

STATE OF INDIANA ) IN THE HAMILTON SUPERIOR COURT  
 ) SS:  
 COUNTY OF HAMILTON ) CAUSE NO.: 29D03

DESTINY CHANDA MARIE HOFFMAN, by )  
 next friend, JENNIFER HOFFMAN, and )  
 JENNIFER HOFFMAN, )  
 )  
 Plaintiffs, )  
 )  
 v, )  
 )  
 WESTFIELD WASHINGTON SCHOOL )  
 CORPORATION, )  
 )  
 Defendants. )

**Summons**

To Interested Parties: Westfield Washington School Corporation  
 1143 E 181st Street  
 Westfield, IN 46074

You are hereby notified that you have been sued by the person named as Petitioner and in the Court indicated above.

The nature of the suit against you is stated in the Complaint which is attached to this Summons. It also states the relief sought or the demand made against you by the Plaintiffs.

An answer or other responsive pleading is required, by your or your attorney, within twenty (20) days, commencing the day after you receive this summons, or judgment will be entered against you for what the Plaintiff has demanded.

Dated: \_\_\_\_\_

\_\_\_\_\_  
 Clerk, HAMILTON SUPERIOR COURT

Timothy R. Stoesz 13782-49  
 STOESZ & STOESZ  
 211 E. Main St.  
 P.O. Box 365  
 Westfield, IN 46074  
 (317) 867-1524

The following manner of service of Summons is hereby designated:

- \_\_\_\_\_ Service on Individual at above address:
- X  Personal Service by Attorney/Petitioner
- \_\_\_\_\_ Registered or Certified Mail
- \_\_\_\_\_ Service on Agent-Sheriff

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**COMPLAINT FOR DAMAGES**

COMES NOW, Plaintiffs, Destiny Chanda Marie Hoffman, by next friend, Jennifer Hoffman, Jennifer Hoffman, individually, by counsel, Tim Stoesz, and for their Complaint for Damages would state as follows:

1. Plaintiff, Destiny Chanda Marie Hoffman, hereinafter "Destiny", was a student at Westfield Washington High School, a school operated by Defendant, Westfield Washington School Corporation, hereinafter "WWSC".

2. On April 23, 2014, Plaintiff Destiny was a student participant in a musical presented by and at Westfield Washington High School.

3. During a performance of the musical at Westfield High School, the stage on which Destiny was performing collapsed, causing her injuries for which she suffered damages.

4. After an investigation by law enforcement, it was determined that the stage had been improperly constructed by an

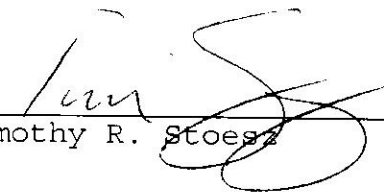
employee of Defendant, WWSC, during and while acting as an employee of WWSC and within the scope of his duties as an employee of WWSC.

5. Defendant WWSC failed to properly supervise its employee(s) who constructed the stage and WWSC's failure to properly supervise was a proximate cause of the injuries suffered by Plaintiff, Destiny Chanda Marie Hoffman.

6. Plaintiffs seek damages against the Defendant, for the injuries suffered to Destiny as a result of WWSC's negligent behavior and failure to provide a safe environment for the students of WWSC.

7. Destiny's mother, Jennifer Hoffman, seeks damages for the loss of consortium, loss of income, and mental anguish as a result of the injuries incurred by Destiny which were the result of the negligent behavior of WWSC.

Respectfully submitted,

  
\_\_\_\_\_  
Timothy R. Stoesz

STOESZ & STOESZ  
211 East Main St.  
P.O. Box 365  
Westfield, IN 46074  
317-867-1524  
[tim@stoeszlaw.com](mailto:tim@stoeszlaw.com)

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Appearance

- 1. Petitioning Party: Destiny Chanda Marie Hoffman  
Jennifer Hoffman
- 2. N/A
- 3. Attorney Information:  
Tim Stoesz  
Attorney No.: 13782-49  
211 E. Main St., P.O. Box 365, Westfield, Indiana 46074  
(317) 867-1524 Fax: (317) 867-4007  
tim@stoeszlaw.com
- 4. Case type requested is CT
- 5. Will accept fax service
- 6. There are no related cases.

  
\_\_\_\_\_  
Timothy R. Stoesz

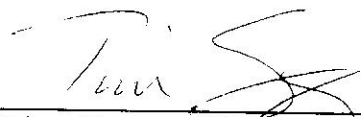
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REQUEST FOR JURY TRIAL

COMES NOW, Plaintiffs, Desinty Chanda Marie Hoffman and Jennifer Hoffman, by counsel, Tim Stoesz, and for their Praecipe For Trial would state as follows:

1. The Plaintiff filed a Complaint for Damages on October 6, 2016.
2. Plaintiffs seek a trial by jury.
3. Parties estimate this matter will take approximately 2 days of the Court's time.

  
\_\_\_\_\_  
Tim Stoesz  
Plaintiff's Attorney  
ID # 13782-49