

**12 Person Jury**

Law Division Motion Section Initial Case Management Dates for Case Filings (A, B, C, D, E, F, H, R, X, Z) will be heard In Person.

All other Law Division Initial Case Management Dates will be heard via Zoom

For more information and Zoom Meeting IDs go to [https://www.cookcountycourt.org/HOME?Zoom-Links?Agg4906\\_SelectTab/12](https://www.cookcountycourt.org/HOME?Zoom-Links?Agg4906_SelectTab/12)

Court Date: 12/6/2023 9:30 AM

FILED  
10/2/2023 9:09 AM  
IRIS Y. MARTINEZ  
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COOK COUNTY, IL  
2023L009993  
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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

MARISSA HERRERA, )  
)  
Plaintiff, )  
)  
)  
)  
ALEXIS DASTAS RODRIGUEZ, )  
)  
Defendant. )

No: 2023L009993

COMPLAINT AT LAW

NOW COMES the Plaintiff, MARISSA HERRERA, by and through her attorneys, STRELLIS FIRM, CHARTERED, and for her complaint against the Defendant, ALEXIS DASTAS RODRIGUEZ, alleges as follows:

1. On and before September 6, 2023, O’Hare Street was a street running east to west at or near the United Airlines de-icing facility at O’Hare International Airport that, in part, allowed commercial vehicle access in the City of Chicago, County of Cook, State of Illinois.
2. On and before September 6, 2023, and at all relevant times, Defendant, ALEXIS DASTAS RODRIGUEZ, was domiciled in the City of Chicago, County of Cook, State of Illinois.
3. On and before September 6, 2023, Defendant, ALEXIS DASTAS RODRIGUEZ, was an employee of LSG SKY CHEFS, which was operating a Ford F750 truck at or near the United Airlines de-icing area located near 103 West O’Hare Street, in the City of Chicago, County of Cook, State of Illinois.

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4. On and before September 6, 2023, LSG SKY CHEFS was one of the world's largest airline and catering service companies, delivering over 308 million meals per year, and is present at 131 locations in 49 countries.

5. On and before September 6, 2023, LSG SKY CHEFS was the wholly owned subsidiary of LSG GROUP and LSG LUFTHANSA SERVICE HOLDING AG, headquartered in New-Isenburg, Germany, with an extensive network of joint ventures and partnerships around the world, authorized and doing business in the County of Cook and the State of Illinois.

6. On or about September 6, 2023, at approximately 2:15 p.m., Plaintiff MARISSA HERRERA, in the course of her employment with United Airlines, was standing between two stopped trucks that were waiting to have their food service products verified at or near the United Airlines de-icing area located near 103 West O'Hare Street, Chicago, Illinois.

7. On or about September 6, 2023, at approximately 2:15 p.m., Defendant, ALEXIS DASTAS RODRIGUEZ, caused his Ford F750 truck to accelerate and strike the plaintiff, MARISSA HERRERA, pinning her between his vehicle and another truck that was immediately in front of his vehicle, causing severe personal injuries, to the Plaintiff, MARISSA HERRERA, as hereinafter alleged.

8. It then and there became and was the duty of Defendant, ALEXIS DASTAS RODRIGUEZ, to exercise reasonable care and caution so as not to injure Plaintiff, but Defendant, ALEXIS DASTAS RODRIGUEZ, drove his vehicle into a violent collision with the pedestrian/plaintiff, MARISSA HERRERA.

9. At the time and place aforesaid Defendant, ALEXIS DASTAS RODRIGUEZ, was negligent in one or more of the following ways:

- (a) Failed to exercise due care to avoid colliding with a pedestrian in violation of 625 ILCS 5/11-1003.1.
- (b) Operated his motor vehicle without keeping a proper and sufficient lookout.
- (c) Operated said vehicle negligently, heedlessly, and without due caution in a manner so as to endanger any person in violation of the Municipal Code of Chicago, Section 9-40-140.
- (d) Failed to give audible warning with his horn when such a warning was reasonably necessary to insure safety, in violation of 625 ILCS 5/12-601(1994), and the Municipal Code of Chicago, Section 9-40-240;

10. As a proximate result of the aforesaid defendant's negligence, Plaintiff MARISSA HERRERA, then and there, sustained and will continue to sustain permanent injuries, partial disability, pain, and medical expenses.

WHEREFORE, Plaintiff MARISSA HERRERA demands judgment against Defendant ALEXIS DASTAS RODRIGUEZ, in an amount in excess of Fifty Thousand Dollars (\$50,000.00) plus costs of suit.

STRELLIS FIRM, CHARTERED

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