

RETURN DATE: JUNE 2, 2015 : SUPERIOR COURT  
ANTHONY GEORGER : J. D. OF NEW BRITAIN  
VS. : AT NEW BRITAIN  
SHELDON B. CROSBY, HILARY W.  
DONALD, JAMES DONALD, ERIC  
STROM and JOSHUA SCHWARTZ : APRIL 15, 2015

COMPLAINT

COUNT ONE: NEGLIGENCE AS TO THE DEFENDANT, SHELDON B. CROSBY

1. The plaintiff, Anthony Georger, is an individual residing in Unionville, Connecticut.
2. Upon information and belief, the defendant, Sheldon B. Crosby, is an individual residing in Farmington, Connecticut.
3. Upon information and belief, the defendant, Hilary W. Donald, is an individual residing in Farmington, Connecticut.
4. Upon information and belief, the defendant, James Donald, is an individual residing in Farmington, Connecticut.
5. Upon information and belief, the defendant, Eric Strom, is an individual residing in Farmington, Connecticut.
6. Upon information and belief, the defendant, Joshua Schwartz, is an individual residing in West Hartford, Connecticut.

7. On or about August 20, 2013 the defendant, Sheldon B. Crosby, and the defendant, Hilary W. Donald, were the owners of the premises located at 14 Colton Street in Farmington, Connecticut (hereinafter referred to as "the premises").

8. On or about August 20, 2013 the plaintiff, Anthony Georger was invited to the premises by the defendants Sheldon B. Crosby and Hilary W. Donald's son, defendant, James Donald, for a gathering with other individuals.

9. At said time and place, the plaintiff was negligently and carelessly assaulted by the defendants, James Donald, Eric Strom and Joshua Schwartz, on the premises, causing the plaintiff to sustain and suffer personal injuries and losses.

10. At all relevant times, the defendant, Sheldon B. Crosby, had a duty to supervise gatherings on the premises and the attendees thereof.

11. The defendant, Sheldon B. Crosby, failed to exercise reasonable care and/or supervision of the gathering and the attendees thereof, and, as a result of such negligence, the plaintiff was assaulted and sustained the personal injuries more fully described below.

12. As a further consequence of the defendant, Sheldon B. Crosby's, negligence as aforesaid, the plaintiff sustained the following severe injuries: right mandibular parasymphysis fracture; left mandibular subcondylar fracture; right superior orbital rim fracture; right orbital roof fracture; right frontal sinus fracture; laceration to his head; multiple abrasions to posterior of his head, base of skull and right knee; loss of consciousness; concussion; BB pellet imbedded into the plaintiff's left hand; multiple contusions; headaches; blurred vision; fatigue; reduced stamina; emotional distress, including ongoing distress with significant mood lability involving

depression and anxiety, as well as periods of irritability and agitation; and a decline in ability to focus and concentrate, and said injuries, and the effects thereof, are, or may be, permanent in nature.

13. As a further consequence of the defendant, Sheldon B. Crosby's negligence, the plaintiff was obliged to expend substantial sums of money for medical care and treatment, hospital care, drugs and medicine, x-rays, and will be obliged to expend further sums of money for such purposes in the future, all to his further loss and damage.

14. As a further result of the defendant, Sheldon Crosby's negligence, the plaintiff has been and will be in the future unable to perform some of life's daily activities, as he had prior to the occurrence, all of which have caused and will cause him in the future great loss and damage.

15. The defendant, Sheldon B. Crosby, is liable for said damages.

COUNT TWO: NEGLIGENCE AS TO THE DEFENDANT, HILARY W. DONALD

1. Paragraphs 1-9 inclusive of Count One are hereby made paragraphs 1-9 of Count Two as if more fully set forth herein.

10. At all relevant times, the defendant, Hilary W. Donald, had a duty to supervise gatherings on her property and the attendees thereof.

11. The defendant, Hilary W. Donald, failed to exercise care and/or supervision of the gathering and the attendees thereof, and as a result of such negligence, the plaintiff was assaulted and sustained the personal injuries more fully described below.

12. As a further consequence of the defendant, Hilary W. Donald's, negligence as aforesaid, the plaintiff sustained the following severe injuries: right mandibular parasymphysis

fracture; left mandibular subcondylar fracture; right superior orbital rim fracture; right orbital roof fracture; right frontal sinus fracture; laceration to his head; multiple abrasions to posterior of his head, base of skull and right knee; loss of consciousness; concussion; BB pellet imbedded into the plaintiff's left hand; multiple contusions; headaches; blurred vision; fatigue; reduced stamina; emotional distress, including ongoing distress with significant mood lability involving depression and anxiety, as well as periods of irritability and agitation; and a decline in ability to focus and concentrate, and said injuries, and the effects thereof, are, or may be, permanent in nature.

13. As a further consequence of the defendant, Hilary W. Donald's negligence, the plaintiff was obliged to expend substantial sums of money for medical care and treatment, hospital care, drugs and medicine, x-rays, and will be obliged to expend further sums of money for such purposes in the future, all to his further loss and damage.

14. As a further result of the defendant, Hilary W. Donald's negligence, the plaintiff has been and will be in the future unable to perform some of life's daily activities, as he had prior to the occurrence, all of which have caused and will cause him in the future great loss and damage.

15. The defendant, Hilary W. Donald, is liable for said damages.

COUNT THREE: NEGLIGENCE AS TO THE DEFENDANT JAMES DONALD

1. Paragraphs 1-9 inclusive of Count One are hereby made paragraphs 1-9 of Count Three as if more fully set forth herein.

10. At all relevant times, the defendant, James Donald, had a duty to supervise gatherings on his property and the attendees thereof.

11. The defendant, James Donald, failed to exercise care and/or supervision of the gathering and the attendees thereof, and as a result of such negligence, the plaintiff was assaulted and sustained the personal injuries more fully described below.

12. As a further consequence of the defendant, James Donald's, negligence as aforesaid, the plaintiff sustained the following severe injuries: right mandibular parasymphysis fracture; left mandibular subcondylar fracture; right superior orbital rim fracture; right orbital roof fracture; right frontal sinus fracture; laceration to his head; multiple abrasions to posterior of his head, base of skull and right knee; loss of consciousness; concussion; BB pellet imbedded into the plaintiff's left hand; multiple contusions; headaches; blurred vision; fatigue; reduced stamina; emotional distress, including ongoing distress with significant mood lability involving depression and anxiety, as well as periods of irritability and agitation; and a decline in ability to focus and concentrate, and said injuries, and the effects thereof, are, or may be, permanent in nature.

13. As a further consequence of the defendant, James Donald's negligence, the plaintiff was obliged to expend substantial sums of money for medical care and treatment, hospital care, drugs and medicine, x-rays, and will be obliged to expend further sums of money for such purposes in the future, all to his further loss and damage.

14. As a further result of the defendant, James Donald's negligence, the plaintiff has been and will be in the future unable to perform some of life's daily activities, as he had prior to the occurrence, all of which have caused and will cause him in the future great loss and damage.

15. The defendant, James Donald, is liable for said damages.

COUNT FOUR: SOCIAL HOST LIABILITY AS TO THE DEFENDANT, JAMES DONALD

1. Paragraphs 1-8 inclusive of Count One are hereby made paragraphs 1-8 of this Count Four as if more fully set forth herein.

9. At said time and place, the defendant, James Donald, served as social host for and presided over the gathering.

10. At said time and place, the defendant, James Donald, did not take measures to prevent consumption of alcohol by minors but rather, allowed, accommodated and provided a venue for underage drinking at the gathering.

11. The defendant, James Donald, tolerated and facilitated underage drinking at the gathering on the premises and, as a result, the plaintiff was assaulted and sustained various injuries as more fully described below.

12. As a further consequence of the defendant, James Donald's, negligence as aforesaid, the plaintiff sustained the following severe injuries: right mandibular parasymphysis fracture; left mandibular subcondylar fracture; right superior orbital rim fracture; right orbital roof fracture; right frontal sinus fracture; laceration to his head; multiple abrasions to posterior of his head, base of skull and right knee; loss of consciousness; concussion; BB pellet imbedded into the plaintiff's left hand; multiple contusions; headaches; blurred vision; fatigue; reduced

stamina; emotional distress, including ongoing distress with significant mood lability involving depression and anxiety, as well as periods of irritability and agitation; and a decline in ability to focus and concentrate, and said injuries, and the effects thereof, are, or may be, permanent in nature.

13. As a further consequence of the defendant, James Donald's negligence, the plaintiff was obliged to expend substantial sums of money for medical care and treatment, hospital care, drugs and medicine, x-rays, and will be obliged to expend further sums of money for such purposes in the future, all to his further loss and damage.

14. As a further result of the defendant, James Donald's negligence, the plaintiff has been and will be in the future unable to perform some of life's daily activities, as he had prior to the occurrence, all of which have caused and will cause him in the future great loss and damage.

15. The defendant, James Donald, is liable for said damages.

COUNT FIVE: SOCIAL HOST LIABILITY AS TO THE DEFENDANT, SHELDON B. CROSBY

1. Paragraphs 1-8 inclusive of Count One are hereby made paragraphs 1-8 of this Count Five as if more fully set forth herein.

9. At said time and place, the defendant, Sheldon B. Crosby, served as social host for and presided over the gathering.

10. At said time and place, the defendant, Sheldon B. Crosby, did not take measures to prevent consumption of alcohol by minors but rather, allowed, accommodated and provided a venue for underage drinking at the gathering.

11. The defendant, Sheldon B. Crosby, tolerated and facilitated underage drinking at the gathering on the premises and, as a result, the plaintiff was assaulted and sustained various injuries as more fully described below.

12. As a further consequence of the defendant, Sheldon B. Crosby's, negligence as aforesaid, the plaintiff sustained the following severe injuries: right mandibular parasymphysis fracture; left mandibular subcondylar fracture; right superior orbital rim fracture; right orbital roof fracture; right frontal sinus fracture; laceration to his head; multiple abrasions to posterior of his head, base of skull and right knee; loss of consciousness; concussion; BB pellet imbedded into the plaintiff's left hand; multiple contusions; headaches; blurred vision; fatigue; reduced stamina; emotional distress, including ongoing distress with significant mood lability involving depression and anxiety, as well as periods of irritability and agitation; and a decline in ability to focus and concentrate, and said injuries, and the effects thereof, are, or may be, permanent in nature.

13. As a further consequence of the defendant, Sheldon B. Crosby's negligence, the plaintiff was obliged to expend substantial sums of money for medical care and treatment, hospital care, drugs and medicine, x-rays, and will be obliged to expend further sums of money for such purposes in the future, all to his further loss and damage.

14. As a further result of the defendant, Sheldon B. Crosby's negligence, the plaintiff has been and will be in the future unable to perform some of life's daily activities, as he had prior to the occurrence, all of which have caused and will cause him in the future great loss and damage.

15. The defendant, Sheldon B. Crosby, is liable for said damages.

COUNT SIX: SOCIAL HOST LIABILITY AS TO THE DEFENDANT, HILARY W. DONALD

1. Paragraphs 1-8 inclusive of Count One are hereby made paragraphs 1-8 of this Count Six as if more fully set forth herein.

9. At said time and place, the defendant, Hilary W. Donald, served as social host for and presided over the gathering.

10. At said time and place, the defendant, Hilary W. Donald, did not take measures to prevent consumption of alcohol by minors but, rather, allowed, accommodated and provided a venue for underage drinking at the gathering.

11. The defendant, Hilary W. Donald, tolerated and facilitated underage drinking at the gathering on the premises and, as a result, the plaintiff was assaulted and sustained various injuries, more fully described below.

12. As a further consequence of the defendant, Hilary W. Donald's, negligence as aforesaid, the plaintiff sustained the following severe injuries: right mandibular parasymphysis fracture; left mandibular subcondylar fracture; right superior orbital rim fracture; right orbital roof fracture; right frontal sinus fracture; laceration to his head; multiple abrasions to posterior of his head, base of skull and right knee; loss of consciousness; concussion; BB pellet imbedded into the plaintiff's left hand; multiple contusions; headaches; blurred vision; fatigue; reduced stamina; emotional distress, including ongoing distress with significant mood lability involving depression and anxiety, as well as periods of irritability and agitation; and a decline in ability to

focus and concentrate, and said injuries, and the effects thereof, are, or may be, permanent in nature.

13. As a further consequence of the defendant, Hilary W. Donald's negligence, the plaintiff was obliged to expend substantial sums of money for medical care and treatment, hospital care, drugs and medicine, x-rays, and will be obliged to expend further sums of money for such purposes in the future, all to his further loss and damage.

14. As a further result of the defendant, Hilary W. Donald's negligence, the plaintiff has been and will be in the future unable to perform some of life's daily activities, as he had prior to the occurrence, all of which have caused and will cause him in the future great loss and damage.

15. The defendant, Hilary W. Donald, is liable for said damages.

COUNT SEVEN: NEGLIGENT ASSAULT AS TO THE DEFENDANT, JAMES DONALD

1-8. Paragraphs 1-8 inclusive of Count One are hereby made paragraphs 1-8 of Count Seven as if more fully set forth herein.

9. At said time and place, the plaintiff was negligently and carelessly assaulted, which included being shot with a BB Gun by the defendant, James Donald, on the premises, causing the plaintiff to sustain and suffer personal injuries and losses.

10. As a result of the negligent actions of the defendant, James Donald, the plaintiff sustained the following severe injuries: right mandibular parasymphysis fracture; left mandibular subcondylar fracture; right superior orbital rim fracture; right orbital roof fracture; right frontal sinus fracture; laceration to his head; multiple abrasions to posterior of his head, base of skull

and right knee; loss of consciousness; concussion; BB pellet imbedded into the plaintiff's left hand; multiple contusions; headaches; blurred vision; fatigue; reduced stamina; emotional distress, including ongoing distress with significant mood lability involving depression and anxiety, as well as periods of irritability and agitation; and a decline in ability to focus and concentrate, and said injuries, and the effects thereof, are, or may be, permanent in nature.

11. As a further consequence of the negligent actions of the defendant, James Donald, the plaintiff was obliged to expend substantial sums of money for medical care and treatment, hospital care, drugs and medicine, x-rays, and will be obliged to expend further sums of money for such purposes in the future, all to his further loss and damage.

12. As a further result of the negligent actions of the defendant, James Donald, the plaintiff has been and will be in the future unable to perform some of life's daily activities, as he had prior to the occurrence, all of which have caused and will cause him in the future great loss and damage.

13. The defendant, James Donald, is liable for said damages.

COUNT EIGHT: INTENTIONAL ASSAULT AS TO THE DEFENDANT, JAMES DONALD

1-8. Paragraphs 1-8 inclusive of Count One are hereby made paragraphs 1-8 of Count Eight as if more fully set forth herein.

9. At said time and place, the plaintiff was willfully, wantonly, and maliciously assaulted, including being shot with a BB Gun by the defendant, James Donald, on the premises, causing the plaintiff to sustain and suffer personal injuries and losses.

10. As a result of the willful, wanton and malicious conduct of the defendant, James Donald, the plaintiff sustained the following severe injuries: right mandibular parasymphysis fracture; left mandibular subcondylar fracture; right superior orbital rim fracture; right orbital roof fracture; right frontal sinus fracture; laceration to his head; multiple abrasions to posterior of his head, base of skull and right knee; loss of consciousness; concussion; BB pellet imbedded into the plaintiff's left hand; multiple contusions; headaches; blurred vision; fatigue; reduced stamina; emotional distress, including ongoing distress with significant mood lability involving depression and anxiety, as well as periods of irritability and agitation; and a decline in ability to focus and concentrate, and said injuries, and the effects thereof, are, or may be, permanent in nature.

11. As a further consequence of the willful, wanton and malicious conduct of the defendant, James Donald, the plaintiff was obliged to expend substantial sums of money for medical care and treatment, hospital care, drugs and medicine, x-rays, and will be obliged to expend further sums of money for such purposes in the future, all to his further loss and damage.

12. As a further result of the willful, wanton and malicious conduct of the defendant, James Donald, the plaintiff has been and will be in the future unable to perform some of life's daily activities, as he had prior to the occurrence, all of which have caused and will cause him in the future great loss and damage.

13. The defendant, James Donald, is liable for said damages.

COUNT NINTH: NEGLIGENT ASSAULT AS TO THE DEFENDANT, ERIC STROM

1-8. Paragraphs 1-8 inclusive of Count One are hereby made paragraphs 1-8 of Count Nine as if more fully set forth herein.

9. At said time and place, the plaintiff was negligently and carelessly assaulted, including being hit with a lacrosse stick by the defendant, Eric Strom, on the premises, causing the plaintiff to sustain and suffer personal injuries and losses.

10. As a result of the negligent actions of the defendant, Eric Strom, the plaintiff sustained the following severe injuries: right mandibular parasymphysis fracture; left mandibular subcondylar fracture; right superior orbital rim fracture; right orbital roof fracture; right frontal sinus fracture; laceration to his head; multiple abrasions to posterior of his head, base of skull and right knee; loss of consciousness; concussion; BB pellet imbedded into the plaintiff's left hand; multiple contusions; headaches; blurred vision; fatigue; reduced stamina; emotional distress, including ongoing distress with significant mood lability involving depression and anxiety, as well as periods of irritability and agitation; and a decline in ability to focus and concentrate, and said injuries, and the effects thereof, are, or may be, permanent in nature.

11. As a further consequence of the negligent actions of the defendant, Eric Strom, the plaintiff was obliged to expend substantial sums of money for medical care and treatment, hospital care, drugs and medicine, x-rays, and will be obliged to expend further sums of money for such purposes in the future, all to his further loss and damage.

12. As a further result of the negligent actions of the defendant, Eric Strom, the plaintiff has been and will be in the future unable to perform some of life's daily activities, as he

had prior to the occurrence, all of which have caused and will cause him in the future great loss and damage.

13. The defendant, Eric Strom, is liable for said damages.

COUNT TEN: INTENTIONAL ASSAULT AS TO THE DEFENDANT, ERIC STROM

1-8. Paragraphs 1-8 inclusive of Count One are hereby made paragraphs 1-8 of Count Ten as if more fully set forth herein.

9. At said time and place, the plaintiff was willfully, wantonly, and maliciously assaulted, including being hit with lacrosse stick by the defendant, Eric Strom, on the premises, causing the plaintiff to sustain and suffer personal injuries and losses.

10. As a result of the willful, wanton and malicious conduct of the defendant, Eric Strom, the plaintiff sustained the following severe injuries: right mandibular parasymphysis fracture; left mandibular subcondylar fracture; right superior orbital rim fracture; right orbital roof fracture; right frontal sinus fracture; laceration to his head; multiple abrasions to posterior of his head, base of skull and right knee; loss of consciousness; concussion; BB pellet imbedded into the plaintiff's left hand; multiple contusions; headaches; blurred vision; fatigue; reduced stamina; emotional distress, including ongoing distress with significant mood lability involving depression and anxiety, as well as periods of irritability and agitation; and a decline in ability to focus and concentrate, and said injuries, and the effects thereof, are, or may be, permanent in nature.

11. As a further consequence of the willful, wanton and malicious conduct of the defendant, Eric Strom, the plaintiff was obliged to expend substantial sums of money for medical

care and treatment, hospital care, drugs and medicine, x-rays, and will be obliged to expend further sums of money for such purposes in the future, all to his further loss and damage.

12. As a further result of the willful, wanton and malicious conduct of the defendant, Eric Strom, the plaintiff has been and will be in the future unable to perform some of life's daily activities, as he had prior to the occurrence, all of which have caused and will cause him in the future great loss and damage.

13. The defendant, Eric Strom, is liable for said damages.

COUNT ELEVEN: NEGLIGENT ASSAULT AS TO THE DEFENDANT, JOSHUA SCHWARTZ

1-8. Paragraphs 1-8 inclusive of Count One are hereby made paragraphs 1-8 of Count Nine as if more fully set forth herein.

9. At said time and place, the plaintiff was negligently and carelessly assaulted by the defendant, Joshua Schwartz, on the premises, causing the plaintiff to sustain and suffer personal injuries and losses.

10. As a result of the negligent actions of the defendant, Joshua Schwartz, the plaintiff sustained the following severe injuries: right mandibular parasymphysis fracture; left mandibular subcondylar fracture; right superior orbital rim fracture; right orbital roof fracture; right frontal sinus fracture; laceration to his head; multiple abrasions to posterior of his head, base of skull and right knee; loss of consciousness; concussion; BB pellet imbedded into the plaintiff's left hand; multiple contusions; headaches; blurred vision; fatigue; reduced stamina; emotional distress, including ongoing distress with significant mood lability involving

depression and anxiety, as well as periods of irritability and agitation; and a decline in ability to focus and concentrate, and said injuries, and the effects thereof, are, or may be, permanent in nature.

11. As a further consequence of the negligent actions of the defendant, Joshua Schwartz, the plaintiff was obliged to expend substantial sums of money for medical care and treatment, hospital care, drugs and medicine, x-rays, and will be obliged to expend further sums of money for such purposes in the future, all to his further loss and damage.

12. As a further result of the negligent actions of the defendant, Joshua Schwartz, the plaintiff has been and will be in the future unable to perform some of life's daily activities, as he had prior to the occurrence, all of which have caused and will cause him in the future great loss and damage.

13. The defendant, Joshua Schawartz, is liable for said damages.

COUNT TWELVE: INTENTIONAL ASSAULT AS TO THE DEFENDANT, JOSHUA SCHWARTZ

1-8. Paragraphs 1-8 inclusive of Count One are hereby made paragraphs 1-8 of Count Ten as if more fully set forth herein.

9. At said time and place, the plaintiff was willfully, wantonly, and maliciously assaulted by the defendant, Joshua Schwartz, on the premises, causing the plaintiff to sustain and suffer personal injuries and losses.

10. As a result of the willful, wanton and malicious conduct of the defendant, Joshua Schwartz, the plaintiff sustained the following severe injuries: right mandibular parasymphysis

fracture; left mandibular subcondylar fracture; right superior orbital rim fracture; right orbital roof fracture; right frontal sinus fracture; laceration to his head; multiple abrasions to posterior of his head, base of skull and right knee; loss of consciousness; concussion; BB pellet imbedded into the plaintiff's left hand; multiple contusions; headaches; blurred vision; fatigue; reduced stamina; emotional distress, including ongoing distress with significant mood lability involving depression and anxiety, as well as periods of irritability and agitation; and a decline in ability to focus and concentrate, and said injuries, and the effects thereof, are, or may be, permanent in nature.

11. As a further consequence of the willful, wanton and malicious conduct of the defendant, Joshua Schwartz, the plaintiff was obliged to expend substantial sums of money for medical care and treatment, hospital care, drugs and medicine, x-rays, and will be obliged to expend further sums of money for such purposes in the future, all to his further loss and damage.

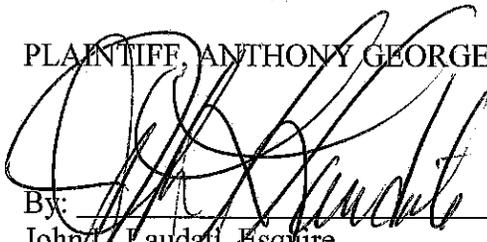
12. As a further result of the willful, wanton and malicious conduct of the defendant, Joshua Schwartz, the plaintiff has been and will be in the future unable to perform some of life's daily activities, as he had prior to the occurrence, all of which have caused and will cause him in the future great loss and damage.

13. The defendant, Joshua Schawartz, is liable for said damages.

**WHEREFORE**, the Plaintiff claims:

1. Money damages;
2. Costs; and
3. Such other relief as the Court may deem appropriate and just.

PLAINTIFF, ANTHONY GEORGER



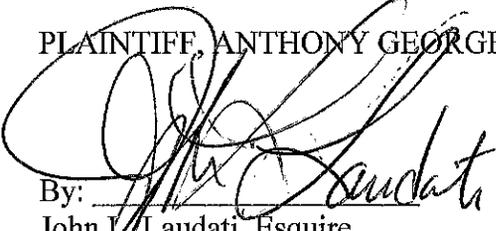
By: \_\_\_\_\_  
John L. Laudati, Esquire  
Murphy, Laudati, Kiel, Buttler & Rattigan  
10 Talcott Notch Road, Suite 210  
Farmington, CT 06032  
(860) 674-8296  
Juris No. 104060

RETURN DATE: JUNE 2, 2015 : SUPERIOR COURT  
ANTHONY GEORGER : J. D. OF NEW BRITAIN  
VS. : AT NEW BRITAIN  
SHELDON B. CROSBY, HILARY W.  
DONALD, JAMES DONALD, ERIC  
STROM and JOSHUA SCHWARTZ : APRIL 15, 2015

AMOUNT IN DEMAND

The amount, legal interest, or property in demand is greater than \$15,000.00,  
exclusive of interest and costs.

PLAINTIFF, ANTHONY GEORGER

By: 

John L. Laudati, Esquire  
Murphy, Laudati, Kiel, Buttler & Rattigan  
10 Talcott Notch Road, Suite 210  
Farmington, CT 06032  
(860) 674-8296  
Juris No. 104060