

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No.

**DENISE N. TRAYNOM and
BRANDON K. AXELROD,**

Plaintiffs,

vs.

CINEMARK, USA, INC., d/b/a CENTURY AURORA 16,

Defendant.

COMPLAINT AND JURY DEMAND

Plaintiffs, Denise Traynom and Brandon Axelrod, by their attorneys, KEATING WAGNER POLIDORI FREE, P.C. herby submits their Complaint and Jury Demand against the above captioned defendant. As grounds therefor, Plaintiff states and alleges as follows:

JURISDICTION

1. At all times relevant to this case, Plaintiffs Denise N. Traynom and Brandon K. Axelrod were residents of the State of Colorado, and they presently reside at 10068 East Arizona Drive, Apt. 1814, Denver, CO 80247.
2. Upon information and belief, Defendant Cinemark, USA, Inc., d/b/a Century Aurora 16 is a Texas corporation with its principal place of business at 3900 Dallas Parkway, Suite 500, Plano, TX 75093. The theater ("theater") where the incidents forming the basis for this Complaint was and is located at 14200-14300 E. Alameda Avenue, Aurora, CO 80012 in the County of Arapahoe, State of Colorado.

3. This Court has jurisdiction over Plaintiff's claims against this Defendant pursuant to 28 U.S.C. §1332, since there is complete diversity of citizenship between the parties, and the amount in controversy herein exceeds the sum of \$75,000.00, exclusive of costs and interest.
4. Venue is proper herein pursuant to 28 U.S.C. § 1391 (b)(2), because a substantial part of the events or omissions giving rise to this claim occurred in the District of Colorado.

GENERAL ALLEGATIONS

5. Upon information and belief, before July 20, 2012, Defendant had information that previous disturbances, incidents, disruptions and other criminal activities had taken place at or near the property of the theater. These incidents most commonly took place during the evening hours.
6. Based upon this knowledge, Defendant hired various security personnel, including, but not limited to, off-duty law enforcement officers from the City of Aurora Police Department.
7. That security personnel was not present at all times the theater was open -- rather, upon information and belief, those guards were placed on Friday and Saturday nights only.
8. Included in the previous incidents at the theater was at least one shooting, involving gang members. These previous incidents also included assaults and robberies.
9. The theater had public parking available on all sides of the theater, including behind Auditorium 9.
10. The theater advertised and sold tickets to the July 20, 2012 midnight premier of the movie, "*The Dark Knight Rises*." Defendant charged people who attended the movie

and the theater showed the movie at more than one auditorium because of the crowds it anticipated.

11. Although the theater was showing a midnight premier of the movie and was expecting large crowds of people to attend the midnight showing, no security personnel were present for that showing.
12. Upon information and belief, security personnel were present at the theater earlier in the day, when box office cash was being transferred.
13. The exterior doors to the theater were lacking in any alarm system, interlocking security systems, or any other security or alarm features which would have put Defendant's employees or security personnel on notice that someone had surreptitiously left the theater by the exterior door and had put the door in an open position which would facilitate a surreptitious and unlawful re-entry.
14. Upon information and belief Defendant did not have in place any security practices or procedures, nor did it employ or adequately train any employee or security personnel to prevent or deter someone to surreptitiously and unlawfully re-enter the theater through an unlocked and unalarmed door.
15. Upon information and belief, there was no system or procedure for the theater personnel to survey or monitor the parking areas and external doors behind or to the sides of the theater. This failure to monitor those doors in any way made it possible for a person to re-enter the theater without fear of interference, interruption or chance at being discovered, and to leave the door open for a period of time.

16. One of the people present at the midnight showing entered the theater on at least one occasion through a door that was located at the right, front side of the screen in Auditorium 9. Hereinafter, that person shall be referred to as "the gunman."
17. The gunman purchased a ticket and entered the theater initially through the normal patron entrance. Later, after the theater lights were darkened and the screen projection began, the gunman left his seat and moved to an exterior door, located at the right, front of the movie screen, exiting to the parking area.
18. At some point, the gunman moved his car so that he was parked very near to the exterior door to Auditorium 9.
19. While the screen projection continued in the darkened theater, the gunman opened the exterior door to Auditorium 9, put the door in a position where it would remain open, and went to his car where he had earlier placed outside that exterior door.
20. That door was unlocked, and had no alarm or other monitoring system to guard against the door being kept open. The gunman had parked his car in the available parking spaces directly outside of the exterior door to Auditorium 9.
21. The gunman was able to have sufficient time to transfer several weapons as well as ammunition at or near this door without being discovered by any theater personnel.
22. The gunman person had a virtual arsenal of weapons, including, but not limited to, one or more fully loaded shotguns, an AR-15 assault rifle, one or more fully loaded, automatic Glock handguns, and several tear gas canisters. The gunman also retrieved and put on body armor and a gas mask. He also had significant amounts of ammunition, including a fully loaded "banana clip" for the assault rifle.

23. Because of the amount of weaponry and ammunition, the gunman required time without fear of monitoring to transport the weapons and ammunition from his car to inside the theater.
24. Any person who wished to make a surreptitious and unauthorized entry into the theater could easily determine that the lack of security personnel and lack of any alarm on the door at the right, front by the screen of Auditorium would allow them to leave the theater, and re-enter without fear of being discovered, interfered with, monitored or stopped.
25. The gunman made one or more trips from his car through the open exterior door of Auditorium 9, bringing his arsenal and ammunition through that open door. Throughout that time, no employee or security personnel contacted him, deterred him, monitored him or stopped him from that re-entry.
26. The gunman's conduct in exiting the theater, parking his car, preparing for his assault, and re-entering Auditorium 9 took place over an extended period of time.
27. Plaintiffs Denise Traynom and Brandon Axelrod also attended the July 20, 2012 midnight showing of "*The Dark Knight Rises*." Plaintiffs were each one of many members of the public who purchased a ticket from Defendant.
28. Plaintiffs were seated in Auditorium 9 of the Century Aurora 16, in the upper level seating area.
29. The gunman began his assault by throwing tear gas canisters into the auditorium. The gunman was still standing near the doorway at the bottom of the theater, to the right of the screen when he began the assault.

30. During the incident, the gunman opened fire with various firearms and shot several people. Several individuals in Auditorium 9, and at least one person in Auditorium 8, were struck by gunfire.
31. Plaintiffs Denise Traynom and Brandon Axelrod ducked down behind the seats because people trying to escape were being shot by the gunman.
32. Plaintiff Denise Traynom was shot in the gluteus maximus. In addition, she suffered significant emotional and psychological distress and trauma from the incident.
33. Plaintiff Brandon Axelrod suffered significant orthopedic injuries to his right knee and ankle. In addition to these injuries, he has suffered significant emotional and psychological distress and trauma from the incident.
34. After the initial episode where the gunman threw the tear gas cannisters, the gunman continued shooting people for many minutes. All through the incident, the movie continued to play, and the houselights remained very low or off.
35. There was no alarm activated during the many minutes while the gunman was stockpiling his arsenal, and inside the theater shooting people.
36. Upon information and belief, there was no action taken by theater employees to safely evacuate the many people left in Auditorium 9.
37. Plaintiffs lay helpless on the ground for many minutes, while the gunman continued shooting people.
38. The gunman continued shooting throughout the Auditorium until eventually his weapon jammed and the shooting stopped.

39. No security personnel and no employee intervened during the entirety of the incident.

The gunman simply walked back out of the theater through the same door he used to enter, and sat in his car.

40. Even after the gunman left the theater and there was no further gunfire, for many minutes no theater personnel took action to assist the injured who were still in Auditorium 9. It took several minutes for law enforcement to finally arrive. During the entirety of that time, the movie continued playing, and the house lights remained very low or off.

41. At no time during the entirety of this incident was there any action taken by theater personnel to assist or evacuate those who were injured by the gunman.

42. Plaintiffs have undergone significant medical treatment for their many injuries.

Plaintiffs have incurred and will continue to incur economic damages, including costs for hospitals, physicians, therapists, medical and assisted care and other medical expenses and will, in the future, continue to incur such expenses. Further, Plaintiffs have incurred a loss of wages and earning capacity. Plaintiffs have also suffered non-economic losses such as physical, mental and emotional pain and suffering, emotional distress, inconvenience and impairment of the quality of life. In addition, Plaintiffs have been informed and allege that these injuries are permanent and have results in permanent impairment and disfigurement.

FIRST CLAIM FOR RELIEF:
PREMISES LIABILITY PURSUANT TO C.R.S. § 13-21-115

43. Defendant operated and maintained the theater, and is a "landowner" under the definition of that term included in the Colorado Premises Liability Act (PLA), found at C.R.S. §§ 13-21-115(1).

44. Plaintiffs were "invitees" while attending this movie showing under the definition of that term included in the PLA, specifically C.R.S. § 13-21-115(5)(a).

45. Accordingly, Defendant had a duty of reasonable care to protect Plaintiffs, and others like them, against dangers of which Defendant actually knew or should have known, pursuant to C.R.S. § 13-15-115(3)(c)(I). Those dangers included the fact of dangerous and criminal activity that had previously taken place at the theater.

46. Specifically, Defendant failed to comply with its duties to Plaintiffs, and others like them, in the following respects:

- a. Failure to employ and have present at the time of the showing of this movie security guards (including, but not limited to, off-duty law enforcement officers) to protect against and reduce the risk of unlawful conduct that posed a risk of injury or death to patrons;
- b. Failure to provide reasonable protection against surreptitious, unauthorized entry into the darkened theater viewing areas;
- c. Failure to provide reasonable door entry security devices, including, but not limited to, automatic locking doors, alarms, warning signals and other such devices on the door located the right, front of Auditorium 9;
- d. Failure to provide other reasonable security devices such as one-way security doors, exit doors interlocked with warning signals, alarms, light or other devices which would put personnel on notice of any surreptitious, unauthorized entry into the darkened theater viewing areas;
- e. Failure to develop, establish and institute adequate emergency or first-aid response and evacuation plans and procedures for patrons in the theater in the event circumstances called for such procedures;
- f. Failure to properly train employees in emergency, crisis and first-aid response and evacuation procedures;
- g. Failure to properly train employees or provide reasonable surveillance procedures including, but not limited to, surveillance devices, monitors, cameras and human surveillance or monitoring of suspicious activity.

47. Defendant knew or should have known of the dangers and risks caused by its failures as noted above.

48. Defendant breached its duties as a landowner under the PLA by its failures as noted above, thereby allowing a dangerous condition to exist, and/or by creating a dangerous condition on its premises.
49. As a direct and proximate result of these dangerous conditions, Plaintiffs were severely injured and suffered non-economic damages, losses and injuries, including extreme physical, mental and emotional pain and suffering, emotional distress, impairment and/or loss of enjoyment of life, fear and embarrassment. These damages are recoverable by Plaintiffs Denise Traynom and Brandon Axelrod pursuant to C.R.S. § 13-21-203.
50. As a direct and proximate result of these dangerous conditions, Plaintiffs suffered economic damages, losses and injuries, including medical expenses, lost wages (past and future), lost economic opportunities (past and future), out-of-pocket expenses and rehabilitation expenses.
51. As a direct and proximate result of these dangerous conditions, Plaintiffs also suffered significant disfigurement, and permanent physical impairment.

SECOND CLAIM FOR RELIEF:
NEGLIGENCE

52. Plaintiff hereby incorporates the allegations contained in paragraphs 1 through 51 above as if set forth fully herein.
53. Defendant had a duty to exercise reasonable care to provide for the safety and security of its patrons, including Plaintiffs.
54. Defendant violated its duty of reasonable care that it owed its patrons in the following, but not limited to the following, ways:

- a. Failure to employ and have present at the time of the showing of this movie security guards (including, but not limited to, off-duty law enforcement officers) to protect against and reduce the risk of unlawful conduct that posed a risk of injury or death to patrons;
- b. Failure to provide reasonable protection against surreptitious, unauthorized entry into the darkened theater viewing areas;
- c. Failure to provide reasonable door entry security devices, including, but not limited to, automatic locking doors, alarms, warning signals and other such devices on the door located the right, front of Auditorium 9;
- d. Failure to provide other reasonable security devices such as one-way security doors, exit doors interlocked with warning signals, alarms, light or other devices which would put personnel on notice of any surreptitious, unauthorized entry into the darkened theater viewing areas;
- e. Failure to develop, establish and institute adequate emergency or first-aid response and evacuation plans and procedures for patrons in the theater in the event circumstances called for such procedures;
- f. Failure to properly train employees in emergency, crisis and first-aid response and evacuation procedures;
- g. Failure to properly train employees or provide reasonable surveillance procedures including, but not limited to, surveillance devices, monitors, cameras and human monitoring procedures.

55. As a direct and proximate result of Defendant's negligent conduct, Plaintiffs suffered the injuries, damages and losses set forth in previous paragraphs of this Complaint as if set forth fully herein.

WHEREFORE, Plaintiffs pray for judgment in their favor and against Defendant in an amount which will fully and fairly compensate each of them for damages, losses and injuries, both past and future. Plaintiffs also requests judgment in their favor for pre-judgment and post-judgment interest as provided by law, for costs, attorney's fees, expert witness expenses and for such other and further relief as the Court deems proper.

PLAINTIFFS REQUEST THAT ALL ISSUES BE TRIED TO A JURY.

Dated: September 21, 2012

Respectfully submitted,

s/William L. Keating

William L. Keating, Esq.

s/Christina M. Habas

Christina M. Habas, Esq.

s/Michael O'B. Keating

Michael O'B. Keating, Esq.

s/Deirdre E. Ostrowski

Deirdre E. Ostrowski, Esq.

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JS 44 (Rev. 12/11)

District of Colorado Form

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS DENISE N. TRAYNOM and BRANDON K. AXELROD	DEFENDANTS CINEMARK, USA, INC. d/b/a CENTURY AURORA 16
(b) County of Residence of First Listed Plaintiff Denver <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i>	County of Residence of First Listed Defendant Collin County (TX) <i>(IN U.S. PLAINTIFF CASES ONLY)</i>
(c) Attorneys (Firm Name, Address, and Telephone Number) William L. Keating/ Christina M. Habas/Michael O.B. Keating/Deirdre E. Ostrowski, Keating Wagner Polidori Free, P.C., 1290 Broadway, Ste. 600, Denver, CO 80203, (303) 534-0401	NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. Attorneys (If Known)

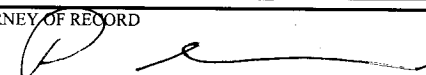
II. BASIS OF JURISDICTION <i>(Place an "X" in One Box Only)</i>	III. CITIZENSHIP OF PRINCIPAL PARTIES <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i>																
<input type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i> <input checked="" type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i>	<table style="width:100%;"> <tr> <th style="text-align: left;">PTF</th> <th style="text-align: left;">DEF</th> <th style="text-align: left;">PTF</th> <th style="text-align: left;">DEF</th> </tr> <tr> <td>Citizen of This State <input checked="" type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State <input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State <input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State <input type="checkbox"/> 5</td> <td><input checked="" type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country <input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation <input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>	PTF	DEF	PTF	DEF	Citizen of This State <input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State <input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State <input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State <input type="checkbox"/> 5	<input checked="" type="checkbox"/> 5	Citizen or Subject of a Foreign Country <input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation <input type="checkbox"/> 6	<input type="checkbox"/> 6
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IV. NATURE OF SUIT <i>(Place an "X" in One Box Only)</i>				
CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Med. Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	FORFEITURE/PENALTY <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition) <input type="checkbox"/> 465 Other Immigration Actions	BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/ Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	OTHER STATUTES <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/ Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN <i>(Place an "X" in One Box Only)</i>	<input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from another district <i>(specify)</i> <input type="checkbox"/> 6 Multidistrict Litigation <input type="checkbox"/> Appeal to District Judge from Magistrate Judgment
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VI. CAUSE OF ACTION	Cite the U.S. Civil Statute under which you are filing <i>(Do not cite jurisdictional statutes unless diversity)</i> : 28 U.S.C. 1332 Brief description of cause: <input type="checkbox"/> AP Docket Personal Injury/Premises Liability/Negligence
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VII. REQUESTED IN COMPLAINT:	<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23	DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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DATE 9/21/12	SIGNATURE OF ATTORNEY OF RECORD 
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FOR OFFICE USE ONLY	RECEIPT #	AMOUNT	APPLYING IFP	JUDGE	MAG. JUDGE
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