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Joseph B. Roesch
7th Judicial Circuit
Sangamon County, IL

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT
SANGAMON COUNTY, ILLINOIS

ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator; ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators; ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators; ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators; ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators; LIVI TUTTLE, a Minor, by and through her Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE; LEO TUTTLE, a Minor, by and through his Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE; ELLA ORSI, a Minor, by and through her Parents and Next Friends, MICHAEL ORSI and LINDSAY ORSI; EMMA FINCH, a Minor, by and through her Mother and Next Friend, JILL CRIPE; and ROSE CORLEY, a Minor, by and through her Mother and Next Friend, ELIZABETH CORLEY, Plaintiffs, vs. YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation; R AND E BUILDINGS, LLC, an Illinois Limited Liability Company; THE JAMES R. LOFTUS & MITZI LOFTUS TRUST; and MARIANNE AKERS, Individually, Defendants, And THE VILLAGE OF CHATHAM, a Municipal Corporation, Respondent in Discovery.	2026LA000088 Case No: **Plaintiffs demand a trial by jury.**

COMPLAINT AT LAW

NOW COME the Plaintiffs, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator; ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators; ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators; ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators; ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators; LIVI TUTTLE, a Minor, by and through her Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE; LEO TUTTLE, a Minor, by and through his Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE; ELLA ORSI, a Minor, by and through her Parents and Next Friends, MICHAEL ORSI and LINDSAY ORSI; EMMA FINCH, a Minor, by and through her Mother and Next Friend, JILL CRIPE; and ROSE CORLEY, a Minor, by and through her Mother and Next Friend, ELIZABETH CORLEY (hereinafter collectively "Plaintiffs"), by and through their attorneys, SALVI, SCHOSTOK & PRITCHARD, P.C. and FREDERICK W. NESSLER & ASSOCIATES, LTD.[1], and complaining of Defendants YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation (hereinafter "YNOT"); R AND E BUILDINGS, LLC, an Illinois Limited Liability Company (hereinafter "R AND E"); THE JAMES R. LOFTUS & MITZI LOFTUS TRUST (hereinafter "LOFTUS TRUST"); and MARIANNE AKERS, Individually (hereinafter "AKERS"), and naming as Respondent in Discovery THE VILLAGE OF CHATHAM, a Municipal Corporation, Plaintiffs state and allege as follows:

[1] Frederick W. Nessler & Associates, Ltd. represents all Plaintiffs with Salvi, Schostok & Pritchard, P.C. with the exception of the Corley Plaintiffs.

THE PARTIES, JURISDICTION, AND VENUE

1. Jurisdiction and venue are proper, as the pertinent events as set forth herein occurred in Sangamon County, Plaintiffs are residents of Sangamon County, and Defendants are located in and/or regularly conduct business in Sangamon County.

2. Decedent, KATHRYN CORLEY, was a seven (7) year old girl who resided in the Village of Chatham, Sangamon County, Illinois and died on April 28, 2025, as set forth herein.

3. The Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, brings these actions pursuant to 740 ILCS 180/1 et seq. and 755 ILCS 5/27-6 et seq., commonly referred to as the "Wrongful Death Act" and "Survival Act," respectively. Attached as *Exhibit A* as evidence of the right to bring these actions, is a copy of the Order appointing ELIZABETH CORLEY as Independent Administrator of the Estate of KATHRYN CORLEY, deceased, entered by the Circuit Court of Sangamon County, Illinois.

4. Decedent, RYLEE D. BRITTON, was an eighteen (18) year old girl who resided in the City of Springfield, Sangamon County, Illinois and died on April 28, 2025, as set forth herein.

5. The Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, brings these actions pursuant to 740 ILCS 180/1 et seq. and 755 ILCS 5/27-6 et seq., commonly referred to as the "Wrongful Death Act" and "Survival Act," respectively. Attached as *Exhibit B* as evidence of the right to bring these actions, is a copy of the Order appointing ZACHERY BRITTON and CHRISTINE BRITTON as Independent Co-Administrators of the Estate of RYLEE D. BRITTON, deceased, entered by the Circuit Court of Sangamon County, Illinois.

6. Decedent, ALMA BUHNERKEMPE, was a seven (7) year old girl who resided in

the Village of Chatham, Sangamon County, Illinois and died on April 28, 2025, as set forth herein.

7. The Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, brings these actions pursuant to 740 ILCS 180/1 et seq. and 755 ILCS 5/27-6 et seq., commonly referred to as the "Wrongful Death Act" and "Survival Act," respectively. Attached as *Exhibit C* as evidence of the right to bring these actions, is a copy of the Order appointing MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE as Independent Co-Administrators of the Estate of ALMA BUHNERKEMPE, deceased, entered by the Circuit Court of Sangamon County, Illinois.

8. Decedent, BRADLEY JAMES LUND, was an eight (8) year old boy who resided in the City of Springfield, Sangamon County, Illinois and died on June 2, 2025, as set forth herein.

9. The Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, brings these actions pursuant to 740 ILCS 180/1 et seq. and 755 ILCS 5/27-6 et seq., commonly referred to as the "Wrongful Death Act" and "Survival Act," respectively. Attached as *Exhibit D* as evidence of the right to bring these actions, is a copy of the Letters of Independent Administration appointing DANIEL LUND and CYNTHIA LUND as Independent Co-Administrators of the Estate of BRADLEY JAMES LUND, deceased, entered by the Circuit Court of Sangamon County, Illinois.

10. Decedent, AINSLEY JOHNSON, was an eight (8) year old girl who resided in the Village of Chatham, Sangamon County, Illinois and died on April 28, 2025, as set forth herein.

11. The Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, bring these actions pursuant to 740 ILCS 180/1 et seq. and 755 ILCS 5/27-6 et seq., commonly referred to as the "Wrongful Death Act" and "Survival Act," respectively. Attached as *Exhibit E* as evidence of the

right to bring these actions, is a copy of the Order appointing TODD JOHNSON and CHRISTY JOHNSON as Independent Co-Administrators of the Estate of AINSLEY JOHNSON, deceased, entered by the Circuit Court of Sangamon County, Illinois.

12. On and before April 28, 2025, and at all times material, PHILLIP TUTTLE and LAURA TUTTLE were the parents and next friends of LIVI TUTTLE, a minor, and were residents of Illinois and resided in the City of Springfield.

13. LIVI TUTTLE was a seven (7) year old girl who resided in the City of Springfield, Sangamon County, Illinois on April 28, 2025.

14. On and before April 28, 2025, and at all times material, PHILLIP TUTTLE and LAURA TUTTLE were the parents and next friends of LEO TUTTLE, a minor, and were residents of Illinois and resided in the City of Springfield.

15. LEO TUTTLE was a ten (10) year old boy who resided in the City of Springfield, Sangamon County, Illinois on April 28, 2025.

16. On and before April 28, 2025, and at all times material, MICHAEL ORSI and LINDSAY ORSI were the parents and next friends of ELLA ORSI, a minor, and were residents of Illinois and resided in the City of Springfield.

17. ELLA ORSI was a seven (7) year old girl who resided in the Village of Chatham, Sangamon County, Illinois on April 28, 2025.

18. On and before April 28, 2025, and at all times material, JILL CRIPE was the mother and next friend of EMMA FINCH, a minor, and was a resident of Illinois and resided in the City of Springfield.

19. EMMA FINCH was an eleven (11) year old girl who resided in the City of Springfield, Sangamon County, Illinois on April 28, 2025.

20. On and before April 28, 2025, and at all times material, ELIZABETH CORLEY was the mother and next friend of ROSE CORLEY, a minor, and was a resident of Illinois and resided in the Village of Chatham.

21. ROSE CORLEY was an eight (8) year old girl who resided in the Village of Chatham, Sangamon County, Illinois on April 28, 2025.

22. On April 28, 2025, and at all times material, Defendant YNOT was an Illinois not-for-profit corporation, licensed and registered to do business in the State of Illinois.

23. On April 28, 2025, and at all times material, YNOT owned and operated an after-school day camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

24. On April 28, 2025, and at all times material, Defendant R AND E was an Illinois limited liability company, licensed and registered to do business in the State of Illinois.

25. Upon information and belief, on April 28, 2025, and at all times material, Defendant LOFTUS TRUST was a trust legally organized under the laws of the State of Illinois and located at 2626 East Lake Shore Drive, Springfield, Sangamon County, Illinois 62712.

26. Upon information and belief, on April 28, 2025, and at all times material, Defendant LOFTUS TRUST was the legal title owner of the parcel located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois in which the YNOT after-school camp was built and operated.

27. On April 28, 2025, and at all times material, Defendant MARIANNE AKERS was a resident of Illinois and resided in the Village of Chatham, Sangamon County, Illinois.

28. On April 28, 2025, and at all times material, Respondent in Discovery THE VILLAGE OF CHATHAM was a municipal corporation licensed and registered under the laws of the State of Illinois.

NATURE OF THE CLAIMS

29. Plaintiffs' claims seek to hold Defendants collectively accountable for the foreseeable harm caused by the negligence of Defendants that culminated in the events of April 28, 2025 when AKERS drove through a cornfield and into the YNOT building, dragging, killing, injuring, and/or traumatizing numerous children and others present.

30. As set forth below, the staggering degree of human loss endured by Plaintiffs and their families was not the sole byproduct of AKERS' individual negligence, but rather a preventable tragedy caused by the Defendants' individual and collective negligent conduct as detailed herein.

31. Through this Complaint, Plaintiffs seek redress to hold Defendants accountable for the incomprehensible harm that has befallen scores of innocent victims and their families.

GENERAL ALLEGATIONS

The YNOT after-school camp for children is built in violation of then-existing safety codes.

32. In 2012, the YNOT after-school camp was built on the plot of land located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois and owned by Defendant LOFTUS TRUST.

33. Upon information and belief, Co-Defendant R AND E was hired by YNOT to complete and/or assist in the construction of the YNOT after-school day camp building.

34. Upon information and belief, in the year 2012, and at all times material, R AND E contracted with YNOT to build the YNOT after-school day camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

35. In the alternative, upon information and belief, in the year 2012, and at all times material, R AND E contracted with Defendant LOFTUS TRUST to build the YNOT after-school

day camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

36. In 2012, there existed 77 Illinois Administrative Code 810, pertaining to youth camps. That administrative code contains General Requirements (Section 810.30) for the construction of youth camps within the State of Illinois.

37. Pursuant to Section 810.30(e), "[n]o permanent youth camp structure or facility shall be located in an area subject to flooding or within 100 feet of a body of stagnant water, highway, railroad track, or manufacturing area." Section 810.30(e).

38. Section 810.30(e) was enacted for the protection of a class of people to which Plaintiffs belong.

39. At the time it was built in 2012 through April 28, 2025, and at all times material, the YNOT after-school camp located at 301 North Breckenridge Road in Chatham, Sangamon County, Illinois was constructed and operated within less than 100 feet of County Highway 5A.

40. At the time it was built in 2012 through April 28, 2025, the premises making up the building and adjacent parking lot did not have adequate means of vehicle restraint installed to prevent a vehicle from striking the building, including, but not limited to, the installation of bollards, poles, wheel guards, or bumper guards.

The YNOT after-school camp as it existed on April 28, 2025.

41. On April 28, 2025, and at all times material, the YNOT after-school camp was located at 301 North Breckenridge Road in Chatham, Sangamon County, Illinois. The YNOT after-school camp was, by design, intended to accommodate children of various ages to participate in recreational activities.

42. On April 28, 2025, and at all times material, the YNOT after-school camp was located on the north side of County Highway 5A, at or near the intersection of County Highway

5A and Breckenridge Road in the Village of Chatham, Sangamon County, Illinois.

43. On April 28, 2025, and at all times material, the YNOT after-school camp was operated within less than 100 feet of County Highway 5A, at the crossroads of a well-travelled intersection.

44. On April 28, 2025, and at all times material, YNOT owned, operated, and/or controlled the building that housed the after-school camp.

45. On April 28, 2025, and at all times material, YNOT owned, operated, and/or controlled the exterior of the building, including, but not limited to, the parking lot.

46. In the alternative, on April 28, 2025, and at all times material, LOFTUS TRUST owned, operated, and/or controlled the building housing the after-school camp.

47. In the alternative, on April 28, 2025, and at all times material, LOFTUS TRUST owned, operated, and/or controlled the exterior of the building, including, but not limited to, the parking lot.

48. On April 28, 2025, and at all times material, the premises making up the building and adjacent parking lot did not have adequate means to prevent a vehicle from striking the building, including, but not limited to, bollards, poles, wheel guards, or bumper guards.

49. On April 28, 2025, and at all times material, there existed approximately four (4) concrete bollards/poles on the premises that were located only at or near the front door entrance and a loading dock area.

50. While the aforementioned four (4) concrete bollards/poles near the entrance and loading dock had been there for at least twelve (12) years prior to April 28, 2025, the areas of the facility where children were routinely present was left unprotected.

The tragic events of April 28, 2025 at YNOT.

51. On April 28, 2025, the Decedents and Minor Plaintiffs were lawfully present on the premises and inside the building of the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

52. On April 28, 2025, AKERS possessed, operated, and controlled a 2018 Jeep Wrangler (the "Vehicle").

53. On April 28, 2025, AKERS was driving the Vehicle westbound on County Highway 5A near the YNOT after-school camp.

54. On April 28, 2025, AKERS drove the Vehicle off the right side of County Highway 5A and through a cornfield along the north side of the road.

55. On April 28, 2025, after driving through the cornfield along the north side of County Highway 5A, AKERS' Vehicle then continued over Breckenridge Road and through the parking lot of the YNOT camp.

56. On April 28, 2025, AKERS' Vehicle then struck the eastern side of the YNOT building, crashing through the thin outer wall and striking and dragging numerous children as it continued through the entire building until it came to a stop on the opposite side.

57. As AKERS' Vehicle drove through the YNOT building, several children were struck and dragged by the Vehicle, causing serious injuries and death. Other children witnessed the horrific events within feet of where they sat or stood.

COUNT ONE: Wrongful Death
(Estate of Kathryn Corley v. Marianne Akers)

1. Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and

paragraphs 32 through 57 (“General Allegations”) as if fully set forth herein.

2. On April 28, 2025, KATHRYN CORLEY was inside at the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, KATHRYN CORLEY was lawfully upon the premises and inside the building.

4. On April 28, 2025, KATHRYN CORLEY was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by all applicable traffic statutes and ordinances that were then and there in force and effect.

6. On April 28, 2025, AKERS committed the negligent act or omission of failing to stop the Vehicle in time to avoid colliding with the building on the premises.

7. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant AKERS, KATHRYN CORLEY died on April 28, 2025.

8. KATHRYN CORLEY left surviving her mother, ELIZABETH CORLEY, as well as her two (2) older minor siblings, ROSE CORLEY and Fiona Corley.

9. The survivors of the Decedent have suffered substantial pecuniary losses as a result of KATHRYN CORLEY’s death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, demands judgment against the Defendant MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT TWO: Survival Act
(Estate of Kathryn Corley v. Marianne Akers)

1. Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, KATHRYN CORLEY was inside at the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, KATHRYN CORLEY was lawfully upon the premises and inside the building.

4. On April 28, 2025, KATHRYN CORLEY was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by all applicable traffic statutes and ordinances that were then and there in force and effect.

6. On April 28, 2025, AKERS committed the negligent act or omission of failing to stop the Vehicle in time to avoid colliding with the building on the premises.

7. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of AKERS, KATHRYN CORLEY suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and KATHRYN CORLEY would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, demands judgment against the Defendant

MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT THREE: Wrongful Death
(Estate of Kathryn Corley v. YNOT Outdoors, Inc.)

1. Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, KATHRYN CORLEY was inside the YNOT after-school camp.

3. On April 28, 2025, KATHRYN CORLEY was lawfully upon the premises and inside the building.

4. On April 28, 2025, KATHRYN CORLEY was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by

one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking KATHRYN, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, KATHRYN CORLEY;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including KATHRYN;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including KATHRYN;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including KATHRYN;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and

struck KATHRYN while she was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant YNOT, KATHRYN CORLEY died on April 28, 2025.

19. KATHRYN CORLEY's injuries and untimely death are the types of injuries that Section 810.30(e) was designed to protect against.

20. KATHRYN CORLEY left surviving her mother, ELIZABETH CORLEY, as well as her two (2) older minor siblings, ROSE CORLEY and Fiona Corley.

21. The survivors of the Decedent have suffered substantial pecuniary losses as a result of KATHRYN CORLEY's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, demands judgment against Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FOUR: Survival Act
(Estate of Kathryn Corley v. YNOT Outdoors, Inc.)

1. Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, KATHRYN CORLEY was inside the YNOT after-school camp.

3. On April 28, 2025, KATHRYN CORLEY was lawfully upon the premises and inside the building.

4. On April 28, 2025, KATHRYN CORLEY was struck by the Vehicle being operated

by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to

exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking KATHRYN, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, KATHRYN CORLEY;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including KATHRYN;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved

a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including KATHRYN;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including KATHRYN;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck KATHRYN while she was inside the building.

18. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of YNOT, KATHRYN CORLEY suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and KATHRYN CORLEY would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, demands judgment against the Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FIVE: Wrongful Death
(Estate of Kathryn Corley v. R and E Buildings, LLC)

1. Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, KATHRYN CORLEY was inside the YNOT after-school camp.

3. On April 28, 2025, KATHRYN CORLEY was lawfully upon the premises and inside the building.

4. On April 28, 2025, KATHRYN CORLEY was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking KATHRYN, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, KATHRYN CORLEY;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including KATHRYN;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including KATHRYN; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including KATHRYN.

12. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did

then drive off the road, striking and entering the building, and struck KATHRYN while she was inside the building.

13. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant R AND E, KATHRYN CORLEY died on April 28, 2025.

14. KATHRYN CORLEY's injuries and untimely death are the types of injuries that Section 810.30(e) was designed to protect against.

15. KATHRYN CORLEY left surviving her mother, ELIZABETH CORLEY, as well as her two (2) older minor siblings, ROSE CORLEY and Fiona Corley.

16. The survivors of the Decedent have suffered substantial pecuniary losses as a result of KATHRYN CORLEY's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, demands judgment against the Defendant R AND E BUILDINGS, LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT SIX: Survival Act
(Estate of Kathryn Corley v. R and E Buildings, LLC)

1. Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, KATHRYN CORLEY was inside the YNOT after-school camp.

3. On April 28, 2025, KATHRYN CORLEY was lawfully upon the premises and inside the building.

4. On April 28, 2025, KATHRYN CORLEY was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking KATHRYN, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, KATHRYN CORLEY;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including KATHRYN;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including KATHRYN; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including KATHRYN.

12. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck KATHRYN while she was inside the building.

13. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of R AND E, KATHRYN CORLEY suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and KATHRYN CORLEY would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, demands judgment against the Defendant R

AND E BUILDINGS, LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT SEVEN: Wrongful Death
(Estate of Kathryn Corley v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, KATHRYN CORLEY was inside the YNOT after-school camp.

3. On April 28, 2025, KATHRYN CORLEY was lawfully upon the premises and inside the building.

4. On April 28, 2025, KATHRYN CORLEY was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was

negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking KATHRYN, when Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, KATHRYN CORLEY;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including KATHRYN;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including KATHRYN;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including KATHRYN;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the

building, and struck KATHRYN while she was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant LOFTUS TRUST, KATHRYN CORLEY died on April 28, 2025.

19. KATHRYN CORLEY's injuries and untimely death are the types of injuries that Section 810.30(e) was designed to protect against.

20. KATHRYN CORLEY left surviving her mother, ELIZABETH CORLEY, as well as her two (2) older minor siblings, ROSE CORLEY and Fiona Corley.

21. The survivors of the Decedent have suffered substantial pecuniary losses as a result of KATHRYN CORLEY's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, demands judgment against the Defendant JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT EIGHT: Survival Act
(Estate of Kathryn Corley v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, KATHRYN CORLEY was inside the YNOT after-school camp.

3. On April 28, 2025, KATHRYN CORLEY was lawfully upon the premises and inside the building.

4. On April 28, 2025, KATHRYN CORLEY was struck by the Vehicle being operated

by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS

TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking KATHRYN, when Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, KATHRYN CORLEY;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including KATHRYN;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence

involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including KATHRYN;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including KATHRYN;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck KATHRYN while she was inside the building.

18. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of LOFTUS TRUST, KATHRYN CORLEY suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and KATHRYN CORLEY would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator, demands judgment against Defendant JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT NINE: Wrongful Death
(Estate of Rylee D. Britton v. Marianne Akers)

1. Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, RYLEE D. BRITTON was inside at the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, RYLEE D. BRITTON was lawfully upon the premises and inside the building.

4. On April 28, 2025, RYLEE D. BRITTON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by all applicable traffic statutes and ordinances that were then and there in force and effect.

6. On April 28, 2025, AKERS committed the negligent act or omission of failing to stop the Vehicle in time to avoid colliding with the building on the premises.

7. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant AKERS, RYLEE D. BRITTON died on April 28, 2025.

8. RYLEE D. BRITTON left surviving her parents, ZACHERY and CHRISTINE BRITTON, as well as her siblings, Rachel Britton and Eli Britton, a minor.

9. The survivors of the Decedent have suffered substantial pecuniary losses as a result of RYLEE D. BRITTON's death, including loss of support, loss of society, and grief, sorrow, and

mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, demands judgment against the Defendant MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT TEN: Survival Act
(Estate of Rylee D. Britton v. Marianne Akers)

1. Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, RYLEE D. BRITTON was inside at the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, RYLEE D. BRITTON was lawfully upon the premises and inside the building.

4. On April 28, 2025, RYLEE D. BRITTON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by all applicable traffic statutes and ordinances that were then and there in force and effect.

6. On April 28, 2025, AKERS committed the negligent act or omission of failing to stop the Vehicle in time to avoid colliding with the building on the premises.

7. As a direct and proximate result of one or more of the aforementioned negligent

acts and/or omissions of AKERS, RYLEE D. BRITTON suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and RYLEE D. BRITTON would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, demands judgment against the Defendant MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT ELEVEN: Wrongful Death
(Estate of Rylee D. Britton v. YNOT Outdoors, Inc.)

1. Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, RYLEE D. BRITTON was inside the YNOT after-school camp.

3. On April 28, 2025, RYLEE D. BRITTON was lawfully upon the premises and inside the building.

4. On April 28, 2025, RYLEE D. BRITTON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to

exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking RYLEE, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, RYLEE D. BRITTON;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including RYLEE;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including RYLEE;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including RYLEE;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck RYLEE while she was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant YNOT, RYLEE D. BRITTON died on April 28, 2025.

19. RYLEE D. BRITTON's injuries and untimely death are the types of injuries that Section 810.30(e) was designed to protect against.

20. RYLEE D. BRITTON left surviving her parents, ZACHERY and CHRISTINE BRITTON, as well as her siblings, Rachel Britton and Eli Britton, a minor.

21. The survivors of the Decedent have suffered substantial pecuniary losses as a result of RYLEE D. BRITTON's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, demands judgment against the Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT TWELVE: Survival Act
(Estate of Rylee D. Britton v. YNOT Outdoors, Inc.)

1. Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, RYLEE D. BRITTON was inside the YNOT after-school camp.

3. On April 28, 2025, RYLEE D. BRITTON was lawfully upon the premises and inside the building.

4. On April 28, 2025, RYLEE D. BRITTON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had

actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking RYLEE, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, RYLEE D. BRITTON;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including RYLEE;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including RYLEE;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including RYLEE;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck RYLEE while she was inside the building.

18. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of YNOT, RYLEE D. BRITTON suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and RYLEE D. BRITTON would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, demands judgment against the Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT THIRTEEN: Wrongful Death
(Estate of Rylee D. Britton v. R and E Buildings, LLC)

1. Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, RYLEE D. BRITTON was inside the YNOT after-school camp.

3. On April 28, 2025, RYLEE D. BRITTON was lawfully upon the premises and inside the building.

4. On April 28, 2025, RYLEE D. BRITTON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building

and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking RYLEE, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, RYLEE D. BRITTON;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including RYLEE;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including RYLEE; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including RYLEE.

12. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck RYLEE while she was inside the building.

13. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant R AND E, RYLEE D. BRITTON died on April 28, 2025.

14. RYLEE D. BRITTON's injuries and untimely death are the types of injuries that Section 810.30(e) was designed to protect against.

15. RYLEE D. BRITTON left surviving her parents, ZACHERY and CHRISTINE BRITTON, as well as her siblings, Rachel Britton and Eli Britton, a minor.

16. The survivors of the Decedent have suffered substantial pecuniary losses as a result of RYLEE D. BRITTON's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, demands

judgment against the Defendant R AND E BUILDINGS, LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FOURTEEN: Survival Act
(Estate of Rylee D. Britton v. R and E Buildings, LLC)

1. Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, RYLEE D. BRITTON was inside the YNOT after-school camp.

3. On April 28, 2025, RYLEE D. BRITTON was lawfully upon the premises and inside the building.

4. On April 28, 2025, RYLEE D. BRITTON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was

equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking RYLEE, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, RYLEE D. BRITTON;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including RYLEE;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including RYLEE; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including RYLEE.

12. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck RYLEE while she was inside the building.

13. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of R AND E, RYLEE D. BRITTON suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and RYLEE D. BRITTON would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, demands judgment against the Defendant R AND E BUILDINGS, LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FIFTEEN: Wrongful Death
(Estate of Rylee D. Britton v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 (“The Parties, Jurisdiction, and Venue”), paragraphs 29 through 31 (“The Nature of the Claims”), and paragraphs 32 through 57 (“General Allegations”) as if fully set forth herein.

2. On April 28, 2025, RYLEE D. BRITTON was inside the YNOT after-school camp.

3. On April 28, 2025, RYLEE D. BRITTON was lawfully upon the premises and inside the building.

4. On April 28, 2025, RYLEE D. BRITTON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS

TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking RYLEE, when Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, RYLEE D. BRITTON;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or

should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including RYLEE;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including RYLEE;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including RYLEE;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck RYLEE while she was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant LOFTUS TRUST, RYLEE D. BRITTON died on April 28, 2025.

19. RYLEE D. BRITTON injuries and untimely death are the types of injuries that Section 810.30(e) was designed to protect against.

20. RYLEE D. BRITTON left surviving her parents, ZACHERY and CHRISTINE BRITTON, as well as her siblings, Rachel Britton and Eli Britton, a minor.

21. The survivors of the Decedent have suffered substantial pecuniary losses as a result

of RYLEE D. BRITTON's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, demands judgment against the Defendant JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT SIXTEEN: Survival Act
(Estate of Rylee D. Britton v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, RYLEE D. BRITTON was inside the YNOT after-school camp.

3. On April 28, 2025, RYLEE D. BRITTON was lawfully upon the premises and inside the building.

4. On April 28, 2025, RYLEE D. BRITTON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection

of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST controlled the exterior of the building on the premises, including, but not limited to, the

building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking RYLEE, when Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, RYLEE D. BRITTON;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including RYLEE;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including RYLEE;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including RYLEE;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck RYLEE while she was inside the building.

18. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of LOFTUS TRUST, RYLEE D. BRITTON suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and RYLEE D. BRITTON would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators, demands judgment against Defendant JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT SEVENTEEN: Wrongful Death
(Estate of Alma Buhnerkempe v. Marianne Akers)

1. Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 (“The Parties, Jurisdiction, and Venue”), paragraphs 29 through 31 (“The Nature of the Claims”), and paragraphs 32 through 57 (“General Allegations”) as if fully set forth herein.

2. On April 28, 2025, ALMA BUHNERKEMPE was inside at the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, ALMA BUHNERKEMPE was lawfully upon the premises and inside the building.

4. On April 28, 2025, ALMA BUHNERKEMPE was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by all applicable traffic statutes and ordinances that were then and there in force and effect.

6. On April 28, 2025, AKERS committed the negligent act or omission of failing to stop the Vehicle in time to avoid colliding with the building on the premises.

7. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant AKERS, ALMA BUHNERKEMPE died on April 28, 2025.

8. ALMA BUHNERKEMPE left surviving her parents, MICHAEL and BILLIE BUHNERKEMPE, as well as her minor brother, William Buhnerkempe.

9. The survivors of the Decedent have suffered substantial pecuniary losses as a result of ALMA BUHNERKEMPE's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, demands judgment against the Defendant MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT EIGHTEEN: Survival Act
(Estate of Alma Buhnerkempe v. Marianne Akers)

1. Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, repeats and

realleges paragraphs 1 through 28 (“The Parties, Jurisdiction, and Venue”), paragraphs 29 through 31 (“The Nature of the Claims”), and paragraphs 32 through 57 (“General Allegations”) as if fully set forth herein.

2. On April 28, 2025, ALMA BUHNERKEMPE was inside at the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, ALMA BUHNERKEMPE was lawfully upon the premises and inside the building.

4. On April 28, 2025, ALMA BUHNERKEMPE was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by all applicable traffic statutes and ordinances that were then and there in force and effect.

6. On April 28, 2025, AKERS committed the negligent act or omission of failing to stop the Vehicle in time to avoid colliding with the building on the premises.

7. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of AKERS, ALMA BUHNERKEMPE suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and ALMA BUHNERKEMPE would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, demands judgment against the Defendant MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT NINETEEN: Wrongful Death
(Estate of Alma Buhnerkempe v. YNOT Outdoors, Inc.)

1. Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, ALMA BUHNERKEMPE was inside the YNOT after-school camp.

3. On April 28, 2025, ALMA BUHNERKEMPE was lawfully upon the premises and inside the building.

4. On April 28, 2025, ALMA BUHNERKEMPE was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by

one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking ALMA, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, ALMA BUHNERKEMPE;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including ALMA;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including ALMA;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including ALMA;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and

struck ALMA while she was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant YNOT, ALMA BUHNERKEMPE died on April 28, 2025.

19. ALMA BUHNERKEMPE's injuries and untimely death are the types of injuries that Section 810.30(e) was designed to protect against.

20. ALMA BUHNERKEMPE left surviving her parents, MICHAEL and BILLIE BUHNERKEMPE, as well as her minor brother, William Buhnerkempe.

21. The survivors of the Decedent have suffered substantial pecuniary losses as a result of ALMA BUHNERKEMPE's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, demands judgment against the Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT TWENTY: Survival Act
(Estate of Alma Buhnerkempe v. YNOT Outdoors, Inc.)

1. Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, ALMA BUHNERKEMPE was inside the YNOT after-school camp.

3. On April 28, 2025, ALMA BUHNERKEMPE was lawfully upon the premises and inside the building.

4. On April 28, 2025, ALMA BUHNERKEMPE was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to

exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking ALMA, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, ALMA BUHNERKEMPE;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have

known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including ALMA;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including ALMA;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including ALMA;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck ALMA while she was inside the building.

18. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of YNOT, ALMA BUHNERKEMPE suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and ALMA BUHNERKEMPE would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators,

demands judgment against the Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT TWENTY-ONE: Wrongful Death
(Estate of Alma Buhnerkempe v. R and E Buildings, LLC)

1. Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, ALMA BUHNERKEMPE was inside the YNOT after-school camp.

3. On April 28, 2025, ALMA BUHNERKEMPE was lawfully upon the premises and inside the building.

4. On April 28, 2025, ALMA BUHNERKEMPE was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should

have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking ALMA, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, ALMA BUHNERKEMPE;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including ALMA;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons,

including ALMA; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including ALMA.

12. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck ALMA while she was inside the building.

13. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant R AND E, ALMA BUHNERKEMPE died on April 28, 2025.

14. ALMA BUHNERKEMPE's injuries and untimely death are the types of injuries that Section 810.30(e) was designed to protect against.

15. ALMA BUHNERKEMPE left surviving her parents, MICHAEL and BILLIE BUHNERKEMPE, as well as her minor brother, William Buhnerkempe.

16. The survivors of the Decedent have suffered substantial pecuniary losses as a result of ALMA BUHNERKEMPE's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, demands judgment against the Defendant R AND E BUILDINGS, LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT TWENTY-TWO: Survival Act
(Estate of Alma Buhnerkempe v. R and E Buildings, LLC)

1. Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL

BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, ALMA BUHNERKEMPE was inside the YNOT after-school camp.

3. On April 28, 2025, ALMA BUHNERKEMPE was lawfully upon the premises and inside the building.

4. On April 28, 2025, ALMA BUHNERKEMPE was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking ALMA, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, ALMA BUHNERKEMPE;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including ALMA;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including ALMA; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including ALMA.

12. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did

then drive off the road, striking and entering the building, and struck ALMA while she was inside the building.

13. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of R AND E, ALMA BUHNERKEMPE suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and ALMA BUHNERKEMPE would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, demands judgment against the Defendant R AND E BUILDINGS, LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT TWENTY-THREE: Wrongful Death
(Estate of Alma Buhnerkempe v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 (“The Parties, Jurisdiction, and Venue”), paragraphs 29 through 31 (“The Nature of the Claims”), and paragraphs 32 through 57 (“General Allegations”) as if fully set forth herein.

2. On April 28, 2025, ALMA BUHNERKEMPE was inside the YNOT after-school camp.

3. On April 28, 2025, ALMA BUHNERKEMPE was lawfully upon the premises and inside the building.

4. On April 28, 2025, ALMA BUHNERKEMPE was struck by the Vehicle being

operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS

TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking ALMA, when Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, ALMA BUHNERKEMPE;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including ALMA;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence

involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including ALMA;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including ALMA;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck ALMA while she was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant LOFTUS TRUST, ALMA BUHNERKEMPE died on April 28, 2025.

19. ALMA BUHNERKEMPE's injuries and untimely death are the types of injuries that Section 810.30(e) was designed to protect against.

20. ALMA BUHNERKEMPE left surviving her parents, MICHAEL and BILLIE BUHNERKEMPE, as well as her minor brother, William Buhnerkempe.

21. The survivors of the Decedent have suffered substantial pecuniary losses as a result of ALMA BUHNERKEMPE's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, demands judgment against the Defendant JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT TWENTY-FOUR: Survival Act
(Estate of Alma Buhnerkempe v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, ALMA BUHNERKEMPE was inside the YNOT after-school camp.

3. On April 28, 2025, ALMA BUHNERKEMPE was lawfully upon the premises and inside the building.

4. On April 28, 2025, ALMA BUHNERKEMPE was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection

of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST controlled the exterior of the building on the premises, including, but not limited to, the

building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking ALMA, when Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, ALMA BUHNERKEMPE;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including ALMA;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including ALMA;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including ALMA;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck ALMA while she was inside the building.

18. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of LOFTUS TRUST, ALMA BUHNERKEMPE suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and ALMA BUHNERKEMPE would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators, demands judgment against Defendant JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT TWENTY-FIVE: Wrongful Death
(Estate of Bradley James Lund v. Marianne Akers)

1. Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 (“The Parties, Jurisdiction, and Venue”), paragraphs 29 through 31 (“The Nature of the Claims”), and paragraphs 32 through 57 (“General Allegations”) as if fully set forth herein.

2. On April 28, 2025, BRADLEY JAMES LUND was inside at the YNOT after-

school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, BRADLEY JAMES LUND was lawfully upon the premises and inside the building.

4. On April 28, 2025, BRADLEY JAMES LUND was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by all applicable traffic statutes and ordinances that were then and there in force and effect.

6. On April 28, 2025, AKERS committed the negligent act or omission of failing to stop the Vehicle in time to avoid colliding with the building on the premises.

7. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant AKERS, BRADLEY JAMES LUND died on June 2, 2025.

8. BRADLEY JAMES LUND left surviving his parents, DANIEL and CYNTHIA LUND, as well as his minor sisters, Evelyn Lund and Nora Lund.

9. The survivors of the Decedent have suffered substantial pecuniary losses as a result of BRADLEY JAMES LUND's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, demands judgment against the Defendant MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT TWENTY-SIX: Survival Act
(Estate of Bradley James Lund v. Marianne Akers)

1. Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND

and CYNTHIA LUND, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, BRADLEY JAMES LUND was inside at the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, BRADLEY JAMES LUND was lawfully upon the premises and inside the building.

4. On April 28, 2025, BRADLEY JAMES LUND was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by all applicable traffic statutes and ordinances that were then and there in force and effect.

6. On April 28, 2025, AKERS committed the negligent act or omission of failing to stop the Vehicle in time to avoid colliding with the building on the premises.

7. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of AKERS, BRADLEY JAMES LUND suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and BRADLEY JAMES LUND would have been entitled to receive compensation from Defendant for those injuries had he survived.

WHEREFORE, the Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, demands judgment against the Defendant MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT TWENTY-SEVEN: Wrongful Death
(Estate of Bradley James Lund v. YNOT Outdoors, Inc.)

1. Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, BRADLEY JAMES LUND was inside the YNOT after-school camp.

3. On April 28, 2025, BRADLEY JAMES LUND was lawfully upon the premises and inside the building.

4. On April 28, 2025, BRADLEY JAMES LUND was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had

actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking BRADLEY, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, BRADLEY JAMES LUND;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including BRADLEY;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including BRADLEY;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including BRADLEY;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck BRADLEY while he was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant YNOT, BRADLEY JAMES LUND died on June 2, 2025.

19. BRADLEY JAMES LUND's injuries and untimely death are the types of injuries that Section 810.30(e) was designed to protect against.

20. BRADLEY JAMES LUND left surviving his parents, DANIEL and CYNTHIA LUND, as well as his minor sisters, Evelyn Lund and Nora Lund.

21. The survivors of the Decedent have suffered substantial pecuniary losses as a result of BRADLEY JAMES LUND's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, demands judgment against Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT TWENTY-EIGHT: Survival Act
(Estate of Bradley James Lund v. YNOT Outdoors, Inc.)

1. Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, BRADLEY JAMES LUND was inside the YNOT after-school camp.

3. On April 28, 2025, BRADLEY JAMES LUND was lawfully upon the premises and inside the building.

4. On April 28, 2025, BRADLEY JAMES LUND was struck by the Vehicle being

operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to

exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking BRADLEY, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, BRADLEY JAMES LUND;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including BRADLEY;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved

a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including BRADLEY;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including BRADLEY;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck BRADLEY while he was inside the building.

18. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of YNOT, BRADLEY JAMES LUND suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and BRADLEY JAMES LUND would have been entitled to receive compensation from Defendant for those injuries had he survived.

WHEREFORE, the Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, demands judgment against the Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT TWENTY-NINE: Wrongful Death
(Estate of Bradley James Lund v. R and E Buildings, LLC)

1. Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, BRADLEY JAMES LUND was inside the YNOT after-school camp.

3. On April 28, 2025, BRADLEY JAMES LUND was lawfully upon the premises and inside the building.

4. On April 28, 2025, BRADLEY JAMES LUND was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E

had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking BRADLEY, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, BRADLEY JAMES LUND;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including BRADLEY;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including BRADLEY; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including BRADLEY.

12. That as a proximate result of one or more of the foregoing negligent acts or

omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck BRADLEY while he was inside the building.

13. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant R AND E, BRADLEY JAMES LUND died on June 2, 2025.

14. BRADLEY JAMES LUND's injuries and untimely death are the types of injuries that Section 810.30(e) was designed to protect against.

15. BRADLEY JAMES LUND left surviving his parents, DANIEL and CYNTHIA LUND, as well as his minor sisters, Evelyn Lund and Nora Lund.

16. The survivors of the Decedent have suffered substantial pecuniary losses as a result of BRADLEY JAMES LUND's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, demands judgment against the Defendant R AND E BUILDINGS, LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT THIRTY: Survival Act
(Estate of Bradley James Lund v. R and E Buildings, LLC)

1. Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, BRADLEY JAMES LUND was inside the YNOT after-school

camp.

3. On April 28, 2025, BRADLEY JAMES LUND was lawfully upon the premises and inside the building.

4. On April 28, 2025, BRADLEY JAMES LUND was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking BRADLEY, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, BRADLEY JAMES LUND;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including BRADLEY;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including BRADLEY; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including BRADLEY.

12. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck BRADLEY while he was inside the building.

13. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of R AND E, BRADLEY JAMES LUND suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability

and disfigurement, and medical and related expenses; and BRADLEY JAMES LUND would have been entitled to receive compensation from Defendant for those injuries had he survived.

WHEREFORE, the Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, demands judgment against the Defendant R AND E BUILDINGS, LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT THIRTY-ONE: Wrongful Death
(Estate of Bradley James Lund v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, BRADLEY JAMES LUND was inside the YNOT after-school camp.

3. On April 28, 2025, BRADLEY JAMES LUND was lawfully upon the premises and inside the building.

4. On April 28, 2025, BRADLEY JAMES LUND was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate

hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS

TRUST controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking BRADLEY, when Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, BRADLEY JAMES LUND;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including BRADLEY;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including BRADLEY;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including BRADLEY;

g. Failed to properly repair or alter the premises, including, but not limited to, the

building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck BRADLEY while he was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant LOFTUS TRUST, BRADLEY JAMES LUND died on June 2, 2025.

19. BRADLEY JAMES LUND's injuries and untimely death are the types of injuries that Section 810.30(e) was designed to protect against.

20. BRADLEY JAMES LUND left surviving his parents, DANIEL and CYNTHIA LUND, as well as his minor sisters, Evelyn Lund and Nora Lund.

21. The survivors of the Decedent have suffered substantial pecuniary losses as a result of BRADLEY JAMES LUND's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, demands judgment against the Defendant JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT THIRTY-TWO: Survival Act
(Estate of Bradley James Lund v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, BRADLEY JAMES LUND was inside the YNOT after-school camp.

3. On April 28, 2025, BRADLEY JAMES LUND was lawfully upon the premises and inside the building.

4. On April 28, 2025, BRADLEY JAMES LUND was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS

TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking BRADLEY, when Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, BRADLEY JAMES LUND;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including BRADLEY;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including BRADLEY;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including BRADLEY;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck BRADLEY while he was inside the building.

18. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of LOFTUS TRUST, BRADLEY JAMES LUND suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and BRADLEY JAMES LUND would have been entitled to receive compensation from Defendant for those injuries had he survived.

WHEREFORE, the Plaintiff, ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators, demands judgment against Defendant JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT THIRTY-THREE: Wrongful Death
(Estate of Ainsley Johnson v. Marianne Akers)

1. Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, AINSLEY JOHNSON was inside at the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, AINSLEY JOHNSON was lawfully upon the premises and inside the building.

4. On April 28, 2025, AINSLEY JOHNSON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by

all applicable traffic statutes and ordinances that were then and there in force and effect.

6. On April 28, 2025, AKERS committed the negligent act or omission of failing to stop the Vehicle in time to avoid colliding with the building on the premises.

7. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant AKERS, AINSLEY JOHNSON died on April 28, 2025.

8. AINSLEY JOHNSON left surviving her parents, TODD and CHRISTY JOHNSON, as well as her minor sister, Avery Johnson.

9. The survivors of the Decedent have suffered substantial pecuniary losses as a result of AINSLEY JOHNSON's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, demands judgment against the Defendant MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT THIRTY-FOUR: Survival Act
(Estate of Ainsley Johnson v. Marianne Akers)

1. Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, AINSLEY JOHNSON was inside at the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, AINSLEY JOHNSON was lawfully upon the premises and inside the building.

4. On April 28, 2025, AINSLEY JOHNSON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by all applicable traffic statutes and ordinances that were then and there in force and effect.

6. On April 28, 2025, AKERS committed the negligent act or omission of failing to stop the Vehicle in time to avoid colliding with the building on the premises.

7. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of AKERS, AINSLEY JOHNSON suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and AINSLEY JOHNSON would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, demands judgment against the Defendant MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT THIRTY-FIVE: Wrongful Death
(Estate of Ainsley Johnson v. YNOT Outdoors, Inc.)

1. Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 (“The Parties, Jurisdiction, and Venue”), paragraphs 29 through 31 (“The Nature of the Claims”), and paragraphs 32 through 57 (“General Allegations”) as if fully set forth herein.

2. On April 28, 2025, AINSLEY JOHNSON was inside the YNOT after-school camp.

3. On April 28, 2025, AINSLEY JOHNSON was lawfully upon the premises and

inside the building.

4. On April 28, 2025, AINSLEY JOHNSON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the

premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking AINSLEY, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, AINSLEY JOHNSON;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby

causing serious personal injuries to patrons, including AINSLEY;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including AINSLEY;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including AINSLEY;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck AINSLEY while she was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant YNOT, AINSLEY JOHNSON died on April 28, 2025.

19. AINSLEY JOHNSON's injuries and untimely death are the types of injuries that Section 810.30(e) was designed to protect against.

20. AINSLEY JOHNSON left surviving her parents, TODD and CHRISTY JOHNSON, as well as her minor sister, Avery Johnson.

21. The survivors of the Decedent have suffered substantial pecuniary losses as a result of AINSLEY JOHNSON's death, including loss of support, loss of society, and grief, sorrow, and

mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, demands judgment against the Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT THIRTY-SIX: Survival Act
(Estate of Ainsley Johnson v. YNOT Outdoors, Inc.)

1. Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, AINSLEY JOHNSON was inside the YNOT after-school camp.

3. On April 28, 2025, AINSLEY JOHNSON was lawfully upon the premises and inside the building.

4. On April 28, 2025, AINSLEY JOHNSON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking AINSLEY, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, AINSLEY JOHNSON;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including AINSLEY;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including AINSLEY;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including AINSLEY;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which

included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck AINSLEY while she was inside the building.

18. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of YNOT, AINSLEY JOHNSON suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and AINSLEY JOHNSON would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, demands judgment against the Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT THIRTY-SEVEN: Wrongful Death
(Estate of Ainsley Johnson v. R and E Buildings, LLC)

1. Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 (“The Parties, Jurisdiction, and Venue”), paragraphs 29 through 31 (“The Nature of the Claims”), and paragraphs 32 through 57 (“General Allegations”) as if fully set forth herein.

2. On April 28, 2025, AINSLEY JOHNSON was inside the YNOT after-school camp.

3. On April 28, 2025, AINSLEY JOHNSON was lawfully upon the premises and

inside the building.

4. On April 28, 2025, AINSLEY JOHNSON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking AINSLEY, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, AINSLEY JOHNSON;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including AINSLEY;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including AINSLEY; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including AINSLEY.

12. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck AINSLEY while she was inside the building.

13. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant R AND E, AINSLEY JOHNSON died on April 28, 2025.

14. AINSLEY JOHNSON's injuries and untimely death are the types of injuries that Section 810.30(e) was designed to protect against.

15. AINSLEY JOHNSON left surviving her parents, TODD and CHRISTY

JOHNSON, as well as her minor sister, Avery Johnson.

16. The survivors of the Decedent have suffered substantial pecuniary losses as a result of AINSLEY JOHNSON's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, demands judgment against the Defendant R AND E BUILDINGS, LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT THIRTY-EIGHT: Survival Act
(Estate of Ainsley Johnson v. R and E Buildings, LLC)

1. Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, AINSLEY JOHNSON was inside the YNOT after-school camp.

3. On April 28, 2025, AINSLEY JOHNSON was lawfully upon the premises and inside the building.

4. On April 28, 2025, AINSLEY JOHNSON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to

exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking AINSLEY, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, AINSLEY JOHNSON;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should

have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including AINSLEY;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including AINSLEY; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including AINSLEY.

12. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck AINSLEY while she was inside the building.

13. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of R AND E, AINSLEY JOHNSON suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and AINSLEY JOHNSON would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, demands judgment against the Defendant R AND E BUILDINGS, LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT THIRTY-NINE: Wrongful Death
(Estate of Ainsley Johnson v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON

and CHRISTY JOHNSON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, AINSLEY JOHNSON was inside the YNOT after-school camp.

3. On April 28, 2025, AINSLEY JOHNSON was lawfully upon the premises and inside the building.

4. On April 28, 2025, AINSLEY JOHNSON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking AINSLEY, when

Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, AINSLEY JOHNSON;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including AINSLEY;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including AINSLEY;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including AINSLEY;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck AINSLEY while she was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant LOFTUS TRUST, AINSLEY JOHNSON died on April 28, 2025.

19. AINSLEY JOHNSON's injuries and untimely death are the types of injuries that

Section 810.30(e) was designed to protect against.

20. AINSLEY JOHNSON left surviving her parents, TODD and CHRISTY JOHNSON, as well as her minor sister, Avery Johnson.

21. The survivors of the Decedent have suffered substantial pecuniary losses as a result of AINSLEY JOHNSON's death, including loss of support, loss of society, and grief, sorrow, and mental suffering.

WHEREFORE, the Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, demands judgment against the Defendant JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FORTY: Survival Act
(Estate of Ainsley Johnson v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, AINSLEY JOHNSON was inside the YNOT after-school camp.

3. On April 28, 2025, AINSLEY JOHNSON was lawfully upon the premises and inside the building.

4. On April 28, 2025, AINSLEY JOHNSON was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the

building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking AINSLEY, when Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, AINSLEY JOHNSON;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including AINSLEY;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including AINSLEY;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other

means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including AINSLEY;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck AINSLEY while she was inside the building.

18. As a direct and proximate result of one or more of the aforementioned negligent acts and/or omissions of LOFTUS TRUST, AINSLEY JOHNSON suffered injuries of a personal and pecuniary nature, including, but not limited to, pain and suffering, loss of normal life, disability and disfigurement, and medical and related expenses; and AINSLEY JOHNSON would have been entitled to receive compensation from Defendant for those injuries had she survived.

WHEREFORE, the Plaintiff, ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators, demands judgment against Defendant JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FORTY-ONE: Negligence
(Livi Tuttle v. Marianne Akers)

1. Plaintiff, LIVI TUTTLE, a Minor, by and through her Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, repeats and realleges paragraphs 1 through 28 (“The Parties, Jurisdiction, and Venue”), paragraphs 29 through 31 (“The Nature of the Claims”), and

paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, LIVI TUTTLE was inside at the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, LIVI TUTTLE was lawfully upon the premises and inside the building.

4. On April 28, 2025, LIVI TUTTLE was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by all applicable traffic statutes and ordinances that were then and there in force and effect.

6. On April 28, 2025, AKERS committed the negligent act or omission of failing to stop the Vehicle in time to avoid colliding with the building on the premises.

7. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant AKERS, LIVI TUTTLE, a minor, sustained injuries of a personal and pecuniary nature on April 28, 2025.

WHEREFORE, the Plaintiff, LIVI TUTTLE, a Minor, by and through her Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, demands judgment against the Defendant MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FORTY-TWO: Negligence
(Livi Tuttle v. YNOT Outdoors, Inc.)

1. Plaintiff, LIVI TUTTLE, a Minor, by and through her Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and

paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, LIVI TUTTLE was inside the YNOT after-school camp.

3. On April 28, 2025, LIVI TUTTLE was lawfully upon the premises and inside the building.

4. On April 28, 2025, LIVI TUTTLE was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was

being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking LIVI, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Minor Plaintiff, LIVI TUTTLE;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including LIVI;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including LIVI;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including LIVI;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck LIVI while she was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant YNOT, LIVI TUTTLE, a minor, sustained injuries of a personal and pecuniary nature on April 28, 2025.

19. LIVI TUTTLE's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, LIVI TUTTLE, a Minor, by and through her Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, demands judgment against the Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FORTY-THREE: Negligence
(Livi Tuttle v. R and E Buildings, LLC)

1. Plaintiff, LIVI TUTTLE, a Minor, by and through her Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, LIVI TUTTLE was inside the YNOT after-school camp.

3. On April 28, 2025, LIVI TUTTLE was lawfully upon the premises and inside the building.

4. On April 28, 2025, LIVI TUTTLE was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was

equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking LIVI, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Minor Plaintiff, LIVI TUTTLE;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including LIVI;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including LIVI; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including LIVI.

12. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck LIVI while she was inside the building.

13. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant R AND E, LIVI TUTTLE, a minor, sustained injuries of a personal and pecuniary nature on April 28, 2025.

14. LIVI TUTTLE's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, LIVI TUTTLE, a Minor, by and through her Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, demands judgment against the Defendant R AND E BUILDINGS, LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FORTY-FOUR: Negligence
(Livi Tuttle v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, LIVI TUTTLE, a Minor, by and through her Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, LIVI TUTTLE was inside the YNOT after-school camp.

3. On April 28, 2025, LIVI TUTTLE was lawfully upon the premises and inside the building.

4. On April 28, 2025, LIVI TUTTLE was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking LIVI, when Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, LIVI TUTTLE;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including LIVI;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including LIVI;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including LIVI;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck LIVI while she was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant LOFTUS TRUST, LIVI TUTTLE, a minor, sustained injuries of a personal and pecuniary nature on April 28, 2025.

19. LIVI TUTTLE's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, LIVI TUTTLE, a Minor, by and through her Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, demands judgment against the Defendant JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FORTY-FIVE: Negligent Infliction of Emotional Distress
(Leo Tuttle v. Marianne Akers)

1. Plaintiff, LEO TUTTLE, a Minor, by and through his Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, LEO TUTTLE was inside at the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, LEO TUTTLE was lawfully upon the premises and inside the building.

4. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by all applicable traffic statutes and ordinances that were then and there in force and effect.

5. On April 28, 2025, AKERS committed the negligent act or omission of failing to stop the Vehicle in time to avoid colliding with the building on the premises.

6. On April 28, 2025, LEO TUTTLE witnessed his sister, LIVI TUTTLE, and the other children being struck by the Vehicle driven by AKERS.

7. On April 28, 2025, LEO TUTTLE was in such close proximity to his sister, LIVI TUTTLE, and the other children being struck by the Vehicle driven by AKERS that he was in the zone of danger at the time LIVI and the other children were struck by the Vehicle driven by AKERS.

8. Since April 28, 2025, and at all times material, LEO TUTTLE has suffered severe emotional distress, causing illness and/or injury.

WHEREFORE, the Plaintiff, LEO TUTTLE, a Minor, by and through his Parents and Next

Friends, PHILLIP TUTTLE and LAURA TUTTLE, demands judgment against the Defendant MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FORTY-SIX: Negligent Infliction of Emotional Distress
(Leo Tuttle v. YNOT Outdoors, Inc.)

1. Plaintiff, LEO TUTTLE, a Minor, by and through his Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, LEO TUTTLE was inside the YNOT after-school camp.

3. On April 28, 2025, LEO TUTTLE was lawfully upon the premises and inside the building.

4. On April 28, 2025, LEO TUTTLE witnessed his sister, LIVI TUTTLE, and the other children being struck by the Vehicle being operated by AKERS when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was

equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building

itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking LIVI and other children, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Minor Plaintiff, LEO TUTTLE;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including LEO;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including LEO;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including LEO;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or

omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck LIVI TUTTLE and other children while they were inside the building.

18. On April 28, 2025, LEO TUTTLE witnessed his sister, LIVI TUTTLE, and the other children being struck by the Vehicle driven by AKERS.

19. On April 28, 2025, LEO TUTTLE was in such close proximity to his sister, LIVI TUTTLE, and the other children being struck by the Vehicle driven by AKERS that he was in the zone of danger at the time LIVI and the other children were struck by the Vehicle driven by AKERS.

20. Since April 28, 2025, and at all times material, LEO TUTTLE has suffered severe emotional distress, causing illness and/or injury.

21. LEO TUTTLE's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, LEO TUTTLE, a Minor, by and through his Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, demands judgment against the Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FORTY-SEVEN: Negligent Infliction of Emotional Distress
(Leo Tuttle v. R and E Buildings, LLC)

1. Plaintiff, LEO TUTTLE, a Minor, by and through his Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, LEO TUTTLE was inside the YNOT after-school camp.

3. On April 28, 2025, LEO TUTTLE was lawfully upon the premises and inside the building.

4. On April 28, 2025, LEO TUTTLE witnessed his sister, LIVI TUTTLE, and the other children being struck by the Vehicle being operated by AKERS when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking LIVI and other children, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Minor Plaintiff, LEO TUTTLE;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including LEO;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including LEO; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including LEO.

12. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck LIVI TUTTLE and other children while they were inside the building.

13. On April 28, 2025, LEO TUTTLE witnessed his sister, LIVI TUTTLE, and the other children being struck by the Vehicle driven by AKERS.

14. On April 28, 2025, LEO TUTTLE was in such close proximity to his sister, LIVI

TUTTLE, and the other children being struck by the Vehicle driven by AKERS that he was in the zone of danger at the time LIVI and the other children were struck by the Vehicle driven by AKERS.

15. Since April 28, 2025, and at all times material, LEO TUTTLE has suffered severe emotional distress, causing illness and/or injury.

16. LEO TUTTLE's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, LEO TUTTLE, a Minor, by and through his Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, demands judgment against the Defendant R AND E BUILDINGS, LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FORTY-EIGHT: Negligent Infliction of Emotional Distress
(Leo Tuttle v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, LEO TUTTLE, a Minor, by and through his Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, LEO TUTTLE was inside the YNOT after-school camp.

3. On April 28, 2025, LEO TUTTLE was lawfully upon the premises and inside the building.

4. On April 28, 2025, LEO TUTTLE witnessed his sister, LIVI TUTTLE, and the other children being struck by the Vehicle being operated by AKERS when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had

a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking LIVI and other children, when Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, LEO TUTTLE;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including LEO;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including LEO;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including LEO;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck LIVI TUTTLE and other children while they were inside the building.

18. On April 28, 2025, LEO TUTTLE witnessed his sister, LIVI TUTTLE, and the other children being struck by the Vehicle driven by AKERS.

19. On April 28, 2025, LEO TUTTLE was in such close proximity to his sister, LIVI TUTTLE, and the other children being struck by the Vehicle driven by AKERS that he was in the zone of danger at the time LIVI and the other children were struck by the Vehicle driven by AKERS.

20. Since April 28, 2025, and at all times material, LEO TUTTLE has suffered severe emotional distress, causing illness and/or injury.

21. LEO TUTTLE's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, LEO TUTTLE, a Minor, by and through his Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE, demands judgment against Defendant

JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FORTY-NINE: Negligence
(Ella Orsi v. Marianne Akers)

1. Plaintiff, ELLA ORSI, a Minor, by and through her Parents and Next Friends, MICHAEL ORSI and LINDSAY ORSI, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, ELLA ORSI was inside at the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, ELLA ORSI was lawfully upon the premises and inside the building.

4. On April 28, 2025, ELLA ORSI was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by all applicable traffic statutes and ordinances that were then and there in force and effect.

6. On April 28, 2025, AKERS committed the negligent act or omission of failing to stop the Vehicle in time to avoid colliding with the building on the premises.

7. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant AKERS, ELLA ORSI, a minor, sustained injuries of a personal and pecuniary nature on April 28, 2025.

WHEREFORE, the Plaintiff, ELLA ORSI, a Minor, by and through her Parents and Next Friends, MICHAEL ORSI and LINDSAY ORSI, demands judgment against the Defendant

MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FIFTY: Negligence
(Ella Orsi v. YNOT Outdoors, Inc.)

1. Plaintiff, ELLA ORSI, a Minor, by and through her Parents and Next Friends, MICHAEL ORSI and LINDSAY ORSI, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, ELLA ORSI was inside the YNOT after-school camp.

3. On April 28, 2025, ELLA ORSI was lawfully upon the premises and inside the building.

4. On April 28, 2025, ELLA ORSI was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by

one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking ELLA, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Minor Plaintiff, ELLA ORSI;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including ELLA;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including ELLA;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including ELLA;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and

struck ELLA while she was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant YNOT, ELLA ORSI, a minor, sustained injuries of a personal and pecuniary nature on April 28, 2025.

19. ELLA ORSI's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, ELLA ORSI, a Minor, by and through her Parents and Next Friends, MICHAEL ORSI and LINDSAY ORSI, demands judgment against the Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FIFTY-ONE: Negligence
(Ella Orsi v. R and E Buildings, LLC)

1. Plaintiff, ELLA ORSI, a Minor, by and through her Parents and Next Friends, MICHAEL ORSI and LINDSAY ORSI, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, ELLA ORSI was inside the YNOT after-school camp.

3. On April 28, 2025, ELLA ORSI was lawfully upon the premises and inside the building.

4. On April 28, 2025, ELLA ORSI was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking ELLA, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Minor Plaintiff, ELLA ORSI;

c. Failed to use ordinary care in the construction of the building and parking lot of the

premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including ELLA;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including ELLA; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including ELLA.

12. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck ELLA while she was inside the building.

13. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant R AND E, ELLA ORSI, a minor, sustained injuries of a personal and pecuniary nature on April 28, 2025.

14. ELLA ORSI's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, ELLA ORSI, a Minor, by and through her Parents and Next Friends, MICHAEL ORSI and LINDSAY ORSI, demands judgment against the Defendant R AND E BUILDINGS, LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FIFTY-TWO: Negligence
(Ella Orsi v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, ELLA ORSI, a Minor, by and through her Parents and Next Friends,

MICHAEL ORSI and LINDSAY ORSI, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, ELLA ORSI was inside the YNOT after-school camp.

3. On April 28, 2025, ELLA ORSI was lawfully upon the premises and inside the building.

4. On April 28, 2025, ELLA ORSI was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking ELLA, when

Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, ELLA ORSI;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including ELLA;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including ELLA;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including ELLA;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck ELLA while she was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant LOFTUS TRUST, ELLA ORSI, a minor, sustained injuries of a personal and pecuniary nature on April 28, 2025.

19. ELLA ORSI's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, ELLA ORSI, a Minor, by and through her Parents and Next Friends, MICHAEL ORSI and LINDSAY ORSI, demands judgment against the Defendant JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FIFTY-THREE: Negligence
(Emma Finch v. Marianne Akers)

1. Plaintiff, EMMA FINCH, a Minor, by and through her Mother and Next Friend, JILL CRIPE, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, EMMA FINCH was inside at the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, EMMA FINCH was lawfully upon the premises and inside the building.

4. On April 28, 2025, EMMA FINCH was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by all applicable traffic statutes and ordinances that were then and there in force and effect.

6. On April 28, 2025, AKERS committed the negligent act or omission of failing to stop the Vehicle in time to avoid colliding with the building on the premises.

7. As a direct and proximate result of one or more of the aforesaid negligent acts

and/or omissions of Defendant AKERS, EMMA FINCH, a minor, sustained injuries of a personal and pecuniary nature on April 28, 2025.

WHEREFORE, the Plaintiff, EMMA FINCH, a Minor, by and through her Mother and Next Friend, JILL CRIPE, demands judgment against the Defendant MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FIFTY-FOUR: Negligence
(Emma Finch v. YNOT Outdoors, Inc.)

1. Plaintiff, EMMA FINCH, a Minor, by and through her Mother and Next Friend, JILL CRIPE, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, EMMA FINCH was inside the YNOT after-school camp.

3. On April 28, 2025, EMMA FINCH was lawfully upon the premises and inside the building.

4. On April 28, 2025, EMMA FINCH was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking EMMA, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Minor Plaintiff, EMMA FINCH;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including EMMA;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including EMMA;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including EMMA;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which

included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck EMMA while she was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant YNOT, EMMA FINCH, a minor, sustained injuries of a personal and pecuniary nature on April 28, 2025.

19. EMMA FINCH's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, EMMA FINCH, a Minor, by and through her Mother and Next Friend, JILL CRIPE, demands judgment against the Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FIFTY-FIVE: Negligence
(Emma Finch v. R and E Buildings, LLC)

1. Plaintiff, EMMA FINCH, a Minor, by and through her Mother and Next Friend, JILL CRIPE, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, EMMA FINCH was inside the YNOT after-school camp.

3. On April 28, 2025, EMMA FINCH was lawfully upon the premises and inside the building.

4. On April 28, 2025, EMMA FINCH was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking EMMA, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Minor Plaintiff, EMMA FINCH;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including EMMA;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including EMMA; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including EMMA.

12. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck EMMA while she was inside the building.

13. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant R AND E, EMMA FINCH, a minor, sustained injuries of a personal and pecuniary nature on April 28, 2025.

14. EMMA FINCH's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, EMMA FINCH, a Minor, by and through her Mother and Next Friend, JILL CRIPE, demands judgment against the Defendant R AND E BUILDINGS,

LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FIFTY-SIX: Negligence
(Emma Finch v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, EMMA FINCH, a Minor, by and through her Mother and Next Friend, JILL CRIPE, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, EMMA FINCH was inside the YNOT after-school camp.

3. On April 28, 2025, EMMA FINCH was lawfully upon the premises and inside the building.

4. On April 28, 2025, EMMA FINCH was struck by the Vehicle being operated by AKERS, when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was

negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking EMMA, when Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Plaintiff's Decedent, EMMA FINCH;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including EMMA;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including EMMA;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including EMMA;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the

building, and struck EMMA while she was inside the building.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant LOFTUS TRUST, EMMA FINCH, a minor, sustained injuries of a personal and pecuniary nature on April 28, 2025.

19. EMMA FINCH's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, EMMA FINCH, a Minor, by and through her Mother and Next Friend, JILL CRIPE, demands judgment against the Defendant JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FIFTY-SEVEN: Negligent Infliction of Emotional Distress
(Rose Corley v. Marianne Akers)

1. Plaintiff, ROSE CORLEY, a Minor, by and through her Mother and Next Friend, ELIZABETH CORLEY, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, ROSE CORLEY was inside at the YNOT after-school camp located at 301 North Breckenridge Road, Chatham, Sangamon County, Illinois.

3. On April 28, 2025, ROSE CORLEY was lawfully upon the premises and inside the building.

4. On April 28, 2025, and at all times material, it was the duty of AKERS to exercise reasonable care and all due caution with respect to the operation of the Vehicle, and to abide by all applicable traffic statutes and ordinances that were then and there in force and effect.

5. On April 28, 2025, AKERS committed the negligent act or omission of failing to

stop the Vehicle in time to avoid colliding with the building on the premises.

6. On April 28, 2025, ROSE CORLEY witnessed her sister, KATHRYN CORLEY, and the other children being struck by the Vehicle driven by AKERS.

7. On April 28, 2025, ROSE CORLEY was in such close proximity to her sister, KATHRYN CORLEY, and the other children being struck by the Vehicle driven by AKERS that she was in the zone of danger at the time KATHRYN and the other children were struck by the Vehicle driven by AKERS.

8. Since April 28, 2025, and at all times material, ROSE CORLEY has suffered severe emotional distress, causing illness and/or injury.

WHEREFORE, the Plaintiff, ROSE CORLEY, a Minor, by and through her Mother and Next Friend, ELIZABETH CORLEY, demands judgment against the Defendant MARIANNE AKERS, Individually in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FIFTY-EIGHT: Negligent Infliction of Emotional Distress
(Rose Corley v. YNOT Outdoors, Inc.)

1. Plaintiff, ROSE CORLEY, a Minor, by and through her Mother and Next Friend, ELIZABETH CORLEY, repeats and realleges paragraphs 1 through 28 (“The Parties, Jurisdiction, and Venue”), paragraphs 29 through 31 (“The Nature of the Claims”), and paragraphs 32 through 57 (“General Allegations”) as if fully set forth herein.

2. On April 28, 2025, ROSE CORLEY was inside the YNOT after-school camp.

3. On April 28, 2025, ROSE CORLEY was lawfully upon the premises and inside the building.

4. On April 28, 2025, ROSE CORLEY witnessed her sister, KATHRYN CORLEY, and the other children being struck by the Vehicle being operated by AKERS when the Vehicle

struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, YNOT knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant YNOT had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant YNOT knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. On and prior to April 28, 2025, and at all times material, YNOT had a duty to

exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. On and prior to April 28, 2025, and at all times material, YNOT controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. On and prior to April 28, 2025, and at all times material, YNOT had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant YNOT was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking KATHRYN and other children, when Defendant YNOT knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Minor Plaintiff, ROSE CORLEY;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when YNOT knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including ROSE;

d. Failed to adequately and securely construct bollards in front of the building when YNOT knew, or should have known, that the location of this occurrence involved

a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including ROSE;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including ROSE;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of YNOT in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck KATHRYN CORLEY and other children while they were inside the building.

18. On April 28, 2025, ROSE CORLEY witnessed her sister, KATHRYN CORLEY, and the other children being struck by the Vehicle driven by AKERS.

19. On April 28, 2025, ROSE CORLEY was in such close proximity to her sister, KATHRYN CORLEY, and the other children being struck by the Vehicle driven by AKERS that she was in the zone of danger at the time KATHRYN and the other children were struck by the Vehicle driven by AKERS.

20. Since April 28, 2025, and at all times material, ROSE CORLEY has suffered severe emotional distress, causing illness and/or injury.

21. ROSE CORLEY's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, ROSE CORLEY, a Minor, by and through her Mother and Next Friend, ELIZABETH CORLEY, demands judgment against Defendant YNOT OUTDOORS, INC., an Illinois Not-for-Profit Corporation in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT FIFTY-NINE: Negligent Infliction of Emotional Distress
(Rose Corley v. R and E Buildings, LLC)

1. Plaintiff, ROSE CORLEY, a Minor, by and through her Mother and Next Friend, ELIZABETH CORLEY, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, ROSE CORLEY was inside the YNOT after-school camp.

3. On April 28, 2025, ROSE CORLEY was lawfully upon the premises and inside the building.

4. On April 28, 2025, ROSE CORLEY witnessed her sister, KATHRYN CORLEY, and the other children being struck by the Vehicle being operated by AKERS when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, R AND E had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, R AND E knew, or should

have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant R AND E had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant R AND E knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. On April 28, 2025, and at all times material, Defendant R AND E was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises, which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking KATHRYN and other children, when Defendant R AND E knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Minor Plaintiff, ROSE CORLEY;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when R AND E knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including ROSE;

d. Failed to adequately and securely construct bollards in front of the building when R AND E knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons,

including ROSE; and

e. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including ROSE.

12. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of R AND E in constructing the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck KATHRYN CORLEY and other children while they were inside the building.

13. On April 28, 2025, ROSE CORLEY witnessed her sister, KATHRYN CORLEY, and the other children being struck by the Vehicle driven by AKERS.

14. On April 28, 2025, ROSE CORLEY was in such close proximity to her sister, KATHRYN CORLEY, and the other children being struck by the Vehicle driven by AKERS that she was in the zone of danger at the time KATHRYN and the other children were struck by the Vehicle driven by AKERS.

15. Since April 28, 2025, and at all times material, ROSE CORLEY has suffered severe emotional distress, causing illness and/or injury.

16. ROSE CORLEY's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, ROSE CORLEY, a Minor, by and through her Mother and Next Friend, ELIZABETH CORLEY, demands judgment against the Defendant R AND E BUILDINGS, LLC, an Illinois Limited Liability Company in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT SIXTY: Negligent Infliction of Emotional Distress
(Rose Corley v. James R. Loftus & Mitzi Loftus Trust)

1. Plaintiff, ROSE CORLEY, a Minor, by and through her Mother and Next Friend,

ELIZABETH CORLEY, repeats and realleges paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. On April 28, 2025, ROSE CORLEY was inside the YNOT after-school camp.

3. On April 28, 2025, ROSE CORLEY was lawfully upon the premises and inside the building.

4. On April 28, 2025, ROSE CORLEY witnessed her sister, KATHRYN CORLEY, and the other children being struck by the Vehicle being operated by AKERS when the Vehicle struck and came through the building.

5. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in the construction of the premises, including, but not limited to, the building and parking lot.

6. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST had a duty to exercise ordinary care in constructing the YNOT after-school camp to eliminate hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

7. On and prior to April 28, 2025, and at all times material, the LOFTUS TRUST knew, or should have known, that the premises, including, but not limited to, the building and parking lot, was equipped with no adequate means of restraint to prevent moving vehicles from striking the building on the premises.

8. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS TRUST had actual knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

9. At the time the YNOT after-school camp was built in 2012, Defendant LOFTUS

TRUST had constructive knowledge of 77 Illinois Administrative Code 810 and Section 810.30.

10. At the time the YNOT after-school camp was built in 2012, and at all times material, Defendant LOFTUS TRUST knew, or should have known, that the YNOT after-school camp was being constructed and operated within less than 100 feet of County Highway 5A.

11. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in the operation, improvements, maintenance, repair, and/or control of the premises, including, but not limited to, the building and parking lot.

12. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in eliminating hazardous conditions which it knew, or should have known existed, for the benefit and protection of all foreseeable Plaintiffs.

13. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care in maintaining the aforesaid premises, including the building, parking lot, parking spaces, and adjacent area, in a reasonably safe condition.

14. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST controlled the exterior of the building on the premises, including, but not limited to, the building itself and the parking lot.

15. In the alternative, on and prior to April 28, 2025, and at all times material, LOFTUS TRUST had a duty to exercise ordinary care for the exterior of the building, including, but not limited to, the building itself and the parking lot.

16. On April 28, 2025, and at all times material, Defendant LOFTUS TRUST was negligent by one or more of the following acts or omissions:

a. Failed to ensure construction of the YNOT after-school camp was in compliance with 77 Illinois Administrative Code 810.30(e);

b. Failed to place bollards in the parking lot adjacent to the building on the premises,

which would have prevented the Vehicle driven by Defendant AKERS from driving off the road and striking and entering the building and striking KATHRYN and other children, when Defendant LOFTUS TRUST knew, or should have known, that failing to place bollards in the parking lot adjacent to the building could allow a vehicle to drive off the road and into the building, striking children and causing them serious, permanent injuries, including Minor Plaintiff, ROSE CORLEY;

c. Failed to use ordinary care in the construction of the building and parking lot of the premises involved in this occurrence by failing to place bollards in the parking lot adjacent to the sidewalk in front of the building, when LOFTUS TRUST knew, or should have known, that a curb was an inadequate restraint to prevent vehicles from driving off the parking surface, over the curb, striking and entering the building, thereby causing serious personal injuries to patrons, including ROSE;

d. Failed to adequately and securely construct bollards in front of the building when LOFTUS TRUST knew, or should have known, that the location of this occurrence involved a high traffic count, and the vehicles may drive off the parking surface onto the walkway and into the building, thereby causing serious personal injuries to patrons, including ROSE;

e. Failed to use due care in the repairs or alterations to the building and parking lot involved in this occurrence;

f. Failed to install adequate wheel guards, bumper guards, curbing, bollards, or other means of restraint to prevent a vehicle from striking and entering the building thereby causing serious personal injuries to patrons, including ROSE;

g. Failed to properly repair or alter the premises, including, but not limited to, the building and parking lot and the placement of bollards, concrete poles, or other proper means of vehicle restraint; and

h. Failed to make proper structural changes and improvements to the premises, which included placement of bollards, concrete poles, or other proper means of vehicle restraint.

17. That as a proximate result of one or more of the foregoing negligent acts or omissions on the part of LOFTUS TRUST in owning, operating, maintaining, and/or controlling the premises, the Vehicle driven by AKERS did then drive off the road, striking and entering the building, and struck KATHRYN CORLEY and other children while they were inside the building.

18. On April 28, 2025, ROSE CORLEY witnessed her sister, KATHRYN CORLEY, and the other children being struck by the Vehicle driven by AKERS.

19. On April 28, 2025, ROSE CORLEY was in such close proximity to her sister, KATHRYN CORLEY, and the other children being struck by the Vehicle driven by AKERS that she was in the zone of danger at the time KATHRYN and the other children were struck by the Vehicle driven by AKERS.

20. Since April 28, 2025, and at all times material, ROSE CORLEY has suffered severe emotional distress, causing illness and/or injury.

21. ROSE CORLEY's injuries are the types of injuries that Section 810.30(e) was designed to protect against.

WHEREFORE, the Plaintiff, ROSE CORLEY, a Minor, by and through her Mother and Next Friend, ELIZABETH CORLEY, demands judgment against the Defendant JAMES R. LOFTUS & MITZI LOFTUS TRUST in an amount in excess of FIFTY THOUSAND DOLLARS ($50,000.00), together with the costs of this action.

COUNT SIXTY-ONE: Respondent in Discovery
(All Plaintiffs v. The Village of Chatham)

1. Plaintiffs repeat and reallege paragraphs 1 through 28 ("The Parties, Jurisdiction, and Venue"), paragraphs 29 through 31 ("The Nature of the Claims"), and paragraphs 32 through 57 ("General Allegations") as if fully set forth herein.

2. Upon information and belief, and at all times material, Respondent in Discovery THE VILLAGE OF CHATHAM, a Municipal Corporation was involved in the approval and/or construction process of the YNOT after-school camp.

3. Respondent in Discovery THE VILLAGE OF CHATHAM, a Municipal Corporation possesses information essential to the Plaintiffs' causes of action and essential to the determination of who should properly be named as additional defendants in this action.

4. Without the ability to conduct discovery against Respondent in Discovery THE

VILLAGE OF CHATHAM, a Municipal Corporation, Plaintiffs cannot accurately pursue any action that may be available pursuant to 735 ILCS 5/2-402 of the Illinois Compiled Statutes and all the other statutory provisions pertaining to discovery.

WHEREFORE, the Plaintiffs, ESTATE OF KATHRYN CORLEY, Deceased, by ELIZABETH CORLEY, Independent Administrator; ESTATE OF RYLEE D. BRITTON, Deceased, by ZACHERY BRITTON and CHRISTINE BRITTON, Independent Co-Administrators; ESTATE OF ALMA BUHNERKEMPE, Deceased, by MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE, Independent Co-Administrators; ESTATE OF BRADLEY JAMES LUND, Deceased, by DANIEL LUND and CYNTHIA LUND, Independent Co-Administrators; ESTATE OF AINSLEY JOHNSON, Deceased, by TODD JOHNSON and CHRISTY JOHNSON, Independent Co-Administrators; LIVI TUTTLE, a Minor, by and through her Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE; LEO TUTTLE, a Minor, by and through his Parents and Next Friends, PHILLIP TUTTLE and LAURA TUTTLE; ELLA ORSI, a Minor, by and through her Parents and Next Friends, MICHAEL ORSI and LINDSAY ORSI; EMMA FINCH, a Minor, by and through her Mother and Next Friend, JILL CRIPE; and ROSE CORLEY, a Minor, by and through her Mother and Next Friend, ELIZABETH CORLEY, pursuant to 735 ILCS 5/2-402, name THE VILLAGE OF CHATHAM, a Municipal Corporation as Respondent in Discovery and request timely responses to all discovery requests.

JURY TRIAL DEMANDED.

Respectfully Submitted,

SALVI, SCHOSTOK & PRITCHARD, P.C.

By: _____
One of the Attorneys for the Plaintiffs

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FILED
NOV 19 2
Joseph B. Rocco
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Clerk of the Circuit Court

STATE OF ILLINOIS
IN THE CIRCUIT COURT FOR THE SEVENTH JUDICIAL CIRCUIT
SANGAMON COUNTY

IN THE MATTER OF THE APPOINTMENT OF AN INDEPENDENT ADMINISTRATOR OF THE ESTATE OF KATHRYN CORLEY, Deceased,	)))	**No. 2025PR00454**

ORDER TO ISSUE LETTERS OF INDEPENDENT ADMINISTRATION

THIS MATTER, having come before the Court on the Petition of ELIZABETH CORLEY to be appointed Independent Administrator of the Estate of KATHRYN CORLEY, it is **HEREBY ORDERED:**

1. ELIZABETH CORLEY is appointed Independent Administrator of the Estate of KATHRYN CORLEY.

2. Letters of Independent Administrator shall be issued.

11/19/25
Date

Judge

PLAINTIFF'S EXHIBIT A

STATE OF ILLINOIS
IN THE CIRCUIT COURT FOR THE SEVENTH JUDICIAL CIRCUIT
SANGAMON COUNTY

FILED
JUN 12 2025
52
Joseph B. Pocsal Clerk of the Circuit Court

IN THE MATTER OF THE APPOINTMENT OF AN INDEPENDENT ADMINISTRATOR OF THE ESTATE OF RYLEE D. BRITTON, Deceased,	)))	**No. 2025PR000248**

ORDER TO ISSUE LETTERS OF INDEPENDENT ADMINISTRATION

THIS MATTER, having come before the Court on the Petition of ZACHERY BRITTON and CHRISTINE BRITTON to be appointed Co-Independent Administrators of the Estate of RYLEE D. BRITTON, it is **HEREBY ORDERED:**

1. ZACHERY BRITTON and CHRISITNE BRITTON are appointed Co-Independent Administrators of the Estate of RYLEE D. BRITTON.

2. Letters of Independent Administrator shall be issued.

6/12/25
Date

Judge

PLAINTIFF'S EXHIBIT B

FILED
NOV 19 2025
Joseph B. Wessel Clerk of the Circuit Court
51

STATE OF ILLINOIS
IN THE CIRCUIT COURT FOR THE SEVENTH JUDICIAL CIRCUIT
SANGAMON COUNTY

IN THE MATTER OF THE APPOINTMENT)
OF AN INDEPENDENT ADMINISTRATOR OF THE)
ESTATE OF ALMA BUHNERKEMPE, Deceased,) No. 2025PR457

ORDER TO ISSUE LETTERS OF INDEPENDENT ADMINISTRATION

THIS MATTER, having come before the Court on the Petition of MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE to be appointed Co-Independent Administrators of the Estate of ALMA BUHNERKEMPE, it is **HEREBY ORDERED:**

1. MICHAEL BUHNERKEMPE and BILLIE BUHNERKEMPE are appointed Co-Independent Administrators of the Estate of ALMA BUHNERKEMPE.

2. Letters of Independent Administrator shall be issued.

11/19/25
Date

Judge

PLAINTIFF'S EXHIBIT C

FILED

APR 13 2026

Joseph B. Polcak Clerk of the Circuit Court

9

STATE OF ILLINOIS
IN THE CIRCUIT COURT FOR THE SEVENTH JUDICIAL CIRCUIT
SANGAMON COUNTY

IN THE MATTER OF THE APPOINTMENT)
OF INDEPENDENT ADMINISTRATORS OF THE)
ESTATE OF BRADLEY JAMES LUND, Deceased) **Case No.** 2026 PR 135

LETTERS OF INDEPENDENT ADMINISTRATION

By Order of the above Court, DANIEL LUND and CYNTHIA LUND, being duly appointed Co-Independent Administrators of the Estate of BRADLEY JAMES LUND, deceased, and are authorized and empowered to take and have the care, management and investment of the Decedent's estate and do all other acts now or hereafter required by law of said representatives.

7TH JUDICIAL CIRCUIT * SEAL * SANGAMON COUNTY, ILLINOIS

Witness, APR 13 2026, 2026

Joseph B. Polcak
Clerk of the Court

CERTIFICATE

I certify that this is a copy of the Letters of office now in force in this case.

7TH JUDICIAL CIRCUIT * SEAL OF COURT * SANGAMON COUNTY, ILLINOIS

, 2026

APR 13 2026

Joseph B. Polcak
Clerk of the Court

PLAINTIFF'S EXHIBIT D

FILED

NOV 19 2025

Joseph B. Kocsal Clerk of the Circuit Court

51

STATE OF ILLINOIS
IN THE CIRCUIT COURT FOR THE SEVENTH JUDICIAL CIRCUIT
SANGAMON COUNTY

IN THE MATTER OF THE APPOINTMENT)
OF AN INDEPENDENT ADMINISTRATOR OF THE)
ESTATE OF AINSLEY JOHNSON, Deceased,) No. 2025PR456

ORDER TO ISSUE LETTERS OF INDEPENDENT ADMINISTRATION

THIS MATTER, having come before the Court on the Petition of TODD JOHNSON and CHRISTY JOHNSON to be appointed Co-Independent Administrators of the Estate of AINSLEY JOHNSON, it is **HEREBY ORDERED:**

1. TODD JOHNSON and CHRISTY JOHNSON are appointed Co-Independent Administrators of the Estate of AINSLEY JOHNSON.

2. Letters of Independent Administrator shall be issued.

11/19/25
Date

Judge

PLAINTIFF'S EXHIBIT E