

**UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS**

<p><b>GUISEPPE RAVESI ,</b> <b>Plaintiff</b></p> <p><b>V.</b></p> <p><b>INTEGRITY FISHING CORPORATION)</b> <b>Defendant</b></p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p><b>Civil Action</b></p> <p><b>No. _____</b></p>
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PLAINTIFF'S COMPLAINT AND DEMAND FOR JURY TRIAL

Now comes the Plaintiff in the above-entitled matter and for his complaint states:

General Factual Allegations

1. The Plaintiff, Giuseppe Ravesi, is a resident of Revere, County of Suffolk, Commonwealth of Massachusetts.
2. The Defendant, Integrity Fishing Corporation, is a corporation, duly organized and existing under the laws of the Commonwealth of Massachusetts.
3. On or about March 27, 2009, the Defendant, Integrity Fishing Corporation, was doing business within the Commonwealth of Massachusetts.
4. On or about March 27, 2009, the Plaintiff, Giuseppe Ravesi, was employed by the Defendant, Integrity Fishing Corporation.
5. On or about March 27, 2009, the Plaintiff, Giuseppe Ravesi, was employed by the Defendant, Integrity Fishing Corporation, as a seaman, and a member of the crew of the F/V AMERICAN HERITAGE.
6. On or about March 27, 2009, the Defendant, Integrity Fishing Corporation, owned the F/V AMERICAN HERITAGE.

7. The Defendant, Integrity Fishing Corporation, chartered the F/V AMERICAN HERITAGE from some other person or entity such that on or about March 27, 2009 the Defendant, Integrity Fishing Corporation was the owner pro hac vice of the F/V AMERICAN HERITAGE.

8. On or about March 27, 2009, the Defendant, Integrity Fishing Corporation, operated the F/V AMERICAN HERITAGE.

9. On or about March 27, 2009, the Defendant, Integrity Fishing Corporation, and/or the Defendant's agents, servants, and/or employees, controlled the F/V AMERICAN HERITAGE.

10. On or about March 27, 2009, the F/V AMERICAN HERITAGE was in navigable waters.

11. On or about March 27, 2009, while in the in the performance of his duties in the service of the F/V AMERICAN HERITAGE, the Plaintiff, Giuseppe Ravesi, sustained personal injuries.

12. Prior to and at the time he sustained the above-mentioned personal injuries, the Plaintiff, Giuseppe Ravesi, was exercising due care.

#### Jurisdiction

13. This Court has subject matter jurisdiction over this matter pursuant to The Merchant Marine Act of 1920, commonly called the Jones Act, 46 U.S.C., §30104 , et. seq. (formerly §688 et. seq.).

14. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §1331, 28 U.S.C. §1332, and 28 U.S.C. §1333.

COUNT I

Giuseppe Ravesi v. Integrity Fishing Corporation

(JONES ACT NEGLIGENCE)

15. The Plaintiff, Giuseppe Ravesi, reiterates the allegations set forth in paragraphs 1 through 14 above.

16. The personal injuries sustained by the Plaintiff, Giuseppe Ravesi, were not caused by any fault on his part but were caused by the negligence of the Defendant, its agents, servants and/or employees.

17. As a result of said injuries, the Plaintiff, Giuseppe Ravesi, has suffered pain of body and anguish of mind, lost time from his usual work and pursuits, incurred medical expenses, and has sustained and will sustain other damages as will be shown at trial.

18. This cause of action is brought under the Merchant Marine Act of 1920, commonly called the Jones Act.

WHEREFORE, the Plaintiff, Giuseppe Ravesi, demands judgment against the Defendant, Integrity Fishing Corporation, in an amount to be determined by the jury together with interest and costs.

COUNT II

Giuseppe Ravesi v. Integrity Fishing Corporation

(GENERAL MARITIME LAW - UNSEAWORTHINESS)

19. The Plaintiff, Giuseppe Ravesi, reiterates the allegations set forth in paragraphs 1 through 14 above.

20. The personal injuries sustained by the Plaintiff, Giuseppe Ravesi, were due to no

fault of his, but were caused by the Unseaworthiness of the F/V AMERICAN HERITAGE.

21. As a result of said injuries, the Plaintiff, Giuseppe Ravesi has, suffered pain of body and anguish of mind, lost time from his usual work and pursuits, incurred medical expenses, and has sustained and will sustain other damages as will be shown at trial.

22. This cause of action is brought under the General Maritime Law for Unseaworthiness and is for the same cause of action as Count I.

WHEREFORE, the Plaintiff, Giuseppe Ravesi, demands judgment against the Defendant, Integrity Fishing Corporation, in the amount to be determined by a jury together with interest and costs.

### COUNT III

#### Giuseppe Ravesi v. Integrity Fishing Corporation

(GENERAL MARITIME LAW - MAINTENANCE and CURE)

23. The Plaintiff, Giuseppe Ravesi, reiterates all of the allegations set forth in Paragraphs 1 through 14 above.

24. As a result of the personal injuries described in paragraph 11 above, the Plaintiff, Giuseppe Ravesi, has incurred and will continue to incur expenses for his maintenance and cure.

WHEREFORE, the Plaintiff, Giuseppe Ravesi, demands judgment against the Defendant, Integrity Fishing Corporation, in the amount of \$10,000 dollars for maintenance and cure, together with costs and interest.

PLAINTIFF DEMANDS A TRIAL BY JURY ON ALL ISSUES  
RAISED IN HIS COMPLAINT.

Respectfully submitted for  
the Plaintiff, GUISEPPE RAVESI,  
by his attorneys,

/s/ David F. Anderson  
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Dated: 03/23/12