

**CHRIS FEGER, INDIVIDUALLY, AS MEMBER OF
THE LOUISVILLE BOAT CLUB BOARD OF DIRECTORS**

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**BRYAN ARNETT, INDIVIDUALLY, AS MEMBER OF
THE LOUISVILLE BOAT CLUB BOARD OF DIRECTORS**

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**BEN HARRALSON, INDIVIDUALLY, AS MEMBER OF
THE LOUISVILLE BOAT CLUB BOARD OF DIRECTORS**

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**RICHARD STUEDLE, INDIVIDUALLY, AS MEMBER OF
THE LOUISVILLE BOAT CLUB BOARD OF DIRECTORS**

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**WILLIAM COLE, INDIVIDUALLY, AS MEMBER OF
THE LOUISVILLE BOAT CLUB BOARD OF DIRECTORS**

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**BRADFORD UNROE, INDIVIDUALLY, AS MEMBER OF
THE LOUISVILLE BOAT CLUB BOARD OF DIRECTORS**

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**RANDY PHILLIPS, INDIVIDUALLY, AS MEMBER OF
THE LOUISVILLE BOAT CLUB BOARD OF DIRECTORS**

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**MIKE BLOM, INDIVIDUALLY, AS MEMBER OF
THE LOUISVILLE BOAT CLUB BOARD OF DIRECTORS**

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COMPLAINT

Come the Plaintiffs, by counsel, and state as follows:

PARTIES

1. Plaintiffs MARILYN C. SEXTON; ALLISON C. SEXTON, a minor; ELIZABETH C. SEXTON, a minor; PETER C. SEXTON, a minor; and, JEFFREY C. SEXTON, a minor, are and at all relevant times were residents of 25 RIO VISTA DRIVE, LOUISVILLE, KENTUCKY 40207. MARILYN C. SEXTON brings this action on behalf of said minors pursuant to Civil Rule 17.03(1).

2. Defendant THE LOUISVILLE BOAT CLUB is incorporated in Kentucky and has its principal place of business at 4200 UPPER RIVER ROAD, LOUISVILLE, KENTUCKY, 40214. THE LOUISVILLE BOAT CLUB is authorized to do business in the Commonwealth of Kentucky. At all relevant times THE LOUISVILLE BOAT CLUB operated a social club offering swim, tennis, racquet, boating and dining amenities, among other activities, onto which

property the general public is invited to enter and remain for purposes directly or indirectly connected with the business of Defendant of operating the swim, racquet and boating club during normal business hours.

3. Defendant PROFESSIONAL POOL MANAGEMENT OF KENTUCKY INC. is incorporated in Kentucky and has its principal place of business at 2302 SOUTH ARRAWANA AVE., TAMPA, FL 33629. PROFESSIONAL POOL MANAGEMENT OF KENTUCKY INC. is authorized to do business in the Commonwealth of Kentucky.

4. Defendant DURAFLEX INTERNATIONAL CORPORATION is incorporated in Nevada and has its principal place of business at 160 WUNOTOO ROAD, SPARKS, NV 89434. According to the Kentucky Secretary of State's FastTrack online entity search, DURAFLEX INTERNATIONAL CORPORATION is unauthorized to do business in the Commonwealth of Kentucky. On its website Duraflex claims to be the maker of the finest springboard diving equipment in the world and distributes its products through a network of authorized dealers. At least one dealer is located in Louisville, Kentucky, and several other dealers, according to its website, conduct sales, installation and service activities in the Commonwealth of Kentucky on behalf of DURAFLEX INTERNATIONAL CORPORATION which is the manufacturer of the high diving board equipment and platform installed at the swimming pool on the premises of Defendant THE LOUISVILLE BOAT CLUB.

5. Individual Defendants DAVID RICHARDSON, JAY HATCHER, RIORDAN MCNERNEY, CHRIS FEGER, BRYAN ARNETT, BEN HARRALSON, RICHARD STUEDLE, WILLIAM COLE, BRADFORD UNROE, RANDY PHILLIPS, and MIKE BLOM were at all times relevant hereto citizens and residents of LOUISVILLE, JEFFERSON COUNTY, KENTUCKY, and served as officers and/or directors of Defendant THE LOUISVILLE BOAT CLUB according to the Defendant's own website and/or the Kentucky Secretary of State's FastTrack online entity search.

JURISDICTION

Jurisdiction is appropriate in Jefferson Circuit Court as (1) a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred Louisville, Jefferson County, Kentucky, and (2) money damages are sought which are in excess of the jurisdiction amount necessary to the jurisdiction of the Court.

STATEMENT OF FACTS

6. On June 18, 2013, a beautiful little 5 ½ year-old girl named Allison Sexton waited patiently in line with other kids to ascend the 10 meter high diving board at The Louisville Boat Club on this hot, sunny summer day. She was approximately 36 inches tall and weighed about 35 lbs. on this day.

7. When it was her turn Allison started walking out onto the board from the top of the aluminum spiral staircase leading to the top. She slipped on the supposedly nonslip surface of the diving board, fell through the very wide gap between the aluminum railing on her left, violently slammed her head, her face and the right side of her abdomen on the side of the diving board as she desperately flailed and tried to grab hold of something in reaction to what was happening to her. She continued to fall into a fabric canopy installed beneath the diving board. The poorly maintained and improperly installed plastic ties securing said fabric canopy immediately gave way when this 35 lbs. sprite of a little girl crashed into it thereby providing no respite from Allison's continued plunge onto the concrete deck ten feet below. Allison's 10 year-old sister, Elizabeth C. Sexton, who was next in line behind Allison on the high dive, watched in shock as her sister lay on the concrete below.

8. When Allison slammed into the concrete deck she was bleeding, dazed and badly injured. As she laid there the lifeguards and onlookers reacted slowly as if in shock themselves. No one could immediately find the backboard that is supposed to be on hand for such emergencies to immobilize potential head, neck and spinal injuries. Allison's mother, Plaintiff Marilyn C. Sexton, was summoned from the other side of the pool and ran to her daughter's side while screaming for someone to call an ambulance . . . and thus exploded the cacophony of screaming and arguing about what to do, should she be moved, where is the backboard, how badly is she hurt, *etc.* After a seemingly interminable wait Louisville Metro EMS arrived to transport Allison and her mother to Kosair Children's Medical Center-Brownsboro. Amidst the melee Allison's 11 year-old brother, Jeffrey, and 5 ½ year-old twin brother, Peter, were visibly shaken and upset at seeing their sister injured, strapped to a backboard, being loaded into an ambulance and being told who among the other pool attendees (predominantly other mothers) would look out for them and get them home whilst Mommy went to the hospital with Allison.

9. From the back of the ambulance Plaintiff Marilyn C. Sexton in a state of shock called her husband and Allison's father, Jeffrey A. Sexton, one of the undersigned attorneys, at his law office to tell him of the accident and that they were in an ambulance, that Allison was conscious and they were going to a hospital.

10. At the hospital it was determined—in addition to the obvious observation that Allison was lucky to be alive—that she suffered a cut on her forehead, a lacerated left eye socket, bruising about the left eye and forehead area, severe swelling causing her left eye to shut, bruising about the abdominal area and a bruised or lacerated pancreas as evidenced by elevated lipase levels. She was suffering nausea indicating a possible concussion, as well. Allison now has a permanent and cosmetically noticeable droop of her left upper eyelid and puffiness in the area of the eye socket just above the upper left eyelid. Permanent vision impairment may result and blepharoplasty and/or other surgical procedures will be required at some point.

11. Throughout the ordeal and in the days and weeks that followed, Allison's siblings, Elizabeth, Jeffrey and Peter, asked their parents if Allison was going to die, was she going to be alright, could she have died, what was going to happen to Allison, and confessed to their parents their fear and anxiety over the tragic accident.

COUNT ONE:

**MINOR CHILD INVITEE OR LICENSEE INJURED BY DANGEROUS CONDITION
ON PREMISES OF BUSINESS OWNER**

12. Plaintiffs incorporate all of the allegations made in the preceding paragraphs as if fully restated herein.

13. On the afternoon of June 18, 2013, during Defendant THE LOUISVILLE BOAT CLUB's normal business hours and at a time in which the general public was invited to enter and remain on the premises for purposes directly or indirectly connected with the business of the Defendant, THE LOUISVILLE BOAT CLUB, Plaintiffs entered Defendant's business premises, whereupon the minor child, Allison C. Sexton, was injured when the poorly maintained nonslip surface of the high diving board failed to prevent her from slipping and plunging through the very wide gap between the rails along the left side of the high dive three meters above a concrete deck and resulting in injuries recited herein to the other Plaintiffs.

14. Allison was injured further still when the under-netting or fabric canopy beneath the diving board failed to catch and hold her, in part because, the poorly maintained, improperly installed plastic ties—wholly inappropriate for such purposes—failed and broke permitting Allison to hit the concrete deck.

15. All of the Plaintiffs' injuries were directly and proximately caused by three (3) unreasonably dangerous conditions on the premises, to wit, 1) the poorly maintained nonslip surface on the high diving board, 2) the failure of the improperly maintained and improperly installed fabric canopy or under-netting and 3) the very wide gap between the aluminum railings alongside the high diving board surface next to which countless dripping wet children walk each day the pool is open.

16. The dangerous conditions were not obvious and were unknown to Plaintiffs.

17. Defendants knew of or by the exercise of reasonable care should have known of the conditions and knew or should have realized invitees and licensees and minor children such as Allison would not discover or realize the dangers, or would fail to protect themselves against them.

18. Defendants failed to exercise reasonable care to remedy the conditions or to protect or warn Plaintiffs against the danger of the unreasonably dangerous conditions.

19. As a proximate result of Defendants' negligence, Plaintiff Allison C. Sexton, Minor, by her Parent and Statutory Guardian, Marilyn C. Sexton, was damaged as follows: physical injuries as set forth in paragraph 10 above, as well as past and future medical expenses, and physical and mental pain and suffering, in an amount exceeding the jurisdictional amount of the court.

20. As a proximate result of Defendants' negligence, Plaintiff Elizabeth C. Sexton, Minor, by her Parent and Statutory Guardian, Marilyn C. Sexton, was damaged as follows: emotional distress and suffering, in an amount exceeding the jurisdictional amount of the court.

21. As a proximate result of Defendants' negligence, Plaintiff Jeffrey C. Sexton, Minor, by her Parent and Statutory Guardian, Marilyn C. Sexton, was damaged as follows: emotional distress and suffering, in an amount exceeding the jurisdictional amount of the court.

22. As a proximate result of Defendants' negligence, Plaintiff Peter C. Sexton, Minor, by her Parent and Statutory Guardian, Marilyn C. Sexton, was damaged as follows: emotional distress and suffering in an amount exceeding the jurisdictional amount of the court.

23. As a proximate result of Defendants' negligence, Plaintiff Marilyn C. Sexton, Individually, was damaged as follows: emotional distress and suffering in an amount exceeding the jurisdictional amount of the court.

COUNT TWO:

**MINOR CHILD INVITEE OR LICENSEE INJURED BASED UPON VIOLATION OF
STATUTE, REGULATION OR ORDINANCE (NEGLIGENCE PER SE)**

24. Plaintiffs incorporate all of the allegations made in the preceding paragraphs as if fully restated herein.

25. Plaintiffs' injuries were directly and proximately caused by three (3) unreasonably dangerous conditions on the premises, to wit, 1) the poorly maintained nonslip surface on the high diving board, 2) the failure of the improperly maintained and improperly installed fabric canopy or under-netting and 3) the very wide gap between the aluminum railings alongside the high diving board surface next to which countless dripping wet children walk each day the pool is open.

26. The dangerous conditions were caused by Defendants' violation of Jefferson County Department of Health §8.2, Louisville & Jefferson County Board of Health Chapter 900, including §900.0808 relating to handrails, and 902 KAR 10:120 §1.1(8), each a law enacted for safety purposes and intended to prevent injuries of the type suffered by Plaintiffs and protect persons such as Plaintiffs, and Defendants' violation proximately caused Plaintiff's damages described elsewhere herein.

27. As a proximate result of Defendants' violation of the law, same being negligence per se, Plaintiffs were damaged as set forth in paragraphs 19-23 above.

COUNT THREE:

ATTRACTIVE NUISANCE

28. Plaintiffs incorporate all of the allegations made in the preceding paragraphs as if fully restated herein.

29. At all relevant times Plaintiffs Allison C. Sexton, Peter C. Sexton, Elizabeth C. Sexton, and Jeffrey C. Sexton, were minors of age 5 ½, 5 ½, 10 and 11.

30. At all relevant times Defendant THE LOUISVILLE BOAT CLUB was the possessor of the real property at 4200 UPPER RIVER ROAD, LOUISVILLE, KENTUCKY 40207 where the attractive nuisance described below was located.

31. At all relevant times there existed on Defendant THE LOUISVILLE BOAT CLUB's said property the following artificial condition, a high diving board, created or maintained by the Defendants.

32. At all relevant times Defendants knew or should have known that the aforesaid condition created an unreasonable risk of serious bodily harm to children of the age of the Plaintiffs listed in paragraph 29 in that the high diving board was three (3) meters above either 12 feet of water or a concrete deck, that the nonslip surface of said high diving board was still slippery when wet and poorly maintained, that the fabric canopy or under-netting was insufficient as any sort of safety net in the event of a fall such as that which occurred on June 18, 2013, by Plaintiff Allison C. Sexton, and, further still, that the very wide gap between the railing alongside the high diving board was wholly incapable of stopping anyone smaller than an average-sized *adult* male or female from slipping through in the event of an accident such as that which occurred on June 18, 2013.

33. At all relevant times Defendants knew or should have known that children of the ages of those Plaintiffs listed in paragraph 29 would not comprehend and appreciate the risk or danger involved due to their youth and immaturity.

34. At all relevant times Defendants knew or should have known that children of the ages of those Plaintiffs listed in paragraph 29 would be attracted to said artificial condition. In fact, said Defendants in no way ever discouraged children of the ages of those Plaintiffs listed in paragraph 29 from using said dangerous artificial condition.

35. The artificial condition was further made dangerous by Defendants' violation of Jefferson County Department of Health §8.2, Louisville & Jefferson County Board of Health Chapter 900, including §900.0808 relating to handrails, and 902 KAR 10:120 §1.1(8), each a law enacted for safety purposes and intended to prevent injuries of the type suffered by Plaintiffs and protect persons such as Plaintiffs, and Defendants' violation proximately caused Plaintiff's damages described elsewhere herein.

36. On June 18, 2013, Plaintiffs entered the premises of Defendant, THE LOUISVILLE BOAT CLUB, to go swimming, lured in part by the presence of the high diving board as said

Defendants knew they would, whereupon Plaintiff Allison C. Sexton had the accident referenced herein and the minor Plaintiffs listed in paragraph 29 suffered the injuries as set forth in paragraphs 19-22.

37. Plaintiffs Allison C. Sexton and Peter C. Sexton, due to youth and immaturity, did not realize or appreciate the danger posed by the artificial conditions created and maintained by Defendants.

39. Plaintiffs Jeffrey C. Sexton and Elizabeth C. Sexton exercised the degree of care usually exercised by ordinarily prudent children of the same age, intelligence and experience as such Plaintiffs under like or similar circumstances, but due to youth and immaturity did not realize the danger posed by the artificial condition created and maintained by Defendants.

40. Defendants had a duty, which Defendants breached, to exercise reasonable care to eliminate or otherwise protect Plaintiff and children similarly situated from the danger created by the artificial condition; Defendants failed to properly maintain the nonslip surface of the high diving board; Defendants failed to properly install and maintain the supposed safety netting beneath the high diving board; Defendants failed to warn of the dangers of a wet, metal structure three (3) meters above either 12 feet of water or a concrete deck; Defendants failed to set any age or size restrictions for users of said dangerous artificial condition, namely the high diving board; and, Defendants failed to properly maintain the railing alongside the high diving board and failed to close the very wide gap between the rails through which all human beings smaller than an average-sized adult would fit easily if they were to slip.

41. As a proximate result of Defendants' negligence and violation of the law listed in paragraph 35, same being negligence per se, Plaintiffs were damaged as set forth in paragraphs 19-23 above in an amount exceeding the jurisdictional minimum of the court.

COUNT FOUR:

PRODUCTS LIABILITY—NEGLIGENCE

42. Plaintiffs incorporate by reference all other paragraphs of this Complaint as if fully set forth herein.

43. Defendant DURAFLEX INTERNATIONAL CORPORATION was negligent and failed to exercise reasonable care to avoid foreseeable injury and harm to Plaintiffs when it

designed, produced, distributed, marketed and sold the railing system installed along with its high diving board at the premises of Defendant THE LOUISVILLE BOAT CLUB which resulted in an unreasonable risk of people smaller than the size of an average-sized adult slipping through the very wide gap between the bottom rail and the top of the high diving board platform itself and resulting in bodily harm to the general public, including the Plaintiffs, who used the product for its intended purpose.

44. Defendant DURAFLEX INTERNATIONAL CORPORATION know or should have known in the exercise of ordinary care that the very wide gap between the bottom rail and the high diving board platform itself, which railing system was designed, produced, distributed, marketed and sold to the general public was inherently dangerous and posed an increased risk of harm to the Plaintiffs.

45. Defendant DURAFLEX INTERNATIONAL CORPORATION made false and misleading statements and representations to the general public regarding the safety of the railing system installed alongside the high diving board on the premises of Defendant THE LOUISVILLE BOAT CLUB and designed, produced, distributed, marketed and sold to the general public, including the Plaintiffs.

46. Defendant DURAFLEX INTERNATIONAL CORPORATION was careless, negligent, breached its duties and obligations owed to Plaintiffs under the common law and are liable to Plaintiffs for their acts or omissions as set forth hereinabove, including but not limited to the following:

- a. selling a product in a defective condition ;
- b. selling a product which was unreasonably dangerous to the user;
- c. failing to supply adequate warnings with the product;
- d. selling a product wherein it was foreseeable that someone smaller than an average-sized adult might be injured because they would fit between the very wide gap in the rails;
- e. selling a product which was not safe for its intended use;
- f. selling a product which was lacking one or more elements necessary to make it safe for its intended use;
- g. manufacturing a product which was defective and which could cause injury to the user;

- h. designing a product which was defective and which could cause injury to the user;
- i. distributing a product which was defective and could cause injuries to the user;
- j. failing to see that ultimate users of the product were advised of the dangers of said product;
- k. failing to exercise reasonable care in the manufacturing of this product;
- l. failing to exercise reasonable care in the marketing of this product;
- m. failing to adequately and properly test said product;
- n. failing to use reasonable care under the circumstances;
- o. delivering a product which was defective and could cause injury to the user;
- p. producing a product which was defective and could cause injury to the user;
- q. supplying a product which was defective and could cause injury to the user;
- r. engaging in other acts regarding the manufacturing, designing, preparing, producing, distributing, advising and selling of high diving board and low diving board railing systems as will be learned in discovery.

47. As a direct and proximate result of the conduct of the Defendant DURAFLEX INTERNATIONAL CORPORATION the Plaintiffs suffered injuries and damages as set forth in paragraphs 19-23 in amounts in excess of the jurisdictional amounts of the court.

COUNT FIVE:

**PRODUCTS LIABILITY—STRICT LIABILITY IN TORT—RESTATEMENT
(SECOND) OF TORTS §402A**

48. Plaintiffs incorporate by reference all other paragraphs of this Complaint as if fully set forth herein.

49. Defendant DURAFLEX INTERNATIONAL CORPORATION is in the business of designing, producing, distributing, marketing and selling spring board diving equipment, including railing systems, which are expected to reach the general public, including the Plaintiffs, without substantial change in the condition in which it is sold.

50. Defendant DURAFLEX INTERNATIONAL CORPORATION is liable to the Plaintiffs for injury, damage and harm caused to the Plaintiffs as a result of their use of the railing system and high diving board.

51. As a direct and proximate result of the conduct of the Defendant DURAFLEX INTERNATIONAL CORPORATION the Plaintiffs suffered injury and damage as set forth in paragraphs 19-23 in amounts in excess of the jurisdictional limits of the court.

COUNT SIX:

OUTRAGEOUS CONDUCT/INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS—RESTATEMENT (SECOND) OF TORTS §46

52. Plaintiffs incorporate by reference all other paragraphs of this Complaint as if fully set forth herein.

53. Defendants' conduct, individually and collectively, as set forth herein above was either intentional or reckless.

54. Defendants' conduct, individually and collectively, is intolerable and offends the generally accepted standards of decency and morality in the community and such conduct would be considered outrageous.

55. Defendants' outrageous conduct was a substantial factor in causing serious and extreme physical, emotional and psychological injuries and damages to the Plaintiffs as set forth in paragraphs 19-23 above.

56. As a direct and proximate result of the outrageous conduct of the Defendants, individually and collectively, the Plaintiffs have suffered injury and damage as set forth in paragraphs 19-23 above in amounts in excess of the jurisdictional limits of the court.

COUNT SEVEN:

NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

57. Plaintiffs incorporate by reference all other paragraphs of this Complaint as if fully set forth herein.

58. Defendants' conduct, individually and collectively, as set forth herein above was negligent.

59. Defendants' negligent conduct was a substantial factor in causing serious and extreme physical, emotional and psychological injuries and damages to the Plaintiffs as set forth in paragraphs 19-23 above.

60. As a direct and proximate result of the negligent conduct of the Defendants, individually and collectively, the Plaintiffs have suffered injury and damage as set forth in paragraphs 19-23 above in amounts in excess of the jurisdictional limits of the court.

COUNT EIGHT:
PUNITIVE DAMAGES

61. Plaintiffs incorporate by reference all other paragraphs of this Complaint as if fully set forth herein.

62. Discovery will show that there have been numerous accidents involving the high diving board on the premises of the Defendant THE LOUISVILLE BOAT CLUB over the past decades. The management, officers and directors of THE LOUISVILLE BOAT CLUB have deliberately and repeatedly ignored the potential dangers posed to swimmers, particularly children, by continuing to operate and maintain the high diving board. Other children have fallen from the high dive yet it remains open with no modifications and no warnings or age/size limits or restrictions. A cheap, flimsy fabric is fastened inadequately beneath the high diving board as a poor attempt at safety netting—which clearly doesn't work as Plaintiff Allison Sexton proved on June 18, 2013.

63. The Board of Directors of THE LOUISVILLE BOAT CLUB has a duty, collectively and as individual members of that Board, to operate and maintain a safe environment for other members of the club especially the children (many of whom are the Directors' own!) who use the swimming pool. If a dangerous situation exists, such as a high diving board resulting in numerous accidents of varying severity over the decades, then the Board and individual members have a duty to warn and rectify or, in the alternative, a duty to step down from said Board and alert authorities. Yet, no less than 24 hours after the accident on June 18, 2013, described hereinabove on the Defendant THE LOUISVILLE BOAT CLUB re-opened the high diving board with re-fastened "safety netting" once again underneath and invited swimmers young and old to resume its use. No reasonable or adequate investigation was conducted by THE LOUISVILLE BOAT CLUB prior to re-opening the high dive so quickly after Allison's accident and Plaintiffs were prevented from conducting their own investigation due to the Defendants' quick and thorough remediation. No re-application of a nonslip surface was undertaken on the high diving board surface. No consideration of the width of the very wide gap in the railing

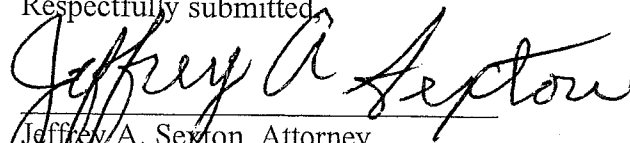
system was taken. In essence, Defendant THE LOUISVILLE BOAT CLUB reloaded that dangerous gun called its high diving board as fast as it could and pointed it once again at its members, particularly the youngest and most vulnerable.

64. Defendants' conduct, individually and collectively, as set forth herein constitutes gross negligence, oppression, fraud, malice or common law bad faith, with willful and wanton disregard for the life, health and rights of the Plaintiffs and was such an extreme departure from ordinary care, as to entitle the Plaintiffs to an award of punitive damages pursuant to KRS 411.184, KRS 411.186 and Kentucky's common law and the counts hereinabove.

WHEREFORE, Plaintiff demand for their relief as follows:

1. Judgment against Defendants, individually and collectively, in an amount the proof will demonstrate as compensatory damages for their permanent and irreparable harm, injury and damage, including severe physical, mental and emotional pain and suffering; past, present and future medical expenses; permanent disfigurement and permanent impairment to body;
2. Judgment against Defendants, individually and collectively, in an amount the proof will demonstrate as punitive damages, which will fairly and reasonable compensate the Plaintiffs for the harm they have suffered as a result of the conduct of the Defendants;
3. Plaintiffs' costs herein expended, including a reasonable attorney's fee;
4. An injunction ordering the permanent removal of the high diving board on the premises of Defendant THE LOUISVILLE BOAT CLUB and prohibiting use of said high diving board until such removal is effected;
5. ~~Jury trial~~ on all issues so triable; and,
6. Any and all other relief to which Plaintiffs may be entitled.

Respectfully submitted,



Jeffrey A. Sexton, Attorney

John Byrnes, Attorney

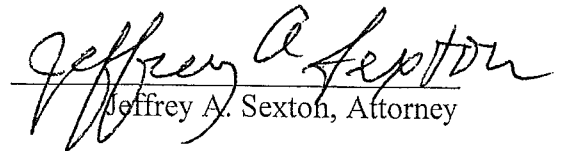
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was mailed this 20th day of February, 2014 to all of the Defendants listed herein.



Jeffrey A. Sexton, Attorney