

STATE OF RHODE ISLAND
PROVIDENCE, S.C.

SUPERIOR COURT

M & N FOOD SERVICE, LLC
d/b/a MILLONZI FINE CATERING

v.

TWIN CITY FIRE INSURANCE COMPANY

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C.A. No.:

COMPLAINT
COUNT I

1. Plaintiff, M & N FOOD SERVICE, LLC is a limited liability company organized in Rhode Island and doing business in Providence County, Rhode Island.
2. Defendant, TWIN CITY FIRE INSURANCE COMPANY is duly authorized to do business in the State of Rhode Island.
3. At all times material hereto, Defendant insured Plaintiff's business against interruption and other losses.
4. Plaintiff has sustained covered business losses by the loss of use of and damage to his premises.
5. Plaintiff's policy of insurance with Defendant includes, but is not limited to losses caused by fungi, bacteria and virus.
6. Plaintiff is further entitled to business interruption losses pursuant to the terms and conditions of his policy.
7. Plaintiff's losses as above described occurred on or after April 2020 and continuing.
8. Defendant has further refused to respond to Plaintiff's lawful demand for compensation. A copy of said demand is attached hereto and made a part hereof.
9. Plaintiff is entitled to punitive and compensatory damages.
10. The monetary amount in controversy is sufficient to establish jurisdiction of this Superior Court.

WHEREFORE, Plaintiff demands judgment against the Defendant, for compensatory damages, punitive damages, attorneys' fees, interest and costs, and such further relief as this Court shall see fit.

PLAINTIFF,
M & N FOOD SERVICE, LLC
d/b/a MILLONZI FINE CATERING
By their Attorney,



Robert D. Goldberg #1733
Goldberg Law Offices
226 Cottage Street
Pawtucket, RI 02860
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Fax: 401-725-3355

PLAINTIFF hereby demands trial by jury.



Robert D. Goldberg #1733

DATED: March 15, 2021

Goldberg Law Offices

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July 21, 2020

Twin City Fire Insurance Company
One Hartford Plaza
Hartford, CT 06155

This office represents your insured, M & N Food Service, LLC d/b/a Millonzi Fine Catering, 25 Belknap Farm Drive, Johnston, RI 02919; Policy Number: 02 SBA AK1040 SB.


On behalf of my client, demand is hereby made for business interruption and other losses suffered by my client under the terms and conditions of the above-referenced policy. Those losses easily exceed one million dollars.

The losses are related to the loss of use or damage to his premises associated with the government shutdown of the structure on account of COVID-19. My initial review of the policy indicates additional coverage for "fungi bacteria or virus".

In addition to the above-referenced losses, my client is specifically seeking business interruption loss compensation.

I would be happy to review this claim with the appropriate person. If, however, I do not hear from you within 14 days from the date hereof, I will institute suit.

Sincerely,


Robert D. Goldberg

/cr