

RETURN DATE MAY 22, 2012	:	SUPERIOR COURT
SARAH SHORT	:	J.D. OF NEW HAVEN
PLAINTIFF,	:	
VS.	:	AT NEW HAVEN
BRENDAN ROSS AND U-HAUL	:	
COMPANY OF CONNECTICUT	:	
DEFENDANTS	:	APRIL 2, 2012

COMPLAINT

COUNT ONE: AS TO ALL DEFENDANTS

1. At all times mentioned herein, the defendant U-Haul Company of Connecticut was a Connecticut Corporation with a principal place of business in Connecticut.

2. On or before November 19, 2011, the defendant U-Haul Company of Connecticut permitted the defendant Brendan Ross to operate a box truck it owned and or maintained and controlled.

3. On or about November 19, 2011, the defendant Ross drove into an area being used as a tailgate before the Harvard-Yale football game.

4. At that same time, the plaintiff Sarah Short was standing with her close friend Nancy Barry in the tailgate area.

5. Then and there, the defendants' box truck struck the two women killing Nancy Barry and causing the severe injuries to the plaintiff as set forth below.

6. The injuries to the plaintiff were proximately caused by the negligence of the defendants U-Haul Company of Connecticut individually and/or

through its agent and/or permittee-operator Ross in one or more of the following ways:

- a) the vehicle was driven too fast for conditions;
- b) the vehicle was not under proper control;
- c) a proper lookout was not kept;
- d) a horn or other warning was not provided; and/or
- e) the vehicle was in an unsafe condition.

7. As a result of this negligence, the plaintiff was caused to suffer the following severe painful and obvious injuries all or part of which are permanent:


- a. Severe and deep bone bruising and/or fracture causing severe cyst like development;
- b. Extensive soft tissue loss/injuries;
- c. Right lower extremity wound with full thickness skin loss;
- d. Multiple surgical interventions requiring skin grafting and post-operative use of wound vacs;
- e. Bilateral hematomas to lower extremities;
- f. Bilateral post-traumatic seromas;
- g. Lower extremity contusions;
- h. Severe scarring;
- i. Severe emotional distress as a result of her own injuries and the experience where she was a bystander to the traumatic death of her close friend; and
- j. Extreme pain and loss of functions.

8. As a further result, the plaintiff lost wages and time from school, incurred and continues to incur costs of medical care, rehabilitation care and

equipment, and suffered and will continue to suffer an overall impairment to her earning capacity and ability to carry on and enjoy all of life's other activities.

WHEREFORE, the plaintiff claims money damages against all defendants in excess of \$15,000 and this matter is within the jurisdiction of this court.

THE PLAINTIFF,

By: 
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**PLEASE ENTER THE APPEARANCE OF
STRATTON FAXON TRIAL LAWYERS, LLC FOR THE PLAINTIFF**