

**STATE OF INDIANA
IN THE SUPERIOR COURT, CIVIL DIVISION 5, OF LAKE COUNTY**

CARIN L. LARSON,

Plaintiff,

v.

Case No. 45D05-1909-CT-000975

BNR PIZZA INC.
and LANGEL'S, INC.,

Defendants.

AFFIDAVIT OF BRIAN RADZINSKI, VICE PRESIDENT BNR PIZZA, INC.

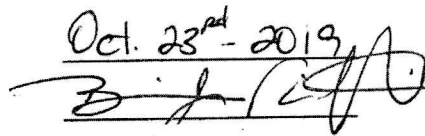
I, Brian Radzinski, state I have personal knowledge of the facts contained in this affidavit . If called as witness, I would completely testify to the contents of this affidavit:

1. I am Vice President of BNR Pizza, Inc. BNR Pizza, Inc. has one BNR Pizza store. This store is located at 1198 E. Summit Street, Crown Point, IN. BNR Pizza, Inc's telephone number. is (219)-663-8888. I run the day to day operations of BNR Pizza, Inc. and know its business.
2. The registered corporate agent for BNR Pizza, Inc. is Tauber Law Offices at 1415 Eagle Ridge Dr., Schecherville, IN 46375.
3. BNR Pizza, Inc. is currently in good standing with the Indiana Department of Corporations. The business ID# for BNR Pizza, Inc . is 2012090600023.
4. I am familiar with Langel's, Inc. Langel's, Inc. operates a restaurant called Langel's Pizza/Rodney's Sports Bar at 2833 Highway Ave, Highland, IN. Langel's Pizza is 15 miles away from BNR Pizza, Inc. The telephone number for Langel's Pizza/Rodney's Sports Bar is (219) - 923-4900.
5. BNR Pizza, Inc. is an Indiana corporation, not related to Langel's Pizza, Inc. BNR Pizza, Inc. rents the store location at 1198 E. Summit Street, Crown Point, IN. where BNR Pizza, Inc. operates its business. Langel's, Inc. does not pay BNR Pizza, Inc.'s rent. BNR Pizza, Inc. does not own the restaurant called Langel's Pizza/Rodney's Sports Bar. BNR Pizza, Inc. does not manage or control Langel's Pizza/Rodney's Sports Bar. Langel's Inc., Langel's Pizza/Rodney's Sports bar does not own BNR Pizza, Inc. or control the business operations of BNR Pizza, Inc.
6. BNR Pizza, Inc. maintains its own business checking accounts and generates its own financial statements. BNR Pizza, Inc. staffs its own employees. BNR Pizza, Inc. does not staff employees to Langel's Pizza/Rodney's Sports Bar, control Langel's Pizza, or tell Langel's Pizza how to conduct its business. BNR Pizza, Inc. does not finance or pay the bills of Langel's Pizza/Rodney's Sports Bar.

7. BNR Pizza, Inc. has its own insurance covering the business operations of BNR Pizza, Inc.
8. From the September 18, 2019 complaint, on information and belief, the March 11, 2019 accident occurred when Carin L. Larson claims an employee pushed or collided with Carin L. Larson. On information and belief, this incident occurred at Langel's Pizza/Rodney's Sports Bar located at 2833 Highway Ave, Highland, IN. This accident did not occur at BNR Pizza, Inc.
9. At no time did the BNR Pizza, Inc. staff any employee at Langel's Pizza/Rodney's Sports Bar that was involved in the March 11, 2019 Carin L. Larson fall.
10. On March 11, 2019, no BNR Pizza, Inc. employee was at Langel's Pizza/Rodney's Sports Bar that pushed or collided with Carin L. Larson; on March 11, 2019, no BNR Pizza, Inc. employee trained any Langel's Pizza/Rodney's Sports Bar employee that pushed or caused Carin L. Larson to fall; on March 11, 2019, no BNR Pizza, Inc. employee supervised, directed or employed any Langel's Pizza/Rodney's Sports Bar employee that may have caused Larson's fall; and on March 11, 2019, no BNR Pizza, Inc. employee supervised, directed, or controlled any Langel's Pizza/Rodney's Sports Bar employees that may have caused Carin L. Larson to be pushed or to have fallen.

CERTIFICATION

I, Brian Radzinski, state the above statements are true and correct to the best of my understanding. If called as a witness I would completely testify to the contents.

Oct. 23rd - 2019


Signed by

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Mr. Brian J. Radzinski
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