

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

LYDIA SANCHEZ, ERIC BETANCOURT,  
JORGE BETANCOURT, ANA MERCADO,

Plaintiffs,

v.

CASA CALABRIA LLC; JOHN  
LOMBARDO; ABC INSURANCE  
COMPANIES; DOES I-X and any other joint  
tortfeasors,

Defendants.

Civil No.: 22-1386 (RAM)

RE: TORT ACTION FOR NEGLIGENCE  
PURSUANT TO ARTICLES 1536 & 1540,  
31 L.P.R.A, 31 L.P.R.A §§ 10801, 10805.

**JURY TRIAL DEMANDED**

**AMENDED COMPLAINT**

**TO THE HONORABLE COURT:**

**APPEAR NOW** the Plaintiffs, LYDIA SANCHEZ, ERIC BETANCOURT, JORGE BETANCOURT, AND ANA MERCADO 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 Connecticut.
3. All Defendants are individuals, corporations, business entities, or partnerships who are citizens of Puerto Rico or of a state other than Connecticut.

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 **LYDIA SANCHEZ** (hereinafter “Mrs. Sanchez” or “Lydia”) is of legal age, a citizen and domiciled in the state of Connecticut.
7. Plaintiff **ERIC BETANCOURT** (hereinafter “Eric”) is of legal age, a citizen and domiciled in the state of Connecticut. He is one of the sons of Lydia.
8. Plaintiff **JORGE BETANCOURT** (hereinafter “Jorge”) is of legal age, a citizen and domiciled in the state of Connecticut. He is one of the sons of Lydia.
9. Plaintiff **ANA MERCADO** (hereinafter “Ana”) is of legal age, a citizen and domiciled in the state of Connecticut. She is the daughter of Lydia.
10. Defendant **CASA CALABRIA LLC** is a corporation organized and operating under the laws of the Commonwealth of Puerto Rico that is the registered owner of the property that was rented by Mrs. Sanchez’s grandson for MRS. SANCHEZ herself and MR. ERIC BETANCOURT and where the incident at issue occurred.
11. Defendant **JOHN LOMBARDO** (hereinafter “**MR. LOMBARDO**”) is the host and operator of the property rented by Mrs. Sanchez’s grandson for MRS. SANCHEZ herself and MR. ERIC BETANCOURT to stay at, via the popular vacation rental service Airbnb. Mr. Lombardo resides in Puerto Rico.
12. 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 Plaintiffs.

13. Defendant **DOES I-X** are individuals, corporations, or entities that are citizens and domiciled in Puerto Rico or a state other than Connecticut who are unknown and are jointly and severally liable for Plaintiffs' damages.

### **GENERAL ALLEGATIONS**

14. Plaintiff Mrs. Sanchez is a 74-year-old mother of six, who lives in Hartford, Connecticut.
15. Airbnb is a popular vacation rental service that uses an online platform to connect travelers with accommodations.
16. On May 2022, Mrs. Sanchez's grandson used Airbnb's platform to book the house owned by **CASA CALABRIA LLC**, listed on Airbnb's website as hosted by **MR. LOMBARDO** located in Carolina, Puerto Rico for the nights of May 12, 2022, to May 22, 2022.
17. The purpose of the trip was for plaintiffs Mrs. Sanchez and Mr. Eric Betancourt to visit Mrs. Sanchez's mother and Eric's grandmother, who resides in Puerto Rico.
18. On May 12, 2022, Mrs. Sanchez arrived at the island with her son Mr. Eric Betancourt and began her stay at the rented house.
19. The following morning, May 13, 2022, Mrs. Sanchez stayed alone in the rented house while Mr. Eric Betancourt went to go pick up their rental car.
20. That morning, while alone in the house, Lydia went into the kitchen of the rental property to make herself some coffee.
21. There was an unnoticeable step in the kitchen's entrance.

22. When exiting the kitchen, Lydia's foot gave way over the unnoticeable step, causing her to lose her balance and to fall forcefully on the floor, landing on the right side of her body, several feet away from the kitchen floor.
23. The fall caused Mrs. Sanchez to fracture her right femur and pelvis and to lacerate the right side of her forehead.
24. Mrs. Sanchez was in severe pain and could not move or stand up from the floor.
25. After the fall, Mrs. Sanchez reached out to grab her cellphone, which had been in her hand prior to the fall and had fallen at arm's length, and called her son Eric to inform him that she had fallen and could not stand up.
26. Eric told his mother Lydia not to move, and immediately returned to the house and called an ambulance.
27. Mrs. Sanchez was in so much pain that she told Eric to not move her and leave her on the floor. He then put a pillow under his mother's head so she could be somewhat comfortable, and both waited for the ambulance to arrive.
28. Mrs. Sanchez was taken to the Emergency Room of Hospital Centro Medico
29. Once in the hospital, Lydia was treated at the emergency room, diagnosed with a fracture, and admitted for surgery.
30. Two days later, on May 15, 2022, Dr. Martinez Becerra operated on Mrs. Sanchez, who underwent intramedullary-nailing surgery – a rod was placed to repair her right femur fracture and stabilize the bone.
31. On May 18, 2022, Mrs. Sanchez was discharged from Centro Medico and went back to the house, where she stayed during the remainder of her scheduled trip in Puerto Rico to undergo her initial recovery before being able to travel back home to Connecticut.

32. During this time, Mrs. Sanchez was unable to perform regular activities, enjoy her vacation or visit her mother due to extreme pain and post-surgery instructions. In sum, Mrs. Sanchez could not move and was confined to her bed.
33. On May 22, 2022, Mrs. Sanchez and Mr. Eric Betancourt flew back to Connecticut, and, on the same day, Mrs. Sanchez went to Hartford Healthcare to follow-up on her medical condition resulting from the slip and fall at the Airbnb rental in Puerto Rico.
34. Since the day of the surgery, Lydia had not been eating, was confused, and was experiencing hallucinations.
35. After a second evaluation at Hartford Healthcare, Dr. Michael Miranda concluded that Mrs. Sanchez had also injured her right rotator cuff as a result of her fall in Puerto Rico, which would only get better by undergoing surgery.
36. To ease the pain, Dr. Miranda injected her with cortisone, but by the next day, Mrs. Sanchez's shoulder pain had returned.
37. Mrs. Sanchez had more X-rays performed for both her right leg and right rotator cuff and received an ambulatory referral to undergo physical therapy.
38. On May 30<sup>th</sup>, 2022, Mrs. Sanchez was transferred from Hartford Healthcare to Bloomfield Center for Nursing and Rehabilitation for physical therapy evaluation and treatment, and she started using a walker for support.
39. On June 15<sup>th</sup>, 2022, Mrs. Sanchez was discharged from Bloomfield Center for Nursing and Rehabilitation and sent home to continue therapy.
40. From May 17<sup>th</sup>, 2022 to the present date, Mrs. Sanchez is still receiving physical therapy at her son Jorge Betancourt's house from Global Horizon Home Care.

41. As of today, Mrs. Sanchez continues to suffer because of the accident, as described above.
42. Mrs. Sanchez has suffered physical and emotional damages as a result of her fall at Defendant's rental house.
43. During Mrs. Sanchez and Mr. Eric Betancourt's stay at the Airbnb, one of Mr. Lombardo's maintenance employees admitted to Mr. Eric Betancourt that he had repeatedly told to Mr. Lombardo that the step leading to the kitchen area was very dangerous.
44. MR. LOMBARDO, operator and host of the Airbnb, therefore, had previous knowledge of this potentially dangerous condition, yet did nothing to prevent it, nor did he warn the guests about it prior to their rental of the property.

**FIRST CAUSE OF ACTION – NEGLIGENCE OF DEFENDANT MR. LOMBARDO  
UNDER ARTICLES 1536 & 1540, 31 L.P.R.A §§ 10801, 10805**

45. The allegations above are incorporated by reference as if again fully set forth herein.
46. Defendant **MR. LOMBARDO**, as the host and operator of the rented house, caused damage to Plaintiffs through fault or negligence in violation of 31 L.P.R.A. § 10801, 10805.
47. On or about May 12, 2022, **MR. LOMBARDO** managed and/or operated the house rented by Mrs. Sanchez's grandson through Airbnb.
48. On or about May 12, 2022, **MR. LOMBARDO** was responsible for operating and maintaining the house, including the area where Mrs. Sanchez suffered her fall.
49. At all times herein mentioned, it was the duty of **MR. LOMBARDO**, his agents, servants, officers, and/or employees, to provide a suitable and safe area for walking and accessing the kitchen, that did not present potential injury to the guests staying at the

house due to foreseeable dangerous conditions.

50. Furthermore, on or about May 12, 2022, **MR. LOMBARDO**, his agents, servants, officers, and/or employees, failed to provide a suitable and safe area for walking to the kitchen that did not present potential injury to the guests that were staying at the house or foreseeable dangerous conditions.
51. Indeed, **MR. LOMBARDO** was aware of this dangerous condition because one of his maintenance employees admitted he had already mentioned it in the past.
52. **MR. LOMBARDO**, his agents, servants, officers, and/or employees acted negligently, carelessly, and recklessly by failing to properly ensure that the step that led to the kitchen of the house complied with standard measures to render them safe and in a suitable condition for the guests staying therein.
53. **MR. LOMBARDO**, his agents, servants, officers, and/or employees acted negligently, carelessly, and recklessly by allowing the kitchen entry step in question to easily go unseen and not providing the appropriate markers and/or signage to warn invitees or take measures to otherwise remedy the condition.
54. **MR. LOMBARDO**, his agents, servants, officers, and/or employees knew or should have known that the step that leads to the kitchen was dangerous and could result in unsuspecting individuals slipping, misstepping, tripping and/or falling.
55. **MR. LOMBARDO**, his agents, servants, officers, and/or employees knew or should have known that injuries could occur to individuals who slipped and/or fell due to the unnoticeable step that leads to the house's kitchen.
56. As a direct result of **MR. LOMBARDO'S** negligent acts or omissions, Mrs. Sanchez suffered a fracture on her right femur and rotator cuff.

57. As a direct result of **MR. LOMBARDO's** agents, servants, officers, and/or employees' negligent acts or omissions, Mrs. Sanchez has been unable to run her household and cannot perform basic daily tasks such as cleaning and cooking as she used to do before this accident.
58. As a direct result of **MR. LOMBARDO's** agents, servants, officers, and/or employees' negligent acts or omissions, Mrs. Sanchez has had to use a walker and is barred from accessing locations without handicap access, and from moving around with liberty and engaging in her daily activities as she used to before the accident.
59. As a direct result of **MR. LOMBARDO's** agents, servants, officers, and/or employees' negligent acts or omissions, Mrs. Sanchez and Mr. Eric Betancourt's family trip visit to Puerto Rico was ruined.
60. As a direct result of **MR. LOMBARDO's** agents, servants, officers, and/or employees' negligent acts or omissions, Mrs. Sanchez was subjected to multiple medical interventions.
61. As a direct result of **MR. LOMBARDO's** agents, servants, officers, and/or employees' negligent acts or omissions, Mrs. Sanchez has required aggressive physical therapy, which is still ongoing.
62. As a direct result of **MR. LOMBARDO's** agents, servants, officers, and/or employees' negligent acts or omissions, Mrs. Sanchez experienced injuries that **have not healed completely**, which may still require additional surgery, as well as consequent pain, limited mobility, and sleepless nights due to significant discomfort on her right leg and shoulder.
63. As a direct result of **MR. LOMBARDO's** agents, servants, officers, and/or employees'



negligent acts or omissions, Mrs. Sanchez continues experiencing pain and suffering as described above.

**SECOND CAUSE OF ACTION – NEGLIGENCE OF DEFENDANT CASA CALABRIA LLC UNDER ARTICLES 1536 & 1540, 31 L.P.R.A §§ 10801, 10805**

64. The allegations above are incorporated by reference as if again fully set forth herein.
65. At all times herein pertinent, co-defendant **CASA CALABRIA LLC** was the owner of the home Lydia and Eric stayed in while visiting Puerto Rico.
66. Co-defendant **CASA CALABRIA LLC**, as owner of the house rented via Airbnb, caused damages to Plaintiffs through fault or negligence in violation of 31 L.P.R.A. § 10801, 10805.
67. Co-defendant **CASA CALABRIA LLC**, as owner of the house failed to properly maintain the home, including the area where Mrs. Sanchez suffered her fall.
68. At all times herein mentioned, it was the duty of **CASA CALABRIA LLC**, its agents, servants, officers, and/or employees, to provide a suitable and safe area for walking and accessing the kitchen, that did not present potential injury to the guests staying at the house due to foreseeable dangerous conditions.
69. **CASA CALABRIA LLC**, its agents, servants, officers, and/or employees acted negligently, carelessly, and recklessly by failing to properly ensure that the step that led to the kitchen of the house complied with standard measures to render them safe and in a suitable condition for the guests staying therein.
70. **CASA CALABRIA LLC**, its agents, servants, officers, and/or employees acted negligently, carelessly, and recklessly by allowing the kitchen's entry step in question to easily go unseen and not providing the appropriate signage to warn invitees or take measures to otherwise remedy the condition.

71. **CASA CALABRIA LLC**, its agents, servants, officers, and/or employees knew or should have known that the step that leads to the kitchen was dangerous and could result in unsuspecting individuals slipping, misstepping, tripping and/or falling.
72. **CASA CALABRIA LLC**, its agents, servants, officers, and/or employees knew or should have known that injuries could occur to individuals who slipped and/or fell due to the unnoticeable step that leads to the house's kitchen.
73. As a direct result of the negligent acts or omissions agents, servants, officers, and/or employees of the **CASA CALABRIA LLC**, Mrs. Sanchez suffered a fracture on her right femur and rotator cuff and has been unable to run her household and could not perform basic daily tasks such as cleaning and cooking.
74. As a direct result of **CASA CALABRIA LLC's** agents, servants, officers, and/or employees' negligent acts or omissions, Mrs. Sanchez has had to use a walker and is barred from accessing locations without handicap access, and from moving around with liberty and engaging in her daily activities.
75. As a direct result of **CASA CALABRIA LLC's** agents, servants, officers, and/or employees' negligent acts or omissions, Mrs. Sanchez and Mr. Eric Betancourt's family trip visit to Puerto Rico was ruined.
76. As a direct result of **CASA CALABRIA LLC's** agents, servants, officers, and/or employees' negligent acts or omissions, Mrs. Sanchez was subjected to multiple medical interventions.
77. As a direct result of **CASA CALABRIA LLC's** agents, servants, officers, and/or employees' negligent acts or omissions, Mrs. Sanchez has required aggressive physical therapy, which is still ongoing.

78. As a direct result of **CASA CALABRIA LLC's** agents, servants, officers, and/or employees' negligent acts or omissions, Mrs. Sanchez experienced injuries that **have not healed completely**, which may still require additional surgery, as well as consequent pain, limited mobility, and sleepless nights due to significant discomfort on her right leg and shoulder.
79. As a direct result of **CASA CALABRIA LLC's** agents, servants, officers, and/or employees' negligent acts or omissions, Mrs. Sanchez continues experiencing pain and suffering as described above.

**THIRD CAUSE OF ACTION – NEGLIGENCE OF DOES I-X**  
**UNDER 31 LPRA §5141 AND 5142**

80. The factual allegations detailed above are restated herein in full.
81. Defendants DOES I-X caused damages to Plaintiffs through fault or negligence in violation of 31 L.P.R.A. §5141 or 31 L.P.R.A. §5142 via their employees, agents, or assignees.
82. Defendants DOES I-X, either personally or through their agents, servants, officers, and/or employees, failed to provide a suitable and safe area for walking and accessing the kitchen at the house, that did not present potential injury to the guests due to foreseeable dangerous conditions.
83. Defendants DOES I-X, either personally or through their agents, servants, officers, and/or employees, failed to provide a suitable and safe area for walking at the house that did not present potential injury to their guests or foreseeable dangerous conditions as a result of noncompliance with applicable building codes.
84. Defendants DOES I-X, either personally or through their agents, servants, officers, and/or employees, acted negligently, carelessly, and recklessly by failing to properly

ensure that the construction and maintenance of the area that led to the kitchen complied with standard measures to render it safe and in a suitable condition for their invitees.

85. Defendants DOES I-X, their agents, servants, officers, and/or employees acted negligently, carelessly, and recklessly by not providing the appropriate signage to warn invitees or take measures of the step that led to the kitchen area or otherwise remedy the condition.
86. Defendants DOES I-X, either personally or through their agents, servants, officers, and/or employees, knew or should have known that the area in question was dangerous and could result in unsuspecting individuals slipping and/or falling.
87. Defendants DOES I-X, either personally or through their agents, servants, officers, and/or employees, knew or should have known that injuries could occur to individuals who slipped and/or fell upon walking in the area in question, which leads to the house's kitchen.
88. As a direct result of the negligent acts and/or omissions of Defendants DOES I-X, either personally or through their agents, servants, officers, and/or employees, Mrs. Lydia Sanchez experienced a foreseeable fall and suffered serious physical injuries as well as mental and emotional pain and suffering and economic damages.
89. As a direct result of the negligent acts and/or omissions of Defendants DOES I-X, either personally or through their agents, servants, officers, and/or employees, Mrs. Sanchez has suffered a fracture of her right leg and rotator cuff.
90. As a direct result of the negligent acts and/or omissions of Defendants DOES I-X, either personally or through their agents, servants, officers, and/or employees, Mrs. Sanchez

was unable to run her household and could not perform basic daily tasks such as cleaning and cooking.

91. As a direct result of the negligent acts and/or omissions of Defendants DOES I-X, either personally or through their agents, servants, officers, and/or employees, Mrs. Sanchez has had to use a walker and is barred from accessing locations without handicap access, and from moving around with liberty and engaging in her daily activities.
92. As a direct result of the negligent acts and/or omissions of Defendants DOES I-X, either personally or through their agents, servants, officers, and/or employees, Mrs. Sanchez and Mr. Eric Betancourt's family trip visit to Puerto Rico was ruined.
93. As a direct result of the negligent acts and/or omissions of Defendants DOES I-X, either personally or through their agents, servants, officers, and/or employees, Mrs. Sanchez was subjected to multiple medical interventions.
94. As a direct result of the negligent acts and/or omissions of Defendants DOES I-X, either personally or through their agents, servants, officers, and/or employees, Mrs. Sanchez required aggressive physical therapy.
95. As a direct result of the negligent acts and/or omissions of Defendants DOES I-X, either personally or through their agents, servants, officers, and/or employees, Plaintiff experienced injuries that have failed to heal completely as well as consequent pain, limited mobility, and sleepless nights due to significant discomfort on her right leg and shoulder.
96. Therefore, Defendants DOES I-X are jointly and severally liable for the damages caused to Plaintiffs.

**FOURTH CAUSE OF ACTION – NEGLIGENCE OF A, B, and C**  
**INSURANCE COMPANIES**

97. The factual allegations contained above are restated herein in full.
98. The insurance companies of any named or unnamed defendants, the A, B, and C Insurance Companies, are directly liable for the fault or negligence of their insured/s pursuant to 26 L.P.R.A. § 2001.
99. Pursuant to 26 L.P.R.A. § 2003, an action against an insurer may be brought separately or may be joined with an action against the insured.

### **DAMAGES**

100. The allegations contained above are incorporated by reference as if again fully set forth herein.
101. As a result of the negligent acts or omissions of Co-Defendants, Plaintiffs have suffered physical, emotional, mental, and economic damages.

#### **A. Mrs. Lydia Sanchez**

102. As a result of the negligent acts, omissions, and/or misrepresentations of Defendants, Mrs. Sanchez has suffered substantial physical, emotional, mental, and economic damages.
103. As a direct result of Defendants' negligent acts or omissions, Mrs. Sanchez suffered damages on her right leg, right shoulder, pelvis, and forehead.
104. As a direct result of Defendants' negligent acts or omissions, Mrs. Sanchez fractured her right femur, right rotator cuff and pelvis, and lacerated her forehead.
105. As a result of the negligent acts, omissions, and/or misrepresentations of Defendants, Mrs. Sanchez had to undergo surgery and intensive and painful treatments for physical rehabilitation.

106. As a result of the negligent acts, omissions, and/or misrepresentations of Defendants, Mrs. Sanchez will likely have to undergo surgery to repair her right rotator cuff tear, and undergo intensive and painful treatments for physical rehabilitation.
107. As a result of the negligent acts, omissions, and/or misrepresentations of Defendants, Mrs. Sanchez continues with severe pain and restricted range of motion.
108. As of today, Mrs. Sanchez needs assistance when walking and with her personal hygiene and is still experiencing pain in her right leg and shoulder when moving and doing daily chores and activities.
109. As a result of the negligent acts, omissions, and/or misrepresentations of Defendants Mrs. Sanchez suffered emotional and mental damages that include but are not limited to hallucinations and loss of appetite.
110. As of today, Mrs. Sanchez is still unable to fend for herself as she used to in her own home.
111. As of today, Mrs. Sanchez is still unable to walk the way she used to.
112. Mrs. Sanchez's past and future physical damages have a reasonable value of no less than **ONE MILLION DOLLARS (\$1,000,000)**.
113. As a direct result of Defendants' negligent acts or omissions, Mrs. Sanchez has experienced the pain and suffering associated at the time of the injury, rehabilitation, and throughout her recovery.
114. As of today, Mrs. Sanchez remains and will continue to be concerned with the fact that her leg bones and shoulder ligaments will be more prone to fractures for the rest of her life now that they have been severely injured.

115. As a direct result of Defendants' negligent acts or omissions, Mrs. Sanchez has, and will continue to, experience past and future pain and suffering, related to but not limited to past and future treatment and medication which has a reasonable value of **FIVE HUNDRED THOUSAND DOLLARS (\$500,000)**.
116. Mrs. Sanchez's combined physical, emotional, mental, and economic damages as a result of the injuries sustained in the incident have a reasonable value of no less than **ONE MILLION FIVE HUNDRED THOUSAND DOLLARS WITH (\$1,500,000)**.
117. These are ongoing damages and will continue to accrue.

**B. Mr. Eric Betancourt**

118. For Eric Betancourt this trip was not only a vacation but also an opportunity for him and his mother to spend time with his grandmother, Lydia's 96-year-old mother. However, this incident impeded him from getting to spend time with his grandmother. He instead found himself at the hospital and rental house taking care of his injured mother.
119. Eric Betancourt was able to see his grandmother only once because a cousin brought her to the rental house once Lydia was discharged from the hospital house so she could see him and her daughter Lydia. Apart from that one time, Eric stayed by his mother's side, taking care of her, and was not able to visit his grandmother.
120. Eric Betancourt was not able to completely enjoy his stay in the house they had rented; instead, he went back and forth between the hospital and the house because he needed to stay with his mother every night at the hospital. Whenever she was sleeping, he would go back to the house to shower and change, and would return to continue taking care of his mother and keep her company through her suffering.



121. Eric Betancourt stayed overnight at the hospital every day and went back to the rental house on a daily basis for his personal hygiene and to gather the things he needed for the stay.

122. On one of the days, Eric's rental car got locked in the hospital's parking, so he had to call an Uber, making it difficult to accomplish other tasks and incurring in additional expenses.

123. Eric Betancourt incurred in other unnecessary expenses because of his mother Lydia's fall and stay at the hospital. The money that was supposed to be used for the vacation was in turn spent on ambulance transportation, medical records, hospital parking, wheelchair for his mother, Uber trips, street food, among others.

124. Eric Betancourt lives with the guilt of having left his mother Lydia alone that morning; he blames himself for her fall and the outcome she now has to endure. He feels responsible for having brought her to the Island and is fearful about his mother's ongoing recovery and the full extent of her damages as a result of this fall.

125. As a direct result of Defendants' negligent acts or omissions, Eric has endured emotional pain and suffering, related to his mother's medical condition and treatment which has a reasonable value of **TWO HUNDRED THOUSAND DOLLARS (\$200,000)**.

### **C. Jorge Betancourt**

126. For Jorge Betancourt, he has suffered to see his mom turn into someone dependent on others. Before the incident, Lydia had her own apartment, but ever since she got back to Connecticut, Jorge has taken her into his house and has helped her with her daily hygiene and overall routine.

127. Jorge Betancourt has been by his mother's side upon her arrival to Connecticut. He has taken her to and has been present during Lydia's follow-up at Hartford Medical Center, and every subsequent medical appointment and therapy session.
128. During his mother's stay at Hartford Medical Center, Jorge Betancourt made sure to visit her every day by driving long distances to and from his house to the hospital. He was also the one that helped her transition to the rehabilitation center once she was discharged from the hospital. He has met with doctors, nurses, and therapists to better understand his mother's condition and make sure he can provide the best care for her once she was released from the rehab center to his house.
129. As a direct result of Defendants' negligent acts or omissions, Jorge has endured economic damages, emotional pain and suffering, related to his mother's medical condition and treatment which has a reasonable value of **TWO HUNDRED THOUSAND DOLLARS (\$200,000)**.

**D. Ana Mercado**

130. Ana Mercado, one of Lydia's daughters, had to care for her mother while hospitalized. This is because Lydia, once was admitted to Hartford Medical Center, was very afraid and in distress and Ana felt the need to comfort her mother and stay by her side. Ana slept in a small and uncomfortable couch for two nights.
131. The days she wasn't staying with her mother, Ana would drive long distances both to the hospital and to the rehab center to visit, assist, and pamper her mother Lydia.
132. Ana Mercado had to change the days of her family vacation because she was anxious and fearful that leaving her mother's side while she was still suffering would further harm Lydia. Therefore, she cancelled and rescheduled her plans until her mother was

discharged and at Jorge's house and she finally felt at ease in going away.

133. Ana Mercado missed several workdays in order to stay the night at the hospital with her mother.

134. As a direct result of Defendants' negligent acts or omissions, Ana has endured emotional pain and suffering, related to her mother's medical condition and treatment which has a reasonable value of **TWO HUNDRED THOUSAND DOLLARS (\$200,000)**.

**TRIAL BY JURY DEMANDED**

135. Plaintiffs hereby demand trial by jury.

**WHEREFORE**, Plaintiffs demand judgment against Defendants, jointly and severally, in the amount of no less **than TWO MILLION AND ONE HUNDRED THOUSAND DOLLARS (\$2,100,000)**, 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 10<sup>th</sup> day of November 2022.

*Plaintiffs' Counsel:*

**INDIANO & WILLIAMS, P.S.C.**  
Attorneys for Plaintiff  
207 del Parque Street, Third Floor  
San Juan, Puerto Rico 00912  
Tel: (787) 641-4545; Fax: (787) 641-4544  
[jeffrey.williams@indianowilliams.com](mailto:jeffrey.williams@indianowilliams.com)  
[vanesa.vicens@indianowilliams.com](mailto:vanesa.vicens@indianowilliams.com)

*s/ Jeffrey M. Williams*  
**JEFFREY M. WILLIAMS**  
USDC PR Bar No. 202414  
*s/ Vanesa Vicéns*  
**VANESA VICÉNS**  
USDC Bar No. 217807