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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MARGARET DALLO,

Plaintiff,

v.

HOLLAND AMERICA LINE, INC., a
Washington corporation; HOLLAND
AMERICA LINE - U.S.A. INC, a Delaware
corporation; HOLLAND AMERICA LINE
N.V. LLC, a Curacao corporation; and HAL
ANTILLEN N.V., a Curacao corporation,

Defendants.

NO.

COMPLAINT FOR DAMAGES FOR
PERSONAL INJURIES

JURY DEMAND

COMES NOW the above-captioned Plaintiff, by and through her undersigned attorney
of record, David P. Roosa of FRIEDMAN | RUBIN, and for cause of action alleges and asserts
as follows:

I. PARTIES

1. Plaintiff Margaret Dallo is a resident of El Cajon, San Diego County, California,
and is a citizen of California.

1 23. Defendants knew or reasonably should have known about the unreasonably
2 dangerous condition posed by the placement of the door and the lack of warning to passengers
3 when the door was opening.

4 24. The unreasonably dangerous condition posed by the door was not apparent, open,
5 or obvious to Plaintiff.

6 25. It is reasonably foreseeable that a door of this kind could cause injury to
7 passengers walking by if opened without due caution.

8 26. Defendants breached their duty of reasonable care by, *inter alia*, failing to warn
9 Plaintiff of the unreasonably dangerous condition posed by the door, failing to open the door
10 with due care and caution, and failing to implement and follow appropriate safety precautions
11 that could have prevented this incident.

12 27. Plaintiff's injuries and damages are a direct and proximate result of Defendants'
13 negligent failures and/or omissions alleged herein.

14 **V. DAMAGES**

15 28. Plaintiff realleges and incorporate by reference the allegations in Paragraphs 1
16 through 27 above as if fully set forth herein.

17 29. As a direct and proximate result of Defendants' negligence, Plaintiff has incurred
18 reasonable and necessary medical expenses, and will incur future medical expenses related to
19 Defendants' negligence.

20 30. As a further direct and proximate result of Defendants' negligence, Plaintiff has
21 experienced pain and suffering, both mental and physical, and disability, and with a reasonable
22 certainty will experience same in the future. Further, Plaintiff has suffered a reduction in
23 Plaintiff's ability to enjoy life, both past and future, as she previously enjoyed.

VII. JURY DEMAND

31. Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff demands a trial by jury as to all issues so triable in this action.

VIII. RELIEF REQUESTED

WHEREFORE, Plaintiff requests the following relief against Defendants, jointly and severally:

A. For monetary judgment in such sum as will fully and fairly compensate Plaintiff for her injuries, general damages, special damages, including prejudgment interest, other damages to be proven at trial, and attorney fees and costs and disbursements herein, together with such other relief as the Court deems fair and equitable.

DATED this 5th day of June, 2019.

/s/David P. Roosa
David P. Roosa, WSBA #45266
Kenneth R. Friedman, WSBA #17148
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