

GLYNDON HAIR STATION, INC. d/b/a
DREAMERS SALON AND DAY SPA
222 Main Street
Reisterstown, MD 21136

Plaintiff

vs

ERIE INSURANCE COMPANY
Serve on:
Kathleen Birrane
Maryland Insurance Administration
200 St. Paul Street
Suite 2700
Baltimore, MD 21202

Defendants

* * * * *

IN THE
CIRCUIT COURT
OF MARYLAND FOR
BALTIMORE COUNTY
CASE NO.: C-03-CV-20-003393

COMPLAINT AND REQUEST FOR JURY TRIAL

NOW COMES, Plaintiff, Glyndon Hair Station, Inc. d/b/a/ Dreamers Salon and Day Spa and Salon, by and through its attorney Robert Feinberg, and Robert Feinberg, P.A., who sues Defendant, Erie Insurance Company, and for its cause of action states:

1. THAT Plaintiff, Glyndon Hair Station, Inc. d/b/a Dreamers Salon and Day Spa, hereinafter referred to as "DREAMERS", contracted with the Defendant, Erie Insurance Company, on or about February 4, 2016 for general business liability insurance coverage. The Defendant issued a general policy of business insurance under policy number Q97-1225064. The Plaintiff paid all premiums promptly and the premium payments were deducted as due from the Plaintiff's general business checking account by the Defendant on a monthly basis. This policy was in full force and effect at the time the Plaintiff suffered its loss of income and interruption of its business as complained of herein.

2. THAT on or about March 23, 2020, DREAMERS, was ordered to close and be shut down from doing any and all business by an executive order issued by the Governor of the State of Maryland, Lawrence Hogan.

3. THAT due to the aforesaid order, DREAMERS suffered a total loss of its income for over two (2) months, and that the Plaintiff lost income primarily as a result of the aforementioned close of its business.

4. THAT DREAMERS owns three (3) buildings on its property that the aforementioned business policy insures. The addresses of these properties are 226, 222 and 222b Main Street, Reisterstown, MD 21136. Two buildings with addresses of 222 and 222b Main St. are leased by the Plaintiff to a tenant which is a church known as Iglesia Jesus El Buen Pastor. This tenant pays a monthly rent to DREAMERS for use of the aforesaid two (2) buildings.

5. THAT due to the aforementioned ordered shut down the Church was not permitted to conduct its religious congregations and its business and therefore for two (2) months paid DREAMERS only one half (1/2) of its regular rent due the Plaintiff causing additional business losses for DREAMERS. The Plaintiff has a lease agreement with the Church that was in effect at the time of the aforesaid closure.

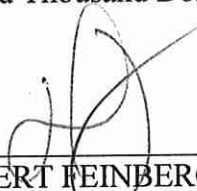
6. THAT DREAMERS complied with all terms and conditions of its business insurance contract with the Defendant including, but not limited to, prompt notice and requisite demand and that DREAMERS was, at all times complained of herein, a covered insured as defined by the aforesaid business insurance policy at the time it sustained its losses of income.

7. THAT Defendant, Erie Insurance Company, breached its contractual duty to

the Plaintiff by refusing to honor the Plaintiff's business interruption claim as it continued to take money and continues today from the Plaintiff for the aforesaid insurance coverage premiums.

8. THAT this is the Court of proper jurisdiction as the Defendant Corporation entered into its contract with the Plaintiff in Baltimore County and the Defendant does substantial business in Baltimore County.

WHEREFORE, Plaintiff, DREAMERS, demands damages against Defendant, Erie Insurance Company, in the amount of One Hundred Thousand Dollars (\$100,000.00).



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Attorney for Plaintiff

REQUEST FOR JURY TRIAL

The Plaintiff respectfully requests that the above captioned case be tried before a jury.



ROBERT FEINBERG, CPF #: 82050100953
Attorney for Plaintiff

CERTIFICATE OF COMPLIANCE

I HEREBY CERTIFY that the foregoing is compliant with Maryland Rule 1-322.2



ROBERT FEINBERG, CPF #: 82050100953
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of September, 2020, the aforesaid Complaint was efiled through the MDEC System with the Circuit Court for Baltimore County and a photocopy was emailed and mailed, postage prepaid, to:

Erie Insurance Company
18544 Breeze Hill Drive
Hagerstown, MD 21741
ATTN: Rebecca Willis
Claim No.: A00002793283



ROBERT FEINBERG, CPF #: 82050100953
Attorney for Plaintiff