

BONNIE THOMPSON

FILED 36TH JUDICIAL DISTRICT COURT

VERSUS

2008 JAN -3 PM 3:10

DOCKET NO.: C2008-0012

GATEHOUSE MEDIA LOUISIANA HOLDINGS, INC. and NEWSLEADER, INC. d/b/a BEAUREGARD DAILY NEWS
CLERK OF COURT
BEAUREGARD PARISH

BEAUREGARD PARISH, LOUISIANA
Filed: 1/3/08
By: Bonnie Thompson
Clerk of Court

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, comes Bonnie Thompson, a resident of full age and majority and domiciled in Bearegard Parish, Louisiana, respectfully represents:

1.

Sought to be made defendants are the corporate owners and operators of a newspaper business located at 903 West 1st Street in DeRidder, Louisiana, known as "Bearegard Daily News", to wit:

- A. Gatehouse Media Louisiana Holdings, Inc., a division of Gatehouse Media, Inc., a corporation with its principal place of business in Fairport, New York and serving as a Louisiana Holding Company for the larger corporation, Gatehouse Media, Inc.
- B. Newsleader, Inc., a corporation sharing the same mailing address, domicile address, and corporate principals as Gatehouse Media, Inc., Gatehouse Media Louisiana Holdings, Inc. and listed as the business successor of Leesville Leader, Inc., the predecessor of the business corporation doing business as Bearegard Daily News.

2.

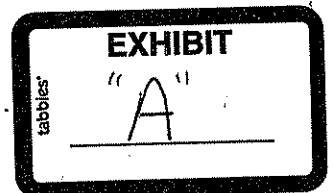
This honorable court has jurisdiction over this matter and is a proper venue pursuant to Louisiana Code of Civil Procedure Article 74.

3.

On or about January 5, 2007, Bonnie Thompson, your petitioner, was conducting business at the Bearegard Daily News as a patron, and associated with business "Your Home-Town Shopper", located at 903 West 1st Street in DeRidder, Louisiana, and is the principal place of business for "Bearegard Daily News".

4.

After transacting business within the commercial structure, your petitioner exited the facility, traversed the walkway leading to the business's parking lot and began traversing the parking lot in order to reach her personal automobile.



5.

While traversing the parking lot, your petitioner tripped, fell and sustained serious personal injuries.

6.

At the time of her accident, the fact that a defect existed in the parking lot of the Beauregard Daily News was not apparent as precipitation had caused the accumulation of water on the parking lot covering an area of ruin, which caused an unreasonable risk of harm to patrons traversing the parking lot of Beauregard Daily News.

7.

Later, it was learned that the concrete parking lot at the Beauregard Daily News had been constructed with certain expansion joints that has withered and crumbled in time. As a result of this, a hole was created between segments of the concrete in parking lot which would have not been immediately apparent to patrons at the Beauregard Daily News, but clearly created unreasonable risk of harm due to this ruin.

8.

The Beauregard Daily News is a trade name for a near daily news publication registered with the Louisiana Secretary of State commercial division as "Newsleader, Inc." and wholly owned by Gatehouse Media, Inc. of Fairport, New York.

9.

Gatehouse Media, Inc. holds itself out commercially as one of the largest providers of weekly, bi-weekly and daily as a "for-profit corporation".

10.

Upon information and belief, upon entering the market of a state, Gatehouse Media, Inc. will incorporate its statewide publications through state holding companies. In this case, Gatehouse Media, Inc. established the corporation "Gatehouse Media Louisiana Holdings, Inc."

11.

Upon information and belief, Gatehouse Media, Inc. wholly owns Gatehouse Media Louisiana Holdings, Inc., which in turn owns Newsleader, Inc. which does business as "The Beauregard Daily News".

12.

In accordance with Louisiana Civil Code Articles 2315 and 2317.1, your petitioner will show that the defendants were negligent in maintaining the premises owned, operated or within their custody for damages occasioned by ruin, vice and defect.

13.

Specifically, due to the want of reasonable care and inspection of the property, a ruin, defect and/or vices within the expansion joints in the parking lot at the Beauregard Daily News which caused Bonnie Thompson to trip and fall would have been prevented by the exercise of reasonable and prudent care including routine maintenance and inspection. The failure to employ such routine inspection and maintenance would have easily made the incident which caused the injuries to Bonnie Thompson preventable. Accordingly, the sole proximate cause of Bonnie Thompson's injuries were due to the negligence and strict liability of the Defendants in this case.

14.

Bonnie Thompson was free from fault in causing her injuries as a result of this accident.

15.

As a result of the trip and fall, your petitioner sustained a complex, compound and comminuted fracture in her upper extremity. As a result of this injury, your petitioner has undergone multiple surgeries in attempts toward correction and reconstruction. Despite her treating physician's best efforts, your petitioner has been left with permanent disability of her upper extremity as well as permanent loss of use and scarring.

16.

As a result of this injury, your petitioner has incurred medical expenses in the past, is presently incurring medical expenses and anticipates that she will incur such expenses in the future. Your petitioner has endured much physical pain and suffering in the past, is presently enduring such pain and suffering and anticipates that she will continue to endure suffering for the remainder of her life. Finally, your petitioner has lost wages in the past, is presently losing wages and anticipates that she will lose wages and business opportunities in the future.

17.

Upon information and belief, the owners and operators of the Beauregard Daily News have liability insurance as well as premises medical payments insurance which will provide insurance coverage available for injury sustained in this accident due to the fault of the defendants as

