUILDING, including INJURED CHILD, a minor, of the dangerous condition it created in the rear common area of the APARTMENT BUILDING; and

i. Was otherwise careless and negligent.

15. Injury to INJURED CHILD, a minor, was a direct and proximate result of one or more of these acts and/or omissions of Defendant.

16. As a direct result of her injuries, INJURED CHILD, a minor, has been injured, damaged, and incapacitated; has in the past and will in the future, incur legal obligations for hospital, medical, nursing, rehabilitative, and related services of treatment; has in the past and will in the future lose profits, wages, and earnings, which she would have otherwise made and acquired; has been caused to suffer pain, disability, disfigurement, scarring, and inconvenience; all of which injuries and conditions are permanent.

WHEREFORE, the Plaintiff, MOTHER, as Mother and Next Friend of INJURED CHILD, a minor, demands judgment against Defendant, PROPERTY OWNER, for a sum in excess of Fifty Thousand Dollars (\$50,000), plus cost of suit.

**COUNT FOUR**  
**NEGLIGENCE**

1. On and before August 24, 2010, Plaintiff, MOTHER, along with her son, INJURED CHILD, a minor, resided at a residential apartment building located at 956 West Garfield Boulevard, in the City of Chicago, County of Cook, and State of Illinois.

2. On and before August 24, 2010, the Defendant, RESPONSIBLE PARTIES, owned, leased, possessed, operated, maintained and managed or had a duty to possess, operate, manage or control, both directly and indirectly through its agents, servants, contractors and/or employees, the apartment building located at 956 West Garfield Boulevard, in the City of Chicago, County of Cook, and State of Illinois (hereinafter, the “APARTMENT BUILDING.”)

3. On and before August 24, 2010, the Defendant, RESPONSIBLE PARTIES, both directly and indirectly through its agents, servants, contractors and/or employees, retained the right to control and/or manage the common areas in and immediately surrounding the aforementioned APARTMENT BUILDING, including but not limited to the exterior walkways, fixtures and equipment, and areas of ingress and egress, including but not limited to the rear porch and rear staircase located at the rear of the APARTMENT BUILDING.

4. On and before August 24, 2010, Defendant, RESPONSIBLE PARTIES, through its agents, servants, contractors and/or employees, performed maintenance work at the APARTMENT BUILDING using sulfuric acid, a hazardous chemical.

5. On and before August 24, 2010, Defendant, RESPONSIBLE PARTIES, through its agents, servants, contractors and/or employees, caused and permitted a container of sulfuric acid, a hazardous chemical, to remain on the second floor rear porch common area at the APARTMENT BUILDING.

6. Upon information and belief, the container of sulfuric acid, a hazardous chemical, remained on the second floor rear porch common area at the APARTMENT BUILDING for a prolonged period of time.

7. On and before, August 24, 2010, it was commonly known or should have been known by Defendant, RESPONSIBLE PARTIES, that minors often spent time playing in and around the rear porch common area at the APARTMENT BUILDING.

8. On and before August 24, 2010, Defendant, RESPONSIBLE PARTIES, through its agents, servants, contractors and/or employees, by leaving a container of sulfuric acid at the rear porch common area at the APARTMENT BUILDING, caused the premises to become and remain

in a dangerous condition for persons using the premises although Defendant knew or in the exercise of ordinary care, should have known of the dangerous condition it created on its property.

9. On and before August 24, 2010, Defendant, RESPONSIBLE PARTIES, through its agents, servants, contractors and/or employees, had actual and/or constructive knowledge of the aforesaid dangerous condition on its property.

10. On August 24, 2010, INJURED CHILD, a minor, was playing with his friends on the first floor of the rear porch at the APARTMENT BUILDING and at all times was exercising ordinary care for his own safety.

11. On August 24, 2010, a fellow minor who was lawfully upon the property at the APARTMENT BUILDING, came upon the container of sulfuric acid, a hazardous chemical, left on the second floor rear porch by Defendant, RESPONSIBLE PARTIES, through its agents, servants, contractors and/or employees, and caused the sulfuric acid to spill below upon INJURED CHILD, a minor, on the first floor of the rear porch.

12. On August 24, 2010, INJURED CHILD, a minor, was severely injured by the sulfuric acid that spilled onto him which was left on the second floor rear porch by Defendant, RESPONSIBLE PARTIES, through its agents, servants, contractors and/or employees.

13. On and before August 24, 2010, it was the duty of RESPONSIBLE PARTIES, to insure that the APARTMENT BUILDING remained in a reasonably safe condition for its tenants, including INJURED CHILD, a minor.

14. That notwithstanding the aforesaid duty, the Defendant, RESPONSIBLE PARTIES, by and through its respective agents, servants, contractors and/or employees in the course and scope of their agency, servitude and/or employment, prior to and at the time of this occurrence, committed one or more of the following negligent acts and/or omissions:

- a. Failed to properly maintain the premises including the common areas at the APARTMENT BUILDING;
- b. Caused and permitted a container of sulfuric acid, a hazardous chemical, to remain on the second floor rear porch common area at the APARTMENT BUILDING;
- c. Caused and permitted a container of sulfuric acid, a hazardous chemical, to remain in an area where minors were known to be present;
- d. Improperly operated, managed, maintained and controlled the common areas and premises at the APARTMENT BUILDING so that as a direct and proximate result, INJURED CHILD, a minor, was injured;
- e. Allowed a known dangerous condition to exist for a prolonged period of time on its property;
- f. Failed to remove or secure a container of sulfuric acid, a hazardous chemical, from the second floor rear porch common area at the APARTMENT BUILDING;
- g. Failed to properly supervise maintenance work being performed at the APARTMENT BUILDING;
- h. Failed to warn the tenants of the APARTMENT BUILDING, including INJURED CHILD, a minor, of the dangerous condition it created in the rear common area of the APARTMENT BUILDING; and
- i. Was otherwise careless and negligent.

15. Injury to INJURED CHILD, a minor, was a direct and proximate result of one or more of these acts and/or omissions of Defendant.

16. As a direct result of her injuries, INJURED CHILD, a minor, has been injured, damaged, and incapacitated; has in the past and will in the future, incur legal obligations for hospital, medical, nursing, rehabilitative, and related services of treatment; has in the past and will in the future lose profits, wages, and earnings, which he would have otherwise made and acquired;

has been caused to suffer pain, disability, disfigurement, [scarring](#), and inconvenience; all of which injuries and conditions are permanent.

WHEREFORE, the Plaintiff, MOTHER, as Mother and Next Friend of INJURED CHILD, a minor, demands judgment against Defendant, RESPONSIBLE PARTIES, for a sum in excess of Fifty Thousand Dollars (\$50,000), plus cost of suit.

**COUNT FIVE**  
**NEGLIGENCE**

1-16. Plaintiff adopts and re-alleges Paragraphs One (1) through Sixteen (16) of Count Five of this Complaint at Law as Paragraphs One (1) through Sixteen (16) inclusive of this Count Six, as though fully set forth herein.

17. On and before August 24, 2010, the Defendant, RESPONSIBLE PARTIES, was the owner, manager, and/or president of Defendant, RESPONSIBLE PARTIES.

18. On and before August 24, 2010, the Defendant, RESPONSIBLE PARTIES, owned, leased, possessed, operated, maintained and managed or had a duty to possess, operate, manage or control, both directly and indirectly through its agents, servants, contractors and/or employees, the APARTMENT BUILDING.

WHEREFORE, the Plaintiff, MOTHER, as Mother and Next Friend of INJURED CHILD, a minor, demands judgment against Defendant, RESPONSIBLE PARTIES, for a sum in excess of Fifty Thousand Dollars (\$50,000), plus cost of suit.

**COUNT SIX**  
**NEGLIGENCE**

1. On and before August 24, 2010, Plaintiff, MOTHER, along with her son, INJURED CHILD, a minor, resided at a residential apartment building located at 956 West Garfield Boulevard, in the City of Chicago, County of Cook, and State of Illinois.

2. On and before August 24, 2010, the Defendant, PROPERTY OWNER, owned, leased, possessed, operated, maintained and managed or had a duty to possess, operate, manage or control, both directly and indirectly through her agents, servants, contractors and/or employees, the apartment building located at 956 West Garfield Boulevard, in the City of Chicago, County of Cook, and State of Illinois (hereinafter, the “APARTMENT BUILDING.”)

3. On and before August 24, 2010, the Defendant, PROPERTY OWNER, both directly and indirectly through her agents, servants, contractors and/or employees, retained the right to control and/or manage the common areas in and immediately surrounding the aforementioned APARTMENT BUILDING, including but not limited to the exterior walkways, fixtures and equipment, and areas of ingress and egress, including but not limited to the rear porch and rear staircase located at the rear of the APARTMENT BUILDING.

4. On and before August 24, 2010, Defendant, PROPERTY OWNER, through her agents, servants, contractors and/or employees, performed maintenance work at the APARTMENT BUILDING using sulfuric acid, a hazardous chemical.

5. On and before August 24, 2010, Defendant, PROPERTY OWNER, through her agents, servants, contractors and/or employees, caused and permitted a container of sulfuric acid, a

hazardous chemical, to remain on the second floor rear porch common area at the APARTMENT BUILDING.

6. Upon information and belief, the container of sulfuric acid, a hazardous chemical, remained on the second floor rear porch common area at the APARTMENT BUILDING for a prolonged period of time.

7. On and before, August 24, 2010, it was commonly known or should have been known by Defendant, PROPERTY OWNER, that minors often spent time playing in and around the rear porch common area at the APARTMENT BUILDING.

8. On and before August 24, 2010, Defendant, PROPERTY OWNER, through her agents, servants, contractors and/or employees, by leaving a container of sulfuric acid at the rear porch common area at the APARTMENT BUILDING, caused the premises to become and remain in a dangerous condition for persons using the premises although Defendant knew or in the exercise of ordinary care, should have known of the dangerous condition it created on its property.

9. On and before August 24, 2010, Defendant, PROPERTY OWNER, through her agents, servants, contractors and/or employees, had actual and/or constructive knowledge of the aforesaid dangerous condition on its property.

10. On August 24, 2010, INJURED CHILD, a minor, was playing with his friends on the first floor of the rear porch at the APARTMENT BUILDING and at all times was exercising ordinary care for his own safety.

11. On August 24, 2010, a fellow minor who was lawfully upon the property at the APARTMENT BUILDING, came upon the container of sulfuric acid, a hazardous chemical, left on the second floor rear porch by Defendant, PROPERTY OWNER, through her agents, servants,

contractors and/or employees, and caused the sulfuric acid to spill below upon INJURED CHILD, a minor, on the first floor of the rear porch.

12. On August 24, 2010, INJURED CHILD, a minor, was severely injured by the sulfuric acid that spilled onto him which was left on the second floor rear porch by Defendant, PROPERTY OWNER, through her agents, servants, contractors and/or employees.

13. On and before August 24, 2010, it was the duty of PROPERTY OWNER to insure that the APARTMENT BUILDING remained in a reasonably safe condition for its tenants, including INJURED CHILD, a minor.

14. That notwithstanding the aforesaid duty, the Defendant, PROPERTY OWNER, by and through her respective agents, servants, contractors and/or employees in the course and scope of their agency, servitude and/or employment, prior to and at the time of this occurrence, committed one or more of the following negligent acts and/or omissions:

- a. Failed to properly maintain the premises including the common areas at the APARTMENT BUILDING;
- b. Caused and permitted a container of sulfuric acid, a hazardous chemical, to remain on the second floor rear porch common area at the APARTMENT BUILDING;
- c. Caused and permitted a container of sulfuric acid, a hazardous chemical, to remain in an area where minors were known to be present;
- d. Improperly operated, managed, maintained and controlled the common areas and premises at the APARTMENT BUILDING so that as a direct and proximate result, INJURED CHILD, a minor, was injured;
- e. Allowed a known dangerous condition to exist for a prolonged period of time on its property;

- f. Failed to remove or secure a container of sulfuric acid, a hazardous chemical, from the second floor rear porch common area at the APARTMENT BUILDING;
- g. Failed to properly supervise maintenance work being performed at the APARTMENT BUILDING;
- h. Failed to warn the tenants of the APARTMENT BUILDING, including INJURED CHILD, a minor, of the dangerous condition it created in the rear common area of the APARTMENT BUILDING; and
- i. Was otherwise careless and negligent.

15. Injury to INJURED CHILD, a minor, was a direct and proximate result of one or more of these acts and/or omissions of Defendant.

16. As a direct result of her injuries, INJURED CHILD, a minor, has been injured, damaged, and incapacitated; has in the past and will in the future, incur legal obligations for hospital, medical, nursing, rehabilitative, and related services of treatment; has in the past and will in the future lose profits, wages, and earnings, which he would have otherwise made and acquired; has been caused to suffer pain, disability, disfigurement, scarring, and inconvenience; all of which injuries and conditions are permanent.

WHEREFORE, the Plaintiff, MOTHER, as Mother and Next Friend of INJURED CHILD, a minor, demands judgment against Defendant, PROPERTY OWNER, for a sum in excess of Fifty Thousand Dollars (\$50,000), plus cost of suit.

Respectfully submitted,

ROSENFELD INJURY LAWYERS

By: \_\_\_\_\_  
Jonathan Rosenfeld

ROSENFELD INJURY LAWYERS

33 NORTH DEARBORN STREET #1930

CHICAGO, IL 60602

TELEPHONE: 847-835-8805

FAX: 847-572-1331

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

Injured Party,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
Property Owners,	)	
	)	No.
Defendants.	)	
	)	
	)	
	)	
	)	
	)	

**AFFIDAVIT PURSUANT TO  
ILLINOIS SUPREME COURT RULE 222**

I, JONATHAN ROSENFELD under oath and subject to the penalties of perjury, depose and state that the damages sought in this cause exceed the sum of FIFTY THOUSAND DOLLARS (\$50,000.00).

Pursuant to 735 ILCS 5/1-109, the undersigned certifies that the foregoing Affidavit is true and correct based upon the personal knowledge of the undersigned.

\_\_\_\_\_  
JONATHAN ROSENFELD

ROSENFELD INJURY LAWYERS  
33 NORTH DEARBORN STREET #1930  
CHICAGO, IL 60602  
TELEPHONE: 847-835-8805  
FAX: 847-572-1331

