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## FACTS OF THE CASE

This case involves a snowmobile accident in which Michael Reebock sustained extensive head injuries due to a defective helmet. Mr. Reebock rented the equipment from Snow Fun, Inc. and Hardhat Sports Group manufactured the helmet. Mr. Reebock was hospitalized for approximately one month and underwent several reconstructive surgeries for multiple facial fractures, to include placing plates in his head. Mr. Reebock has been permanently disfigured due to the loss of most of his teeth and was unable to eat solid food for approximately three to four months following the accident.

Investigation concluded that the helmet was improperly manufactured and that the lining of the helmet was not properly installed which ultimately caused a defect and weakness in the helmet that caused the helmet to collapse upon impact with no cushioning for the head, which was the intended use of the helmet. Due to the defective manufacturing of the helmet, when Mr. Reebock's head impacted with a rock, the helmet collapsed and caused Mr. Reebock to sustain extensive head injuries.

Michael Reebock resides at 152 Deer Path Road in Hopkinton, NH.

Snow Fun, Inc is a business located at 12 Spear Lane, North Conway, NH.

Hardhats Sports Group is a business located at 1275 N.W. Boulevard, Canton, OH.

The accident occurred on January 27, 2012.

WHAT FOLLOWS IS THE COMPLAINT:

THE STATE OF NEW HAMPSHIRE

MERRIMACK COUNTY, SS

SUPERIOR COURT  
( x ) Jury ( ) Court

MICHAEL REEBOCK

v.

SNOW FUN, INC., a corporation and HARDHATS SPORTS GROUP, a corporation

**COMPLAINT OF PLAINTIFF, MICHAEL REEBOCK**

NOW COMES, the Plaintiff, Michael Reebock (hereinafter "Plaintiff"), by and through his counsel, Marcia Brown Esq., does hereby and respectfully submit the following complaint.

**PARTIES**

1. The Plaintiff, Michael Reebock, an individual, resides at 152 Deer Path Road, Hopkinton, County of Merrimack and State of New Hampshire.
2. The Defendant, Snow Fun, Inc., a corporation, conducting business at, 12 Spear Lane, North Conway, County of Carroll and State of New Hampshire.
3. The Defendant, Hardhats Sports Group, a corporation, conducting business at, 1275 N.W. Boulevard, Canton, County of Stark and State of Ohio and licensed to conduct business in New Hampshire.

**JURISDICTION AND VENUE**

4. This Court has jurisdiction pursuant to RSA 491:7.
5. Venue rests with this Court in that the Plaintiff is a resident of Merrimack County.

**STATEMENT OF FACTS**

6. On January 27, 2012, Plaintiff rented snowmobile equipment from Snow Fun, Inc, including a helmet.

7. The helmet the Plaintiff rented was manufactured by Hardhats Sports Group and sold to Snow Fun, Inc.

8. On January 27, 2012, Plaintiff was involved in a snowmobile accident while he was wearing a helmet which he had rented from Defendant, Snow Fun, Inc..

9. The Plaintiff was thrown from the snowmobile he was riding and his head struck a rock and he sustained head injuries when the helmet that he was wearing which he had rented from Defendant, Snow Fun, Inc. collapsed.

10. Plaintiff sustained severe injuries including head trauma and facial fractures, which necessitated reconstructive surgery.

11. Plaintiff has been permanently disfigured.

12. The helmet was improperly designed and the lining of the helmet was not properly installed which ultimately caused a defect and weakness in the helmet which caused the helmet to collapse upon impact, leaving no cushioning for the head, which was the intended use of the helmet.

13. Due to the defective manufacturing of the helmet, when the Plaintiff's head impacted with a rock, the helmet collapsed and caused the Plaintiff to sustain extensive head injuries.

**COUNT I**  
**(NEGLIGENCE: SNOW FUN, INC.)**

14. The Plaintiff incorporates Paragraphs 1 through 13 by this reference.

15. The Defendant, Snow Fun, Inc., owed a duty to the Plaintiff to properly maintain and inspect their rental equipment.

16. The Defendant, Snow Fun, Inc., breached that duty of care by failing to properly maintain the helmet thus causing the Plaintiff's injuries and consequential damages.

17. The Defendant, Snow Fun, Inc.'s, breach of duty is the actual and proximate cause of the injuries and consequential damages to Plaintiff described above.

18. The Plaintiff has sustained damages in the form of injuries and incurred expenses as a result of Defendant, Snow Fun, Inc.'s, Negligence.

**COUNT II**  
**(NEGLIGENCE: HARDHATS SPORTS GROUP)**

19. The Plaintiff incorporates Paragraphs 1 through 18 by this reference.
20. The Defendant, Hardhats Sports Group, owed a duty to the Plaintiff to properly design and manufacture their snowmobile helmets.
21. The Defendant, Hardhats Sports Group, breached that duty of care by failing to properly manufacture the helmet that was worn by Plaintiff on January 27, 2012.
22. The Defendant, Hardhats Sports Group's, breach of duty caused the injuries and consequential damages to Plaintiff described above.

**COUNT III**  
**(PRODUCT LIABILITY: HARDHATS SPORTS GROUP)**

23. The Plaintiff incorporates Paragraphs 1 through 22 by this reference.
24. The Defendant, Hardhats Sports Group, manufactured and distributed the snowmobile helmet worn by Plaintiff on January 27, 2012 and used by the Plaintiff in a foreseeable manner.
25. The helmet that Defendant, Hardhats Sports Group, manufactured and distributed was defective, collapsing on impact and thus causing injuries to the Plaintiff.
26. The helmet that Defendant, Hardhats Sports Group, manufactured and distributed caused the Plaintiff to incur damages described above.

WHEREFORE, Plaintiff prays for:

- A. Damages in an amount within the jurisdictional limits of this Court by way of full, fair and complete compensation as required by the New Hampshire Constitution;
- B. The Plaintiff requests a jury trial; and
- C. Such other relief as is just.

Respectfully submitted

MICHAEL REEBOK

By and through his attorneys

DUSTIN, CANTON AND HUGHES

Date: January 9, 2014

By: Marcia Brown, Esq. NH Bar #007

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