

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ASHLEY STEVENSON,

Plaintiff,

-vs-

Case No: 11-7839

SPIRIT CRUISES, LLC,

Defendant.

O'BRYAN BAUN KARAMANIAN
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-and-

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COMPLAINT

NOW COMES Plaintiff, by and through counsel undersigned, O'BRYAN BAUN
KARAMANIAN, complaining against Defendant as follows:

1. Jurisdiction and venue lie in this action, Defendant conducting business within this forum's boundaries.

2. Jurisdiction is founded under the Jones Act (46 USCA 30104) for negligence, and under the General Maritime Law for unseaworthiness, maintenance, cure and wages.

3. At all times material to issues herein Plaintiff served as an employee of Defendant serving as a crew member aboard its vessels, with all acts and/or omissions giving rise to this action occurring in the course of Plaintiff's employment in the service of his ship.

4. On or about September 1, 2011, Plaintiff was in the course of her employment when she was required to negotiate on an inadequately lit stairway and as a result of said failure to provide a safe place to work and seaworthy vessel she was injured.

5. Defendant's tortuous acts aforesaid caused or contributed to Plaintiff's damages, **inter alia**, as follows:

- a. Pain and suffering, past, present and future;
- b. Mortification, humiliation, fright shock and embarrassment;
- c. Loss of earnings and earning capacity;
- d. Hospital, pharmaceutical and other cure expenses;
- e. Aggravation of prior condition, if any there be;
- f. Inability to engage in social, recreational, and other pursuits previously enjoyed;
- g. Mental anguish;
- h. Found;

- i. Maintenance, cure, wages, attorney fees and/or punitive damages.

WHEREFORE, Plaintiff demands trial by jury and judgment against Defendant, together with interest, costs, attorney fees and expenses, all to be methodically adjusted upwards during the pendency of this cause.

O'BRYAN BAUN KARAMANIAN

/s/ Dennis M. O'Bryan

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/s/ Frederic Mendelsohn (w/ consent)

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Dated: November 4, 2011