

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY, OHIO

HOLLIAN PATETE  
1600 PARK TRAIL DRIVE  
WESTERVILLE, OH 43081

:

: CASE NO.

Plaintiff,

:

vs.

:

GOOD NEWS MESSENGERS INC  
dba THE CONNECTION CHURCH  
JUDITH KAYE WALLS,  
REGISTERED AGENT  
59 W BROADWAY AVE  
WESTERVILLE, OH 43081

:

JUDGE

:

JURY DEMAND ENDORSED HEREIN

:

Defendant.

:

**REFILED COMPLAINT**

**FIRST CLAIM FOR RELIEF:**

1. The Defendant, Good News Messengers Inc., (hereinafter referred to as “Good News Messengers”), is a non-profit corporation incorporated and registered in the State of Ohio, under charter number 834676 and is licensed and authorized to transact business in the State of Ohio.
2. Defendant Good News Messengers owns, operates and manages a property in Franklin County, Ohio, located at 5516 Sinclair Road, Columbus, Ohio 43229.
3. On or about 8/24/2020, the Plaintiff, Hollian Patete, signed a two-year lease with Defendant Good News Messengers for the property located at 5516 Sinclair Road, Columbus, Ohio 43229. This lease was renewed for an additional year through 8/24/2023.

4. On or about 10/28/2022, Plaintiff sought medical treatment and was instructed by her physician that black mold was causing her severe health issues.
5. A visual inspection of the house on 10/ 27/2022 by a mold remediation company showed multiple active mold growths.
6. Defendant Good News Messengers, by and through their employees/agents, negligently maintained the premises in a dangerous condition, which endangered the life and limb of any person in the building by their failure to keep the premises in a fit and habitable condition.
7. As a direct and proximate result of the negligence of the Defendant Good News Messengers, the Plaintiff, Holliann Patete, sustained severe and painful injuries, which are permanent.
8. As a further proximate result thereof, the Plaintiff, Holliann Patete, has experienced great physical pain and suffering and attendant emotional distress.
9. As a further proximate result thereof, this Plaintiff, Holiann Patete, has experienced a loss of ability to perform usual functions (loss of enjoyment of life).
10. As a further proximate result thereof, the Plaintiff, Holliann Patete, has incurred hospital and medical expenses in an amount to be determined at the time of trial and expects to incur additional hospital and medical expenses in the future.
11. As a further proximate result thereof, this Plaintiff has sustained a direct earnings loss in an amount to be determined at the time of the trial and has sustained an impairment of her earning capacity.

WHEREFORE, the Plaintiff, Holliann Patete, demands judgment against the Defendant, in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00), plus interest, prejudgment interest, together with costs herein expended, and any and all other relief the Court deems equitable.

Respectfully submitted,

/s/ Shawn M. Riehl  
Shawn M. Riehl (0081180)  
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Attorney for Plaintiff

**JURY DEMAND**

Plaintiffs demand a trial by jury of eight (8) on all issues of the within cause.

/s/ Shawn M. Riehl  
Shawn M. Riehl (0081180)