

Cause No. _____

Julius Johnson § **IN THE DISTRICT COURT OF**
§
-VS- § **HARRIS COUNTY, TEXAS**
§
A&J Hospitality Group, LLC § _____ **JUDICIAL DISTRICT**

PLAINTIFF'S ORIGINAL PETITION WITH REQUEST FOR DISCLOSURES

Julius Johnson, Plaintiff, complains of **A&J Hospitality Group, LLC**, Defendant, and for cause would show this Court as follows:

I.
DISCOVERY PLAN LEVEL 2

Plaintiff requests that this lawsuit be governed by Discovery Plan Level 2 pursuant to Rule 190.2 of the Texas Rules of Civil Procedure.

II.
CLAIMS FOR RELIEF

Pursuant to Rule 47 C in the Teas Rules of Civil Procedure, this lawsuit is for monetary relief over \$100,000,000.

III.

Plaintiff is a resident of Harris County, Houston, Texas.

Defendant, **A&J Hospitality Group, LLC** is a limited liability corporations and may be served with citation by serving its registered agent, Ashishkumar Patel at 18032 McKay Drive, Humble, Texas 77338 or wherever he may be located.

IV.

Plaintiff brings this suit to recover damages for personal injuries sustained by plaintiff in a incident in Harris County, Texas, on or about 01/10/2021, which plaintiff was injured in Scottish Inns & Suites located at 11233 Antoine Drive, Houston, Texas 77066. At the time and on the occasion in question, Plaintiff was an invitee on Defendant's property, having gone there for the purpose of vacationing.

V.

During the course of Plaintiff's visit on Scottish Inns & Suites, Defendant's premises, Plaintiff was caused to suffer injury by when he was walking into the lobby and slipped on the wet floor, striking his body which was the direct result of an unreasonably dangerous condition on defendant's premises. Scottish Inns & Suites' knew of the unreasonably dangerous condition and neither corrected nor warned the Plaintiff of it. Your Plaintiff did not have any knowledge of the dangerous condition and could have warned Plaintiff constituted negligence, and such negligence was proximate cause of the occurrence in question and the Plaintiff's resulting injuries. Plaintiff's conduct was reasonable and prudent at all times and did not in any way contribute to the incident and the ensuing injuries suffered by Plaintiff.

VI.

As a result of the collision described above, Plaintiff has suffered severe personal injuries causing Plaintiff to sustain permanent bodily impairment and a loss of earnings. Plaintiff has experienced physical pain and suffering and mental anguish and will, in reasonable probability, continue to do so in the future by reason of the nature and severity of his injuries. Plaintiff has been caused to incur medical charges and expenses in the past and will, in reasonable probability, continue to incur medical expenses in the future for treatment of his injuries.

VII.

REQUEST FOR DISCLOSURES

Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Defendant is requested to disclose the information and material described in Rule 194.2 within fifty (50) days of the service of this Plaintiff(s) Request for Disclosure to Defendant.

VIII.

PRAYER

Plaintiff prays that he has judgment against Defendant, jointly and severally, for actual damages shown and proven at a trial, for prejudgment and post judgment interest, for cost of court and for all other relief, legal and equitable, to which he is entitled.

Respectfully submitted,

DeSimone Law Office

By: /s/ Donald G. DeSimone

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