

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY

KRISANNE BRADLEY

Plaintiff,

v.

JEANNE F. BOJARSKI

and

GRANT STAUFFER

Defendants.

Case No. 1216-CV10698

Division 7

FILED - CIRCUIT COURT  
JACKSON COUNTY, MO  
12 AUG - 8 AM 10:54

AMENDED PETITION FOR DAMAGES

Plaintiff Krisanne Bradley, for her Amended Petition against Defendant Jeanne F. Bojarski and Defendant Grant Stauffer, states and alleges the following:

1. Plaintiff Krisanne Bradley ("Plaintiff") resides in Kansas City, Jackson County, Missouri.
2. Defendants Jeanne Bojarski and Grant Stauffer reside in Kansas City, Jackson County, Missouri.
3. Jurisdiction is proper in this Court.
4. Venue is proper under R.S.Mo. §508.010.
5. Defendants Jeanne Bojarski and Grant Stauffer are husband and wife.
6. Defendants Jeanne Bojarski and Grant Stauffer were the owners of a large dog.
7. On October 28, 2011, Plaintiff was at the residence located at 49 E. 32<sup>nd</sup> Street, Kansas City, MO 64111.

8. Plaintiff was bitten by the Defendants' dog while Plaintiff was inside the residence, causing Plaintiff serious physical injuries.

9. These injuries caused Plaintiff to incur substantial medical bills.

#### COUNT I

##### STRICT LIABILITY UNDER R.S.MO. §273.036

10. Plaintiff incorporates the paragraphs above as though fully set forth herein.

11. Plaintiff was bitten by the Defendants' dog while lawfully on the Defendants' property.

12. The Defendants' dog bit Plaintiff without provocation.

WHEREFORE, Plaintiff prays for judgment against the Defendants for a reasonable sum of money damages, for costs and expenses incurred, and for such further relief as this Court may deem just and proper.

#### COUNT II

##### STRICT LIABILITY UNDER COMMON LAW

13. Plaintiff incorporates the paragraphs above as though fully set forth herein.

14. The Defendants' dog had vicious and dangerous propensities.

15. The Defendants knew or should have known of the dog's vicious and dangerous propensities.

16. Plaintiff's injuries resulted from the dog's exercise of its vicious and dangerous propensities.

WHEREFORE, Plaintiff prays for judgment against the Defendants for a reasonable sum of money damages, for costs and expenses incurred, and for such further relief as this Court may deem just and proper.

#### COUNT III

##### PREMISES LIABILITY

17. Plaintiff incorporates the paragraphs above as though fully set forth herein.

18. Plaintiff was an invitee on the Defendants' property.

19. The Defendants had a duty to exercise reasonable care to protect Plaintiff against both known dangers and those that would be revealed by inspection.

20. The Defendants' dog presented a foreseeable danger to Plaintiff and the Defendants knew or should have known of that danger.

21. The Defendants failed to remove the dog from the premises, restrain it, or warn Plaintiff of it, creating a condition on the premises that was not reasonably safe.

22. The Defendants' negligence directly caused or directly contributed to cause damage to Plaintiff.

WHEREFORE, Plaintiff prays for judgment against the Defendants for a reasonable sum of money damages, for costs and expenses incurred, and for such further relief as this Court may deem just and proper.

#### COUNT IV

#### NEGLIGENCE

23. Plaintiff incorporates the paragraphs above as though fully set forth herein.

24. The Defendants knew or by using ordinary care would have known of her dog's vicious and dangerous propensities.

25. The Defendants owed a duty of care to Plaintiff.

26. The Defendants breached their duty of care when they failed to use ordinary care to control their dog, restrain it, or warn Plaintiff of it.

27. The Defendants negligence directly caused or directly contributed to cause damage to Plaintiff.

WHEREFORE, Plaintiff prays for judgment against the Defendants for a reasonable sum of money damages, for costs and expenses incurred, and for such further relief as this Court may deem just and proper.

**REQUEST FOR JURY TRIAL**

Plaintiff requests a jury trial on all issues in this matter.

Respectfully submitted,



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