

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

Index No.:
Date Purchased:
SUMMONS

-----X

YURI F BAUGHMAN,

Plaintiff(s),

Plaintiffs designate Kings
County as the place of trial.

-against-

The basis of venue is:
Plaintiff's Residence

LARA HALWANI, JOHNY GOMEZ AND REVEL
TRANSIT INC.,

Defendant(s).

Plaintiffs reside at:
757 Hart Street, 1L
Brooklyn, NY 11237

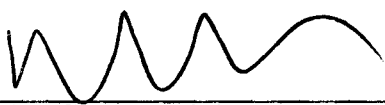
-----X

County of Kings

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(s) within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. 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: Rockville Centre, New York
July 24, 2020



MICHAEL M. GOLDBERG
Law Offices of Michael M. Goldberg, P.C.
Attorneys for Plaintiff(s)
YURI F BAUGHMAN
265 Sunrise Highway, Suite 32
Rockville Centre, New York 11570
(212) 481-0011
Our File No. 19-1157

TO:

REVEL TRANSIT INC
c/o DOS
68 3rd Street
Brooklyn, Nyd 11231

LARA HALWANI
128 Everett Avenue
Staten Island, NY 10309

JOHNY GOMEZ
757 Hart Street, 1L
Brooklyn, NY 11237

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X

VERIFIED COMPLAINT

YURI F BAUGHMAN,

Plaintiff(s),

Index No.:
Date Purchased:

-against-

LARA HALWANI, JOHNY GOMEZ AND REVEL
TRANSIT INC.,

Defendant(s).

-----X

Plaintiff, by her attorneys, LAW OFFICES OF MICHAEL M. GOLDBERG, P.C.,
complaining of the Defendants, respectfully allege, upon information and belief:

1. At all times herein mentioned, Plaintiff was, and still is a resident of the County of Kings, State of New York.
2. At all times herein mentioned, Defendant LARA HALWANI was, and still is, a resident of the County of Richmond, State of New York.
3. That at all times hereinafter mentioned, the Defendant, REVEL TRANSIT INC., was and still is a domestic business corporation duly organized and existing under and by virtue of the laws of the State of New York.
4. That at all times hereinafter mentioned, the Defendant REVEL TRANSIT INC., was and still is a foreign business corporation duly authorized to do business in the State of New York.
5. That at all times hereinafter mentioned, the Defendant REVEL TRANSIT INC., maintained a principal place of business in the County of Kings, State of New York.
6. At all times herein mentioned, Defendant JOHNY GOMEZ was, and still is, a resident of the County of Kings, State of New York.
7. At all times herein mentioned, Defendant LARA HALWANI was the owner of an

unknown vehicle.

8. At all times herein mentioned, Defendant LARA HALWANI operated the aforesaid unknown motor vehicle.

9. At all times herein mentioned, Defendant LARA HALWANI managed the aforesaid unknown motor vehicle.

10. At all times herein mentioned, Defendant LARA HALWANI controlled the aforesaid unknown motor vehicle.

11. At all times herein mentioned, Defendant REVEL TRANSIT INC was the owner of a Vespa bearing New York State registration number 99BF43.

12. At all times herein mentioned, Defendant JOHNY GOMEZ operated a 2020 Vespa bearing New York State registration number 99BF43.

13. At all times herein mentioned, Defendant JOHNY GOMEZ operated the aforesaid Vespa with the knowledge of Defendant REVEL TRANSIT INC.

14. At all times herein mentioned, Defendant JOHNY GOMEZ operated the aforesaid Vespa with the permission of Defendant REVEL TRANSIT INC.

15. At all times herein mentioned, Defendant JOHNY GOMEZ operated the aforesaid Vespa with the consent of Defendant REVEL TRANSIT INC.

16. At all times herein mentioned, Defendant REVEL TRANSIT INC managed the aforesaid motor vehicle.

17. At all times herein mentioned, Defendant JOHNY GOMEZ managed the aforesaid motor vehicle.

18. At all times herein mentioned, Defendant REVEL TRANSIT INC controlled the aforesaid motor vehicle.

19. At all times herein mentioned, Defendant JOHNY GOMEZ controlled the aforesaid motor vehicle.

20. At all times herein mentioned, Plaintiff YURI F BAUGHMAN was a passenger on

the Vespa owned by Defendant REVEL TRANSIT INC and operated by Defendant JOHNY GOMEZ.

21. At all times herein mentioned, Morgan Avenue at or near Meadow Street, Kings County, New York State, were public roadways and/or thoroughfares.

22. That on July 31, 2019, at the aforementioned location, the aforementioned motor vehicles were involved in a collision.

23. That as a result of the aforesaid contact, Plaintiff YURI F BAUGHMAN was injured.

24. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendants without any fault or negligence on the part of the Plaintiff contributing thereto.

25. That Defendants were negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid vehicle and the Defendants were otherwise negligent, careless and reckless under the circumstances then and there prevailing.

26. That as a result of the foregoing, Plaintiff YURI F BAUGHMAN, was caused to sustain serious injuries and to have suffered pain, shock and mental anguish; that these injuries and their effects will be permanent; and as a result of said injuries, Plaintiff has been caused to incur, and will continue to incur, expenses for medical care and attention and lost wages, and, as a further result, Plaintiff was and will continue to be rendered unable to perform Plaintiff's normal activities and duties and has sustained a resultant loss therefrom.

26. That as a result of the foregoing, Plaintiff, YURI F BAUGHMAN , has incurred substantial expenses for medical treatment, lost wages and other related expenses, and continuing, the full amount of which is claimed in this action.

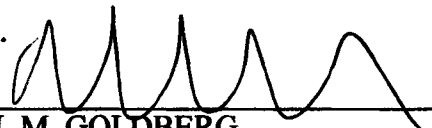
27. That this action falls within one or more of the exceptions set forth in CPLR §1602.

28. That by reason of the foregoing, Plaintiff, YURI F BAUGHMAN , has been damages in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, Plaintiff(s) demand(s) judgment against the Defendants herein on all causes of action, in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: Rockville Centre, New York
 July 24, 2020

Yours, etc.



MICHAEL M. GOLDBERG
Law Offices of Michael M. Goldberg, P.C.
Attorneys for Plaintiff(s)
YURI F BAUGHMAN
265 Sunrise Highway, Suite 32
Rockville Centre, New York 11570
(212) 481-0011
Our File No. 19-1157

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.