

**CIVIL ACTION COVER SHEET**TRIAL COURT OF MASSACHUSETTS  
SUPERIOR COURT DEPARTMENT  
COUNTY OF SUFFOLKDOCKET NO. 15-0073**PLAINTIFF(S)**

TANIA HENRY

**DEFENDANT(S)**NATALIA SHCHERBINA, OSAMA NIL, and PLANNED PARENTHOOD  
LEAGUE OF MASSACHUSETTS, INC.Plaintiff Atty Frank C. Corso

Type Defendant's Attorney Name

Address 492 Winthrop Street, Suite 5

Defendant Atty

City Rehoboth State MA Zip Code 02769

Address

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Tel. 774-901-2677BBO# 545552**TYPE OF ACTION AND TRACK DESIGNATION (See reverse side)**

CODE NO.

TYPE OF ACTION (specify)

TRACK

IS THIS A JURY CASE?

B03 F - Motor Vehicle Negligence personal injury/property damage

[X] Yes [ ] No

The following is a full, itemized and detailed statement of the facts on which plaintiff relies to determine money damages. For this form, disregard double or treble damage claims; indicate single damages only.

**TORT CLAIMS**

(Attach additional sheets as necessary)

**A. Documented medical expenses to date:**

- |                                    |              |
|------------------------------------|--------------|
| 1. Total hospital expenses         | \$ 821.00    |
| 2. Total doctor expenses           | \$ 6,477.00  |
| 3. Total chiropractic expenses     | \$ 64.75     |
| 4. Total physical therapy expenses | \$ 19,709.00 |
| 5. Total other expenses (describe) | \$ 0.00      |

Subtotal \$ 27,071.75**B. Documented lost wages and compensation to date**\$ 0.00**C. Documented property damages to date**\$ 0.00**D. Reasonably anticipated future medical expenses**\$ 0.00**E. Reasonably anticipated lost wages and compensation to date**\$ 0.00**F. Other documented items of damages (describe)**\$ 0.00**G. Brief description of plaintiff's injury, including nature and extent of injury (describe)**

The Plaintiff suffered injuries to her neck, shoulder blades, back and head as a result of a multi-car accident in which her vehicle was struck in the rear.

Total \$ 27,071.75**CONTRACT CLAIMS**

(Attach additional sheets as necessary)

Provide a detailed description of claim(s):

TOTAL \$ \_\_\_\_\_

PLEASE IDENTIFY, BY CASE NUMBER, NAME AND COUNTY, ANY RELATED ACTION PENDING IN THE SUPERIOR COURT DEPARTMENT

"I hereby certify that I have complied with the requirements of Rule 5 of the Supreme Judicial Uniform Rules on Dispute Resolution (SJC) Rule 1:18) requiring that I provide my clients with information about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods."

Signature of Attorney of Record  
A.O.S.C. 3-2007Date: 1/6/15

TurboLaw (800) 518-8726

**Commonwealth of Massachusetts**

SUFFOLK, SS.

SUPERIOR COURT DEPARTMENT  
OF THE TRIAL COURT  
CIVIL ACTION NO.:

15-0073 C

TANIA HENRY,

PLAINTIFF

v.

NATALIA SHCHERBINA,  
OSAMA NIL, and  
PLANNED PARENTHOOD LEAGUE OF  
MASSACHUSETTS INC.,  
DEFENDANTS

CIVIL COMPLAINT FOR ACCIDENT  
OF 1/20/12

**COMPLAINT AND DEMAND FOR JURY TRIAL**

**GENERAL ALLEGATIONS**

1. At all relevant times, the Plaintiff, Tania Henry, was a citizen of the Commonwealth of Massachusetts and a resident of the Town of Newburyport, Essex County, Massachusetts.
2. On information and belief, the Defendant, Diane Luby, is and was at all relevant times a citizen of the Commonwealth of Massachusetts.
3. On information and belief, the Defendant, Planned Parenthood League of Massachusetts, Inc. is a corporation duly organized and existing in the Commonwealth of Massachusetts.
4. On information and belief, the Defendant, Natalia Shcherbina, is and was at all relevant times a Citizen of the Commonwealth of Massachusetts.
5. On information and belief, the Defendant, Osama Nil, is and was at all relevant times a Citizen of the Commonwealth of Massachusetts.
6. On or about January 20, 2012, Natalia Shcherbina, was involved in an automobile accident while operating a motor vehicle registered to Osama Nil on Beacon Street in the City of Boston and pursuant to G. L. c. 231, §85A, Osama Nil is legally responsible for the negligent conduct of Natalia Shcherbina.
7. On or about January 20, 2012, Diane Luby was involved in an automobile accident while



operating a motor vehicle registered to Planned Parenthood League of Massachusetts, Inc. on Beacon Street in the City of Boston and pursuant to G. L. c. 231, §85A, Planned Parenthood League of Massachusetts, Inc. is legally responsible for the negligent conduct of Diane Luby.

8. At all relevant times, Beacon Street in the City of Boston, County of Suffolk was a public way within the meaning of G. L. c. 90, §1.

### COUNT ONE

#### CLAIM OF THE PLAINTIFF, TANIA HENRY, AGAINST THE DEFENDANT, DIANE LUBY, FOR PERSONAL INJURIES PREDICATED UPON NEGLIGENCE

9. Pursuant to Mass. R. Civ P. 10(c), 371 Mass. 909(1977), the Plaintiff adopts by reference ¶¶1-8 above.
10. On or about January 20, 2012, Defendant Diane Luby was involved in an automobile accident while operating a motor vehicle registered to Planned Parenthood League of Massachusetts, Inc. on Beacon Street, a public way, in the City of Boston.
11. While operating a motor vehicle on a public way on January 20, 2012 the Defendant Luby had a legal duty to operate the vehicle in a reasonable manner which she breached on the same day by negligently causing the vehicle she was operating to strike the Plaintiff's car.
12. The Plaintiff suffered serious personal injuries as a result of Defendant Luby's negligent operation for which damages are now being sought and demanded.

### COUNT TWO

#### CLAIM OF THE PLAINTIFF, TANIA HENRY, AGAINST THE DEFENDANT, PLANNED PARENTHOOD LEAGUE OF MASSACHUSETTS, INC. FOR PERSONAL INJURIES PREDICATED UPON NEGLIGENCE

13. Pursuant to Mass. R. Civ P. 10(c), 371 Mass. 909(1977), the Plaintiff adopts by reference ¶¶1-12 above.
14. Pursuant to G. L. c. 231, §85A, the Defendant Parenthood League of Massachusetts, Inc. is legally responsible for the negligent conduct of Diane Luby.

### COUNT THREE

#### CLAIM OF THE PLAINTIFF, TANIA HENRY, AGAINST THE DEFENDANT, NATALIA SHCHERBINA FOR PERSONAL INJURIES PREDICATED UPON NEGLIGENCE

15. On or about January 20, 2012, Defendant Natalia Shcherbina was involved in an automobile accident while operating a motor vehicle registered to Osama Nil on Beacon Street, a public way, in the City of Boston.
16. While operating a motor vehicle on a public way on January 20, 2012 the Defendant Natalia Shcherbina had a legal duty to operate the vehicle in a reasonable manner which she breached on the same day by negligently causing the vehicle she was operating to strike another vehicle and cause injury to the Plaintiff.
17. The Plaintiff suffered serious personal injuries as a result of Defendant Natalia Shcherbina's negligent operation for which damages are now being sought and demanded.

### COUNT FOUR

#### CLAIM OF THE PLAINTIFF, TANIA HENRY, AGAINST THE DEFENDANT, OSAMA NIL FOR PERSONAL INJURIES PREDICATED UPON NEGLIGENCE

18. Pursuant to Mass. R. Civ P. 10(c), 371 Mass. 909(1977), the Plaintiff adopts by reference ¶¶1-12 & 15-17.
19. Pursuant to G. L. c. 231, § 85A, the defendant Osama Nil is legally responsible for the negligent conduct of Defendant Natalia Shcherbina.
20. As a direct and proximate result of the negligence of all defendants the Plaintiff was caused to suffer severe personal injuries, incurred pain and suffering, loss of earning capacity and incurred medical bills and other costs for which the defendants are jointly and severally liable.

Wherefore, Plaintiff prays that judgment be entered against each Defendant Operator and Defendant Owner in an amount that will fairly and adequately compensate for Plaintiff's conscious pain and suffering and all other damages recoverable under Massachusetts law together with interest, costs and such other relief as this Honorable Court may deem appropriate.

### JURY DEMAND

Plaintiff hereby demands a trial by jury on each claim asserted or hereafter asserted in the

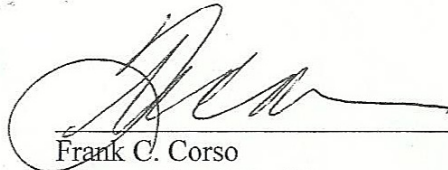


Complaint, and on each defense asserted or hereafter asserted by any Defendant.

Dated: 1/6/15

Respectfully submitted,

Tania Henry,  
By her Attorney,



Frank C. Corso  
Attorney for Plaintiff  
Corso Law LLC  
492 Winthrop Street, Suite 5  
Rehoboth, MA 02769  
Tel: 774-901-2677  
Fax: 774-901-2678  
fcc@corsolaw.com

FOR

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1/6/15

TurboLaw (800) 518-8726

Commonwealth of Massachusetts  
SUPERIOR COURT DEPARTMENT  
OF THE TRIAL COURT

SUFFOLK Division

Docket No. 15-0073C

UNIFORM COUNSEL CERTIFICATION FORM

Case Caption: Tania Henry v. Natalia Shcherbina, Osama Nil, and Planned Parenthood League of Massachusetts, Inc.

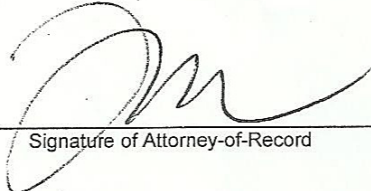
I am attorney of record for: Tania Henry

Plaintiff in the above-entitled matter.

In accordance with Rule 5 of the Supreme Judicial Court Uniform Rules on Dispute Resolution (SJC Rule 1:18) which states in part:

"...Attorneys shall provide their clients with this information about court-connected dispute resolution services; discuss with their clients the advantages and disadvantages of the various methods of dispute resolution; and certify their compliance with this requirement on the civil cover sheet or its equivalent."

I hereby certify that I have complied with this requirement.

  
\_\_\_\_\_  
Signature of Attorney-of-Record

Frank C. Corso  
\_\_\_\_\_  
Print Name

B.B.O.# 545552

Date: January 6, 2015

INSTRUCTIONS:

Plaintiff's/Petitioner's counsel shall file this document at the time his/her initial pleading is filed. All other counsel shall file it within thirty (30) days of his/her initial entry into the case whether by answer, motion, appearance slip or other pleading.