

**IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA**

Shirley Sanchez, Carla Barahona, Walter)
Valdez, Katta Suresh Gowtham Gupta, Prajwal)
Devanath Kuchangi, Jon McNair, Rebecca)
George, Pamela George, Ashlynnne Matta,)
Phillip Tremble, Timothy Butler, Erica King,)
Bruce Reid Howard, Robert Hardinge, Rachel)
Blanks, Julian Blondell, Destanie Fonoimoana,)
Mounika Kotha, Vishnu Sundhar Bangaru,)
Ryan Echols, Latrecia Milline, Furqan)
Muhammad, Derrick Watson, Tommy)
Williams, Beverly Powell, Lynn Driver,)
Marques Johnson, Laura Tarsitano, Aaron)
Kimble, Elisabeth Nelson, Dwayne Haastrup,)
Dymon Godbey, Darlene Godbey, Charles)
Hollman, Sara Kidane, James Wiley, Jian Pang,)
Arthenia Foster, Seth Jones, Aquiles Frazier,)
John Crownover, Srinivas Pasumathi, Page)
Johnson, Shakila Forbes, Sara Savage, Samuel)
Savage, Antoine Schand, Ryan Baptiste,)
Jasmine Tilson, Dennis Pendleton, Mayur)
Kamble, Julianna Hembd, Joy Young, Lianne)
Anderson)
)
Plaintiffs,)
)
vs.)
)
GS Main Street, LLC, Greystar Management)
Services, L.P., Danny Hudson, John Doe 123)
& Corporations XYZ)
Defendants)

CIVIL ACTION FILE NO.:

JURY TRIAL DEMANDED

COMPLAINT AND DEMAND FOR TRIAL BY JURY

COME NOW the above captioned Plaintiffs who file this Complaint and Demand for Trial by Jury against GS Main Street, LLC, Greystar Management Services, L.P. and Danny Hudson respectfully demanding a trial by jury and alleging the following:

1.

Plaintiffs, at all relevant times, were citizens and residents of Fulton County, Georgia.

2.

Plaintiffs, as citizens and residents of the State of Georgia, brings this action in this capacity.

3.

GS Main Street, LLC is subject to the jurisdiction of this Court, and venue is proper in Fulton County. Defendant GS Main Street, LLC is a foreign limited liability company organized under the laws of and authorized to do business in the State of Georgia. This defendant is subject to the jurisdiction of this Court, and venue is proper in Fulton County. GS Main Street, LLC may be served through its registered agent for service, CT Corporation System, 289 S. Culver St., Lawrenceville, GA 30046-4805.

4.

Greystar Management Services, LP is subject to the jurisdiction of this Court, and venue is proper in Fulton County. Defendant Greystar Management Services, LP is a foreign limited partnership company organized under the laws of and authorized to do business in the State of Georgia. This defendant is subject to the jurisdiction of this Court, and venue is proper in Fulton County. Greystar Management Services, LP may be served through its registered agent for service, CT Corporation System, 289 S. Culver St., Lawrenceville, GA 30046-4805.

5.

Danny Hudson is subject to the jurisdiction of this Court, and venue is proper in Fulton County. Defendant Danny Hudson is an individual who may be served at 508 North Main Street, Atlanta, Georgia 30324.

6.

At all times material, including but not limited to August 19, 2020, GS Main Street, LLC owned, controlled and managed the rental property located at 508 Main Street, Atlanta, Fulton County, Georgia.

7.

At all times material, including but not limited to August 19, 2020, Greystar Management Services, LLP owned, controlled and managed the rental property located at 508 Main Street, Atlanta, Fulton County, Georgia.

8.

At all times material, including but not limited to August 19, 2020, Danny Hudson was employed by GS Main Street, LLC and/or Greystar Management Services L.P. as the service manager for the property located at 508 Main Street, Atlanta, Fulton County, Georgia.

9.

At all times material, including but not limited to August 19, 2020, Plaintiffs were either tenants or guests at the property located at 508 Main Street, Atlanta, Fulton County, Georgia.

10.

At all times material, Defendant, GS Main Street, LLC owed Plaintiffs a duty to inspect and keep the premises in good repair and safe condition, which included ensuring the property had properly installed and working heating and air conditioning units.

11.

At all times material, Defendant, Greystar Management Services, LLP owed Plaintiffs a duty to inspect and keep the premises in good repair and safe condition, which included ensuring the property had properly installed and working heating and air conditioning units.

12.

Defendant, GS Main Street, LLC breached these duties owed to Plaintiffs by failing to install, inspect and ensure that the rental property had properly installed and working heating and air conditioning units and was free of fire hazards.

13.

Defendant, Greystar Management Services, LLP breached these duties owed to Plaintiffs by failing to install, inspect and ensure that the rental property had properly installed and working heaters and air conditioning units.

14.

Defendant, GS Main Street, LLC breached these duties owed to Plaintiffs by failing to provide and/or maintain the smoke alarms, fire extinguishers, and fire alarm system at the subject property.

15.

Defendant, Greystar Management Services, LLP breached these duties owed to Plaintiffs by failing to provide and/or maintain the smoke alarms, fire extinguishers, and fire alarm system at the subject property.

16.

Defendant, GS Main Street, LLC breached these duties owed to Plaintiffs by failing to correct or adequately correct the fire protection devices and systems and dangerous conditions relating to the habitability and fire safety at the subject property for Plaintiff.

17.

Defendant, Greystar Management Services, LLP breached these duties owed to Plaintiffs by failing to correct or adequately correct the fire protection devices and systems and dangerous conditions relating to the habitability and fire safety at the subject property for Plaintiff.

18.

Defendant, Greystar Management Services breached these duties when the acts or omissions of its employee, Danny Hudson, caused the fire in question at 508 Main Street, Atlanta, Fulton County, Georgia.

19.

Defendant, GS Main Street, LLC breached these duties when the acts or omissions of its employee, Danny Hudson, caused the fire in question at 508 Main Street, Atlanta, Fulton County, Georgia.

20.

The failure to install, inspect and ensure the rental property had properly working and installed heaters and air conditioning units created a hazardous living condition.

21.

Defendants, GS Main Street, LLC and Greystar Management Services, LLP, knew or should have known about the hazardous condition and the hazard it created.

22.

During the day on August 19, 2020, a fire started on the roof at or near the HVAC units/system at the property. Upon information and belief, at or around the time the fire started, one or more service managers and/or maintenance personnel, including Danny Hudson, conducted work/maintenance on the HVAC units/systems. The roof is only accessible to management and/or maintenance personnel.

23.

Plaintiffs did not cause or contribute to the ignition and or spread of the subject fire.

24.

Plaintiffs suffered tremendous property loss and continue to suffer psychological injuries as a result of the fire of August 19, 2020.

25.

By reason of the above and foregoing, Plaintiffs are entitled to recover from Defendants compensatory damages, in an amount to be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully pray and demand as follows:

- a. That Process and Summons issue as provided by law, requiring Defendants to appear and answer Plaintiffs' Complaint;
- b. That service be had upon Defendants as provided by law;
- c. That the Court award and enter a judgment in favor of Plaintiffs and against Defendants for compensatory damages in an amount to be proven at trial;
- d. That Plaintiffs have a trial by jury as to all issues; and
- e. That Plaintiffs have such other and further relief as the Court may deem just and proper.

This 19th day of August, 2021.

Respectfully submitted,

/s/ Dylan A. Bess
DYLAN A. BESS,
Georgia Bar No. 501825
Attorney for Plaintiff

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