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4/26/2021 4:26 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
13095284

**IN THE CIRCUIT COURT OF COOK COUNTY ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

STEPHEN BRENNAN,)	
)	
Plaintiff,)	
)	No.: 2021L004300
v.)	
)	<i>Plaintiff Demands Trial by Jury</i>
UNITED AIRLINES, INC.)	

COMPLAINT AT LAW

NOW COMES Plaintiff, STEPHEN BRENNAN, by and through his attorneys, CLIFFORD LAW OFFICES, P.C., for his complaint against Defendant, UNITED AIRLINES, INC., and states as follows:

PARTIES AND JURISDICTION

1. Plaintiff, STEPHEN BRENNAN, currently, and at all relevant times mentioned herein, resides in Hawaii.
2. Defendant, UNITED AIRLINES, INC., is a commercial airline incorporated in Illinois, which maintains its headquarters in Chicago, Illinois and which conducts substantial business in Illinois, with its registered agent located at 208 South LaSalle St., Suite 814, Chicago, County of Cook, State of Illinois.
3. Venue is appropriate in Cook County, Illinois, because Defendant, UNITED AIRLINES, INC. is a resident of Cook County, Illinois.

COUNT I – NEGLIGENCE – UNITED AIRLINES, INC.

4. On and before February 20, 2021, and at all times relevant herein, a certain Boeing 777-222 aircraft, registration no. N772UA (hereinafter “the subject aircraft”), was owned, operated, managed, maintained and controlled by Defendant UNITED AIRLINES, INC.

FILED DATE: 4/26/2021 4:26 PM 2021L004300

5. On and before February 20, 2021, and at all times mentioned herein, Defendant, UNITED AIRLINES, INC., was a commercial passenger air carrier for hire.

5. On February 20, 2021, Defendant UNITED AIRLINES, INC. operated the subject aircraft as United Flight 328 from Denver International Airport (DEN) in Denver, Colorado to Daniel K. Inouye International Airport (HNL) in Honolulu, Hawaii.

6. On February 20, 2021, the subject aircraft being operated by Defendant, UNITED AIRLINES, INC. departed Denver International Airport (DEN) at approximately 13:04 MST from Runway 25.

7. On February 20, 2021, Plaintiff, STEPHEN BRENNAN, was a passenger on board United Flight 328.

8. On February 20, 2021, at approximately 13:09 MST, the subject aircraft experienced a failure of the right engine, while climbing through an altitude of approximately 12,500 feet mean sea level.

9. On and before February 20, 2021, and at all times mentioned herein, Defendant, UNITED AIRLINES, INC., as a common carrier for hire/commercial air carrier, owed Plaintiff STEPHEN BRENNAN and others similarly situated, the highest duty of care.

10. On and before February 20, 2021, and at all times mentioned herein, Defendant, UNITED AIRLINES, INC., breached its duty of care owed to the Plaintiff and others similarly situated through one or more of the following negligent acts and/or omissions:

- (a) Did not provide a safe aircraft;
- (b) Did not provide a properly maintained, serviced, and inspected aircraft for the flight;
- (c) Did not adequately and properly inspect, maintain, and service the subject aircraft's engines, including, but not limited to, the fan blades and other component parts;

- (d) Did not adequately and properly instruct and train its aircraft service personnel regarding the inspection, maintenance, and service of the subject aircraft's engines;
- (e) Was otherwise negligent.

11. On February 20, 2021, as a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant, UNITED AIRLINES, INC., the engine on the right side of the subject aircraft experienced a failure and explosion while the aircraft was in flight, forcing an emergency landing.

12. As a direct and proximate result of the aforesaid engine failure and explosion, Plaintiff, STEPHEN BRENNAN suffered, and continues to suffer, personal, emotional, and pecuniary injuries.

WHEREFORE, Plaintiff, STEPHEN BRENNAN, through his undersigned counsel, demands judgment against Defendant, UNITED AIRLINES, INC. for an amount in excess of the jurisdictional limit of Fifty Thousand Dollars (\$50,000.00), together with costs and any other damages permitted by the law and facts of this case.

/s/ Charles R. Haskins
Attorney for Plaintiff

CLIFFORD LAW OFFICES, P.C.
Richard F. Burke, Jr. (RFB@cliffordlaw.com)
Charles R. Haskins (CRH@cliffordlaw.com)
120 N. LaSalle St., Suite 3600
Chicago, IL 60602
P: 312/899-9090
Firm I.D.: 32640

FILED
4/26/2021 4:11 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021L004298

**IN THE CIRCUIT COURT OF COOK COUNTY ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

ASHLY RYAN McGARITY,)
)
 Plaintiff,)
)
 v.)
)
 UNITED AIRLINES, INC.)

No.: 2021L004298

Plaintiff Demands Trial by Jury

COMPLAINT AT LAW

NOW COMES Plaintiff, ASHLY RYAN McGARITY, by and through her attorneys, CLIFFORD LAW OFFICES, P.C., for her complaint against Defendant, UNITED AIRLINES, INC., and states as follows:

PARTIES AND JURISDICTION

1. Plaintiff, ASHLY RYAN McGARITY, currently, and at all relevant times mentioned herein, resides in King of Prussia, Pennsylvania.

2. Defendant, UNITED AIRLINES, INC., is a commercial airline incorporated in Illinois, which maintains its headquarters in Chicago, Illinois and which conducts substantial business in Illinois, with its registered agent located at 208 South LaSalle St., Suite 814, Chicago, County of Cook, State of Illinois.

3. Venue is appropriate in Cook County, Illinois, because Defendant, UNITED AIRLINES, INC. is a resident of Cook County, Illinois.

COUNT I – NEGLIGENCE – UNITED AIRLINES, INC.

4. On and before February 20, 2021, and at all times relevant herein, a certain Boeing 777-222 aircraft, registration no. N772UA (hereinafter “the subject aircraft”), was owned, operated, managed, maintained and controlled by Defendant UNITED AIRLINES, INC.

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5. On and before February 20, 2021, and at all times mentioned herein, Defendant, UNITED AIRLINES, INC., was a commercial passenger air carrier for hire.

5. On February 20, 2021, Defendant UNITED AIRLINES, INC. operated the subject aircraft as United Flight 328 from Denver International Airport (DEN) in Denver, Colorado to Daniel K. Inouye International Airport (HNL) in Honolulu, Hawaii.

6. On February 20, 2021, the subject aircraft being operated by Defendant, UNITED AIRLINES, INC. departed Denver International Airport (DEN) at approximately 13:04 MST from Runway 25.

7. On February 20, 2021, Plaintiff, ASHLY RYAN McGARITY, was a passenger on board United Flight 328.

8. On February 20, 2021, at approximately 13:09 MST, the subject aircraft experienced a failure of the right engine, while climbing through an altitude of approximately 12,500 feet mean sea level.

9. On and before February 20, 2021, and at all times mentioned herein, Defendant, UNITED AIRLINES, INC., as a common carrier for hire/commercial air carrier, owed Plaintiff ASHLY RYAN McGARITY and others similarly situated, the highest duty of care.

10. On and before February 20, 2021, and at all times mentioned herein, Defendant, UNITED AIRLINES, INC., breached its duty of care owed to the Plaintiff and others similarly situated through one or more of the following negligent acts and/or omissions:

- (a) Did not provide a safe aircraft;
- (b) Did not provide a properly maintained, serviced, and inspected aircraft for the flight;
- (c) Did not adequately and properly inspect, maintain, and service the subject aircraft's engines, including, but not limited to, the fan blades and other component parts;

- (d) Did not adequately and properly instruct and train its aircraft service personnel regarding the inspection, maintenance, and service of the subject aircraft's engines;
- (e) Was otherwise negligent.

11. On February 20, 2021, as a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant, UNITED AIRLINES, INC., the engine on the right side of the subject aircraft experienced a failure and explosion while the aircraft was in flight, forcing an emergency landing.

12. As a direct and proximate result of the aforesaid engine failure and explosion, Plaintiff, ASHLY RYAN McGARITY, suffered, and continues to suffer, personal, emotional, and pecuniary injuries.

WHEREFORE, Plaintiff, ASHLY RYAN McGARITY, through her undersigned counsel, demands judgment against Defendant, UNITED AIRLINES, INC. for an amount in excess of the jurisdictional limit of Fifty Thousand Dollars (\$50,000.00), together with costs and any other damages permitted by the law and facts of this case.

/s/ Charles R. Haskins
Attorney for Plaintiff

CLIFFORD LAW OFFICES, P.C.
Richard F. Burke, Jr. (RFB@cliffordlaw.com)
Charles R. Haskins (CRH@cliffordlaw.com)
120 N. LaSalle St., Suite 3600
Chicago, IL 60602
P: 312/899-9090
Firm I.D.: 32640

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IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021L004294

**IN THE CIRCUIT COURT OF COOK COUNTY ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

SKYLER JONES,

Plaintiff,

v.

UNITED AIRLINES, INC.

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)

13094138

No.: 2021L004294

Plaintiff Demands Trial by Jury

COMPLAINT AT LAW

NOW COMES Plaintiff, SKYLER JONES, by and through his attorneys, CLIFFORD LAW OFFICES, P.C., for his complaint against Defendant, UNITED AIRLINES, INC., and states as follows:

PARTIES AND JURISDICTION

1. Plaintiff, SKYLER JONES, currently, and at all relevant times mentioned herein, resides in King of Prussia, Pennsylvania.

2. Defendant, UNITED AIRLINES, INC., is a commercial airline incorporated in Illinois, which maintains its headquarters in Chicago, Illinois and which conducts substantial business in Illinois, with its registered agent located at 208 South LaSalle St., Suite 814, Chicago, County of Cook, State of Illinois.

3. Venue is appropriate in Cook County, Illinois, because Defendant, UNITED AIRLINES, INC. is a resident of Cook County, Illinois.

COUNT I – NEGLIGENCE – UNITED AIRLINES, INC.

4. On and before February 20, 2021, and at all times relevant herein, a certain Boeing 777-222 aircraft, registration no. N772UA (hereinafter “the subject aircraft”), was owned, operated, managed, maintained and controlled by Defendant UNITED AIRLINES, INC.

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5. On and before February 20, 2021, and at all times mentioned herein, Defendant, UNITED AIRLINES, INC., was a commercial passenger air carrier for hire.

5. On February 20, 2021, Defendant UNITED AIRLINES, INC. operated the subject aircraft as United Flight 328 from Denver International Airport (DEN) in Denver, Colorado to Daniel K. Inouye International Airport (HNL) in Honolulu, Hawaii.

6. On February 20, 2021, the subject aircraft being operated by Defendant, UNITED AIRLINES, INC. departed Denver International Airport (DEN) at approximately 13:04 MST from Runway 25.

7. On February 20, 2021, Plaintiff, SKYLER JONES, was a passenger on board United Flight 328.

8. On February 20, 2021, at approximately 13:09 MST, the subject aircraft experienced a failure of the right engine, while climbing through an altitude of approximately 12,500 feet mean sea level.

9. On and before February 20, 2021, and at all times mentioned herein, Defendant, UNITED AIRLINES, INC., as a common carrier for hire/commercial air carrier, owed Plaintiff SKYLER JONES, and others similarly situated, the highest duty of care.

10. On and before February 20, 2021, and at all times mentioned herein, Defendant, UNITED AIRLINES, INC., breached its duty of care owed to the Plaintiff and others similarly situated through one or more of the following negligent acts and/or omissions:

- (a) Did not provide a safe aircraft;
- (b) Did not provide a properly maintained, serviced, and inspected aircraft for the flight;
- (c) Did not adequately and properly inspect, maintain, and service the subject aircraft's engines, including, but not limited to, the fan blades and other component parts;

- (d) Did not adequately and properly instruct and train its aircraft service personnel regarding the inspection, maintenance, and service of the subject aircraft's engines;
- (e) Was otherwise negligent.

11. On February 20, 2021, as a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant, UNITED AIRLINES, INC., the engine on the right side of the subject aircraft experienced a failure and explosion while the aircraft was in flight, forcing an emergency landing.

12. As a direct and proximate result of the aforesaid engine failure and explosion, Plaintiff, SKYLER JONES, suffered, and continues to suffer, personal, emotional, and pecuniary injuries.

WHEREFORE, Plaintiff, SKYLER JONES, through his undersigned counsel, demands judgment against Defendant, UNITED AIRLINES, INC. for an amount in excess of the jurisdictional limit of Fifty Thousand Dollars (\$50,000.00), together with costs and any other damages permitted by the law and facts of this case.

 /s/ Charles R. Haskins
Attorney for Plaintiff

CLIFFORD LAW OFFICES, P.C.
Richard F. Burke, Jr. (RFB@cliffordlaw.com)
Charles R. Haskins (CRH@cliffordlaw.com)
120 N. LaSalle St., Suite 3600
Chicago, IL 60602
P: 312/899-9090
Firm I.D.: 32640

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IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
13104023

**IN THE CIRCUIT COURT OF COOK COUNTY ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

MARC MARCEL,

Plaintiff,

v.

UNITED AIRLINES, INC.,

Defendant,

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)
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)

No.: 2021L004310

Plaintiff Demands Trial by Jury

COMPLAINT AT LAW

NOW COMES Plaintiff, MARC MARCEL, by and through his attorneys, CLIFFORD LAW OFFICES, P.C., and for his complaint against Defendant, UNITED AIRLINES, INC., states as follows:

PARTIES AND JURISDICTION

1. Plaintiff, MARC MARCEL, currently, and at all relevant times mentioned herein, resides in Woodstock, Maryland.
2. Defendant, UNITED AIRLINES, INC., is a commercial airline incorporated in Illinois, which maintains its headquarters in Chicago, Illinois and which conducts substantial business in Illinois, with its registered agent located at 208 South LaSalle St., Suite 814, Chicago, County of Cook, State of Illinois.
3. Venue is appropriate in Cook County, Illinois, because Defendant, UNITED AIRLINES, INC. is a resident of Cook County, Illinois.

COUNT I – NEGLIGENCE – UNITED AIRLINES, INC.

FILED DATE: 4/27/2021 11:23 AM 2021L004310

4. On and before February 20, 2021, and at all times relevant herein, a certain Boeing 777-222 aircraft, registration no. N772UA (hereinafter “the subject aircraft”), was owned, operated, managed, maintained and controlled by Defendant UNITED AIRLINES, INC.

5. On and before February 20, 2021, and at all times mentioned herein, Defendant, UNITED AIRLINES, INC., was a commercial passenger air carrier for hire.

6. On February 20, 2021, Defendant UNITED AIRLINES, INC. operated the subject aircraft as United Flight 328 from Denver International Airport (DEN) in Denver, Colorado bound for Daniel K. Inouye International Airport (HNL) in Honolulu, Hawaii.

7. On February 20, 2021, the subject aircraft being operated by Defendant, UNITED AIRLINES, INC. departed Denver International Airport (DEN) at approximately 13:04 MST from Runway 25.

8. On February 20, 2021, Plaintiff, MARC MARCEL, was a passenger on board United Flight 328.

9. On February 20, 2021, at approximately 13:09 MST, the subject aircraft experienced a failure of the right engine, while climbing through an altitude of approximately 12,500 feet mean sea level.

10. On and before February 20, 2021, and at all times mentioned herein, Defendant, UNITED AIRLINES, INC., as a common carrier for hire/commercial air carrier, owed Plaintiff MARC MARCEL and others similarly situated, the highest duty of care.

11. On and before February 20, 2021, and at all times mentioned herein, Defendant, UNITED AIRLINES, INC., breached its duty of care owed to the Plaintiff and others similarly situated through one or more of the following negligent acts and/or omissions:

- (a) Did not provide a safe aircraft;

- (b) Did not provide a properly maintained, serviced, and inspected aircraft for the flight;
- (c) Did not adequately and properly inspect, maintain, and service the subject aircraft's engines, including, but not limited to, the fan blades and other component parts;
- (d) Did not adequately and appropriately instruct and train its aircraft service personnel regarding proper inspection, maintenance, and service of the subject aircraft's engines;
- (e) Was otherwise negligent.

12. On February 20, 2021, as a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant, UNITED AIRLINES, INC., the engine on the right side of the subject aircraft experienced a failure of various component parts, including fractures of fan blades, causing an engine fire and an uncommanded shutdown of the engine while the aircraft was in flight, forcing an emergency landing.

13. As a direct and proximate result of the aforesaid engine failure and fire, Plaintiff, MARC MARCEL suffered, and continues to suffer, personal, emotional, and pecuniary injuries.

WHEREFORE, Plaintiff, MARC MARCEL, through his undersigned counsel, demands judgment against Defendant, UNITED AIRLINES, INC. for an amount in excess of the jurisdictional limit of Fifty Thousand Dollars (\$50,000.00), together with costs and any other damages permitted by the law and facts of this case.

/s/ Richard F. Burke, Jr.
One of the Attorneys for Plaintiff

CLIFFORD LAW OFFICES, P.C.
Richard F. Burke, Jr. (RFB@cliffordlaw.com)
Charles R. Haskins (CRH@cliffordlaw.com)
120 N. LaSalle St., Suite 3600
Chicago, IL 60602
P: 312/899-9090
Firm I.D.: 32640