

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK

-----X
MARIE CELESTIN,

Plaintiff(s),

-Against-

HUNTINGTON HOSPITAL,

Defendant(s).
-----X

Index No.:

Date Filed:

Plaintiff designates

Suffolk County as the place of trial.

Basis of the venue is Plaintiff's residence

69 Henry Street

Huntington Sta., New York 11746

SUMMONS

TO THE ABOVE-NAMED DEFENDANT(S):

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 twenty (20) days after the service of this summons, exclusive of the day of service (or within thirty (30) days after the 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: Huntington Station, New York
 July 14, 2020

Yours etc.,

CANNON & ACOSTA, LLP
Attorneys for Plaintiff(s)
1995 New York Avenue
Huntington Station, NY 11746
(631) 271-6363

TO:

HUNTINGTON HOSPITAL
270 Park Avenue
Huntington, New York 11743

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK

-----X Index No.:

MARIE CELESTIN,

Plaintiff(s),

VERIFIED COMPLAINT

-Against-

HUNTINGTON HOSPITAL,

Defendant(s).

-----X

Plaintiff, MARIE CELESTIN, by her attorneys, CANNON & ACOSTA, LLP.,
complaining of the defendants herein, respectfully states and alleges upon information
and belief as follows:

FIRST: That at all times hereinafter mentioned, the plaintiff,
MARIE CELESTIN, was and still is a resident of the County of Suffolk, State of New
York.

SECOND: That defendant, HUNTINGTON HOSPITAL, was and
still is a business entity entitled to perform business in the State of New York.

THIRD: That on or about the 28TH day of December 2019, the
plaintiff, MARIE CELESTIN, was legally and lawfully a pedestrian at the aforesaid
premises.

FOURTH: That at all times hereinafter mentioned, the defendant,
HUNTINGTON HOSPITAL, was the owner and/or had exclusive possession of the
premises located at 270 Park Avenue, Huntington, New York 11743.

FIFTH: That at all times hereinafter mentioned, it was the duty of defendant, HUNTINGTON HOSPITAL, to properly maintain the aforementioned premises including the isles at premises.

SIXTH: That on or about 28th day of December 2019 the plaintiff, MARIE CELESTIN, was traversing the walkway at premises and was caused to slip and fall on uneven and broken walkway at the premises.

SEVENTH: That on or about the 28th day of December 2019, the plaintiff, MARIE CELESTIN, was caused to slip and fall on uneven and broken walkway at the aforesaid premises.

EIGHTH: That the aforesaid fall resulted in personal injuries and damages to the plaintiff, MARIE CELESTIN, solely by reason of the negligence, fault and carelessness of the defendants in the operation, maintenance, special use and control of the aforesaid premises.

NINTH: That this action falls within one or more of the exceptions set forth in Section 1602 of the Civil Practice Law and Rules.

TENTH: That as a result of the aforesaid fall, the plaintiff, MARIE CELESTIN, was caused to and did sustain permanent personal injuries.

ELEVENTH: That the defendants, HUNTINGTON HOSPITAL, had a duty to control and maintain the aforesaid premises in a safe manner for individuals traveling at the aforesaid location and failed to do so or did so in a negligent and/or unreasonable manner by causing or permitting premises in question to be defective and dangerous.

TWELFTH: That by reason of the foregoing careless, negligent and reckless acts and omissions of the defendants, the plaintiff, MARIE CELESTIN, sustained severe and painful personal injuries; was rendered sick, sore, lame and disabled and so remains; was prevented from attending to her usual duties and activities; sustained bodily damages; has lost and will continue to lose the enjoyment of life and was obligated to seek and receive medical care and attention and will hereinafter necessarily seek further medical care and attention as a consequence of the injuries aforesaid; all to her damages in the sum within the jurisdictional limits of this Court and for an amount in excess of the jurisdictional limits of the lower Courts of the State of New York.

WHEREFORE, the plaintiffs herein demand judgment as against the defendants for a sum within the jurisdictional limits of this Court and for an amount in excess of the jurisdictional limits of the lower Courts of the State of New York together with costs and disbursements of this action and for such other and further relief as this Court deems just and proper.

Dated: Huntington Station, New York
July 14, 2020

Yours etc,


CANNON & ACOSTA, LLP
Attorneys for Plaintiff(s)
1995 New York Avenue
Huntington Station, NY 11746
(631) 271-6363

TO:

HUNTINGTON HOSPITAL

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