

SUPREME COURT OF STATE OF NEW YORK
COUNTY OF QUEENS

-----X INDEX NO.:
MICHAEL CROWDER,
PLAINTIFF, PLAINTIFF'S COMPLAINT
-against-
THE CITY OF NEW YORK,
DEFENDANT.

-----X
AS AND FOR A FIRST CAUSE OF ACTION (NEGLIGENCE):

1. Plaintiff resides at 112-26 Roosevelt Avenue, Corona, Queens, New York, and timely and properly filed a Notice of Claim herein, Claim #2019PI029433.

2. Defendant is a domestic municipal corporation with a principal business located at 530 Municipal Building, NY, NY 10007, and on or about October 28, 2019 was in dominion, possession, ownership and/or control over Best Western shelter, Queens, NY, where plaintiff then resided, and said defendant then had both actual and/or constructive knowledge of the below described dangerous conditions therein.

3. On or about October 28, 2019 at Queens Best Western shelter, plaintiff became injured on an unreasonably dangerous and defective bed frame that protruded, juttred out and/or was not properly constructed and/or was not merchantable, and defendant was negligent therefor.

4. As a result of said negligence, plaintiff injured his right toe, foot, neck, back and body, some of which injuries are permanent in nature, and incurred medical-related expenses.

5. Plaintiff is ready, willing and able to submit to a proper statutory 50-h hearing, and NY Executive Order 202.55 suspends all limitations due to covid-19 health emergency.

WHEREFORE, plaintiff prays for relief as follows: 1. \$250,000.00 in damages; 2. Costs; and 3. Any other just relief deemed proper by the Court.
NY, NY; 8-8-20 Respectfully submitted,

M. L. L.