

IN THE CIRCUIT COURT FOR THE TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS

DEBORAH SPIVAK,)
)
 Plaintiff,)
)
 v.)
)
 MARK SANDHEINRICH and)
 KAREN SANDHEINRICH,)
)
 Defendants.)

21L0008

COMPLAINT

NOW COMES, Plaintiff, Deborah Spivak, by and through her attorneys, Hipskind & McAninch, LLC, and for her Complaint against Defendants, Mark Sandheinrich and Karen Sandheinrich., states as follows:

1. This count is brought pursuant to §16 of the Illinois Animal Control Act, 510 ILCS 5/1, et seq.
2. On December 29, 2020, Plaintiff, Deborah Spivak, and Defendants, Mark Sandheinrich and Karen Sandheinrich., were residents of St. Clair County, Illinois.
3. On December 29, 2020, at or around 12:57 pm., Plaintiff was walking past the Defendant's home at 332 Carson Drive, Belleville, Illinois and was conducting herself peacefully.
4. On December 29, 2020, Defendants owned and housed a dog at their residence at 332 Carson Drive, Belleville, Illinois.
5. Without any provocation, the dog that Defendants owned and/or had a right of property in, sought out, and attacked Plaintiff, injuring her person.
6. At the aforesaid time and place, the dog that Defendants owned and/or had a right of property in, and knowingly permitted to remain on their premises was unrestrained.

7. On December 29, 2020, there was in force in Illinois a certain statute known as the Illinois Animal Control Act, 510 ILCS 5/16, which in relevant part reads as follows:

“If a dog or other animal, without provocation, attacks, attempts to attack, or injures any person who is peaceable conducting himself or herself in any place where he or she may lawfully be, the owner of such dog or other animal is liable in civil damages to such person for the full amount of the injury proximately caused thereby.”

See 510 ILCS 5/16.

8. As a result of said attack by Defendants’ dog, Defendants violated the Animal Control Act and Plaintiff suffered injuries to her person; Plaintiff has endured pain and suffering and will continue to endure pain and suffering in the future; Plaintiff has suffered and will in the future suffer disability and disfigurement; and Plaintiff has incurred and will in the future incur medical expenses as a result of the injuries sustained by Defendants’ dog.

WHEREFORE, Plaintiff, Deborah Spivak, demands judgment against Defendants, Mark Sandheinrich and Karen Sandheinrich, in an amount exceeding \$50,000.00, and for any other such relief the Court deems just and equitable.

Respectfully Submitted,

HIPSKIND & MCANINCH, LLC

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