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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

07 - 2346

Elaine C. Gulliford
on behalf of John R. Gulliford, Jr. : 105 Windsor Ct.
: Lumberton, NJ 08048-4631

CIVIL ACTION NO.

and
and
and

vs. Philadelphia Eagles :
+ Jeffrey Lurie :
c/o Lincoln Financial Field : Novacare complex
Lincoln National Corporation : Novacare Way
: Philadelphia, PA 19145
: 1500 Market St., Suite 3900
: Philadelphia, PA 19102
ARAMARK : 1101 Market St.
National Event Services : Philadelphia, PA 19107
: 501 Bailey Rd., Yeadon, PA 19050

COMPLAINT

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EL**07 - 2346**COMPLAINT

I would like to file a pro-se Discovery Lawsuit (and inspection of premises) on behalf of my husband, John R. Gulliford, Jr. in order to ascertain the facts surrounding his brain injury incurred at the Lincoln Financial Center on November 12, 2006. John's sister, Joanne Gulliford Hoban, submitted proper authorization and requested information from the Philadelphia Eagles and Lincoln Financial Field immediately after the occurrence, but her requests went unanswered. Attached is a copy of her most recent letter dated January 10, 2007. We also need to know the identity of the company in charge of security on November 12, 2006 and their contact information.

On November 12, 2006, I received a call from a police officer who called "ICE" (in case of emergency) on my husband's cell phone, and he told me that my husband had been hurt. He went on to verify my husband's identity with me by describing his build and the clothes he was wearing. He informed me they were going to take him to the hospital but they weren't sure which one and I would hear back. I received another call shortly after from either a doctor or a paramedic, who indicated that my husband somehow fell down the steps at the Lincoln Financial Field (where he had gone to see the Eagles game that day) and that it was his understanding that several people also fell down the steps at the same time. He said my husband had been knocked unconscious for a time, but was now conscious and able to speak. He informed me they were taking him to Jefferson University Hospital. In being evaluated in the emergency room there, he was diagnosed as having a skull fracture, a brain bleed, and a brain bruise. The bleed was on one side of his head from the impact, and the bruise was on the other side due to the brain being knocked against the other side of the skull as a result of the impact. I prayed very hard. In the emergency room, before he started having pain so bad that he repeatedly lost consciousness and before entering into a combative state over which he had no control, he recalled that as he was exiting the Lincoln Financial Field via the steps, sensed a disturbance in the crowd, and tried to move away from it. That is the last thing he remembered before waking up in the hospital. He was awake before, during, and after the ambulance ride because he called me and told me I didn't have to come to the hospital and he was awake at the scene when they had me on the phone; he just doesn't remember due to the brain injury.

My husband and I would like to know what happened, and he feels he has a right to discover the truth. We do not think he fell over his own feet, especially with the information about others falling down the steps with him that I was given. We feel there may be video cameras that could have captured the occurrence. We feel the ambulance and paramedic company surely have a report on the matter as does the Lincoln Financial Field and the Philadelphia Eagles. We would like to be provided with any and all information regarding the situation that day by all involved to determine what happened so that any legal appropriate action can be taken. If it turns out there is no appropriate action to be taken, then we will at least be at peace knowing what did indeed happen.

My husband was admitted to the Nuerosensory Intensive Care Unit of Jefferson Hospital on November 12, 2006 and remained there through November 15, 2006, was given his last rights due to the severity of his injuries, suffered a seizure on November 24, 2006 due to the brain injury, and suffered greatly throughout his recovery until he returned to work as early as he could on January 22, 2007 as his lost income and the hospital bills were greatly straining our already strained finances. I did not think he was able to return to work that quickly, but he is a strong willed person. He still has limitations due to the injury to this day.

Joanne Gulliford Hoban
12 Gover Road
Millbury, MA 01527
(508) 865-8504

January 10, 2007

Via Facsimile (267) 570-4165

Paul Turner
Manager, Guest Services
Philadelphia Eagles
Lincoln Financial Field

Re: John R. Gulliford

Dear Mr. Turner:

On November 16, 2006, I enclosed an authorization for the release of medical records and reports regarding my brother, John Gulliford and the accident he suffered at Lincoln Financial Field on November 12, 2006. To date, I have not received any records, incident reports or materials in follow-up to my request. When we spoke, you indicated you would forward my request directly to your insurer and counsel – I have not received the courtesy of a reply from them either.

Needless to say, I am disappointed by the lack of response from the Philadelphia Eagles. It took many days and messages in order to speak with you directly when this first occurred and I continue to be avoided by your organization.

My brother sustained very severe injuries at Lincoln Financial Field on November 12, 2006 that required a stay in the Intensive Care Unit at Jefferson University Hospital. To date, he has not returned to work and continues to treat with care providers. While I know your organization is quite busy, this was a major event for my brother and his family and we would like a response to our request.

Specifically, I am requesting copies of any and all incident reports filled out regarding my brother and the fall he sustained, in addition to any internal reports or evaluations that were done after his fall. Also, please advise if the Eagles are in possession of any information that may identify individuals also present at the time he fell (some have reported that multiple people fell at the same time that day on the wet stairs at the field) and whether any witness statements were obtained. My brother's fall occurred on the steps from the first level down toward the street level. In addition, I request the identification and location of all security cameras in use on November 12, 2006 that were in the vicinity of his fall.

11-16-2006 11:39am From:Rindler+Morgan;PC

6170730885

T-010 P.002/005 F-522

John R. Gulliford
105 Windsor Court
Lumberton, NJ 08048-4631

November 16, 2006

Via Facsimile (610) 623-5876

National Event Services
Attn: Medical Records Department

Re: John R. Gulliford

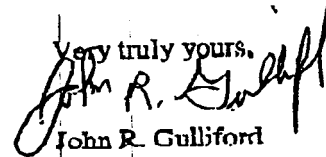
Dear Sir or Madam:

Enclosed please find an Authorization for the Release of all medical records and reports regarding my incident on November 12, 2006.

Please forward the records to: Joanne Gulliford Hoban, Rindler Morgan, P.C.,
133 Portland Street, Suite 500, Boston, MA 02114.

Thank you for your prompt attention to this matter.

Very truly yours,



John R. Gulliford