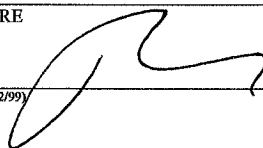
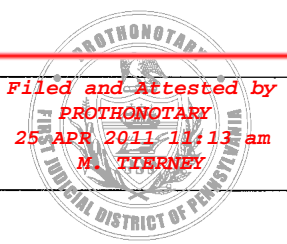


USTED ESTA ORDENADO COMPARECER EN Arbitration Hearing 1880 JFK Blvd. 5th fl. at 11:00 AM - 12/20/2011

You must show up with the Pleas of Philadelphia County TO DAVIA DEBE CUPLIR CON EL PAGO PARA DEFENDERSE.
 This matter will be heard by Trial Division Arbitrators at the time, date and place specified but, if one or more parties is not present at the hearing, the matter may be heard at the same time and date before a judge of the court without the absent party or parties.

PLAINTIFF'S NAME Lopez McCray		DEFENDANT'S NAME Lawrence Street Associates	
PLAINTIFF'S ADDRESS 150 N. Edgewood Street Philadelphia, PA 19151		DEFENDANT'S ADDRESS 2101 N. College Avenue Philadelphia, PA 19121	
PLAINTIFF'S NAME		DEFENDANT'S NAME IS Lawrence Street	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS 215 W. Church Road, Suite 201 King of Prussia, PA 19406	
PLAINTIFF'S NAME		DEFENDANT'S NAME ISAF, LP	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS 1412 Flat Rock Road Penn Valley, PA 19072	
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NO. OF DEFENDANTS 4	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input checked="" type="checkbox"/> \$50,000.00 or less <input type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input checked="" type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minors Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other:		
CASE TYPE AND CODE (SEE INSTRUCTIONS) Negligence 2S – Premises Liability – Slip and Fall			
STATUTORY BASIS FOR CAUSE OF ACTION (SEE INSTRUCTIONS) N/A			
RELATED PENDING CASES (LISTED BY CASE CAPTION AND DOCKET NUMBER) NONE			IS CASE SUBJECT TO COORDINATION ORDER? YES NO <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
TO THE PROTONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S APPELLANT'S ATTORNEY Richard F. Corbin, Esquire		ADDRESS (SEE INSTRUCTIONS) CHRISTOPHER L. GIDDINGS, P.C. 3000 Market Street, Suite 201 Philadelphia, PA 19104	
PHONE NUMBER 215-243-3450	FAX NUMBER 215-243-0626	E-MAIL ADDRESS	
SUPREME COURT IDENTIFICATION NUMBER 92167		DATE 4/25/11	
SIGNATURE 			



CHRISTOPHER L. GIDDINGS, P.C.

By: Richard F. Corbin, Esquire
Attorney Identification No.: 92167
3000 Market Street, Suite 201
Philadelphia, PA 19104
(215) 243-3450

**THIS IS AN ARBITRATION MATTER.
AN ASSESSMENT OF DAMAGES
HEARING IS REQUIRED.**

ATTORNEYS FOR PLAINTIFF

LOPEZ McCRAY
150 N. Edgewood Street
Philadelphia, PA 19151

Plaintiff,

vs.

LAWRENCE STREET ASSOCIATES, LLC
2101 N. College Avenue
Philadelphia, PA 19121

and

IS LAWRENCE STREET
215 W. Church Road, Suite 201
King of Prussia, PA 19406

and

ISAF, LP
1412 Flat Rock Road
Penn Valley, PA 19072

and

SHERMAN TOPPIN REAL ESTATE, LLC
2112 Walnut Street
Philadelphia, PA 19103

Defendants.

COURT OF COMMON PLEAS
OF PHILADELPHIA COUNTY

TERM,

No.:

COMPLAINT - CIVIL ACTION
NEGLIGENCE 2S - PREMISES LIABILITY - SLIP & FALL

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your attorney at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association
Lawyer Referral and Information Service
One Reading Center
Philadelphia, Pennsylvania 19107
(215) 238-6333

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion de Licenciados de Filadelfia
Servicio de Referencia e Informacion Legal
One Reading Center
Filadelfia, Pennsylvania 19107
(215) 238-6333

NOTICE TO PLEAD

To: Defendant:

You are hereby notified to file a written response to the enclosed Complaint within twenty (20) days from the date of service hereof or a judgment may be entered against you.

Attorneys for Plaintiff

CHRISTOPHER L. GIDDINGS, P.C.

By: Richard F. Corbin, Esquire
Attorney Identification No. 92167
3000 Market Street, Suite 201
Philadelphia, PA 19104
(215) 243-3450

**THIS IS AN ARBITRATION MATTER.
AN ASSESSMENT OF DAMAGES
HEARING IS REQUIRED.**

ATTORNEYS FOR PLAINTIFF

LOPEZ McCRAY
150 N. Edgewood Street
Philadelphia, PA 19151
Plaintiff,

COURT OF COMMON PLEAS
OF PHILADELPHIA COUNTY

vs.

TERM,

LAWRENCE STREET ASSOCIATES, LLC
2101 N. College Avenue
Philadelphia, PA 19121
and
IS LAWRENCE STREET
215 W. Church Road, Suite 201
King of Prussia, PA 19406
and
ISAF, LP
1412 Flat Rock Road
Penn Valley, PA 19072
and
SHERMAN TOPPIN REAL ESTATE, LLC
2112 Walnut Street
Philadelphia, PA 19103
Defendants.

No.:

**COMPLAINT - CIVIL ACTION
NEGLIGENCE 2S - PREMISES LIABILITY - SLIP & FALL**

Plaintiff, Lopez McCray, by and through counsel, hereby brings in civil action for damages sustained, and upon information and belief, against defendants, Lawrence Street Associates, LLC, IS Lawrence Street, ISAF, LP, Sherman Toppin Real Estate, LLC, and he avers as follows:

1. Plaintiff is an adult individual who resides at the address set forth in the caption above.

2. Defendant, Lawrence Street Associates, LLC, is a business entity with an office located at the address set forth in the caption above.

3. Defendant, IS Lawrence Street, is a business entity with an office located at the address set forth in the caption above.

4. Defendant, ISAF, LP, is a business entity with an office located at the address set forth in the caption above.

5. Defendant, Sherman Toppin Real Estate, LLC, is a business entity with an office located at the address set forth in the caption above.

6. At all times relevant, and especially on the date and time of the accident alleged herein, defendants owned, possessed, operated, controlled, and were responsible for the inspection and maintenance of the property located at 4510 N. Lawrence Street, Philadelphia, PA 19140.

7. At all times relevant, and especially on the date and time of the accident alleged herein, defendants Lawrence Street Associates, LLC, IS Lawrence Street, ISAF, LP, Sherman Toppin Real Estate, LLC, were acting directly or through its agents, servants and/or employees, who, in turn, were acting within the scope and course of their employment, in the furtherance of the business of the property.

8. At all times relevant, and especially on the date and time of the accident alleged herein, plaintiff was lawfully on the property and premises located at 4510 N. Lawrence Street, Philadelphia, PA 19140, as a tenant, and as such was owed the highest degree of care by defendant.

9. At all times relevant, and especially on the date and time of the accident alleged herein, and for a long time before the accident which is the subject of this suit, there existed a dangerous and defective condition upon defendant's property and premises, i.e., an accumulation of hills and ridges of snow and ice.

10. On or about December 25, 2009, at the property located at 4510 N. Lawrence Street, Philadelphia, PA 19140, plaintiff was approaching the entrance of the apartment complex located on defendant's property and premises, when he was suddenly and unexpectedly caused to slip and fall on the aforesaid accumulation of hills and ridges of snow and ice located on the defendant's property and premises.

11. The fall of plaintiff was caused by the negligence of the defendants that owned, possessed, operated, controlled and was responsible for the inspection and maintenance of the property and premises.

12. By reason of the negligence of defendant, Plaintiff sustained serious personal injury, which may include injuries to the head, neck, back, upper and lower extremities, severe shock to the nerves and nervous system, including but not limited to **Broad based disc herniation C6-7 eccentric to the right, Shallow diffuse broad based disc herniation C5-C5 also impinged upon the dural sac, Central disc bulging without distinct focal disc herniation C2-3, C3-4, and C4-5**, and various other ills and injuries, all of which may continue for an indefinite period of time into the future.

13. As a direct result of the negligence of defendant, the plaintiff was, is, and yet in the future, will be rendered sick, sore, lame and disordered and he has, yet does, and will in the future sustain pain, harm, damage and suffering.

14. As a further result of the negligence of defendant, the plaintiff has, yet does, and will in the future, sustain loss of earnings and earning power and has been, yet is, and will in the future be unable to attend to her usual duties, occupations and to the essentials of daily living.

15. As a further result of the negligence of the defendant, the plaintiff has had to spend money for medicine and medical attention in order to attempt to effect a cure, treat and alleviate the signs and symptoms of his personal injuries, and he may have to spend monies for medicine and medical attention indefinitely into the future for the same or similar purpose.

16. The plaintiff has sustained and will in the future sustain further harm, damage and inconvenience.

COUNT I – PLAINTIFF, LOPEZ McCRAY V.
DEFENDANT, LAWRENCE STREET ASSOCIATES, LLC. – NEGLIGENCE

17. Plaintiff repeats the allegations contained in paragraphs one (1) through sixteen (16) of the Complaint and incorporates them by reference herein as if pleaded at length.

18. The aforesaid accident resulted solely from the negligence, carelessness and/or recklessness of the defendant, which consisted of, *inter alia*:

- a) permitting the dangerous condition of hills and ridges of snow and ice to exist on the property and premises;
- b) permitting the property and premises to remain in a dangerous condition;
- c) failing to remove the hills and ridges of snow and ice from the property and premises;
- d) failing to make safe the dangerous condition;

- e) failing to inspect the property and premises;
- f) failing to warn the plaintiff of the dangerous condition;
- g) failing to erect and maintain a proper barrier preventing persons from encountering said dangerous condition;
- h) failing to provide safe and proper ingress, egress, and passage thereby causing unreasonable risk of injury to people such as plaintiff;
- i) failing to use reasonable prudence and care to keep the property and premises in a safe condition for people such as plaintiff;
- j) negligence and recklessness at law.

WHEREFORE, plaintiff, Lopez McCray respectfully requests that judgment be entered in his favor, on this count alone, and against the defendant, **Lawrence Street Associates, LLC**, jointly and severally, in an amount not in excess of fifty thousand dollars (\$50,000.00), together with interest and costs according to law.

**COUNT II – PLAINTIFF, LOPEZ McCRAY V.
DEFENDANT, IS LAWRENCE STREET – NEGLIGENCE**

19. Plaintiff repeats the allegations contained in paragraphs one (1) through eighteen (18) of the Complaint and incorporates them by reference herein as if pleaded at length.

20. The aforesaid accident resulted solely from the negligence, carelessness and/or recklessness of the defendant, which consisted of, *inter alia*:

- a) permitting the dangerous condition of hills and ridges of snow and ice to exist on the property and premises;
- b) permitting the property and premises to remain in a dangerous condition;
- c) failing to remove the hills and ridges of snow and ice from the property and premises;

- d) failing to make safe the dangerous condition;
- e) failing to inspect the property and premises;
- f) failing to warn the plaintiff of the dangerous condition;
- g) failing to erect and maintain a proper barrier preventing persons from encountering said dangerous condition;
- h) failing to provide safe and proper ingress, egress, and passage thereby causing unreasonable risk of injury to people such as plaintiff;
- i) failing to use reasonable prudence and care to keep the property and premises in a safe condition for people such as plaintiff;
- j) negligence and recklessness at law.

WHEREFORE, plaintiff, Lopez McCray respectfully requests that judgment be entered in his favor, on this count alone, and against the defendant, **IS Lawrence Street**, jointly and severally, in an amount not in excess of fifty thousand dollars (\$50,000.00), together with interest and costs according to law.

COUNT III – PLAINTIFF, LOPEZ McCRAY V.
DEFENDANT, ISAF, LP – NEGLIGENCE

21. Plaintiff repeats the allegations contained in paragraphs one (1) through twenty (20) of the Complaint and incorporates them by reference herein as if pleaded at length.

22. The aforesaid accident resulted solely from the negligence, carelessness and/or recklessness of the defendant, which consisted of, *inter alia*:

- a) permitting the dangerous condition of hills and ridges of snow and ice to exist on the property and premises;
- b) permitting the property and premises to remain in a dangerous condition;

c) failing to remove the hills and ridges of snow and ice from the property and premises;

d) failing to make safe the dangerous condition;

e) failing to inspect the property and premises;

f) failing to warn the plaintiff of the dangerous condition;

g) failing to erect and maintain a proper barrier preventing persons from encountering said dangerous condition;

h) failing to provide safe and proper ingress, egress, and passage thereby causing unreasonable risk of injury to people such as plaintiff;

i) failing to use reasonable prudence and care to keep the property and premises in a safe condition for people such as plaintiff;

j) negligence and recklessness at law.

WHEREFORE, plaintiff, Lopez McCray respectfully requests that judgment be entered in his favor, on this count alone, and against the defendant, **ISAF, LP**, jointly and severally, in an amount not in excess of fifty thousand dollars (\$50,000.00), together with interest and costs according to law.

**COUNT IV – PLAINTIFF, LOPEZ McCRAY V.
DEFENDANT, SHERMAN TOPPIN REAL ESTATE, LLC – NEGLIGENCE**

23. Plaintiff repeats the allegations contained in paragraphs one (1) through twenty-two (22) of the Complaint and incorporates them by reference herein as if pleaded at length.

24. The aforesaid accident resulted solely from the negligence, carelessness and/or recklessness of the defendant, which consisted of, *inter alia*:

a) permitting the dangerous condition of hills and ridges of snow and ice to exist on the property and premises;

- b) permitting the property and premises to remain in a dangerous condition;
- c) failing to remove the hills and ridges of snow and ice from the property and premises;
- d) failing to make safe the dangerous condition;
- e) failing to inspect the property and premises;
- f) failing to warn the plaintiff of the dangerous condition;
- g) failing to erect and maintain a proper barrier preventing persons from encountering said dangerous condition;
- h) failing to provide safe and proper ingress, egress, and passage thereby causing unreasonable risk of injury to people such as plaintiff;
- i) failing to use reasonable prudence and care to keep the property and premises in a safe condition for people such as plaintiff;
- j) negligence and recklessness at law.

WHEREFORE, plaintiff, Lopez McCray respectfully requests that judgment be entered in his favor, on this count alone, and against the defendant, **Sherman Toppin Real Estate, LLC**, jointly and severally, in an amount not in excess of fifty thousand dollars (\$50,000.00), together with interest and costs according to law.

Dated: _____

9/25/11

CHRISTOPHER L. GIDDINGS, P.C.

By: _____

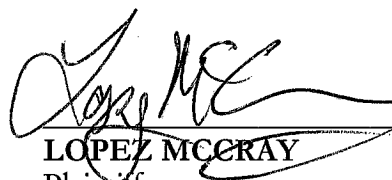
Richard F. Corbin, Esquire
Attorney for Plaintiff

VERIFICATION

LOPEZ MCCRAY hereby states that he is the plaintiff in this action and verifies the statements made in the foregoing pleading are true and correct, to the best of his knowledge, information and belief. The undersigned understands that the statements there in are made subject to the penalties of 18 Pa. C.S. 4904, relating to unsworn falsification to authorities.

DATE: _____

4/25/11



LOPEZ MCCRAY
Plaintiff