RETURN DATE: MARCH 12, 2013 : SUPERIOR COURT

JENNIFER CONNELL : J.D. OF FAIRFIELD

VS. ; AT BRIDGEPORT

SEAN TARALA : FEBRUARY 6, 2013

COMPLAINT

The defendant, Sean Tarala, is a minor with a date of birth of March 18,
 and is hereinafter referred to as the minor defendant, and Michael Tarala is the father of the minor defendant.

- 2. On or about March 18, 2011, the plaintiff, Jennifer Connell, was lawfully upon the premises owned by Michael Tarala, located at 25 Woods Grove Road, Westport, CT.
- 3. On said date and at said place, the minor defendant negligently and carelessly caused the plaintiff to fall by knocking her to the ground, resulting in the severe personal injuries, damages and losses hereinafter set forth.
- 4. The injuries, losses and harms to the plaintiff were caused by the negligence and carelessness of the minor defendant in that a reasonable eight year old under those circumstances would know or should have known that a forceful greeting such

as the one delivered by the defendant to the plaintiff could cause the harms and losses suffered by the plaintiff.

- 5. As a result of said negligence, the plaintiff sustained injuries of a severe and permanent nature to the plaintiff's person, and as a result of said injuries has suffered and will continue to suffer pain and mental anguish. Upon medical examination, it was determined that the plaintiff suffered injury to her left arm, including a fracture, requiring surgery with internal fixation and then a subsequent surgery to remove the hardware.
- 6. From all the injuries or the effects thereof, the plaintiff suffered pain and will continue to suffer pain, discomfort, soreness, limitation of motion and restriction of activity.
- 7. The plaintiff's injuries, or some of them, will be permanent in nature and/or permanently disabling, including scarring to the left arm.
- 8. As a further result of the occurrence and the negligence and carelessness as aforesaid, the plaintiff incurred expenses for hospitalization, medical care and attention, x-rays, pharmaceuticals, etc., to the plaintiff's further loss and damage and it is reasonably probable that the plaintiff's injuries, or some of them, will require future

WHEREFORE, THE PLAINTIFF CLAIMS MONEY DAMAGES.

DATED: February 6, 2013

BY:

Aaron Jainchill, Esq. Jainchill & Beckert, LLC

Please enter the Appearance of:

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As Attorneys for the Plaintiff

medical treatment and expenditures.

- 9. As a further result of this incident, the plaintiff lost wages from her employment and her earning capacity likely has been impaired.
- 10. As a further result of the incident, the plaintiff's ability to pursue and enjoy life's activities has been reduced.