

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

ALBERTO TORRES, CLARIBEL RAMIREZ,
individually and on behalf of their minor
daughter A.T.R., and MELISA TORRES
RAMIREZ,

Plaintiffs,

v.

HACIENDA MADRIGAL, INC.; ABC
INSURANCE COMPANIES; DOES I-X and
any other joint tortfeasors,

Defendants.

Civil No.: 15-1629

RE: TORT ACTION FOR NEGLIGENCE
PURSUANT TO ARTICLES 1802, 1803
and 1805, 31 L.P.R.A §§ 5141, 5142 &
5144.

JURY TRIAL DEMANDED

COMPLAINT

TO THE HONORABLE COURT:

APPEAR NOW the Plaintiffs, ALBERTO TORRES and CLARIBEL RAMIREZ individually and in representation of their minor daughter ATR, and MELISA TORRES RAMIREZ (hereinafter referred to as “Plaintiffs”), through the undersigned counsel, and hereby state, allege, and request as follows:

JURISDICTIONAL BASIS

1. This case is based upon diversity jurisdiction under 28 U.S.C. §1332.
2. Plaintiffs are citizens of and domiciled in the state of Wisconsin.
3. All Defendants are individuals, corporations, business entities, or partnerships who are citizens of Puerto Rico or of a state other than Wisconsin.

4. The matter in controversy exceeds the sum of SEVENTY FIVE THOUSAND DOLLARS (\$75,000.00), exclusive of interest and costs, thus vesting jurisdiction on this Honorable Court pursuant to 28 U.S.C. § 1332.
5. Venue is proper in the District of Puerto Rico pursuant to 28 U.S.C. §1391, since the events and acts or omissions giving rise to this claim occurred in this district.

THE PARTIES

6. Plaintiff **ALBERTO TORRES** (hereinafter “Mr. Torres” or “Plaintiff”) is of legal age, a citizen and domiciled in the state of Wisconsin and father and legal guardian of minor daughter ATR.
7. Plaintiff **CLARIBEL RAMIREZ** (hereinafter “Mrs. Ramirez” or “Plaintiff”) is of legal age, a citizen and domiciled in the state of Wisconsin and mother and legal guardian of minor daughter ATR.
8. Plaintiff **A.T.R.** (hereinafter "ATR) is a minor, a citizen and domiciled in the state of Wisconsin, who was seriously injured as a result of the events that give rise to the *Complaint* of caption, when she was seventeen (17) years old.
9. Plaintiff **MELISA TORRES RAMIREZ** (hereinafter “Melisa” or “Plaintiff”) is of legal age, a citizen and domiciled in the state of Wisconsin and sister of minor A.T.R.
10. Defendant **HACIENDA MADRIGAL, INC.** (hereinafter “Hacienda Madrigal” or “Defendant”) is a for-profit corporation incorporated under the laws of the Commonwealth of Puerto Rico, which, upon information and belief, owns, operates, controls and/or manages the property where Plaintiff ATR's accident took place.
11. **HACIENDA MADRIGAL, INC.** (hereinafter “Hacienda Madrigal” or “Defendant”), on or about May 28, 2014, owned and operated Hacienda Madrigal located in Cidra,

Puerto Rico.

12. Hacienda Madrigal owns, harbors, possesses, controls, lends or leases the horses that it provides riders for horseback tours on the property.
13. Defendants **ABC INSURANCE COMPANIES** are corporations organized or operating under the laws of the Commonwealth of Puerto Rico, which insure one or more co-defendants for the acts and/or omissions described herein or that insure the facilities and/or are liable for the injuries and damages sustained by Plaintiff.
14. Defendant **DOES I-X** are individuals, corporations, or entities that are citizens and domiciled in Puerto Rico or a state other than Wisconsin who are unknown and are jointly and severally liable for Plaintiff's damages.

GENERAL ALLEGATIONS

15. In May of 2014, Plaintiffs visited Puerto Rico in order to attend the wedding of Mariel Torres Ramirez, sister of ATR and Melisa and daughter of Alberto Torres and Claribel Ramirez.
16. While in Puerto Rico, Plaintiffs ATR, Melisa Torres Ramirez, Alberto Torres and Claribel Ramirez decided to go on a horseback tour of the mountains in Cidra at Hacienda Madrigal.
17. Plaintiffs arrived at Hacienda Madrigal on the afternoon of May 28, 2014 for their tour.
18. Plaintiffs were made part of the last tour scheduled for the day.
19. The horses were provided by defendant Hacienda Madrigal's personnel to Plaintiffs without the latter having any say in the matter.
20. ATR was provided with a larger horse than provided other plaintiffs, particularly for a young girl with a petite frame. This horse will be designated hereinafter as ATR's

horse.

21. No helmets were offered, suggested, or provided by Defendant for use during the horseback riding tour.
22. No instructions were provided to ATR or to other plaintiffs.
23. No warnings were provided to ATR or to other plaintiffs.
24. Hacienda Madrigal assigned two (2) guides to accompany approximately 14 riders.
25. The horses started up on the tour in a haphazard fashion.
26. One of the guides led the horses and the other was at the end of the group.
27. Once the tour began, it became obvious that the guides were in a rush, presumably because they wanted to finish as quickly as possible and be done for the day.
28. The guides' haste was palpable throughout the tour, as they rushed the horses so they would increase their pace.
29. Mrs. Ramirez complained to the rear guide that she was not comfortable with this fast pace, and that it could be dangerous.
30. Mrs. Ramirez told the rear guide that she wanted to go slower.
31. The guide continued with their conduct of rushing the horses and keeping a fast pace.
32. Due to this haste, the horses often would crowd each other.
33. The trail at Hacienda Madrigal has bottlenecks where the horses bunch together.
34. The trail was full of perilous conditions, as parts of it ran along sheer drops and steep uphill areas without any kind of railing.
35. The guides were not paying adequate attention to the riders in the group.
36. The guides did not have any specialized training in the basic safety rules of managing such a group of riders and horses.

37. The guides did not follow basic safety rules to keep safe the members of such a group of riders
38. During the ride, ATR's horse wound up running along the edge of a small cliff.
39. In an attempt to steer the horse away from the edge, ATR realized that her bridle – which is used to brake – was not adjusted nor inserted correctly and she had difficulty controlling her horse.
40. ATR notified one of the guides that her horse's bridle was misplaced, who only then adjusted the horse's bridle.
41. Well into the tour, the group had to make a stop so the guides could open and close a gate that closed off their trail.
42. In the area of the gate the horses crowded together.
43. Previously during the tour, Melisa's horse had exhibited aggressive behavior and attempted to bite other horses.
44. The guide told Mrs. Ramirez to keep her leg away from that horse because it had a tendency to bite.
45. The horse on which Melisa was riding (hereinafter Melisa's horse) had been known to Hacienda Madrigal's personnel to be aggressive towards other horses and riders on previous occasions.
46. Melisa attempted as much as she could to keep her horse away from the others.
47. Melisa's horse was hard to control despite her attempts to do so.
48. While waiting for the guides to operate the gate, Melisa's horse again lunged at ATR's horse, attempting to bite its face.
49. ATR's horse sped away and up a hill by the side of the trail.

50. ATR's horse reared up and fell backwards, on top of ATR.
51. Melisa witnessed the fall of ATR and the horse she was riding.
52. The horse struggled to get back up and fell on top of ATR once again.
53. ATR was not visible during this time, since the horse covered her completely.
54. ATR could not move from under the horse since she was carrying the full weight of an animal that weighed in excess of a thousand pounds.
55. ATR sustained a severe blow to the head when she fell, causing a depressed cranial fracture.
56. ATR also sustained a fracture to her left elbow from a horse kick while attempting to climb out from under the horse.
57. Upon hearing ATR's screams, Mr. Torres, her father, jumped off his horse and ran over to his daughter.
58. ATR felt great pain in her head, arm and ribs, and had trouble breathing.
59. Mr. Torres and Mrs. Ramirez were distraught, and cried out to the guides for help.
60. The guides did not offer initial assistance, nor were they prepared to respond to an emergency situation. They limited their response to asking whether Plaintiffs wanted to continue the tour.
61. Neither guide dismounted their horse, helped ATR, or helped move or separate the horse from ATR.
62. Eventually, Mr. Torres and Mrs. Ramirez were able to prevail upon the guides the urgency of the situation. Due to their distance from the main area at Hacienda Madrigal, however, an ambulance could not reach ATR at her current location.
63. An employee of Hacienda Madrigal reached the trail and transported Plaintiffs to the

main area in an all-terrain vehicle that was not suitable to transport an injured person.

64. Melisa called for an ambulance in order to transport ATR to the nearest hospital.
65. Torres Ramirez family waited for well over an hour for the ambulance to arrive. During this time, no employees, administrative or otherwise, offered Plaintiffs any assistance. Only the man who drove the all-terrain vehicle stayed with Plaintiffs.
66. Plaintiffs were very concerned about ATR's condition.
67. ATR had a large wound to the head, covering frontal part, left side of her head back towards the area of her left ear.
68. ATR had pain and difficulty breathing and could not move her arm.
69. Finally, an ambulance from Caguas arrived and transported ATR and her family to Hospital HIMA San Pablo in Caguas.
70. While in the ambulance, ATR was losing consciousness. Mrs. Ramirez, fearing what would happen if her daughter lost consciousness after a grievous blow to the head, frantically tried to keep her daughter awake while they arrived at the hospital. ATR threw up twice in the ambulance and noticed that her extremities – hands and feet – were clenched. ATR thought she was paralyzed.
71. A provisional diagnosis was made at HIMA Caguas hospital which required the intervention of a neurosurgeon and other services unavailable there.
72. ATR was airlifted to Medical Center in San Juan for treatment.
73. ATR was diagnosed with a depressed left fronto-temporal bone fracture and an elbow fracture. Her left elbow had been fractured in four places.
74. ATR underwent surgery two days later. Plates, screws, and bars were inserted into her cranium. ATR also had reconstructive surgery and was hospitalized for approximately

one week.

75. After her original discharge from Centro Médico, ATR began suffering from auditory hallucinations and changes in behavior, reverting back to being a child. Mrs. Ramirez noticed that her daughter was disoriented. ATR could not understand conversations, and had difficulty walking and speaking.
76. As a result of these symptoms, Plaintiffs rushed ATR to the emergency room at Children's Hospital, at Centro Médico in Río Piedras, where she was diagnosed with an intercranial hematoma.
77. After an agonizing period of time, physicians decided not to operate on the hematoma, and wait to see whether the body absorbed it instead.
78. After a short hospitalization, ATR was discharged.
79. Due to the nature of ATR's injuries, Plaintiffs were obliged to stay in Puerto Rico for two months while ATR recovered.
80. ATR was greatly affected by memory loss, strong headaches, light headedness, and limitation in physical activities for many months after the accident.
81. ATR had to undergo painful physical therapy once her elbow was out of the cast.
82. ATR had to take narcotic medication for pain management. Medication was given for pain after she was released from the hospital while staying in Puerto Rico.
83. To date, ATR continues to suffer from memory loss, strong headaches, and lightheadedness as a result of the accident.
84. As a result of her injuries, ATR is now homeschooled, and unable to participate in many extracurricular activities that she previously enjoyed.
85. Nearly a year after the date of the accident, ATR's left elbow is still swollen and does

not have full mobility. Despite physical therapy, ATR is unable to completely bend her arm.

86. ATR has suffered physical, emotional, and mental damages as a direct result of this incident, including, but not limited to, the physical and emotional pain and suffering of memory loss, severe headaches, past and future corrective surgeries, memory loss, cognitive processing issues, as well as other physical, emotional, and mental damages.
87. Plaintiffs Mr. Torres and Mrs. Ramirez have suffered emotional and mental suffering watching their daughter go through the pain and suffering entailed by her dramatic fall, the surgeries and hospitalization and the struggle to recover from her injuries.
88. Plaintiff Melisa Torres Ramirez has suffered emotional and mental damages upon witnessing her sister's traumatic fall, her subsequent injuries and her struggle to regain her prior state and cope with the limitations resulting from her injuries.

**FIRST CAUSE OF ACTION – ABSOLUTE LIABILITY UNDER
32 L.P.R.A. SEC. 5144**

89. The allegations above are incorporated by reference as if again fully set forth herein.
90. HACIENDA MADRIGAL, INC., as the owner and/or possessor and/or custodian of the horses used in the tour taken by the Plaintiffs, caused damages to Plaintiffs in violation of 31 PR. Laws Ann. 5144 (Article 1805 of Puerto Rico's Civil Code).
91. HACIENDA MADRIGAL, INC. is the owner and/or possessor and/or user of the horses that were used in the tour in controversy.
92. HACIENDA MADRIGAL, INC. used the horses for its economic gain.
93. HACIENDA MADRIGAL, INC. had control of and possessed and used the horses in controversy in their business of providing horseback riding tours through the countryside.

94. As owner and/or possessor of the horses in controversy, HACIENDA MADRIGAL, INC. are strictly liable for the damages caused by the animals.
95. As owner and/or possessor of the horses in controversy, HACIENDA MADRIGAL, INC. was duty bound to exercise its control and possession of the horses intervening the required care to avoid causing harm to third parties.
96. As owner and/or possessor of the horses in controversy, HACIENDA MADRIGAL, INC. is responsible for the damages caused to the Plaintiffs without regard to the fact that the animal was used for the activity of horseback riding tours.
97. As renters of the horses in controversy, neither ATR, nor ALBERTO TORRES, or CLARIBEL RAMIREZ, or MELISA TORRES RAMIREZ possessed the horses for purposes of the application of 32 L.P.R.A. sec. 1544.
98. At the time that they were riding the horses in controversy, ATR, ALBERTO TORRES, CLARIBEL RAMIREZ, and MELISA TORRES RAMIREZ were merely using the horses briefly, for purely recreational purposes, having paid to obtain permission to that effect.
99. No act of God or major force intervened in the events that caused the damages to the Plaintiffs.
100. No fault on the part of any of the Plaintiffs intervened in the events that caused the damages to the Plaintiffs.
101. The animals that were owned and/or of which HACIENDA MADRIGAL, INC. was in possession and/of which HACIENDA MADRIGAL, INC. used to generate economic gain directly caused the economic and grave physical and emotional damages to the Plaintiffs who visited the premises of HACIENDA MADRIGAL, INC. and contracted

to be taken on a tour under the impression that HACIENDA MADRIGAL, INC., properly conducted the business of selling and guiding horseback riding tours in a safe manner.

102. HACIENDA MADRIGAL, INC.'s liability towards the Plaintiffs is premised on their mere ownership, possession and use for economic gain of the horses in controversy, as well as in the commission of negligent acts or omissions, as state henceforth.

103. HACIENDA MADRIGAL, INC. is liable for all the damages caused plaintiffs by the horses it owned, possessed, controlled and lent to plaintiffs for the horseback tour.

**SECOND CAUSE OF ACTION – NEGLIGENCE OF
HACIENDA MADRIGAL, INC. UNDER 32 L.P.R.A. secs 5141 AND 5142.**

104. The allegations above are incorporated by reference as if again fully set forth herein.

105. Defendants, through their acts or omissions caused damages to the Plaintiffs through fault or negligence in violation of 31 PR. Laws Ann. 5141 and 5142 (Articles 1802 and 1803 of Puerto Rico's Civil Code, respectively).

106. On or about May 28, 2014, Hacienda Madrigal provided horseback riding tours on its property located in Cidra, Puerto Rico.

107. As the owners and operators of Hacienda Madrigal, who organized and offered horseback riding tours, Defendants, had a duty to Plaintiffs to safely conduct the horseback riding tour, so that Plaintiffs and other customers would not suffer harm or damage.

108. Hacienda Madrigal provided the leaders that guided Plaintiffs' horseback riding tour on May 28, 2014.

109. The guides provided by Hacienda Madrigal were its employees or agents.

110. Hacienda Madrigal received payment from Plaintiffs for the horseback tour.

111. Hacienda Madrigal breached their duty of care to Plaintiffs by failing to provide an adequate amount of guides during the horseback riding tour.
112. These guides acted in an unsafe and reckless manner, and through their negligence caused injury to Plaintiffs.
113. Among the negligent and reckless acts were: failure to correctly match the horse with the rider, failure to select the appropriate tour for the level of experience of the riders, failure to provide adequate separation among the horses during the ride, failure to properly place the horses in the group, failure to exclude and/or separate the inherently dangerous horses from the group, failure to select appropriate horses for the tour, use of inherently dangerous horses.
114. The failure to provide adequately trained, experienced, and prudent tour guides was negligent and put all members of the horseback riding tour, including ATR, ALBERTO TORRES, CLARIBEL RAMIREZ, and MELISA TORRES RAMIREZ, at risk.
115. Hacienda Madrigal knew or should have known that the failure to man the horseback riding tours with adequately trained, experienced and prudent guides could result in the horses causing harm to the riders.
116. Defendants breached their duty of care to Plaintiffs by failing to provide hard hats or helmets to the riders of their horseback riding tours.
117. The failure to provide hard hats or helmets to the riders of their horseback riding tours negligently enhanced the risk involved in the horseback riding activity.
118. Defendants knew or should have known that the failure to provide hard hats or helmets to the riders of their horseback riding tours presented a great risk of head trauma to the riders.

119. Defendants breached their duty of care to Plaintiffs by failing to properly match ATR and Melisa to the horse that was assigned for her to ride and to check that the brakes were working adequately.
120. The failure to properly match ATR and Melisa to the horse that was assigned for her to ride negligently enhanced the risk involved in the horseback riding activity.
121. Defendants knew or should have known that the failure to properly match ATR, a petite sized minor, to a horse could result in the horse causing her harm.
122. Defendants breached their duty of care to Plaintiffs by failing to maintain a safe trail and environment for the riders, causing the horses to accumulate too close to each other at closed gates along the trail.
123. The failure to maintain a safe trail for the riders, causing the horses to accumulate too close to each other at closed gates along the trail, negligently enhanced the risk involved in the horseback riding activity.
124. Defendants knew or should have known that the failure to provide adequate trails for the horseback riding tours could result in the horses coming too close together, causing the riders harm.
125. Defendants knew or should have known that the failure to provide adequate instructions and control for the horseback riding tour could result in the horses coming too close together, causing the riders harm.
126. Defendants breached their duty of care to Plaintiffs by negligently allowing a horse that was known and prone to attacking and biting other horses, to participate in a horseback riding tour and assigning this horse to an inexperienced rider.
127. Defendants breached their duty of care to Plaintiffs by negligently allowing a horse that

was known and prone to rearing while being ridden, to participate in a horseback riding tour and assigning this horse to an inexperienced rider.

128. Allowing a horse that was known and prone to attacking and biting other horses, as well as another that was prone to rearing, to participate in a horseback riding tour, and assigning these horses inexperienced riders, recklessly and negligently enhanced the risk involved in the horseback riding activity.
129. Defendants knew or should have known that allowing a horse that was known and prone to attacking and biting other horses, as well as another that was prone to rearing, to participate in a horseback riding tour and assigning these horses to inexperienced riders could cause the inexperienced riders harm.
130. Defendants placed plaintiffs as well as the entire group at risk when they provided horses that should never be allowed for the purpose used.
131. Defendants breached their duty of care to Plaintiffs by failing to provide safe horses to plaintiffs as well as keeping the aggressive horse from the others.
132. The failure to do so, negligently enhanced the risk involved in the horseback riding activity.
133. Defendants knew or should have known that allowing the aggressive horses to be close to each other could cause the inexperienced riders harm.
134. The guides, through their lack of training experience, hurry and carelessness, contributed to the dangerous crowding of the horses.
135. The trail was dangerous and required a gate to be operated which contributed to the horses crowding in close proximity.
136. It known to defendant Hacienda Madrigal and thus foreseeable that the aggressive

horse would attack the other horses in proximity.

137. It was foreseeable that such attack on another horse could cause serious harm to the riders involved.
138. It was foreseeable that such attack on another horse could cause the second horse to rear and thus cause serious harm to the riders involved.
139. The guides provided by Defendants acted in a reckless manner, and through their negligence caused injury to Plaintiffs.
140. Defendants breached their duty of care to Plaintiffs by failing to promptly provide assistance to Plaintiffs once ATR was injured.
141. Defendants breached their duty of care to Plaintiffs by failing to take all possible safety measures to ensure that Plaintiff ATR was not injured on their premises by their horses.
142. Defendants' failure to take all possible safety measures to ensure that Plaintiff ATR was not injured on their premises by their horses, negligently enhanced the risk involved in the horseback riding activity.
143. Defendants knew or should have known that their failure to take all possible safety measures to the patrons paying for guided horseback riding tours could cause the riders harm.
144. Plaintiffs had the right to expect that the Defendants properly maintained the trails, properly trained their guides, provided adequate equipment and safe horses to the riders and properly matched the horses to the level of proficiency of the riders.
145. The risks presented by the negligently maintained trail, the inadequately trained guides, the use in a guided tour of a horse that was prone to biting others, the failure to provide safety equipment to the riders -helmets or hard hats- and the failure to properly match

horses to riders are not risks inherent to horseback riding.

146. As a direct and proximate result of Defendants' negligence and carelessness, Plaintiff ATR sustained grave physical, emotional, mental, and economic damages.

147. As a direct and proximate result of Defendants' negligence and carelessness, Plaintiff Alberto Torres has suffered emotional, metal, and economic damages.

148. As a direct and proximate result of Defendants' negligence and carelessness, Plaintiffs have physical and emotional and economic damages.

THIRD CAUSE OF ACTION - ABC INSURANCE COMPANIES

149. The allegations contained above are incorporated by reference as if again fully set forth herein.

150. Defendants ABC Insurance Companies were, at the time herein pertinent, authorized to do business in Puerto Rico, and issued an insurance policy on behalf of one or more of the Defendants.

151. Pursuant to 26 P.R. Laws Ann. § 2001, an insurance company is directly liable for the negligence or fault of its insured.

152. Pursuant to 26 P.R. Laws Ann. § 2003, an action against an insurer may be brought separately or may be joined together with an action against its insured.

153. As a result, Defendants ABC Insurance Companies are liable to Plaintiff for the damages caused to her by Defendants or another tortfeasor.

FOURTH CAUSE OF ACTION - DOES I-X

154. The allegations contained above are incorporated by reference as if again fully set forth herein.

155. Defendants Does I-X caused damages to Plaintiff through fault or negligence in

violation of 31 L.P.R.A. §§5141, 4142 and/or 5144 via their employees, agents, or assignees.

156. Defendants Does I-X are jointly and severally liable for the damages caused to Plaintiffs.

DAMAGES

157. The allegations contained above are incorporated by reference as if again fully set forth herein.

158. As a result of the negligent acts, omissions, and/or misrepresentations of Defendants, Plaintiff ATR has suffered substantial physical, emotional, and mental damages, in the form of physical and emotional pain and suffering.

159. As a result of the negligent acts, omissions, and/or misrepresentations of Defendants, ATR suffered a very serious cranial fracture, requiring surgical intervention and causing changes in personality and behavior and with persistent headaches, memory loss, and lightheadedness.

160. As a result of the negligent acts, omissions, and/or misrepresentations of Defendants, ATR has had to undergo intensive treatments with physicians ranging from neurologists to physical therapists, which have taken economic, as well as emotional tolls on her as well as her father, her mother and her sister.

161. As a result of the negligent acts, omissions, and/or misrepresentations of Defendants, ATR's life underwent drastic changes, and have required a long and difficult recovery.

162. As a result of the negligent acts, omissions, and/or misrepresentations of Defendants, Plaintiff ATR has not been able to go to school, or engage in sports and hobbies that

she used to enjoy. Her life has been drastically changed due to Defendants' tortious conduct.

163. As a result of the negligent acts, omissions, and/or misrepresentations of Defendants, Plaintiffs have suffered economic damages, including but not limited to out of pocket medical expenses, medical liens, and co-payments.

164. As a result of the negligent acts, omissions, and/or misrepresentations of Defendants, Plaintiffs Alberto Torres and Claribel Ramirez have suffered emotional and mental damages in watching their daughter go through this painful situation and struggling to recover from her injuries. Plaintiffs have also suffered economic damages including, but not limited to, transportation and accommodation expenses, past and future medical expenses, medical transport by helicopter for ATR, as well as other economic damages.

165. As a result of the negligent acts, omissions, or misrepresentations of Defendants, Plaintiff Melisa Torres Ramirez has suffered emotional and mental damages by witnessing her sister's traumatic accident, and experiencing her struggle towards recovery firsthand.

166. Plaintiff ATR's physical, emotional, mental, and economic damages as a result of the injuries sustained in the incident have a reasonable value of no less than **\$2,000,000.00** (TWO MILLION DOLLARS).

167. Plaintiff Alberto Torres' emotional and mental damages as a result of his daughter's accident have a reasonable value of no less than **\$1,000,000.00** ONE MILLION DOLLARS).

168. Plaintiff Claribel Ramirez's emotional, mental and economic damages as a result of her daughter's accident have a reasonable value of no less than **\$1,000,000.00** ONE

MILLION DOLLARS).

169. Plaintiff Alberto Torres and Plaintiff Claribel Ramirez's economic damages as a result of their daughter's accident have a reasonable value of no less than **\$50,000.00** (FIFTY THOUSAND DOLLARS).
170. Plaintiff Melisa Torres Ramirez' emotional and mental damages as a result of her sister's accident have a reasonable value of no less than **\$500,000.00** (FIVEHUNDRED THOUSAND DOLLARS).
171. These are ongoing damages and will continue to accrue.

TRIAL BY JURY DEMANDED

172. Plaintiffs hereby demand trial by jury.
173. **WHEREFORE**, Plaintiffs demand judgment against Defendants, jointly and severally, in the amount of no less than **\$4,550,000.00** (FOUR MILLION FIVE HUNDRED AND FIFTY THOUSAND DOLLARS) plus costs incurred, reasonable attorneys' fees, and such other and further relief as to this Honorable Court may seem just and proper under the law.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of May, 2015.

Plaintiff's Counsel:

INDIANO & WILLIAMS, P.S.C.
207 Del Parque Street, Third Floor
San Juan, P.R. 00912
Tel. (787) 641-4545; Fax (787) 641-4544
jeffrey.williams@indianowilliams.com

s/ Jeffrey M. Williams

JEFFREY M. WILLIAMS
USDC PR 202414