

ERIN CARTWRIGHT WEINSTEIN

Clerk of the Circuit Court

Lake County, Illinois

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS

**NOTICE**

**PURSUANT TO LCR - 2-2.14**

**THIS CASE IS HEREBY SET FOR AN INITIAL CASE MANAGEMENT CONFERENCE**

Court No. **IN COURTROOM** c202 **ON**  
7/9/24 **AT** 0900a **A.M./P.M.**

**FAILURE TO APPEAR MAY RESULT IN THE CASE BEING DISMISSED OR  
AN ORDER OF DEFAULT BEING ENTERED.**

Amount Claimed: **2024LA00000320**  
In Excess of \$50,000

JULIA GNESIN,

Plaintiff,

v.

JASON B. SHAPIRO,

Defendant.

**COMPLAINT**

NOW COMES the Plaintiff, JULIA GNESIN, ("Plaintiff"), by and through her attorneys, NEMEROFF LAW OFFICES, LTD., and complaining of Defendant, JASON B. SHAPIRO ("Shapiro"), states in support as follows:

1. At all times relevant, Plaintiff resided in the village of Riverwoods in Lake County, Illinois.
2. At all times relevant, Defendant Shapiro resided in the village of Deerfield in Lake County, Illinois.
3. The intersection of Park Avenue West and Skokie Valley Road in the village of Highland Park in Lake County, Illinois is controlled by a traffic light.
4. On or about June 1, 2022, Plaintiff operated and controlled a motor vehicle stopped at the traffic light on Park Avenue West where Park Avenue West intersects with Skokie Valley Road in the village of Highland Park in Lake County, Illinois.
5. On or about June 1, 2022, Defendant Shapiro operated and controlled a motor vehicle traveling directly behind Plaintiff on Park Avenue West in the village of Highland Park, Illinois.
6. At said time and place, Defendant Shapiro's vehicle struck Plaintiff's vehicle while Plaintiff was stopped at the traffic light at the intersection of Park Avenue West and Skokie Valley Road in Highland Park, Illinois.
7. At said time and place, Defendant Shapiro's vehicle rear-ended Plaintiff's vehicle.

8. At all relevant times, Plaintiff was in the exercise of due care and caution for her own safety and for the safety of others.

9. On June 1, 2022, Defendant Shapiro owed to Plaintiff a duty to operate, maintain and control his motor vehicle in a safe and lawful manner.

10. Notwithstanding said duty, at said time and place Defendant Shapiro was guilty of one or more of the following careless and negligent acts or omissions:

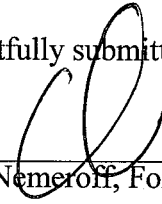
- (a) Operated his motor vehicle without keeping a proper and sufficient lookout;
- (b) Failed to decrease speed so as to avoid colliding with another vehicle, in violation of 625 ILCS 5/11-601(a);
- (c) Proceeded at a speed which was greater than reasonable and proper with regard to traffic conditions and the use of the roadway, in violation of 625 ILCS 5/11-601;
- (d) Failed to keep said vehicle under proper control and failed to stop, slow down or otherwise alter speed, movement or direction of said vehicle, when danger of collision with Plaintiff was imminent;
- (e) Operated an electronic communicating device while operating a motor vehicle on a roadway, in violation of 625 ILCS 5/12-610.2; and
- (f) Carelessly and negligently struck Plaintiff's vehicle.

11. As a direct and proximate result of one or more of the foregoing acts and/or omissions of Defendant Shapiro, Shapiro's vehicle came into collision with Plaintiff's vehicle.

12. As a direct and proximate result of aforementioned collision, Plaintiff suffered and will continue to suffer injuries of a personal and pecuniary nature.

**WHEREFORE**, Plaintiff JULIA GNESIN demands judgment against Defendant JASON B. SHAPIRO in an amount greater than \$50,000 plus costs.

Respectfully submitted,



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David Nemeroff, For Plaintiff

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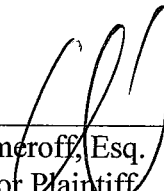
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**AFFIDAVIT**

I, David B. Nemeroff, first being duly sworn on oath, depose and state as follows:

1. The damages claimed by the plaintiff(s) exceed the sum of FIFTY THOUSAND DOLLARS (\$50,000).

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
David Nemeroff, Esq.  
Attorney for Plaintiff

VERIFICATION

Under penalties as provided by law pursuant to 735 ILCS 5/1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

  
\_\_\_\_\_  
David Nemeroff