

STATE OF INDIANA ) IN THE HOWARD COUNTY COURT  
 ) SS:  
COUNTY OF HOWARD ) CAUSE NO.:

PATTI HOST, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
CITY OF KOKOMO and )  
HOWARD COUNTY BOARD OF )  
COMMISSIONERS, )  
 )  
Defendants. )

**COMPLAINT FOR DAMAGES**

Comes now the Plaintiff, Patti Host, by counsel, and, for her cause of action against the Defendants, City of Kokomo and Howard County Board of Commissioners, alleges and says:

1. At all times relevant hereto, Plaintiff was a resident of the City of Kokomo, County of Howard, State of Indiana.
2. At all times relevant hereto, Defendants, City of Kokomo and Howard County Board of Commissioners, provides over a 3 mile outdoor trail for the purpose of hiking, bicycling and other non-motorized recreation, commonly known as Wildcat Creek Walk of Excellence located in the County of Howard, City of Kokomo, State of Indiana.
3. On or about February 10, 2019, Plaintiff, Patti Host, a patron and invitee of Defendant’s trail, slipped and fell on snow covered ice resulting in injuries, some of which are permanent in nature.
4. The Defendants owed Plaintiff a duty to exercise reasonable care in maintaining the premises in a reasonably safe condition for its patrons and invitees.
5. That Defendants failed to ensure trail-goer safety due to lack of proper maintenance and care in clearing the walkway/path of any and all obstacle that could create an unsafe environment which led to the injuries sustained by Plaintiff.
6. That Defendants were negligent in that they failed to take reasonable measures to properly warn its patrons of the potential dangers posed by the weather and temperatures.
7. That at said time, Defendants knew, or by the exercise of reasonable care of proper maintenance, should have known of the unsafe condition of the environment.

8. That Defendants breached their duty to the public.

9. As a direct and proximate result of the Defendants negligence the Plaintiff has suffered severe and permanent injuries; has incurred hospital, medical and prescription expenses; has suffered physical and emotional pain, has missed opportunities to enjoy life; and will continue to incur such losses and damages.

10. As a direct and proximate result of the carelessness and negligence of the Defendants, as aforesaid, Plaintiff has been otherwise damaged.

WHEREFORE, the Plaintiff prays for judgment against the Defendants in an amount which will reasonably and fairly compensate him for all the losses and damages he has incurred to date and will incur in the future, for the cost of this action and for all other relief just and proper in the premises.

Respectfully submitted,

**GOLITKO & DALY, PC**

/s/ Edward R. Reichert, Esq.  
Edward R. Reichert, Esq. #30414-49  
***Counsel for Plaintiff***

Edward R. Reichert  
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### **REQUEST FOR JURY TRIAL**

Plaintiff, by counsel, pursuant to Rule 38(b) of the Indiana Rules of Trial Procedure, requests that this case be tried by jury.

Respectfully submitted,

**GOLITKO & DALY, PC**

/s/ Edward R. Reichert, Esq.  
Edward R. Reichert, Esq. #30414-49  
***Counsel for Plaintiff***

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