

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

HANNAH CARLSON, MARY
BAKER FOR HERSELF AND IN
REPRESENTATION OF MBC, LEE
BAKER

Plaintiffs.

v.

HOMEOWNERS ASSOCIATION OF
VILLAS DE MONTE Y MAR, LA
CASA DEL CONVALECIENTE INC.,
MARIA JULIA ROMERO ROSADO,
also known as "MARIJULIA"
ROMERO ROSADO, JOSE A.
RODRIGUEZ GONZALEZ, AND
THE CONJUGAL PARTNERSHIP
COMPRISED OF THEM BOTH,
LIBERTY MUTUAL INSURANCE
COMPANY, LIBERTY MUTUAL
GROUP INC., JOHN DOE; JAMES
ROE , and ABC, INSURANCE
COMPANIES;

Defendants.

Civil No. 21-1475 (PAD)

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

JURY TRIAL DEMANDED

AMENDED COMPLAINT

TO THE HONORABLE COURT:

APPEAR NOW the Plaintiffs Hannah Carlson, Mary Baker for herself and in representation of her minor daughter MBC, and Lee Baker 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 are domiciled in the state of Georgia.

3. All Defendants are individuals, corporations, business entities, or partnerships who are citizens of Puerto Rico or of a state other than Georgia.
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 **HANNAH CARLSON** (hereinafter “Hannah”) is of legal age, a citizen and domiciled in the state of Georgia.
7. Plaintiff **MARY BAKER** (hereinafter “Mrs. Baker”) is of legal age, a citizen and domiciled in the state of Georgia, and mother of Plaintiffs MBC and Hannah Carlson.
8. Plaintiff **MARY BAKER** in representation of her minor daughter **MBC** who is a 20 year old citizen and domiciled in the state of Georgia.
9. Plaintiff **LEE BAKER** (hereinafter “Mr. Baker”) is of legal age, a citizen and domiciled in the state of Georgia, and father of Plaintiffs Mary Baker in representation of MBC and Hannah Carlson.
10. Co-Defendant **the HOMEOWNERS ASSOCIATION OF VILLAS DE MONTE Y MAR** is an organized entity that upon information and belief is composed of citizens of Puerto Rico, who are jointly and severally liable for Plaintiffs’ damages.
11. Co-defendant **LA CASA DEL CONVALECIENTE, INC.** is a corporation organized and operating under the law of the Commonwealth of Puerto Rico that is the sole

registered owner of the apartment unit rented by Plaintiffs in Isabela, Puerto Rico, where Plaintiffs suffered injuries as described below. This corporation was authorized by co-defendant the Homeowners Association of Villas de Monte y Mar to rent the property.

12. Co-Defendants **MARIA JULIA ROMERO ROSADO, also known as “MARIJULIA” ROMERO ROSADO, and JOSE A. RODRIGUEZ GONZALEZ, and the Conjugal Partnership comprised of them both,** are the owners and/or sole stockholders, officials, and directors of co-defendant La Casa del Convaleciente, Inc. Upon information and belief, they are citizens of and domiciled in the Commonwealth of Puerto Rico.
13. Co-Defendants **JOHN DOE** and **JAMES ROE** are unknown joint tortfeasors to be later replaced by their actual names which may become known through further discovery in this litigation and who may be liable to Plaintiffs for the damages suffered, in whole or in part, for the actions and/or omissions herein described, encompassing the relevant period of time.
14. Co-Defendant **LIBERTY MUTUAL INSURANCE COMPANY** is a foreign corporation organized in a state other than Georgia, which is authorized to do business in Puerto Rico and which upon information and believe insures one or more co-defendants for the acts and/or omissions described herein and/or, is liable for the injuries and damages sustained by Plaintiffs.
15. Co-Defendant **LIBERTY MUTUAL GROUP INC.** is a foreign corporation organized or operating under the laws of the Commonwealth of Puerto Rico or of a state other than Georgia, which is authorized to do business in Puerto Rico and which

upon information and believe is the holding company of co-Defendant LIBERTY MUTUAL INSURANCE COMPANY, which upon information and belief insures one or more co-defendants for the acts and/or omissions described herein and/or, is liable for the injuries and damages sustained by Plaintiffs.

16. Defendants **ABC INSURANCE COMPANIES** are corporations organized or operating under the laws of the Commonwealth of Puerto Rico or of a state other than Georgia, which are authorized to do business in Puerto Rico, and which insure one or more co-defendants for the acts and/or omissions described herein and/or are liable for the injuries and damages sustained by Plaintiffs.

GENERAL ALLEGATIONS

17. Plaintiffs MBC and Hannah Baker, along with their Parents Mary and Lee Baker, planned a visit to Puerto Rico from May 29, 2021 to June 6, 2021.
18. The purpose of the trip was for plaintiff Mary Baker to meet her sister for the first time since her sister is a 4-year cancer survivor and was scheduled to undergo surgery for a mass found on her ovary. The family wanted to meet her as well and enjoy the island for a few days.
19. Plaintiffs Mary and Lee Baker, mother and stepfather of MBC and Hannah Carlson, rented a beachfront apartment through owners Defendants **MARIA JULIA ROMERO ROSADO, also known as “MARIJULIA” ROMERO ROSADO, and JOSE A. RODRIGUEZ GONZALEZ, and the Conjugal Partnership comprised of them both,** for the family to stay in during their Vacation.
20. The apartment unit they rented from Mrs. Maria Julia Romero is located at the condominium “Villas de Monte Y Mar” in Isabela, Puerto Rico.

21. The Family landed in Puerto Rico on May 29, 2021 and a few hours later arrived at the apartment.
22. A few hours after arriving, Hannah and MBC were at the condominium's pool area along with their father, Lee Baker.
23. MBC and Hannah then decided to take a walk on the beach and take pictures of the view.
24. The pool area of this beachfront condominium is surrounded by a wired railing and offers beach access through a gate.
25. To access said gate one must go down a staircase.
26. MBC and Hannah both went down the stairs and spent some time at the beach. When coming back up to return to the pool area, they noticed that the gate did not close automatically.
27. Because MBC came up the stairs first, she asked Hannah to close the gate.
28. Hannah turned around and headed down the stairs to close the gate. Because there was no hand railing Hannah supported her hand on the wire railing on the left side of the staircase and, upon touching said railing, began receiving an electric shock.
29. MBC, after noticing something was wrong with Hannah, went down the stairs to help her sister. MBC also placed her hand on said wired railing due to the lack of a handrail and began experiencing electric shock.
30. Lee Baker was still at the pool when he realized something was going on, however, he just thought the girls had found a sea creature. He quickly realized that was not the case after hearing Hannah scream "get her off the wire". He believed the wire had pinched MBC's hands but soon enough realized that they were suffering electrocution

after grabbing the wire to release MBC's hands and feeling a slight shock. Because he had shoes on, Lee did not suffer electrocution.

31. He realized what was going on and was able to pull MBC away from the wire.
32. Moments later, Hannah was able to push herself off the wire.
33. The wires that served as a fence by the pool are near the ocean and were not insulated. They are located very close to electrical outlets that appear to use 110-120 voltage. The outlet covers are not in good repair and appear to be lacking proper seals. All of this is set close to the ocean where it is well known that sea salt can cause corrosion to concrete and metal resulting in potential electrical hazards.





34. MBC and Hannah were both taken to an urgent care clinic in Isabela where they bandaged their wounds and performed electrocardiograms on both MBC and Hannah.
35. Because of the severity of the electrocardiograms and the electrocution injuries the girls were transferred to “Hospital Buen Samaritano” in Aguadilla, a higher level of care facility, to receive additional medical treatment.
36. When MBC and Hannah arrived at “Hospital Buen Samaritano” in Aguadilla, they were triaged and subjected to more studies and electrocardiograms.

37. Defendant **MARIA JULIA ROMERO ROSADO** visited MBC and Hannah at this hospital and stated what had happened to the girls was her fault.
38. During the hospital visit, **JOSE A. RODRIGUEZ GONZALEZ** also handed back to Lee Baker the amount paid for their stay in the apartment which had been paid earlier that day in cash by Mrs. Baker.
39. At the hospital, Defendant **MARIA JULIA ROMERO ROSADO** stated that she would take care of the hospital bill while her husband handed the money paid for the rental of the apartment back to Lee Baker.
40. Despite the statement of **MARIA JULIA ROMERO ROSADO** regarding the hospital bill, Mary Baker received both Hospital bills after MBC and Hannah's discharge.
41. MBC and Hannah spent Sunday, May 30, 2021 and Monday, May 1, 2021 at "Hospital Buen Samaritano" in Aguadilla.
42. Mary Baker spent two nights in the hospital with her daughters while Lee Baker slept in their rental car due to Covid restrictions.
43. Parents Mary and Lee Baker had to reserve an additional hotel in Aguadilla to be closer to the hospital before the girls were discharged given the uncertainty of the girls' medical condition and because on Sunday, May 30, 2021, Defendant **MARIA JULIA ROMERO ROSADO** contacted Mary Baker's sister and essentially asked when they would be getting their belongings out of the apartment and returning the key, making it clear that they needed to find other accommodations immediately. However, because of the holiday weekend there were no hotel rooms available until Monday evening.

44. On Wednesday, June 2, 2021, Hannah was taken back to “Hospital Buen Samaritano” in Aguadilla due to an allergic reaction and to one of her wounds seeming infected.
45. Mary and Lee Baker decided it would be better for MBC and Hannah’s health to return to their home state and be attended by local doctors.
46. The family changed their flights to leave for home several times and had to reserve a room in a hotel in San Juan to be closer to the airport.
47. The family traveled from Aguadilla to San Juan and prepared for their flight.
48. The flight had to be postponed because MBC and Hannah could not travel due to muscle spasms and worsening of their health state.
49. After various flight cancellations due to health issues, MBC, Hannah and their parents, Mary and Lee Baker, arrived at Georgia on June 6, 2021.
50. MBC and Hannah are both still undergoing medical care back in Georgia for the burns and wounds they suffered throughout their bodies.
51. MBC is also undergoing treatment for a herniated disk as a result of falling after being pulled off the wire.
52. MBC and Hannah are both currently suffering post-traumatic stress and are undergoing psychological therapy.
53. Both MBC and Hannah are both traumatized and suffer panic attacks as a result of this incident.
54. MBC and Hannah both suffer from memory loss, insomnia, tiredness, and depression as a result of this incident.
55. These events have significantly affected their jobs, academic career and have permanently scarred them not only physically but also emotionally.

56. Although MBC and Hannah are undergoing treatment, the long-term consequences of electrocution are ongoing, some still unknown, and hence cannot be calculated.
57. Therefore, the extent of their damages is still fully unknown and ongoing.

FIRST CAUSE OF ACTION –

NEGLIGENCE UNDER ART. 1536 OF THE PUERTO RICO CIVIL CODE OF MARIA JULIA ROMERO ROSADO , also known as “MARIJULIA” ROMERO ROSADO, and JOSE A. RODRIGUEZ GONZALEZ, and the CONJUGAL PARTNERSHIP COMPRISED OF THEM BOTH

58. The allegations contained above are incorporated by reference as if again fully set forth herein.
59. At all times herein pertinent, Co-Defendants **MRS. MARIA JULIA ROMERO ROSADO also known as “MARIJULIA” ROMERO ROSADO, and JOSE A. RODRIGUEZ GONZALEZ, and the Conjugal Partnership comprised of them both** were the owners of the apartment unit the Baker Family rented at “Villas de Monte y Mar” in Isabela **and/or the** sole stockholders, officials and directors of La Casa del Convaleciente Inc., the registered owner of the apartment.
60. Co-Defendants **MRS. MARIA JULIA ROMERO ROSADO also known as “MARIJULIA” ROMERO ROSADO, and JOSE A. RODRIGUEZ GONZALEZ, and the Conjugal Partnership comprised of them both** through their acts and omissions while renting said apartment, caused damage to Plaintiffs through fault and/or negligence in violation of 31 PR. Laws Ann. (Article 1536 of Puerto Rico’s Civil Code).
61. Co-Defendants **MRS. MARIA JULIA ROMERO ROSADO also known as “MARIJULIA” ROMERO ROSADO, and JOSE A. RODRIGUEZ**

GONZALEZ, and the Conjugal Partnership comprised of them both are responsible for their negligent behavior in failing to warn the Baker family with the associated risks of being in the condominium's common areas, including the pool area and surrounding wire fence, therefore causing the damages herein described.

62. Co-Defendants **MRS. MARIA JULIA ROMERO ROSADO also known as "MARIJULIA" ROMERO ROSADO, and JOSE A. RODRIGUEZ GONZALEZ, and the Conjugal Partnership comprised of them both** are responsible for their negligent behavior in failing to warn the Baker Family of the electricity in the wired railing along the staircase providing access to the beach therefore causing the damages described in this Complaint.

63. As a direct and proximate result of the negligence of Co-Defendants **MRS. MARIA JULIA ROMERO ROSADO also known as "MARIJULIA" ROMERO ROSADO, and JOSE A. RODRIGUEZ GONZALEZ, and the Conjugal Partnership comprised of them both**, Plaintiffs sustained physical, emotional, mental, and economic damages.

SECOND CAUSE OF ACTION –
NEGLIGENCE OF THE HOMEOWNER'S ASSOCIATION OF
VILLAS DE MONTE Y MAR UNDER ARTS. 1536 AND
1540 OF THE PUERTO RICO CIVIL CODE

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

65. Co- Defendant the **HOMEOWNERS' ASSOCIATION OF VILLAS DE MONTE Y MAR** caused damages to Plaintiffs through fault or negligence in violation of Arts. 1536 and 1540 of the Puerto Rico Civil Code via their employees, agents, or

assignees.

66. Co-Defendant the **HOMEOWNERS' ASSOCIATION OF VILLAS DE MONTE Y MAR** is responsible for their negligent behavior in failing to properly and safely maintain the Condominium's common areas, including the pool area, and preventing the wired railing to conduct electric charge.
67. Co-Defendant the **HOMEOWNERS' ASSOCIATION OF VILLAS DE MONTE Y MAR** is responsible for their negligent behavior in failing to warn guests of electricity in wired railing surrounding the pool area, which is a common area of the condominium.
68. Co-Defendant the **HOMEOWNERS' ASSOCIATION OF VILLAS DE MONTE Y MAR** is responsible for their negligent behavior in failing to ensure safety of the condominium's guests in their common areas.
69. As a direct and proximate result of the negligence of Co-Defendant the **HOMEOWNERS' ASSOCIATION OF VILLAS DE MONTE Y MAR** Plaintiffs sustained physical, emotional, mental, and economic damages.

THIRD CAUSE OF ACTION –
NEGLIGENCE OF LA CASA DEL CONVALECIENTE, INC.
UNDER ARTS. 1536 AND 1540 OF THE PUERTO RICO
CIVIL CODE

70. The allegations contained above are incorporated by reference as if again fully set forth herein.
71. At all times herein pertinent, co- Defendant the **LA CASA DEL CONVALECIENTE, INC.** was the owner of the apartment unit the Baker Family rented at “Villas de Monte y Mar” in Isabela.

72. Co-defendant the **LA CASA DEL CONVALECIENTE, INC.** while renting said apartment caused damages to Plaintiffs through fault or negligence in violation of Arts. 1536 and 1540 of the Puerto Rico Civil Code via their employees, agents, or assignees.
73. Co-defendant the **LA CASA DEL CONVALECIENTE, INC.** , is responsible for its negligent behavior in failing to warn the Baker family with the associated risks of being in the condominium's common areas, including the pool area and surrounding wire fence, therefore causing the damages herein described.
74. **LA CASA DEL CONVALECIENTE, INC.** derived revenue from their ocean front property with access to the beach via the gate attached to the wired fence that became electrified.
75. **LA CASA DEL CONVALECIENTE, INC.** transacted a business activity and failed to inspect and assess the conditions of the areas their tenants would have access to.
76. Co-defendant the **LA CASA DEL CONVALECIENTE, INC.**, is responsible for its negligent behavior in failing to warn the Baker Family of the electricity in the wired railing along the staircase providing access to the beach therefore causing the damages described in this Complaint.
77. As a direct and proximate result of the negligence of co-defendants **LA CASA DEL CONVALECIENTE, INC.**, plaintiffs sustained physical, emotional, mental, and economic damages.

FOURTH CAUSE OF ACTION –
LIBERTY MUTUAL INSURANCE COMPANY

78. The allegations contained above are incorporated by reference as if again fully set forth herein.
79. Defendant **LIBERTY MUTUAL INSURANCE COMPANY** was, at the time herein pertinent, a foreign corporation authorized to do business as such in Puerto Rico, and which, upon information and belief, issued an insurance policy on behalf of any or all Defendants or another tortfeasor.
80. Pursuant to 26 P.R. Laws Ann. § 2001, an insurance company is directly liable for the negligence or fault of its insured.
81. 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.
82. As a result, Defendant **LIBERTY MUTUAL INSURANCE COMPANY** is liable to Plaintiffs for the damages caused to them by any or all of insured Defendants or another tortfeasor.

FIFTH CAUSE OF ACTION –
LIBERTY MUTUAL GROUP INC.

83. The allegations contained above are incorporated by reference as if again fully set forth herein.
84. Defendant **LIBERTY MUTUAL GROUP INC.** was, at the time herein pertinent, a foreign corporation authorized to do business as such in Puerto Rico, which upon information and belief is the holding company of co-DEFENDANT LIBERTY MUTUAL INSURANCE COMPANY, who upon information and belief, issued an

insurance policy on behalf of any or all Defendants or another tortfeasor.

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

86. 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.

87. As a result, Defendant **LIBERTY MUTUAL GROUP INC.** is liable to Plaintiffs for the damages caused to them by any or all insured Defendants or another tortfeasor.

SIXTH CAUSE OF ACTION –
ABC INSURANCE COMPANIES

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

89. Defendants ABC Insurance Companies were, at the time herein pertinent, authorized to do business as such in Puerto Rico, and issued insurance policies on behalf of Defendants or another tortfeasor.

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

91. 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.

92. As a result, Defendants ABC Insurance Companies are liable to Plaintiffs for the damages caused to them by Defendants or another tortfeasor.

SEVENTH CAUSE OF ACTION –
NEGLIGENCE UNDER ARTICLES
1536 OF THE PUERTO RICO CIVIL CODE

AGAINST JOHN DOE AND JAMES ROE UNKNOWN JOINT TORTFEASORS

93. The allegations contained above are incorporated by reference as if again fully set forth herein.
94. Co-Defendants John Doe and James Roe are so designated for lack of knowledge at this point in the proceedings
95. Co-Defendants John Doe and James Roe caused damage to Plaintiffs through fault and/or negligence in violation of 31 PR. Laws Ann. (Article 1536 of Puerto Rico's Civil Code).
96. As a direct and proximate result of the negligence of Co-Defendants John Doe and James Roe, Plaintiffs sustained physical, emotional, mental, and economic damages.
97. As a result, Co-Defendants John Doe and James Roe are liable to Plaintiffs for the damages caused to them.

DAMAGES

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

A. MBC

100. As a result of the negligent acts or omissions of Co-Defendants, MBC suffered physical, emotional, mental, and economic damages.
101. MBC's emotional damages include but are not limited to, insomnia, panic attacks, fear, depression, and tiredness. She is currently under ongoing medical treatment

and therapy. The extent of Ms. Carlson's emotional damages remains unknown and ongoing.

102. MBC's physical damages include but are not limited to burns and injuries throughout her body, a herniated disk, burns which at some point impeded her from bathing without help, muscle spasms, and bodily pain. She is currently under ongoing medical treatment. The extent of Ms. Carlson's physical damages is unknown and ongoing.

103. MBC was completely unable to enjoy the family vacation in Puerto Rico or spend time with her newly met aunt, her and her family's time was spent in the hospital and resting in hotel rooms.

104. MBC's physical and emotional damages will require lifetime care and a lifecare plan for future and periodic neurological evaluations, treatment of depression induced by shock, and for the day-to-day care of the yet unknown extent of the physical injuries as a result of having suffered electrocution due to defendants' negligence.

105. MBC's physical damages as a result of the injuries sustained in the incident described above, have a reasonable value of no less than **SEVEN HUNDRED AND FIFTY THOUSAND DOLLARS (\$750,000.00)**.

106. MBC's emotional and mental damages as a result of the injuries sustained in the incident described above, have a reasonable value of no less than **FIVE HUNDRED THOUSAND DOLLARS (\$500,000.00)**.

107. As a result of the negligent acts, omissions, or misrepresentations of co-Defendants,

MBC has suffered economic damages.

108. MBC has had to stop working and drop summer classes therefore placing her a year behind to graduate.

109. MBC's economic damages as a result of the injuries sustained in the incident have a reasonable value of approximately **TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00)**.

110. Thus, MBC's total physical, economic, emotional, and mental damages as a result of injuries sustained in the incident have a reasonable value of no less than **ONE MILLION TWO-HUNDRED AND SEVENTY-FIVE THOUSAND DOLLARS (\$1,275,000.00)**.

111. These are ongoing damages and will continue to accrue.

B. Hannah Carlson

112. As a result of the negligent acts or omissions of Co-Defendants, Ms. Hannah Carlson suffered physical, emotional, mental, and economic damages.

113. Hannah Carlson's emotional damages include but are not limited to, memory loss, irritability, insomnia, panic attacks, fear, depression, and tiredness. She is currently under ongoing medical treatment and therapy. The extent of Ms. Hannah Carlson's emotional damages is unknown and ongoing.

114. Hannah Carlson was left with considerable burns and injuries throughout her body, burns which at some point did not allow her to bathe without help, muscle spasms, and bodily pain. She is currently under ongoing medical treatment. The extent of Ms. Carlson's physical damages is unknown and ongoing.

115. Ms. Carlson was completely unable to enjoy the vacation planned with her family or spend time with her newly met aunt, her and her families time was spent in the hospital and resting in hotel rooms.
116. Ms. Hannah Carlson's physical and emotional damages will require lifetime care and a lifecare plan for future and periodic neurological evaluations, treatment of depression induced by shock, and for the day-to-day care of the yet unknown extent of the physical injuries as a result of having suffered electrocution due to defendants' negligence.
117. Ms. Hannah Carlson's physical damages as a result of the injuries sustained in the incident described above have a reasonable value of no less than **SEVEN HUNDRED AND FIFTY THOUSAND DOLLARS (\$750,000.00)**.
118. Ms. Hannah Carlson's emotional and mental damages as a result of the injuries sustained in the incident described above have a reasonable value of no less than **FIVE HUNDRED THOUSAND DOLLARS (\$500,000.00)**.
119. As a result of the negligent acts, omissions, or misrepresentations of co-Defendants, Ms. Hannah Carlson has suffered economic damages.
120. Ms. Hannah Carlson had to stop working and was impeded from enrolling in summer/fall 2021 courses due to her mental and emotional state and the trauma and insomnia she is enduring, as well as the time-consuming medical appointments.
121. Ms. Hannah Carlson's economic damages as a result of the injuries sustained in the incident have a reasonable value of approximately **TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00)**.

122. Thus, Ms. Hannah Carlson's total physical, economic, emotional, and mental damages as a result of injuries sustained in the incident described above have a reasonable value of no less than **ONE MILLION TWO-HUNDRED AND SEVENTY-FIVE THOUSAND DOLLARS (\$1,275,000.00)**.

123. These are ongoing damages and will continue to accrue.

C. Mary Baker

124. Mary Baker lives with the trauma of almost losing her entire family, given that if her husband had not had shoes on, he too would have been stuck on the wire along with her daughters.

125. MBC and Hannah's ongoing physical damages and emotional damages have affected her deeply and constantly worry her.

126. For Mary Baker this trip was not only a vacation but an opportunity for her to meet her sister for the first time and help her in her battle with cancer. However, this incident impeded her from getting to know and spending time with her sister. She instead found herself at hospitals and hotel rooms taking care of her injured daughters.

127. Mary Baker suffers from a neck condition and the emotional distress and fear for her daughters has aggravated her physical symptoms.

128. After the events described above, Mary Baker has had to help her daughters with day-to-day tasks, even simple ones such as bathing, therefore worsening her preexisting neck condition.

129. Mrs. Baker's physical and emotional damages as a result of the injuries sustained by

her daughters MBC and Hannah Carlson in the incident have a reasonable value of no less than **TWO-HUNDRED AND FIFTY THOUSAND DOLLARS (\$250,000.00)**.

130. As a result of the negligent acts, omissions, or misrepresentations of Defendants, Mrs. Baker has suffered economic damages.

131. Before the incident, Ms. Baker had a catering business where two (2) of the three (3) main employees were her daughters, MBC and Hannah Carlson, with the third being herself.

132. After the incident Mary Baker's business was left without employees therefore, she had to shut down her business and other business projects to take care of her daughters.

133. Mary Baker's restaurant/catering business grossed about three hundred and fifty thousand dollars (\$350,000.00) to four hundred thousand dollar (\$400,000.00) yearly; therefore, closing her business since the incident has represented a substantial loss of income to her family, which to date averages no less than \$120,000.00, including her salary from her business which averaged \$1,000.00 weekly.

134. At the time of the incident, Mrs. Baker was also in in the process of starting another business for which she was taking classes. This is now on hold too because of the time required to assist her daughters with doctors' appointments and providing them with mental and emotional support

135. Mary Baker and her husband, Lee Baker have had to incur in hotel fees, flight

change fees, medical bills, and hospital bills.

136. Mrs. Baker's economic damages as a result of the injuries sustained by her daughters in the incident have a reasonable value of approximately **ONE TWENTY-FIVE THOUSAND DOLLARS (\$125,000.00)**.

137. Thus, Mrs. Baker's total physical, emotional and economic damages because of the injuries sustained by her daughters in the incident have a reasonable value of no less than **THREE-HUNDRED AND SEVENTY-FIVE THOUSAND DOLLARS (\$375,000.00)**.

138. These are ongoing damages and will continue to accrue.

D. Lee Baker

139. Lee Baker lives with the trauma of having watched his stepdaughters suffer electrocution in front of him and almost losing them. He also has had to witness his wife suffer the mental and emotional burdens of her daughters' ongoing recovery.

140. MBC and Hannah's ongoing physical damages and emotional damages have affected him deeply.

141. Mr. Baker has had to stop working to help take care of his daughters at home. Mr. Baker is a contractor and has suffered business interruption.

142. Mr. Baker suffers ongoing stress due to the high amount of medical expenses and accumulation of bills associate to the treatment of his daughters.

143. Mr. Baker was impeded from enjoying this trip with his family and getting to know his newly met sister-in-law. He instead spent his vacation in the hospital, sleeping in the car and taking care of his injured daughters in hotel rooms.

144. Mr. Baker's emotional damages as a result of the injuries sustained by his daughters MBC and Hannah, in the incident described above have a reasonable value of no less than **TWO-HUNDRED AND FIFTY THOUSAND DOLLARS (\$250,000.00)**.

145. As a result of the negligent acts, omissions, or misrepresentations of co-Defendants, Mr. Baker has suffered economic damages.

146. Mr. Baker's economic damages include out-of-pocket medical expenses, hospital bills, hotel expenses and flight change fees.

147. Mr. Baker's economic damages as a result of the injuries sustained by her daughters in the incident described above have a reasonable value of approximately **TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00)**.

148. Thus, Mr. Baker's total economic, emotional, and mental damages as a result of the injuries sustained by her daughters in the incident described above have a reasonable value of no less than **TWO-HUNDRED AND SEVENTY-FIVE THOUSAND DOLLARS (\$275,000.00)**

149. These are ongoing damages and will continue to accrue.

TRIAL BY JURY DEMANDED

150. Plaintiffs hereby demand trial by jury.

WHEREFORE, Plaintiffs demand judgment against Defendants, jointly and severally, in the amount of no less than **THREE MILLION TWO-HUNDRED THOUSAND DOLLARS (\$3,200,000.00)** plus costs incurred, reasonable attorneys' fees, and such other and further relief as to this Honorable Court may deem just and proper.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 24th day of November 2021.

INDIANO & WILLIAMS, P.S.C.

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