

**STATE OF NEW YORK
SUPREME COURT: COUNTY OF TOMPKINS**

HALEY KRISTINE JONES
65 Jerry Smith Road
Lansing, New York 14882

Plaintiff

v.

SUMMONS

Index No.: _____

LEONARD A. SCOTT
233 Hinman Road
Cortland, New York 13045

Defendant

TO THE ABOVE NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED to Answer the Complaint in this action and to serve a copy of your Answer 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 if this Summons is not personally delivered to you within the State) and in case of your failure to Answer, Judgment will be entered against you by default for the relief demanded in the Complaint. Plaintiff's complaint against you is in excess of the jurisdictional limits of all lower Courts for causes of action based upon negligence. Tompkins County is designated as the place of trial based upon the Plaintiff's residence therein.

DATED: January 5, 2022



Arienne J. Irving, Esq.
WILLIAM MATTAR, P.C.
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(716) 633-3535

**STATE OF NEW YORK
SUPREME COURT: COUNTY OF TOMPKINS**

HALEY KRISTINE JONES

Plaintiff

v.

COMPLAINT**Index No.:** _____**LEONARD A. SCOTT**

Defendant

The Plaintiff, HALEY KRISTINE JONES, by her attorneys, **WILLIAM MATTAR, P.C.**, as and for her complaint against the Defendant, LEONARD A. SCOTT, herein, alleges:

- 1) That the plaintiff, HALEY KRISTINE JONES, at all times mentioned herein, was a resident of the County of Tompkins and State of New York.
- 2) That upon information and belief, at all times hereinafter mentioned, the Defendant, LEONARD A. SCOTT, was a resident of the City of Cortland, County of Cortland and State of New York.
- 3) That at all times hereinafter mentioned, on or about October 4, 2021, the Defendant, LEONARD A. SCOTT, was the owner of a motor vehicle, license plate number KDL9086, registered in the State of New York for the year 2021.
- 4) That at all times hereinafter mentioned, East Cayuga Street, in Moravia, New York, was a public street, highway and/or thoroughfare.
- 5) That upon information and belief, this action falls within one or more of the exceptions set forth in CPLR 1602.

6) That on or about October 4, 2021, the Defendant, LEONARD A. SCOTT, was owner and operator of the aforementioned vehicle, when said vehicle collided with and became involved in a collision with a vehicle operated by the Plaintiff, HALEY KRISTINE JONES, said collision occurring on East Cayuga Street, in Moravia, New York.

7) That the collision herein occurred wholly and solely as a result of the negligent, careless and/or reckless manner in which the Defendant, LEONARD A. SCOTT, operated his motor vehicle on or about October 4, 2021, without any fault or want of care on the part of the Plaintiff, HALEY KRISTINE JONES.

8) That the Defendant, LEONARD A. SCOTT, is not allowed to needlessly endanger the public when operating his motor vehicle.

9) That the Defendant, LEONARD A. SCOTT, must operate his motor vehicle in a safe manner on public roads.

10) That the Defendant, LEONARD A. SCOTT, must abide by the New York State Vehicle and Traffic Law when operating his motor vehicle.

11) That wholly and solely as a result of the negligence, carelessness and recklessness of the Defendant, LEONARD A. SCOTT, Plaintiff, HALEY KRISTINE JONES, suffered and sustained serious injuries as the same are defined in §5102(d) of the Insurance Law of the State of New York, as amended, and she has been caused to suffer and sustain personal injuries in and to the body which are permanent in nature. That the Plaintiff, Haley Kristine Jones, has also sustained economic loss greater than basic economic loss as defined in §5102(a) of the Insurance Law of the

State of New York, and has or may be caused to suffer loss in excess of the jurisdictional limits of all lower Courts.

WHEREFORE, the Plaintiff, HALEY KRISTINE JONES, demands Judgment against the Defendant, herein in an amount that exceeds the jurisdictional limits of all lower Courts which would otherwise have jurisdiction, together with the costs and disbursements of said action and any such other and further relief as the Court may deem just and proper.

DATED: January 5, 2022



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