

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS=====X  
KAYLEEN BAEZ,

SUMMONS

Plaintiff,

-against-

REVEL TRANSIT, INC. and JOHN or JANE DOE,

Defendants.  
=====X

Plaintiff designates Kings County as the place of trial based upon the County where the accident occurred.

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 Attorneys within 20 days after the service of this Summons, exclusive of the day of service (or within 30 days after the service is complete if this Summons is not personally delivered to you within the State of New York). In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: July 24, 2020  
Garden City, New York

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Paul Ajlouny & Associates, P.C.

By: Paul Ajlouny, Esq.

*-Attorneys for Plaintiff-*

320 Old Country Road, Suite 205

Garden City, New York 11530

(516) 535-5555

Our File No.: 04511

Defendant's Address:

REVEL TRANSIT, INC.  
12 Cypress Avenue  
Brooklyn, NY 11237

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

=====X

KAYLEEN BAEZ,

Plaintiff,

COMPLAINT

-against-

REVEL TRANSIT, INC. and JOHN or JANE DOE,

Defendants.

=====X

Plaintiff, by her attorneys, **PAUL AJLOUNY & ASSOCIATES, P.C.**, alleges the following, upon information and belief:

1. The accident occurred in the County of Kings, State of New York.

2. At all times herein mentioned, Defendant, **REVEL TRANSIT, INC.**, was and still is a domestic corporation duly authorized to do business in the State of New York.

3. At all times herein mentioned, Defendant, **REVEL TRANSIT, INC.**, maintained an office for the transaction of business at 12 Cypress Avenue, County of Kings, State of New York.

4. At all times herein mentioned, Defendant **REVEL TRANSIT, INC.**, was the registered owner of a certain electric scooter.

5. At all times herein mentioned, Defendant **REVEL TRANSIT, INC.**, was the title owner of a certain electric scooter.

6. At all times herein mentioned, Defendant, **JOHN or JANE DOE**, operated and controlled the aforementioned electric scooter.

7. At all times herein mentioned, Defendant, **JOHN or JANE DOE**, operated and

controlled the aforementioned moped with the knowledge, permission and consent of Defendant, **REVEL TRANSIT, INC.**

8. At all times herein mentioned, Plaintiff, **KAYLEEN BAEZ**, was the operator of a certain electric scooter.

9. At all times herein mentioned, the road in front of 467 16th Street, in the County of Kings, State of New York were and are public highways and or thoroughfares in common use by the residents of said County, State and others.

10. That on or about June 25, 2020, the electric scooter owned by Defendant, **REVEL TRANSIT, INC.**, and operated by Defendant, **JOHN or JANE DOE**, came into contact with the Plaintiff, **KAYLEEN BAEZ**, while she was operating an electric scooter at the aforementioned location.

11. At all times herein mentioned, the electric scooter owned by Defendant, **REVEL TRANSIT, INC.**, and operated by Defendant, **JOHN or JANE DOE**, struck the Plaintiff, **KAYLEEN BAEZ**, while she was operating an electric scooter at the aforementioned location, and left the scene of an accident.

12. The negligence of the Defendants consisted of owning and operating the electric scooter in a dangerous manner; failing to keep a proper lookout ahead; failing to obey and heed the road and traffic conditions then and there existing; failing to give warning or signal of approach; violating the "Rules of the Road" and the Vehicle and Traffic Regulations of State of New York and the City of New York; failing to be provided with or timely utilize adequate, sufficient braking and or other safety devices; placing Plaintiff in imminent hazard; failing to comprehend, apprehend and/or anticipate a hazardous and dangerous situation; failing to take reasonable steps to avoid the accident; failure to assure its users, including Defendant **JOHN or**

**JANE DOE**, had sufficient knowledge and skill to operate the electric scooter; failed to ascertain previous experience in operating the electric scooter; failed to assure that the operator was in good physical condition prior to operating the electric scooter and was not under the influence of drugs or alcohol prior to rental; failed to provide the Defendant **JOHN or JANE DOE**, and or make available user training classes prior to rental and the Defendant, was vicariously liable for the reckless, careless and negligent acts of its driver.

13. That solely by reason of the negligence of the Defendants as in hereinbefore alleged, Plaintiff, **KAYLEEN BAEZ**, was rendered sick, sore, lame and disabled and suffered and still suffers great pain and anguish and sustained severe and serious injuries in and about her head, body, limbs, nerves and nervous system and was obliged to and did seek medical treatment aide and assistance and was disabled and incapacitated in the performance of her normal duties and her habits and pattern of life was varied.

14. Plaintiff has sustained a serious injury as defined by Subdivision (d) of Section 5102 of the Insurance Law of the State of New York, or economic loss greater than basic economic loss, as defined in Subdivision (a) of Section 5102 of the Insurance Law.

15. That this action falls within one or more of the exceptions set forth in C.P.L.R. 1602.

16. That as a result of the foregoing, Plaintiff, **KAYLEEN BAEZ**, was damaged in a sum of money which exceeds the monetary jurisdiction of all lower Courts.

**WHEREFORE**, Plaintiff demands judgment in an amount to be determined at trial with costs and disbursements.

Dated: July 24, 2020  
Garden City, New York



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Paul Ajlouny & Associates, P.C.

By: Paul Ajlouny, Esq.

Attorneys for Plaintiffs

320 Old Country Road, Suite 205

Garden City, New York 11530

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Our File No.: 04511

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