

FILED

Date: 1/30/12

Monica A. Klein  
Clerk of the Circuit Court  
Winnebago County, Illinois  
COPY Deputy

IN THE CIRCUIT COURT FOR THE 17<sup>TH</sup> JUDICIAL CIRCUIT  
WINNEBAGO COUNTY, ROCKFORD, ILLINOIS

STACY STEPANCIK-GOFF,

Plaintiff,

v.

JANICE WARNER,

Defendant.

CASE NO. 12 AR 60

Amount claimed: In excess of \$15,000

**COMPLAINT**

NOW COMES the Plaintiff, STACY STEPANCIK-GOFF, by and through her attorneys, LAW OFFICE OF JACK LEVIN and presents her COMPLAINT against Defendant, JANICE WARNER, and in support thereof alleges as follows:

**JURISDICTION AND VENUE**

1. The Plaintiff, STACY STEPANCIK-GOFF (hereinafter "Plaintiff") is, and at all times complained of, was a resident of the State of Illinois, County of Winnebago.
2. The Defendant, JANICE WARNER, (hereinafter "Defendant"), is, and at all times complained of, was a resident of the State of Illinois, County of Winnebago.
3. Jurisdiction is proper where all events complained of took place within the city of Roscoe, County of Winnebago.
4. Venue is proper as all parties to this matter are residents of the State of Illinois, County of Winnebago.

**COUNT I – NEGLIGENCE**

5. Plaintiff repeats and re-alleges paragraphs one through four as if fully set forth herein.

6. That on June 14, 2010, at or near 7:15 p.m., Defendant, JANICE WARNER, the owner and operator of a 2006 Saab motor vehicle, was driving her vehicle in a parking lot, located at 5755 Elevator Road, Roscoe, Illinois.

7. That on June 14, 2010, at or near 7:15 p.m., Plaintiff, STACY STEPANCIK-GOFF, was the owner and operator of a 2004 Ford van motor vehicle, which was parked in the parking lot at 5755 Elevator Road, Roscoe, Illinois.

8. That on June 14, 2010, at or near 7:15 p.m., Defendant, JANICE WARNER, while driving her car in an unreasonable and unsafe manner, struck Plaintiff's vehicle in the rear while Plaintiff was stopped in said parking lot.

9. That at all times complained of, Defendant was under a duty to conform to the Illinois Vehicle Code and was under a duty to operate her vehicle upon the roads of the State of Illinois in a reasonable and safe manner and to exercise ordinary care for the safety of others.

10. That notwithstanding said duty, Defendant committed one or more of the following negligent acts or omissions:

- a. failed to keep a proper lookout;
- b. operated her motor vehicle at an excessive rate of speed under the circumstances;
- c. failed to keep her motor vehicle under proper control;
- d. failed to properly apply the brakes;

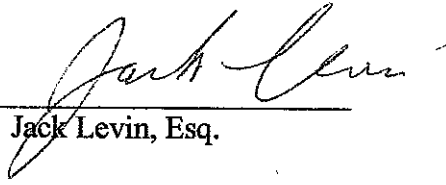
e. failed to take proper evasive action to avoid a collision once it became imminent.

11. That as a direct and proximate cause of one or more of the aforementioned negligent acts or omissions, Defendant's vehicle struck Plaintiff's vehicle causing her to suffer serious injuries that required her to seek medical attention, caused her great pain and suffering, caused her to incur substantial medical bills, work loss and property damage.

WHEREFORE, Plaintiff, STACY STEPANCIK-GOFF prays for an award of compensatory damages against Defendant, JANICE WARNER, in an amount in excess of \$15,000.00, plus fees and costs.

Respectfully submitted,

By: \_\_\_\_\_

  
Jack Levin, Esq.

**LAW OFFICES OF JACK LEVIN**  
**666 BARBERRY ROAD**  
**HIGHLAND PARK, ILLINOIS 60035**  
**(847) 915-0144**  
**ATTY. NO. 3128715**