

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
CINDY PHILEMON

Plaintiff,

**SUMMONS**

-against-

Index No.:  
D/P:

BAHRON BORONOV and SUNNATJON AMINOZ (sp),

Plaintiff designates her  
resident County as the  
place of trial.

Defendants.

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**TO THE ABOVE-NAMED DEFENDANTS:**

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

Dated: New York, New York  
February 23, 2023

Yours, etc.  
The Meyers Law Firm  
Attorneys for Plaintiff  
30 Vesey Street, 4<sup>th</sup> Floor  
New York, NY 10007  
212-252-1212

Type text here

By: Glenn R Meyers  
Glenn R. Meyers

To Defendants Boronov, Aminoza,

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
CINDY PHILEMON

Index No.:

Plaintiff,

**VERIFIED COMPLAINT**

-against-

BAHRON BORONOV, SUNNATJON AMINOZ (sp),

Defendants.

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Plaintiff, CINDY PHILEMON, by her attorneys, The Meyers Law Firm, complaining of the defendants herein, states upon information and belief as follows:

1. That at all times hereinafter mentioned, Plaintiff CINDY PHILEMON was and is a resident of Brooklyn, Kings County, State of New York.
2. That at all times hereinafter mentioned this accident that is the subject of this Complaint took place in the County of New York, State of New York.
3. That at all times hereinafter mentioned defendant BAHRON BORONOV was and is the owner of a vehicle bearing license plate Taxi and Limousine Commission (TLC) number T751025C and TLC Company 5868768.
4. That at all times hereinafter mentioned defendant BAHRON BORONOV controlled the vehicle. bearing license plate Taxi and Limousine Commission (TLC) bearing license number T751025C and TLC Company 5868768.

5. That at all times hereinafter mentioned, defendant BAHRON BORONOV operated the vehicle bearing license plate TLC number T751025C and TLC Company 5868768.

6. That at all times hereinafter mentioned defendant BAHRON BORONOV, maintained the vehicle bearing license plate TLC number T751025C and TLC Company 5868768.

7. That at all times hereinafter mentioned, defendant BAHRON BORONOV managed the vehicle bearing license plate TLC number T751025C and TLC Company 5868768.

8. That at all times hereinafter mentioned, defendant BAHRON BORONOV was responsible for hiring personnel.

9. That at all times hereinafter mentioned defendant SUNNATJON AMINOZ (sp) was the driver of the vehicle bearing license plate TLC number T751025C and TLC Company 5868768.

10. That at all times hereinafter mentioned defendant SUNNATJON AMINOZ (sp) controlled the vehicle bearing license plate TLC number T751025C and TLC Company 5868768.

11. That at all times hereinafter mentioned defendant SUNNATJON AMINOZ (sp) managed the vehicle bearing license plate TLC number T751025C and TLC Company 5868768.

12. That at all times hereinafter mentioned defendant SUNNATJON AMINOZ (sp) maintained the vehicle bearing license plate TLC number T751025C and TLC Company 5868768.

13. That at all times hereinafter mentioned defendant SUNNATJON AMINOZ (sp) operated the vehicle bearing license plate TLC number T751025C and TLC Company 5868768.

14. That at all times hereinafter mentioned defendant SUNNATJON AMINOZ (sp) was the employee of defendant BAHRON BORONOV

15. That at all times hereinafter mentioned, defendant SUNNATJON AMINOZ (sp) was hired by defendant BAHRON BORONOV

16. That at all times hereinafter mentioned defendant SUNNATJON AMINOZ (sp) was under the supervision of defendant BAHRON BORONOV.

17. That at all times hereinafter mentioned, defendant SUNNATJON AMINOZ (sp) was under the control of defendant BAHRON BORONOV

18. On February 6, 2020, plaintiff CINDY PHILEMON was legally and lawfully a passenger in a motor vehicle bearing license plate TLC number T751025C and TLC Company 5868768.

19. On February 6, 2020, a motor vehicle bearing license plate TLC number T751025C and TLC Company 5868768 stopped on or near 407 West 146<sup>th</sup> Street and Nicholas Avenue a public thoroughfare for pedestrians and traffic, to let passengers off including plaintiff CINDY PHILEMON.

20. On February 6, 2020 at approximately 12:10 p.m., Plaintiff CINDY PHILEMON, was legally and lawfully exiting from the aforementioned vehicle/bus also known at times as Access-A-Ride.

21. While exiting the vehicle, the door slammed against plaintiff's body and held her pinned in the doorway of the vehicle.

22. The plaintiff sustained injuries about her whole body including her shoulder, arms, and legs causing her great pain and suffering.

23. The negligence of the defendants consisted in that defendants displayed a blatant disregard for the safety of its passengers including plaintiff CINDY PHILEMON; defendants were inept in their hiring and training practices; defendants were want of due care and caution in the ownership, operation, management, maintenance and control of the vehicle/bus; in failing to supervise the defendant bus driver; in failing to perform daily inspections of the electronically controlled door; in failing to have competent and reasonable control of the electronically controlled door of the vehicle/bus; in that the defendant bus driver SUNNATJON AMINOV, in carelessly operating the aforesaid vehicle including the electronically controlled door was in violation of the existing laws, statutes and regulations of the State of New York; in operating the aforementioned bus/vehicle in such a manner as failing to make timely and careful use and application of the electronically controlled door, braking mechanism, steering mechanism and devices of the bus; in operating and driving the bus in an inattentive and unalert manner; in

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