

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

Index No.:

YANLING YU,

Plaintiff,

Plaintiff designates Queens
County as the place of trial.

-against-

S U M M O N S

KOREAN AIR LINES CO. LTD. and "JANE DOE", a
fictitious name intended to identify defendant's employee
flight attendant,

The basis of venue is
Plaintiff's residence:

[REDACTED]
Flushing, NY 11355

Defendants.

To the above named Defendant:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer on the plaintiff's attorneys within 20 days after the service of this summons, exclusive of the day of service of this summons, or within 30 days after service of this summons is complete if this summons is not personally delivered to you within the State of New York.

In case of your failure to answer this summons, a judgment by default will be taken against you for the relief demanded in the complaint, together with the costs of this action.

Dated: Astoria, New York
February 2, 2024



By: Victor I. Bota, Esq.
SACCO & FILLAS, LLP
Attorneys for Plaintiff
Yanling Yu
31-19 Newtown Avenue
Seventh Floor
Astoria, New York 11102
(718) 746-3440
Our File # 31185-23

DEFENDANTS:

**KOREAN AIR LINES CO. LTD. (*Via Secretary of State*)
900 Wilshire Blvd, Suite 1100
C/o Robin Choi, Esq.
Los Angeles, CA 90017**

**9 North Service Road
Room 251
Jamaica, NY 11430**

FORWARD THIS IMMEDIATELY TO YOUR ATTORNEY OR INSURANCE COMPANY

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

Index No.:

YANLING YU,

Plaintiff,

**VERIFIED
COMPLAINT**

-against-

KOREAN AIR LINES CO. LTD. and "JANE DOE", a
fictitious name intended to identify defendant's employee
flight attendant,

Defendants.

The plaintiff, YANLING YU, at all times herein mentioned was and still is a resident of the
County of Queens and the State of New York.

1. The defendant, KOREAN AIR LINES CO. LTD., at all times herein mentioned, was and still is a foreign business corporation organized and existing under the laws of the Republic of Korea, with its principal place of business situated in the County of Queens and the State of New York.
2. The defendant, KOREAN AIR LINES CO. LTD., at all times herein mentioned conducted and carried on business in the County of Queens and the State of New York.
3. At all times herein mentioned, defendant, KOREAN AIR LINES CO. LTD., transacted business within the State of New York.
4. At all times herein mentioned, defendant, KOREAN AIR LINES CO. LTD., derived substantial revenue from goods used or consumed or services rendered in the State of New York.
5. At all times herein mentioned, defendant, KOREAN AIR LINES CO. LTD., expected or should reasonably have expected its acts to have consequences in the State of New York.

6. At all times herein mentioned, YANLING YU, was a lawful passenger on defendant's aircraft, more specifically defendant's Flight Number KE 85.
7. At all times herein mentioned, the aircraft operating Flight Number KE 85 was owned and operated by defendant, KOREAN AIR LINES CO. LTD.
8. At all times herein mentioned, the defendant KOREAN AIR LINES CO. LTD., owned all coffee brewing and serving equipment on the aircraft operating Flight Number KE 85.
9. At all times herein mentioned, the defendant KOREAN AIR LINES CO. LTD., was a lessee of all coffee brewing and serving equipment on the aircraft operating Flight Number KE 85.
10. At all times herein mentioned, the defendant KOREAN AIR LINES CO. LTD., defendant's servants, agents and/or employees operated all coffee brewing and serving equipment on the aircraft operating Flight Number KE 85.
11. At all times herein mentioned, the defendant KOREAN AIR LINES CO. LTD., defendant's servants, agents and/or employees maintained all coffee brewing and serving equipment on the aircraft operating Flight Number KE 85.
12. At all times herein mentioned, the defendant KOREAN AIR LINES CO. LTD., defendant's servants, agents and/or employees managed all coffee brewing and serving equipment on the aircraft operating Flight Number KE 85.
13. At all times herein mentioned, the defendant KOREAN AIR LINES CO. LTD., defendant's servants, agents and/or employees controlled all coffee brewing and serving equipment on the aircraft operating Flight Number KE 85.
14. At all times herein mentioned, the defendant KOREAN AIR LINES CO. LTD., defendant's servants, agents and/or employees supervised all coffee brewing and serving equipment on the aircraft operating Flight Number KE 85.

15. At all times herein mentioned, the defendant KOREAN AIR LINES CO. LTD., defendant's servants, agents and/or employees repaired maintained all coffee brewing and serving equipment on the aircraft operating Flight Number KE 85.
16. At all times herein mentioned, the defendant KOREAN AIR LINES CO. LTD., defendant's servants, agents and/or employees inspected all coffee brewing and serving equipment *on the* aircraft operating Flight Number KE 85.
17. At all times herein mentioned, the defendant KOREAN AIR LINES CO. LTD., defendant's servants, agents and/or employees designed all coffee brewing and serving equipment on the aircraft operating Flight Number KE 85.
18. At all times herein mentioned, it was the duty of the defendant, KOREAN AIR LINES CO. LTD., defendant's servants, agents and/or employees to maintain said coffee brewing and service equipment on the aircraft operating Flight Number KE 85.
19. That on or about the October 8, 2023, while the plaintiff, YANLING YU, a lawful passenger occupying seat 33B on KOREAN AIR LINES CO. LTD.'s aircraft operating Flight Number KE 85, JANE DOE, the defendant's flight attendant, negligently spilled a coffee cup of boiling hot coffee on plaintiff's lap, causing her to sustain grievous personal injuries near her genital area, with attendant special damage.
20. Solely as a result of the negligence, carelessness and recklessness of the defendant, KOREAN AIR LINES CO. LTD., its servants, agents and/or employees, plaintiff, YANLING YU was caused to suffer severe and serious personal injuries to mind and body, and further, that YANLING YU was subjected to great physical pain and mental anguish.
21. By reason of the foregoing, YANLING YU was severely injured and damaged, sustained severe nervous shock and mental anguish, great physical pain and emotional upset, some of

which injuries are believed to be permanent in nature and duration, and YANLING YU will be permanently caused to suffer pain, inconvenience and other effects of such injuries; YANLING YU incurred and in the future will necessarily incur further hospital and/or medical expenses in an effort to be cured of said injuries; and YANLING YU will be unable to pursue YANLING YU 's usual duties with the same degree of efficiency as prior to this accident, all to YANLING YU 's great damage.

22. As a result of the foregoing, plaintiff, YANLING YU has become sick, sore, lame and disabled, has sustained severe and serious injuries, has suffered and will continue to suffer severe mental and nervous shock with accompanying pain, has required medical treatment and was and will be unable to attend to her usual duties for a long period of time; was obliged to and did expend large sums of money for medical care and attention and will be required to expend additional sums of money for medical care in the future to attend to her injuries which she believes to be of a permanent nature.

23. As a result of the foregoing negligence of the defendant, KOREAN AIR LINES CO. LTD., the plaintiff has expended and become obligated for the sums of money for medical care and attention for the plaintiff in an effort to cure her of her injuries and to alleviate her pain and suffering; was caused to incur damages.

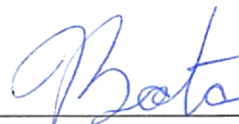
24. This action falls within one or more of the exceptions set forth in Section 1602 of the Civil Practice Law and Rules.

25. Due to defendant KOREAN AIR LINES CO. LTD.'s negligence, plaintiff, YANLING YU is entitled to damages.

WHEREFORE, the plaintiff demands judgment awarding damages, in an amount exceeding the monetary jurisdictional limits of all lower courts which would otherwise have jurisdiction,

together with interest and the costs and disbursements of this action, and such other and further relief as to this Court seems just and proper.

Dated: Astoria, New York
February 2, 2024



By: Victor I. Bota, Esq.
SACCO & FILLAS, LLP
Attorneys for Plaintiff
31-19 Newtown Avenue
Seventh Floor
Astoria, New York 11102
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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

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YANLING YU,

Plaintiff,

**ATTORNEY'S
VERIFICATION**

-against-

KOREAN AIR LINES CO. LTD. and "JANE DOE", a
fictitious name intended to identify defendant's employee
flight attendant,

Defendants.

Victor I. Bota, Esq., an attorney duly admitted to practice law in the State of New York, makes the following affirmation under the penalty of perjury:

I am of the firm of SACCO & FILLAS, LLP, the attorneys of record for the plaintiff.

I have read the foregoing Complaint and know the contents thereof; the same is true to my own knowledge except as to the matters therein stated to be alleged on information and belief and that as to those matters, I believe them to be true.

This verification is made by affirmant and not by plaintiff because she is not in the County of Queens, which is the County where your affirmant maintains offices.

The grounds of affirmant's belief as to all matters not stated upon affirmant's knowledge are correspondence had with the said plaintiff, information contained in the said plaintiff's file, which is in affirmant's possession, and other pertinent data relating thereto.

Dated: Astoria, New York
February 2, 2024



Victor I. Bota, Esq.

SUPREME COURT OF THE STATE OF NEW YORK
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Plaintiff,

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KOREAN AIR LINES CO. LTD. and "JANE DOE", a fictitious
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Defendants.

SUMMONS and VERIFIED COMPLAINT

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed documents are not frivolous.

Dated: Astoria, New York
February 2, 2024

Signature:



By: Victor I. Bota, Esq.

SACCO & FILLAS, LLP

Attorneys for Plaintiff

Yanling Yu

31-19 Newtown Avenue

Seventh Floor

Astoria, New York 11102

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Our File # 31185-23