

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

Index No.:
Date Purchased:

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JENNIFER SHERIDAN,

SUMMONS

Plaintiff,

Plaintiff designates Kings
County as the place of trial.

-against-

OLGA ST. PIERRE, RICHARD ST. PIERRE,
and AIRBNB, INC.

The basis of venue is:
Plaintiff's residence


Defendants.
-----X

Plaintiff resides at:
2152 85th Street
Brooklyn, NY 11214

To the above named Defendants:

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: BROOKLYN, NEW YORK
 July 13, 2016



Jennifer Sheridan
Plaintiff Pro-Se
2152 85th Street
Brooklyn, NY 11214
(347) 497-9965

TO: OLGA ST. PIERRE
 226 STANWOOD ROAD
 FAIRLESS HILLS, PA 19030

 RICHARD ST. PIERRE
 226 STANWOOD ROAD
 FAIRLESS HILLS, PA 19030

 AIRBNB, INC. VIA SECRETARY OF STATE

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
JENNIFER SHERIDAN,

Plaintiff,

VERIFIED COMPLAINT

-against-

OLGA ST. PIERRE and RICHARD ST. PIERRE and
AIRBNB, INC.,

Defendant.

-----X

Plaintiff, complaining of the Defendants respectfully alleges, upon information and belief:

1. That at the time of the commencement of this action, Plaintiff, **JENNIFER SHERIDAN**, resided in the County of Kings, State of New York.
2. That the cause of action alleged herein arose in the State of Pennsylvania.
3. That at the time of the commencement of this action, Defendant **OLGA ST. PIERRE** resided in the State of Pennsylvania.
4. That at the time of the commencement of this action, Defendant **RICHARD ST. PIERRE** resided in the State of Pennsylvania.
5. That at all times herein mentioned, the Defendant **AIRBNB, INC.** was and still is a domestic corporation duly organized and existing under and by virtue of the laws of the State of New York.
6. That at all times herein mentioned, the Defendant **AIRBNB, INC.** was and still is a foreign corporation duly organized and existing under and by virtue of the laws of the State of New York.

7. That at all times herein mentioned, the Defendant **AIRBNB, INC.** maintained a principal place of business in the County of New York, State of New York.

8. That this action falls within one or more of the exemptions set forth in CPLR §1602.

9. That at all times herein mentioned, Defendant **OLGA ST. PIERRE** owned the premises located at 80 Bear Rock Road, County of Wayne, State of Pennsylvania.

10. That at all times herein mentioned, the Defendant, **OLGA ST. PIERRE** operated the aforesaid premises.

11. That at all times herein mentioned, the Defendant **OLGA ST. PIERRE** managed the aforesaid premises.

12. That at all times herein mentioned, the Defendant **OLGA ST. PIERRE** controlled the aforesaid premises.

13. That at all times herein mentioned, the Defendant **OLGA ST. PIERRE** maintained the aforesaid premises.

14. That at all times herein mentioned, the Defendant **OLGA ST. PIERRE** repaired the aforesaid premises.

15. That at all times herein mentioned, Defendant **RICHARD ST. PIERRE** owned the premises located at 80 Bear Rock Road, County of Wayne, State of Pennsylvania.

16. That at all times herein mentioned, the Defendant, **RICHARD ST. PIERRE** operated the aforesaid premises.

17. That at all times herein mentioned, the Defendant **RICHARD ST. PIERRE** managed the aforesaid premises.

18. That at all times herein mentioned, the Defendant **RICHARD ST. PIERRE** controlled the aforesaid premises.

19. That at all times herein mentioned, the Defendant **RICHARD ST. PIERRE** maintained the aforesaid premises.

20. That at all times herein mentioned, the Defendant **RICHARD ST. PIERRE** repaired the aforesaid premises.

21. That at all times herein mentioned, Defendant **AIRBNB, INC.** entered into a rental contract with Defendants **OLGA and RICHARD ST. PIERRE** for the premises located at 80 Bear Rock Road, County of Wayne, State of Pennsylvania.

22. That at all times herein mentioned, the Defendant, **AIRBNB, INC.** operated the aforesaid premises.

23. That at all times herein mentioned, the Defendant **AIRBNB, INC.** managed the aforesaid premises.

24. That at all times herein mentioned, the Defendant **AIRBNB, INC.** controlled the aforesaid premises.

25. That at all times herein mentioned, the Defendant **AIRBNB, INC.** maintained the aforesaid premises.

26. That at all times herein mentioned, the Defendant **AIRBNB, INC.** repaired the aforesaid premises.

27. That on June 4, 2016, and at all times herein mentioned Plaintiff **JENNIFER SHERIDAN** was lawfully on the aforesaid premises.

28. That on June 4, 2016, while Plaintiff was lawfully at the aforesaid location, Plaintiff was caused to slip and/or trip and fall and sustain severe and permanent injuries.

29. That the above mentioned occurrence, and the results thereof, were caused by the recklessness, carelessness and negligence of the Defendants and/or said Defendant's agents, servants,

employees and/or licensees in the ownership, operation, management, supervision, maintenance and control of the aforesaid premises.

30. That, upon information and belief, Defendant had actual notice of this defective condition for at least fifteen (15) days prior to June 4, 2016.

31. That no negligence on the part of the Plaintiff contributed to the occurrence alleged herein in any manner whatsoever.

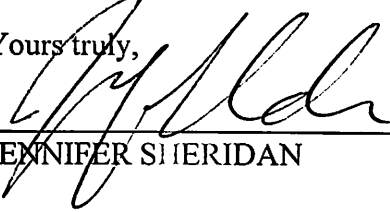
32. That by reason of the foregoing, Plaintiff **JENNIFER SHERIDAN** was caused to sustain serious injuries and to have suffered pain, shock and mental anguish; that these injuries and their effects will be permanent; and as a result of said injuries Plaintiff has been caused to incur, and will continue to incur, expenses for medical care and attention; and, as a further result, Plaintiff was, and will continue to be, rendered unable to perform Plaintiff's normal activities and duties and has sustained a resultant loss therefrom.

33. That by reason of the foregoing, Plaintiff **JENNIFER SHERIDAN** was damaged in a substantial amount to be determined by a jury and or judge of the Supreme Court of the State of New York which amount exceeds the jurisdictional limits of all lower courts which might otherwise have jurisdiction thereof.

WHEREFORE, Plaintiff demands judgment against the Defendant herein, in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: Brooklyn, New York
July 13, 2016

Yours truly,



JENNIFER SHERIDAN

Index No.
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

JENNIFER SHERIDAN,

Plaintiff,

-against-

OLGA ST. PIERRE, RICHARD ST. PIERRE and AIRBNB, INC.,

Defendants.

Summons and Complaint

Jennifer Sheridan
Plaintiff Pro Se
2152 85th Street
Brooklyn, New York 11214
(347) 497-9965

To: ALL PARTIES