



**PHILADELPHIA MUNICIPAL COURT
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA**

1339 Chestnut Street, 10th Floor, Philadelphia, PA 19107

Marsha H. Neifield, President Judge Patricia R. McDermott, Deputy Court Administrator

STATEMENT OF CLAIM

Code: Other - (13)

SC-14-07-08-3806

GENECE BRINKLEY [REDACTED] PHILADELPHIA, PA 19146	HERSHEY ESTATE AKA/DBA: THE HOTEL HERSHEY 27 WEST CHOCOLATE AVE HERSHEY, PA 17033 HERSHEY ENTERTAINMENT RESORTS COMPANY 27 WEST CHOCOLATE AVE HERSHEY, PA 17033
<i>Plaintiff(s)</i>	<i>Defendant(s)</i>

Service Address (information) if other than above:

To the Defendant: Plaintiff is seeking a money judgment against the Defendant(s) based on the following claim:

1. Plaintiff is an individual who resides at the above-stated address.
2. Defendants are business entities/corporations whose offices are located at the above-stated address.
3. Defendants entered into a contract or contracts with and at the office of the Administrative Office of Pennsylvania Courts, ("AOPC") located at 1515 Market Street, Suite 1400, Philadelphia, PA to host the Annual Conference of the Pennsylvania Conference of State Trial Judges from July 25, 2012 through July 28, 2012. Defendants regularly advertise in Philadelphia County and have millions of visitors, patrons and/or clients from Philadelphia County.
4. Defendants' contract with the AOPC included reserving a hotel room and providing meals and beverages to Plaintiff, who is a long time member of the Pennsylvania Conference of State Trial Judges.
(continued...)

Summons to the Defendant

You are hereby ordered to appear at a hearing scheduled as follows:

Citation al Demandado

Por la presenta, Usted esta dirlijido a presentarse a la siguiente:

1339 Chestnut Street 6th Floor
 Philadelphia, PA 19107
 Hearing Room: 6

August 22nd, 2014

01:15 PM

Amount Claimed

Principal	\$	12000.00
Interest	\$	0.00
Attorney Fees	\$	0.00
Other Fees	\$	0.00
Subtotal	\$	<u>12000.00</u>
Service	\$	0.00
State Fee	\$	10.00
Automation Fee	\$	5.50
Convenience Fee	\$	0.00
JCS St. Add. Surcharge	\$	11.25
JCS St. Add. Fee	\$	2.25
Court Costs	\$	49.50
TOTAL CLAIMED	\$	<u>12078.50</u>

Date Filed: 07/08/2014

I am a plaintiff in this statement of claims action. I hereby verify that I am authorized to make this verification and that the facts set forth above are true and correct to the best of my knowledge, information and belief. I understand that this verification is made subject to the penalties set forth in 18 Pa. C.S. § 4904, which concerns the making of unsworn falsifications to authorities.

Genece Brinkley

Signature Plaintiff/Attorney
 Atty ID #: _____

Address & [REDACTED]
 Phone PHILADELPHIA, PA 19146

NOTICE TO THE DEFENDANT, YOU HAVE BEEN SUED IN COURT.
 PLEASE SEE ATTACHED NOTICES

AVISO AL DEMANDADO LE HAN DEMANDADO EN CORTE. VEA POR FAVOR
 LOS AVISOS ASOCIADOS.

If you wish to resolve this matter without appearing in court, please contact the attorney shown above immediately.



**PHILADELPHIA MUNICIPAL COURT
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA**

1339 Chestnut Street, 10th Floor, Philadelphia, PA 19107

Marsha H. Neifield, President Judge Patricia R. McDermott, Deputy Court Administrator

SMALL CLAIMS COMPLAINT

SC-14-07-08-3806

<p>GEMINOC BRINKLEY [REDACTED] PHILADELPHIA, PA 19146</p> <p align="right"><i>Plaintiff</i></p>	<p>HERSHEY ESTATE AKA/DBA: THE HOTEL HERSHEY 27 WEST CHOCOLATE AVE HERSHEY, PA 17033</p> <p>HERSHEY ENTERTAINMENT RESORTS COMPANY 27 WEST CHOCOLATE AVE HERSHEY, PA 17033</p> <p align="right"><i>Defendant(s)</i></p>
---	--

DESCRIPTION OR NATURE OF VIOLATION

5. Plaintiff attended the Annual Conference of the Pennsylvania Conference of State Trial Judges on or about July 25, 2012 in her position as a Judge of the Court of Common Pleas of Philadelphia County and a member of the Pennsylvania Conference of State Trial Judges as she had for approximately 15 years prior to the incident described herein below.

6. Plaintiff checked into Defendant, The Hotel Hershey, on July 25, 2012 at approximately 9:30 p.m. and was assigned a room pursuant to her reservation through the AOPC.

7. Plaintiff went to sleep at approximately Midnight and awoke at approximately 2:00 a.m. when she rolled over and felt a hard metal object under her body. Completely confused, Plaintiff reached down below her right leg/thigh and to her horror, recovered the name badge of an employee/housekeeper, by the name of OKSANA. This object was not on either side of the bed, or tucked under the sides of the sheets, it was in the middle of the bed, between the sheets, underneath Plaintiff's body.

8. Plaintiff immediately dialed the front desk twice and no one answered.

9. Plaintiff then got dressed and went down to the front desk and found no one inside or outside the hotel to whom to report this incident.

10. Plaintiff then reported the incident to an Administrative Judge of the Philadelphia Common Pleas Court, who also came to Plaintiff's room to view the incident.

11. Plaintiff had to wait until an AOPC administrator was available the next day, to report the incident to the hotel, at which time it was reported and Plaintiff requested a copy of any incident report. Plaintiff never received the requested copy of the incident report.

12. Plaintiff was then relocated to another room.

13. Plaintiff was traumatized, unable to sleep, and experienced flashbacks throughout the night of the incident, and the rest of her stay, and could not concentrate on the classes, to the point where she had to leave early. Plaintiff checked out early, on July 27 instead of July 28, 2012 as scheduled.

14. Plaintiff was traumatized and continued to be unable to sleep, tossing and turning all night and experienced flashbacks after she returned to her home. Even after two weeks of tossing and turning all night, Plaintiff began to take medication to help her sleep.

15. Plaintiff continued to have nightmares for approximately two months after which the intense trauma subsided, until approximately May, 2013 when the notice of the
(continued...)



**PHILADELPHIA MUNICIPAL COURT
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA**

1339 Chestnut Street, 10th Floor, Philadelphia, PA 19107

Marsha H. Neifield, President Judge Patricia R. McDermott, Deputy Court Administrator

SMALL CLAIMS COMPLAINT

SC-14-07-08-3806

<p>GENIVOC BRINKLEY [REDACTED] PHILADELPHIA, PA 19146</p> <p style="text-align: right;"><i>Plaintiff</i></p>	<p>HERSHEY ESTATE AKA/DBA: THE HOTEL HERSHEY 27 WEST CHOCOLATE AVE HERSHEY, PA 17033</p> <p>HERSHEY ENTERTAINMENT RESORTS COMPANY 27 WEST CHOCOLATE AVE HERSHEY, PA 17033</p> <p style="text-align: right;"><i>Defendant(s)</i></p>
--	---

DESCRIPTION OR NATURE OF VIOLATION

next Conference came out. The nightmares began again.

16. Plaintiff has repeatedly attempted to resolve this matter with defendants to no avail.

Wherefore, Plaintiff respectfully requests that this Honorable Court award damages in an amount not to exceed twelve thousand dollars (\$12,000) plus court costs.