

2. The defendant, Intercontinental Hotels Group Resources, Inc., is a corporation organized and existing under the laws of the state of Delaware, with its principal place of business located in the state of Georgia.

3. The defendant, Intercontinental Hotels Group, PLC, is a corporation organized and existing under the laws of the United Kingdom, with its principal place of business located in the United Kingdom.

4. The defendant, Intercontinental Carlton Cannes, is a corporation organized and existing under the laws of France, with its principal place of business located in France.

5. The defendant Intercontinental Hotels Group Resources, Inc. is a subsidiary of the defendant Intercontinental Hotels Group, PLC.

6. Upon information and belief, the defendant Intercontinental Carlton Cannes is a hotel owned, operated, managed, maintained, and or/controlled by the defendant Intercontinental Hotels Group, PLC.

7. Upon information and belief, the defendant Intercontinental Carlton Cannes is a hotel owned, operated, managed, maintained, and or/controlled by the defendant Intercontinental Hotels Group Resources, Inc.

8. The defendant Intercontinental Hotels Group, PLC does business as Intercontinental Hotels and Resorts and advertises the Intercontinental Carlton Cannes extensively in the State of

Connecticut in order to encourage and/or solicit Connecticut residents, businesses, clubs, and associations to that destination in Cannes, France.

9. The defendant Intercontinental Hotels Group Resources, Inc. does business as Intercontinental Hotels and Resorts and advertises the Intercontinental Carlton Cannes extensively in the State of Connecticut in order to encourage and/or solicit Connecticut residents, businesses, clubs, and associations to that destination in Cannes, France.

10. The defendant Intercontinental Carlton Cannes advertises its lodging and event services extensively in the State of Connecticut in order to encourage and/or solicit Connecticut residents, businesses, clubs, and associations to its hotel in Cannes, France.

11. The defendant, Reed Elsevier, Inc., is a corporation organized and existing under the laws of the state of Massachusetts, with its principal place of business located in Massachusetts.

12. The defendant, Reed Exhibitions, Ltd. is a corporation organized and existing under the laws of the United Kingdom, with its principal place of business located in the United Kingdom.

13. The defendant, Reed Midem Organisation, UK is a corporation organized and existing under the laws of the United Kingdom, with its principal place of business located in the United Kingdom.

14. Defendant Reed Midem Organisation, UK is a subsidiary of defendant Reed Exhibitions, Ltd., which is a subsidiary of defendant Reed Elsevier, Inc.

15. Defendant Reed Elsevier, Inc. advertises and/or solicits event management, conference, and advertising services extensively to residents, businesses, clubs, and associations in the State of Connecticut, in particular out of an office located on Main Avenue in Norwalk, Connecticut.

16. Defendant Reed Exhibitions, Ltd. advertises and/or solicits event management, conference, and advertising services extensively to residents, businesses, clubs, and associations in the State of Connecticut, in particular out of an office located on Main Avenue in Norwalk, Connecticut.

17. Defendant Reed Midem Organisation, UK advertises and/or solicits event management, conference, and advertising services extensively to residents, businesses, clubs, and associations in the State of Connecticut, in particular out of an office located on Main Avenue in Norwalk, Connecticut.

18. The jurisdiction of this Court is asserted pursuant to 28 U.S.C. §1332 in that the parties are of diverse citizenship and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

COUNT ONE: (Against Intercontinental Hotels Group Resources, Inc.)

1-18. The plaintiff repeats and re-alleges the allegations contained in paragraphs one through eighteen as if they were set forth fully herein.

19. On March 16, 2010, at approximately 8:00 p.m., Barbara Schmerzler was an invitee attending a reception at the Intercontinental Carlton Cannes.

20. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by defendant Reed Elsevier, Inc.

21. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by defendant Reed Exhibitions, Ltd.

22. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by defendant Reed Midem Organisation, UK.

23. On or before March 16, 2010, defendant Intercontinental Hotels Group Resources, Inc., through its agents, servants, and/or employees, hired Reed Elsevier, Inc., Reed Exhibitions, Ltd., and/or Reed Midem Organisation, UK to provide reception-related services.

24. On March 16, 2010, at approximately 8:00 p.m., as Barbara Schmerzler was walking in the hallway of the Intercontinental Carlton Cannes, she was caused to fall by an electrical cable that extended across the hotel hallway.

25. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Hotels Group, PLC was in possession of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

26. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Hotels Group, PLC was in control of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

27. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Hotels Group Resources, Inc. was in possession of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

28. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Hotels Group Resources, Inc. was in control of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

29. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Carlton Cannes was in possession of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

30. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Carlton Cannes was in control of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

31. On March 16, 2010, at approximately 8:00 p.m., and at all relevant times, the hallway of the Intercontinental Carlton Cannes was in a dangerous condition in that there was an electrical cable extended across the hotel hallway which was not secured to the floor.

32. At the date, time, and place of the aforesaid incident and for a reasonable time prior thereto, the defendant Intercontinental Hotels Group Resources, Inc., its agents, servants, and/or

employees knew or should have known of the dangerous condition that existed in the hallway, and failed to remedy the condition.

33. The dangerous condition of the hallway was caused by the negligence of the defendant Intercontinental Hotels Group Resources, Inc., its agents, servants, and/or employees in one or more of the following ways:

- (a) they extended an electrical cable across the hotel hallway;
- (b) they failed to secure the electrical cable to the floor;
- (c) they failed to provide adequate warning to reception attendees, in particular

Barbara Schmerzler, of the dangerous condition described above;

(d) they failed to properly inspect the hallway in order to render it reasonably safe for reception attendees, and other guests, to move about the hotel;

(e) they failed to maintain the premises in a reasonably safe condition;

(f) they failed to properly instruct its agents, servants, and/or employees regarding proper installation of the cable;

(g) they failed to supervise its agents, servants, and/or employees regarding the condition of the hotel, in particular the hallway where Barbara Schmerzler was caused to fall;

34. As a result of the dangerous condition of the premises, and the neglect of the defendant Intercontinental Hotels Group Resources, Inc., its agents, servants, and/or employees as described

herein, Barbara Schmerzler has suffered the following severe injuries, some or all of which are permanent in nature:

- (a) Left distal humerus fracture dislocation, resulting in a total left elbow replacement;
- (b) Permanent and disfiguring scarring.

35. As a result of these injuries, Barbara Schmerzler has experienced and will experience in the future, intense pain and suffering.

36. As a result of these injuries, Barbara Schmerzler has experienced and will experience in the future, mental and emotional injury.

37. As a result of these injuries, Barbara Schmerzler's ability to pursue and enjoy life's activities has been significantly reduced.

38. As a result of these injuries, Barbara Schmerzler has incurred, and will incur in the future, medical expenses.

39. As a result of these injuries, Barbara Schmerzler has lost time from work and has lost earnings, and her earning capacity has been and will be reduced.

COUNT TWO: (Against Intercontinental Hotels Group, PLC)

1-18. The plaintiff repeats and re-alleges the allegations contained in paragraphs one through eighteen as if they were set forth fully herein.

19. On March 16, 2010, at approximately 8:00 p.m., Barbara Schmerzler was an invitee attending a reception at the Intercontinental Carlton Cannes.

20. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by defendant Reed Elsevier, Inc.

21. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by defendant Reed Exhibitions, Ltd.

22. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by defendant Reed Midem Organisation, UK.

23. On or before March 16, 2010, defendant Intercontinental Hotels Group, PLC, through its agents, servants, and/or employees, hired Reed Elsevier, Inc., Reed Exhibitions, Ltd., and/or Reed Midem Organisation, UK to provide reception-related services.

24. On March 16, 2010, at approximately 8:00 p.m., as Barbara Schmerzler was walking in the hallway of the Intercontinental Carlton Cannes, she was caused to fall by an electrical cable that extended across the hotel hallway.

25. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Hotels Group, PLC was in possession of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

26. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Hotels Group, PLC was in control of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

27. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Hotels Group Resources, Inc. was in possession of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

28. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Hotels Group Resources, Inc. was in control of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

29. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Carlton Cannes was in possession of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

30. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Carlton Cannes was in control of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

31. On March 16, 2010, at approximately 8:00 p.m., and at all relevant times, the hallway of the Intercontinental Carlton Cannes was in a dangerous condition in that there was an electrical cable extended across the hotel hallway which was not secured to the floor.

32. At the date, time, and place of the aforesaid incident and for a reasonable time prior thereto, the Intercontinental Hotels Group, PLC, its agents, servants, and/or employees knew or should have known of the dangerous condition that existed in the hallway, and failed to remedy the condition.

33. The dangerous condition of the hallway was caused by the negligence of the defendant Intercontinental Hotels Group, PLC, its agents, servants, and/or employees in one or more of the following ways:

- (a) they extended an electrical cable across the hotel hallway;
- (b) they failed to secure the electrical cable to the floor;
- (c) they failed to provide adequate warning to reception attendees, in particular Barbara Schmerzler, of the dangerous condition described above;
- (d) they failed to properly inspect the hallway in order to render it reasonably safe for reception attendees, and other guests, to move about the hotel;
- (e) they failed to maintain the premises in a reasonably safe condition;
- (f) they failed to properly instruct its agents, servants, and/or employees regarding proper installation of the cable;

(g) they failed to supervise its agents, servants, and/or employees regarding the condition of the hotel, in particular the hallway where Barbara Schmerzler was caused to fall.

34. As a result of the dangerous condition of the premises, and the neglect of the defendant Intercontinental Hotels Group, PLC, its agents, servants, and/or employees as described herein, Barbara Schmerzler has suffered the following severe injuries, some or all of which are permanent in nature:

(a) Left distal humerus fracture dislocation, resulting in a total left elbow replacement;

(b) Permanent and disfiguring scarring.

35. As a result of these injuries, Barbara Schmerzler has experienced and will experience in the future, intense pain and suffering.

36. As a result of these injuries, Barbara Schmerzler has experienced and will experience in the future, mental and emotional injury.

37. As a result of these injuries, Barbara Schmerzler's ability to pursue and enjoy life's activities has been significantly reduced.

38. As a result of these injuries, Barbara Schmerzler has incurred, and will incur in the future, medical expenses.

39. As a result of these injuries, Barbara Schmerzler has lost time from work and has lost earnings, and her earning capacity has been and will be reduced.

COUNT THREE: (Against Intercontinental Carlton Cannes)

1-18. The plaintiff repeats and re-alleges the allegations contained in paragraphs one through eighteen as if they were set forth fully herein.

19. On March 16, 2010, at approximately 8:00 p.m., Barbara Schmerzler was an invitee attending a reception at the Intercontinental Carlton Cannes.

20. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by defendant Reed Elsevier, Inc.

21. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by defendant Reed Exhibitions, Ltd.

22. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by defendant Reed Midem Organisation, UK.

23. On or before March 16, 2010, the defendant Intercontinental Carlton Cannes, through its agents, servants, and/or employees, hired Reed Elsevier, Inc., Reed Exhibitions, Ltd., and/or Reed Midem Organisation, UK to provide reception-related services.

24. On March 16, 2010, at approximately 8:00 p.m., as Barbara Schmerzler was walking in the hallway of the Intercontinental Carlton Cannes, she was caused to fall by an electrical cable that extended across the hotel hallway.

25. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Hotels Group, PLC was in possession of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

26. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Hotels Group, PLC was in control of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

27. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Hotels Group Resources, Inc. was in possession of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

28. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Hotels Group Resources, Inc. was in control of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

29. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Carlton Cannes was in possession of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

30. On March 16, 2010, and at all relevant times herein, defendant Intercontinental Carlton Cannes was in control of the Intercontinental Carlton Cannes and, in particular, the hotel hallway where Barbara Schmerzler was caused to fall.

31. On March 16, 2010, at approximately 8:00 p.m., and at all relevant times, the hallway of the Intercontinental Carlton Cannes was in a dangerous condition in that there was an electrical cable extended across the hotel hallway which was not secured to the floor.

32. At the date, time, and place of the aforesaid incident and for a reasonable time prior thereto, the Intercontinental Carlton Cannes, its agents, servants, and/or employees knew or should have known of the dangerous condition that existed in the hallway, and failed to remedy the condition.

33. The dangerous condition of the hallway was caused by the negligence of the defendant Intercontinental Carlton Cannes, its agents, servants, and/or employees in one or more of the following ways:

- (a) they extended an electrical cable across the hotel hallway;
- (b) they failed to secure the electrical cable to the floor;
- (c) they failed to provide adequate warning to reception attendees, in particular Barbara Schmerzler, of the dangerous condition described above;
- (d) they failed to properly inspect the hallway in order to render it reasonably safe for reception attendees, and other guests, to move about the hotel;
- (e) they failed to maintain the premises in a reasonably safe condition;
- (f) they failed to properly instruct its agents, servants, and/or employees regarding proper installation of the cable;

(g) they failed to supervise its agents, servants, and/or employees regarding the condition of the hotel, in particular the hallway where Barbara Schmerzler was caused to fall;

34. As a result of the dangerous condition of the premises, and the neglect of the Intercontinental Carlton Cannes, its agents, servants, and/or employees as described herein, Barbara Schmerzler has suffered the following severe injuries, some or all of which are permanent in nature:

(a) Left distal humerus fracture dislocation, resulting in a total left elbow replacement;

(b) Permanent and disfiguring scarring.

35. As a result of these injuries, Barbara Schmerzler has experienced and will experience in the future, intense pain and suffering.

36. As a result of these injuries, Barbara Schmerzler has experienced and will experience in the future, mental and emotional injury.

37. As a result of these injuries, Barbara Schmerzler's ability to pursue and enjoy life's activities has been significantly reduced.

38. As a result of these injuries, Barbara Schmerzler has incurred, and will incur in the future, medical expenses.

39. As a result of these injuries, Barbara Schmerzler has lost time from work and has lost earnings, and her earning capacity has been and will be reduced.

COUNT FOUR: (Against Reed Elsevier, Inc.)

1-18. The plaintiff repeats and re-alleges the allegations contained in paragraphs one through eighteen as if they were set forth fully herein.

19. On March 16, 2010, at approximately 8:00 p.m., Barbara Schmerzler was an invitee attending a reception at the Intercontinental Carlton Cannes.

20. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by Reed Elsevier, Inc.

21. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by Reed Exhibitions, Ltd.

22. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by Reed Midem Organisation, UK.

23. On or before March 16, 2010, Intercontinental Hotels Group, PLC, through its agents, servants, and/or employees, hired Reed Elsevier, Inc. to provide reception-related services.

24. On or before March 16, 2010, Intercontinental Hotels Group, PLC, through its agents, servants, and/or employees, hired Reed Exhibitions, Ltd. to provide reception-related services.

25. On or before March 16, 2010, Intercontinental Hotels Group, PLC, through its agents, servants, and/or employees, hired Reed Midem Organisation, UK to provide reception-related services.

26. On or before March 16, 2010, Intercontinental Hotels Group Resources, Inc., through its agents, servants, and/or employees, hired Reed Elsevier, Inc. to provide reception-related services.

27. On or before March 16, 2010, Intercontinental Hotels Group Resources, Inc., through its agents, servants, and/or employees, hired Reed Exhibitions, Ltd. to provide reception-related services.

28. On or before March 16, 2010, Intercontinental Hotels Group Resources, Inc., through its agents, servants, and/or employees, hired Reed Midem Organisation, UK to provide reception-related services.

29. On or before March 16, 2010, Intercontinental Carlton Cannes, through its agents, servants, and/or employees, hired Reed Elsevier, Inc. to provide reception-related services.

30. On or before March 16, 2010, Intercontinental Carlton Cannes, through its agents, servants, and/or employees, hired Reed Exhibitions, Ltd. to provide reception-related services.

31. On or before March 16, 2010, Intercontinental Carlton Cannes, through its agents, servants, and/or employees, hired Reed Midem Organisation, UK to provide reception-related services.

32. On March 16, 2010, at approximately 8:00 p.m., as Barbara Schmerzler was walking in the hallway of the Intercontinental Carlton Cannes, she was caused to fall by an electrical cable that extended across the hotel hallway.

33. On March 16, 2010, at approximately 8:00 p.m., and at all relevant times, the hallway of the Intercontinental Carlton Cannes was in a dangerous condition in that there was an electrical cable extended across the hotel hallway which was not secured to the floor.

34. At the date, time, and place of the aforesaid incident and for a reasonable time prior thereto, the defendant Reed Elsevier, Inc., its agents, servants, and/or employees knew or should have known of the dangerous condition that existed in the hallway, and failed to remedy the condition.

35. The dangerous condition of the hallway was caused by the negligence of the defendant Reed Elsevier, Inc., its agents, servants, and/or employees in one or more of the following ways:

- (a) they extended an electrical cable across the hotel hallway;
- (b) they failed to secure the electrical cable to the floor;
- (c) they failed to provide adequate warning to reception attendees, in particular Barbara Schmerzler, of the dangerous condition described above;
- (d) they failed to properly inspect the hallway in order to render it reasonably safe for reception attendees, and other guests, to move about the hotel;
- (e) they failed to maintain the premises in a reasonably safe condition;
- (f) they failed to properly instruct its agents, servants, and/or employees regarding proper installation of the cable;

(g) they failed to supervise its agents, servants, and/or employees regarding the condition of the hotel, in particular the hallway where Barbara Schmerzler was caused to fall.

36. As a result of the dangerous condition of the premises, and the neglect of the defendant Reed Elsevier, Inc., its agents, servants, and/or employees as described herein, Barbara Schmerzler has suffered the following severe injuries, some or all of which are permanent in nature:

(a) Left distal humerus fracture dislocation, resulting in a total left elbow replacement;

(b) Permanent and disfiguring scarring.

37. As a result of these injuries, Barbara Schmerzler has experienced and will experience in the future, intense pain and suffering.

38. As a result of these injuries, Barbara Schmerzler has experienced and will experience in the future, mental and emotional injury.

39. As a result of these injuries, Barbara Schmerzler's ability to pursue and enjoy life's activities has been significantly reduced.

40. As a result of these injuries, Barbara Schmerzler has incurred, and will incur in the future, medical expenses.

41. As a result of this collision and these injuries, Barbara Schmerzler has lost time from work and has lost earnings, and her earning capacity has been and will be reduced.

COUNT FIVE: (Against Reed Exhibitions, Ltd.)

1-18. The plaintiff repeats and re-alleges the allegations contained in paragraphs one through eighteen as if they were set forth fully herein.

19. On March 16, 2010, at approximately 8:00 p.m., Barbara Schmerzler was an invitee attending a reception at the Intercontinental Carlton Cannes.

20. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by Reed Elsevier, Inc.

21. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by Reed Exhibitions, Ltd.

22. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by Reed Midem Organisation, UK.

23. On or before March 16, 2010, Intercontinental Hotels Group, PLC, through its agents, servants, and/or employees, hired Reed Elsevier, Inc. to provide reception-related services.

24. On or before March 16, 2010, Intercontinental Hotels Group, PLC, through its agents, servants, and/or employees, hired Reed Exhibitions, Ltd. to provide reception-related services.

25. On or before March 16, 2010, Intercontinental Hotels Group, PLC, through its agents, servants, and/or employees, hired Reed Midem Organisation, UK to provide reception-related services.

26. On or before March 16, 2010, Intercontinental Hotels Group Resources, Inc., through its agents, servants, and/or employees, hired Reed Elsevier, Inc. to provide reception-related services.

27. On or before March 16, 2010, Intercontinental Hotels Group Resources, Inc., through its agents, servants, and/or employees, hired Reed Exhibitions, Ltd. to provide reception-related services.

28. On or before March 16, 2010, Intercontinental Hotels Group Resources, Inc., through its agents, servants, and/or employees, hired Reed Midem Organisation, UK to provide reception-related services.

29. On or before March 16, 2010, Intercontinental Carlton Cannes, through its agents, servants, and/or employees, hired Reed Elsevier, Inc. to provide reception-related services.

30. On or before March 16, 2010, Intercontinental Carlton Cannes, through its agents, servants, and/or employees, hired Reed Exhibitions, Ltd. to provide reception-related services.

31. On or before March 16, 2010, Intercontinental Carlton Cannes, through its agents, servants, and/or employees, hired Reed Midem Organisation, UK to provide reception-related services.

32. On March 16, 2010, at approximately 8:00 p.m., as Barbara Schmerzler was walking in the hallway of the Intercontinental Carlton Cannes, she was caused to fall by an electrical cable that extended across the hotel hallway.

33. On March 16, 2010, at approximately 8:00 p.m., and at all relevant times, the hallway of the Intercontinental Carlton Cannes was in a dangerous condition in that there was an electrical cable extended across the hotel hallway which was not secured to the floor.

34. At the date, time, and place of the aforesaid incident and for a reasonable time prior thereto, the Reed Exhibitions, Ltd. their agents, servants, and/or employees knew or should have known of the dangerous condition that existed in the hallway, and failed to remedy the condition.

35. The dangerous condition of the hallway was caused by the negligence of Reed Exhibitions, Ltd., their agents, servants, and/or employees in one or more of the following ways:

- (a) they extended an electrical cable across the hotel hallway;
- (b) they failed to secure the electrical cable to the floor;
- (c) they failed to provide adequate warning to reception attendees, in particular Barbara Schmerzler, of the dangerous condition described above;
- (d) they failed to properly inspect the hallway in order to render it reasonably safe for reception attendees, and other guests, to move about the hotel;
- (e) they failed to maintain the premises in a reasonably safe condition;
- (f) they failed to properly instruct its agents, servants, and/or employees regarding proper installation of the cable;

(g) they failed to supervise its agents, servants, and/or employees regarding the condition of the hotel, in particular the hallway where Barbara Schmerzler was caused to fall.

36. As a result of the dangerous condition of the premises, and the neglect of Reed Exhibitions, Ltd., their agents, servants, and/or employees as described herein, Barbara Schmerzler has suffered the following severe injuries, some or all of which are permanent in nature:

(a) Left distal humerus fracture dislocation, resulting in a total left elbow replacement;

(b) Permanent and disfiguring scarring.

37. As a result of these injuries, Barbara Schmerzler has experienced and will experience in the future, intense pain and suffering.

38. As a result of these injuries, Barbara Schmerzler has experienced and will experience in the future, mental and emotional injury.

39. As a result of these injuries, Barbara Schmerzler's ability to pursue and enjoy life's activities has been significantly reduced.

40. As a result of these injuries, Barbara Schmerzler has incurred, and will incur in the future, medical expenses.

41. As a result of this collision and these injuries, Barbara Schmerzler has lost time from work and has lost earnings, and her earning capacity has been and will be reduced.

COUNT SIX: (Against Reed Midem Organisation, UK)

1-18. The plaintiff repeats and re-alleges the allegations contained in paragraphs one through eighteen as if they were set forth fully herein.

19. On March 16, 2010, at approximately 8:00 p.m., Barbara Schmerzler was an invitee attending a reception at the Intercontinental Carlton Cannes.

20. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by Reed Elsevier, Inc.

21. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by Reed Exhibitions, Ltd.

22. At that date, time, and place, the reception, which included several exhibitions, was organized, managed, coordinated, and/or directed by Reed Midem Organisation, UK.

23. On or before March 16, 2010, Intercontinental Hotels Group, PLC, through its agents, servants, and/or employees, hired Reed Elsevier, Inc. to provide reception-related services.

24. On or before March 16, 2010, Intercontinental Hotels Group, PLC, through its agents, servants, and/or employees, hired Reed Exhibitions, Ltd. to provide reception-related services.

25. On or before March 16, 2010, Intercontinental Hotels Group, PLC, through its agents, servants, and/or employees, hired Reed Midem Organisation, UK to provide reception-related services.

26. On or before March 16, 2010, Intercontinental Hotels Group Resources, Inc., through its agents, servants, and/or employees, hired Reed Elsevier, Inc. to provide reception-related services.

27. On or before March 16, 2010, Intercontinental Hotels Group Resources, Inc., through its agents, servants, and/or employees, hired Reed Exhibitions, Ltd. to provide reception-related services.

28. On or before March 16, 2010, Intercontinental Hotels Group Resources, Inc., through its agents, servants, and/or employees, hired Reed Midem Organisation, UK to provide reception-related services.

29. On or before March 16, 2010, Intercontinental Carlton Cannes, through its agents, servants, and/or employees, hired Reed Elsevier, Inc. to provide reception-related services.

30. On or before March 16, 2010, Intercontinental Carlton Cannes, through its agents, servants, and/or employees, hired Reed Exhibitions, Ltd. to provide reception-related services.

31. On or before March 16, 2010, Intercontinental Carlton Cannes, through its agents, servants, and/or employees, hired Reed Midem Organisation, UK to provide reception-related services.

32. On March 16, 2010, at approximately 8:00 p.m., as Barbara Schmerzler was walking in the hallway of the Intercontinental Carlton Cannes, she was caused to fall by an electrical cable that extended across the hotel hallway.

33. On March 16, 2010, at approximately 8:00 p.m., and at all relevant times, the hallway of the Intercontinental Carlton Cannes was in a dangerous condition in that there was an electrical cable extended across the hotel hallway which was not secured to the floor.

34. At the date, time, and place of the aforesaid incident and for a reasonable time prior thereto, the defendant Reed Midem Organisation, UK, their agents, servants, and/or employees knew or should have known of the dangerous condition that existed in the hallway, and failed to remedy the condition.

35. The dangerous condition of the hallway was caused by the negligence of Reed Midem Organisation, UK, their agents, servants, and/or employees in one or more of the following ways:

- (a) they extended an electrical cable across the hotel hallway;
- (b) they failed to secure the electrical cable to the floor;
- (c) they failed to provide adequate warning to reception attendees, in particular Barbara Schmerzler, of the dangerous condition described above;
- (d) they failed to properly inspect the hallway in order to render it reasonably safe for reception attendees, and other guests, to move about the hotel;
- (e) they failed to maintain the premises in a reasonably safe condition;
- (f) they failed to properly instruct its agents, servants, and/or employees regarding proper installation of the cable;

(g) they failed to supervise its agents, servants, and/or employees regarding the condition of the hotel, in particular the hallway where Barbara Schmerzler was caused to fall.

36. As a result of the dangerous condition of the premises, and the neglect of Reed Midem Organisation, UK, their agents, servants, and/or employees as described herein, Barbara Schmerzler has suffered the following severe injuries, some or all of which are permanent in nature:

(a) Left distal humerus fracture dislocation, resulting in a total left elbow replacement;

(b) Permanent and disfiguring scarring.

37. As a result of these injuries, Barbara Schmerzler has experienced and will experience in the future, intense pain and suffering.

38. As a result of these injuries, Barbara Schmerzler has experienced and will experience in the future, mental and emotional injury.

39. As a result of these injuries, Barbara Schmerzler's ability to pursue and enjoy life's activities has been significantly reduced.

40. As a result of these injuries, Barbara Schmerzler has incurred, and will incur in the future, medical expenses.

41. As a result of this collision and these injuries, Barbara Schmerzler has lost time from work and has lost earnings, and her earning capacity has been and will be reduced.

WHEREFORE, the plaintiff, Barbara Schmerzler, prays for judgment as follows:

- a.) Compensatory and consequential damages;
- b.) Attorneys' fees as allowed by law;
- c.) Costs of suit;
- d.) Such other relief as the Court deems just and proper.

THE PLAINTIFF,

BY: 

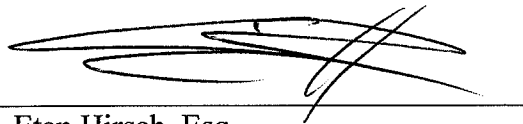
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JURY DEMAND

The plaintiff demands a jury trial of all issues involved, now, or in the future, in the above cause.

THE PLAINTIFF,

BY: _____



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