

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

SHARON REED,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 20L0648
)	
STEAK AND SHAKE)	
ENTERPRISES, INC.)	
)	
Defendants.)	

COMPLAINT

COMES NOW, plaintiff, SHARON REED, by and through her attorney, Kirk A. Caponi of Williams, Caponi & Associates, P.C. and for her complaint against the defendants, STEAK AND SHAKE ENTERPRISES, INC. in support thereof, states as follows:

COUNT I

(SHARON REED vs. Steak and Shake Enterprises, Inc.)

1. That at all times relevant to this cause of action, plaintiff, SHARON REED, is a citizen and resident of the City of Belleville, County of St. Clair, State of Illinois.
2. That at all times relevant to this cause of action, defendant, Steak and Shake Enterprises Inc. owns and operates a business at 10860 Lincoln Trail in the City of Fairview Heights, County of St. Clair, State of Illinois.
3. That on or about August 31, 2018, the plaintiff, SHARON REED, was lawfully on the defendant's property.

4. That at said time and place the plaintiff was walking on the property of the defendant with the purpose of purchasing food.

5. That as the plaintiff was exiting the store, the plaintiff slipped on water that had been allowed to accumulate on the floor.

6. That the defendant, Steak and Shake Enterprises, Inc., failed in its duty to maintain its property under proper safety conditions and was negligent in one or more of the following ways:

- a. The defendant negligently and carelessly failed to warn the plaintiff of the wet condition of the floor;
- b. The defendant negligently and carelessly failed to provide the plaintiff and other patrons with a mat at the entrance of the premises; and
- c. The defendant negligently failed to properly maintain its property as to cause the wet condition.

7. That as a direct and proximate result of the defendant's negligence, plaintiff, SHARON REED, was injured in one or more of the following ways:

- a. The plaintiff was made sick, sore, lame, disordered and disabled and suffered extensive injuries to her head, body, and limbs, both internally and externally;
- b. The plaintiff received injuries to her left knee, ankle, and arm;
- c. The plaintiff received injuries to her low back;
- d. The plaintiff received injuries to the soft tissues of the cervical, shoulder, and lumbar area, including the muscles, ligaments, tendons, and nerves;
- e. The plaintiff has expended money for necessary medical care, treatment and services and will be required to expend money for medical care, treatment and services in the future.

- f. The plaintiff has experienced pain and suffering and will be reasonably certain to experience pain and suffering in the future as a result of the injuries; and
- g. The plaintiff has lost money from the loss of wages and will suffer an impairment of future earning capacity.

WHEREFORE, the plaintiff, SHARON REED, prays this Court enter a judgment against the defendant, Steak and Shake Enterprises, Inc., in an amount in excess of Fifty Thousand Dollars (\$50,000.00) plus the costs of this suit.

RESPECTFULLY SUBMITTED,

/s/ Kirk A. Caponi
BY: KIRK A. CAPONI #06203940

LAW OFFICES

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DEFENDANT TO BE SERVED:

Steak and Shake Enterprises, Inc.
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