

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

SHANA STEWART	*	CIVIL ACTION
VERSUS	*	NO.: 3:26-CV-392
STARK GROUP, LLC D/B/A STARK USA	*	JUDGE
D/B/A STARK TOOLS USA	*	MAGISTRATE JUDGE

NOTICE OF REMOVAL

NOW INTO COURT, through undersigned counsel, comes Defendant, STARK GROUP, LLC (hereinafter “Defendant”), who with full reservation of rights, files this Notice of Removal and avers that this matter is hereby removed from the 19th Judicial District Court for the Parish of East Baton Rouge, State of Louisiana, to this Court on the following grounds:

BACKGROUND INFORMATION

1.

On April 25, 2025, Plaintiff, Shana Stewart (hereinafter “Plaintiff”), through Venese M. Morgan of The Law Office of Venese M. Morgan, LLC, filed this action, entitled *Shana Stewart v. Stark Group, LLC d/b/a Stark USA d/b/a Stark Tools USA*, Case No. C-762461, Sect. 26, 19th Judicial District Court, Parish of East Baton Rouge, State of Louisiana (the “Petition”). (A copy of the Petition for Damages is attached hereto as Exhibit “A” in accordance with 28 U.S.C. § 1446(a)).

THE DEFENDANT HAS SATISFIED THE PROCEDURAL REQUIREMENTS FOR REMOVAL

2.

Stark Group, LLC has been made a defendant, served through the Louisiana long-arm statute in Chino, California on May 9, 2025, and an Answer was filed with the state court on September 24, 2025. The amount in controversy is not facially apparent from the Petition, but Plaintiff has provided discovery responses claiming the amount in controversy exceeds \$75,000

(discussed in paragraph 10a below). *See Exhibit B.*

3.

The U.S. District Court for the Middle District of Louisiana encompasses the 19th Judicial District Court, Parish of East Baton Rouge, State of Louisiana. the parish in which the state court action is now pending. Therefore, this venue is proper pursuant to 28 U.S.C. § 1441(a).

4.

Pursuant to 28 U.S.C. § 1446(a), filed herewith as Exhibit “A” are copies of all process and pleadings served upon the Defendant in the state court proceeding.

5.

Pursuant to 28 U.S.C. § 1446(b), promptly after notice of this removal is filed, written notice hereof will be given to Plaintiff, and a copy of this Notice of Removal will be filed with the Clerk of the aforesaid state court to effect the removal of the civil action to this Honorable Court. *See Exhibit C.*

THIS COURT HAS SUBJECT MATTER JURISDICTION PURSUANT TO 28 U.S.C. § 1332

6.

This Court has subject-matter jurisdiction over this action pursuant to 28 U.S.C. § 1332.

7.

Upon information and belief, Plaintiff is a resident and domiciliary of the Parish of East Baton Rouge, State of Louisiana.

8.

Defendant, Stark Group, LLC is a limited liability company organized in the State of California with its principal place of business in Chino, San Bernardino County, California. The sole member of Stark Group, LLC is Kit Sze, who is domiciled in Chino, San Bernardino County, California.

9.

Complete diversity of citizenship exists between the Plaintiff and Defendant.

10.

Although the Defendant denies any liability to Plaintiff, the amount in controversy exceeds \$75,000, exclusive of interest and costs. In accordance with Article 893 of the Louisiana Code of Civil Procedure, Plaintiff's Petition does not allege an amount in controversy. Defendant has requested that Plaintiff stipulate that her damages are less than \$75,000; Plaintiff's counsel has refused to stipulate and responded to discovery stating her damages exceed \$75,000. See Exhibit D. Defendant firmly denies any liability for the plaintiff's alleged injuries or damages in this matter. Defendant is free from fault and firmly denies medical causation for the plaintiff's injuries in this matter. The following is for the purpose of establishing the amount in controversy only and is not an admission as to the existence or value of any of Plaintiff's claims.

10a.

Plaintiff claims splashing of boiling hot water on plaintiff's body caused severe injuries, including but not limited to, third and/or fourth degree burns to her arms, chest, stomach, face and underarms requiring medical, surgical, rehabilitative, and related care and treatment for her injuries. Plaintiff claims to still receive burn scraping and treatment but has permanent scarring and disfigurement as a result of the explosion. Plaintiff claims to have suffered past, present and future medical and related expenses, physical injury, pain and suffering, scarring, disfigurement, embarrassment, disability, mental injury, mental anguish and distress, loss of enjoyment of life, and other items of damages which to be shown through discovery and/or at trial. Plaintiff's medical expenses total \$5,747.99 to date, but Plaintiff alleges her medical expenses are far greater than this amount. After the accident on April 26, 2024, plaintiff received treatment at Lane Regional Medical Center for burns and blisters to her mouth, lower part of her face, breast and

arms. Beginning on May 1, 2024, plaintiff began treatment at the Baton Rouge General Burn Clinic for second and third degree scald burns to her face, chest and BUE wherein she continues to treat. On June 12, 2024, her therapist recommended she participate in six months of occupational therapy at the Baton Rouge General Medical Center for the scar management for burns to her upper limbs to help prevent scar bands and contractures and daily wear of compression garments.

Defendant has requested records from all medical facilities that Defendant knows has treated Plaintiff. However, Plaintiff alleges that she has received extensive treatment and therapy for third and fourth degree burns to her face, mouth, chest and arms and continues to receive treatment since the date of the accident. Based on her injuries, it is likely Plaintiff's medicals costs alone will exceed \$75,000 before any consideration of the general damages she has alleged. Given all of the above, we expect her total damages to be well in excess of \$75,000, if she is successful in proving her claims. The undersigned is mindful of the Fifth Circuit's disfavor of sealing records¹, so we have not attached the medical exhibits to this pleading, as they would require sealing to protect Plaintiff's privacy. If the Court requires the medical records as proof of the amount in controversy, the undersigned requests leave to provide them under seal. **Exhibit A, D and E.**

11.

The Defendant reserves the right to amend or supplement this Notice of Removal.

12.

The following Exhibits are attached hereto and incorporated here in:

- A. Plaintiff's State Court Filings;
- B. Answer to Plaintiff's Petition;
- C. Notice of Filing of Notice of Removal;

¹ *Binh Hoa Le v. Exeter Fin. Corp.*, 990 F.3d 410, 416 (5 Cir. 2021); *Sealed Appellant v. Sealed Appellee*, No. 22-50707, 2024 WL 980494, at *2-3 (5 Cir. Mar. 7, 2024).

D. Excerpt of Plaintiff's Discovery Responses;²

E. A Selection of Photographs of Plaintiff's Alleged Injuries;³

WHEREFORE, Defendant, STARK GROUP, LLC, prays that the matter entitled, *Shana Stewart v. Stark Group, LLC*, Case No. C-762461, Sect. 26 of the 19th Judicial District Court, Parish of East Baton Rouge, State of Louisiana, be removed to the United States District Court, Middle District of Louisiana, and that the 19th Judicial District Court, Parish of East Baton Rouge, State of Louisiana, proceed no further in said action filed herein unless and until this action be remanded by this Court.

Respectfully submitted:

JEANSONNE & REMONDET

/s/ Michael J. Remondet, Jr.

MICHAEL J. REMONDET, JR. (#21046)

GARRETT M. BOUDREAUX (#41163)

Post Office Box 91530

Lafayette, LA 70509

Telephone: (337) 237-4370

MikeR@JeanRem.com; GarrettB@JeanRem.com

ATTORNEYS FOR DEFENDANT,
STARK GROUP, LLC

² *Id.*

³ Although undersigned counsel is in possession of additional photographs of Plaintiff's injuries, only a selection of these photographs are attached in order to avoid placing more intimate photographs of Plaintiff into the public record.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system and has been served via email, facsimile, electronic filing notification, and/or first-class United States mail, proper addressed, postage prepaid on the following:

Ms. Venese M. Morgan
The Law Office of Venese M. Morgan, LLC
412 N. 4th St., Suite 102
Baton Rouge, LA 70802
venese@vmorganlawfirm.com

East Baton Rouge Clerk of Court
PO Box 1991
Baton Rouge, LA 70821-1991

Lafayette, Louisiana on this 13th day of April 2026.

/s/ Michael J. Remondet, Jr.
MICHAEL J. REMONDET, JR.

JS 44 (Rev. 12/12)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
SHANA STEWART

DEFENDANTS
STARK GROUP, LLC D/B/A STARK USA D/B/A STARK TOOLS USA

(b) County of Residence of First Listed Plaintiff East Baton Rouge, LA
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant San Bernardino County CA
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)
Venese M. Morgan, The Law Office of Venese M. Morgan, LLC
412 N. 4th St., Suite 102, Baton Rouge, LA 70802
(225) 310-1110

Attorneys (If Known)
Michael J. Remondet, Jr., Jeansonne & Remondet
P. O. Box 91530, Lafayette, LA 70509-1530
(337) 237-4370

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
 2 U.S. Government Defendant
- 3 Federal Question (U.S. Government Not a Party)
 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input checked="" type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input checked="" type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from Another District (specify)
 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 USC 1332

Brief description of cause:
Petition for Damages/Personal Injury/Products Liability

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$** _____
CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

4/13/26

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

SHANA STEWART	*	CIVIL ACTION
VERSUS	*	NO.: 3:26-CV-392
STARK GROUP, LLC D/B/A STARK USA D/B/A STARK TOOLS USA	*	JUDGE MAGISTRATE JUDGE

VERIFICATION

STATE OF LOUISIANA
PARISH OF LAFAYETTE

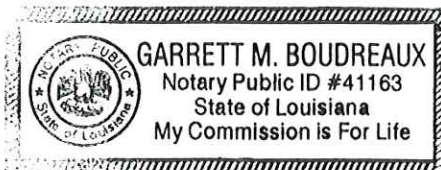
Before me, the undersigned Notary, personally came and appeared MICHAEL J. REMONDET, JR., who, after being duly sworn, deposed and said:

That he is the attorney for defendant, Stark Group, LLC, who filed the Notice of Removal, and that all of the allegations contained therein are true and correct according to the best of his knowledge, information and belief, and that a copy of the foregoing Notice of Removal is this day being sent via email and U.S. Mail to opposing counsel, Venese M. Morgan of The Law Office of Venese M. Morgan, LLC, 412 N. 4th St., Suite 102, Baton Rouge, LA 70802, venese@vmorganlawfirm.com, and that a copy thereof has also this day been filed electronically with the Clerk of Court for the 19th Judicial District Court of East Baton Rouge Parish, State of Louisiana, to be filed in the case of the same title, being suit number C-762461, on the docket of said Court.

MICHAEL J. REMONDET, JR.

This 13th day of April 2026, in Lafayette, Lafayette Parish, Louisiana.

NOTARY PUBLIC



UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

SHANA STEWART	*	CIVIL ACTION
VERSUS	*	NO.: 3:26-CV-392
STARK GROUP, LLC D/B/A STARK USA	*	JUDGE
D/B/A STARK TOOLS USA	*	MAGISTRATE JUDGE

ORDER OF REMOVAL

THE FOREGOING CONSIDERED, it is hereby ordered that the petition of plaintiff in the suit entitled "*Shana Stewart v. Stark Group, LLC.*" filed in the 19th Judicial District Court, Parish of East Baton Rouge, State of Louisiana, under docket number C-762461, is hereby removed to the United States District Court in and for the Middle District of Louisiana.

Counsel for plaintiff, Venese M. Morgan, is hereby notified that all pleadings and document of record in the 19th Judicial District Court docket have been removed and filed with this court.

Baton Rouge, Louisiana, this ____ day of _____ 2026.

UNITED STATES DISTRICT JUDGE

EAST BATON ROUGE PARISH C-762461
Filed Apr 25, 2025 3:20 PM 26
Deputy Clerk of Court

SHANA STEWART

SUIT NO. _____ SEC _____

VERSUS

19TH JUDICIAL DISTRICT COURT

PARISH OF EAST BATON ROUGE

STARK GROUP, LLC
D/B/A STARK USA
D/B/A STARK TOOLS USA

STATE OF LOUISIANA

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, comes Plaintiff, SHANA STEWART, a person of full age of majority residing in the Parish of East Baton Rouge, State of Louisiana, who respectfully represents:

1.

Made Defendant herein is STARK GROUP, LLC ("STARK USA"), a California corporation with its principal place of business at 13850 Central Ave Ste 200, Chino, California, 91710.

2.

This is a products liability personal injury case arising out of an incident which occurred on or about April 26, 2024 at Plaintiff's home located in the Parish of East Baton Rouge.

3.

In March of 2024, Plaintiff purchased Model 99901-H2 Barton 8 Quart Aluminum Stovetop Pressure Cooker from the Walmart App. The product came in its original packaging. Plaintiff used the pressure cooker twice following the purchase.

4.

On or about April 26, 2024, Plaintiff decided to utilize the pressure cooker again for the third time. Approximately thirty to forty minutes into using the pressure cooker, the pressure cooker suddenly and without warning, exploded, resulting in boiling hot water to splash all over her arms, chest, stomach, and underarms causing serious bodily injuries.

5.

On information and belief, Defendant, STARK USA, designed, manufactured, sold, and supplied the aforementioned Model 99901-H2 Barton 8 Quart Aluminum Stovetop Pressure Cooker and/or placed into the stream of commerce a defective and unreasonably dangerous product that caused SHANA STEWART's injuries and damages for the following non-exclusive

Dencie Brunson



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CertID: 2025042801024

East Baton Rouge Parish
Deputy Clerk Of Court

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EXHIBIT "A"

reasons, in violation of the Louisiana Products Liability Act:

- A) At all times referenced in these pleadings, the M Model 99901-H2 Barton 8 Quart Aluminum Stovetop Pressure Cooker manufactured by **STARK USA** was being utilized in a manner reasonably anticipated by the manufacturer;
- B) The Model 99901-H2 Barton 8 Quart Aluminum Stovetop Pressure Cooker, manufactured by **STARK USA**, is unreasonably dangerous pursuant to Louisiana law because it contained a manufacturing defect or flaw which rendered the Model 99901-H2 Barton 8 Quart Aluminum Stovetop Pressure Cooker unreasonably dangerous owing to its construction or composition;
- C) In the alternative, **STARK USA** constructed and placed into the stream of commerce an unreasonably dangerous and defective Model 99901-H2 Barton 8 Quart Aluminum Stovetop Pressure Cooker in that the design of the Model 99901-H2 Barton 8 Quart Aluminum Stovetop Pressure Cooker allowed this incident to occur;
- D) In the alternative, **STARK USA** constructed and placed into the stream of commerce an unreasonably dangerous and defective Model 99901-H2 Barton 8 Quart Aluminum Stovetop Pressure Cooker in that the design of such failed to provide an adequate warning of the potentially dangerous characteristics of the Model 99901-H2 Barton 8 Quart Aluminum Stovetop Pressure Cooker;
- E) In addition, and in the further alternative, the Model 99901-H2 Barton 8 Quart Aluminum Stovetop Pressure Cooker manufactured by **STARK USA** was unreasonably dangerous and thus legally defective for its anticipated use in that it failed to adequately warn of the design defects; and
- F) In addition, and in the further alternative, the Model 99901-H2 Barton 8 Quart Aluminum Stovetop Pressure Cooker manufactured by **STARK USA** failed to conform to certain warranties and representations made by the manufacturer, all of which combined to render the Model 99901-H2 Barton 8 Quart Aluminum Stovetop Pressure Cooker unreasonably dangerous and defective pursuant to Louisiana law.

Page 2 of 5

Kencie Brunson

East Baton Rouge Parish
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6.

Plaintiff shows that **STARK USA** designed and/or manufactured a product or products as described above and that it/they were defective and unreasonably dangerous in design, construction, composition/manufacture and inadequate in its instructions and/or warnings thereby rendering Defendant liable under the Louisiana Products Liability Act and other applicable provisions of Louisiana Law. Specifically, Defendant herein is liable to plaintiff as a result of its breach of one or more of the following obligations:

- A) Its design and manufacture of an unreasonably dangerous product;
- B) Its negligence for failing to provide, as the manufacturer of the Model 99901-H2 Barton 8 Quart Aluminum Stovetop Pressure Cooker, adequate instructions and/or warnings to the purchasers and users of the product;
- C) The negligent failure to properly test the Model 99901-H2 Barton 8 Quart Aluminum Stovetop Pressure Cooker before marketing and selling the device and/or its failure to make sure that the device was properly tested and safe for use by its customers;
- D) The pressure cooker lacked features necessary to make it safe for its intended use;
- E) The pressure cooker contained design features which made it unsafe for its intended purpose;
- F) The pressure cooker was designed in such a way that the blade cannot be locked into the bottom of the pressure cooker to prevent it from falling out;
- G) The pressure cooker's packaging lacked features necessary to make it safe to handle during opening and unpacking;
- H) The pressure cooker lacked a cover for the blade assembly; and
- I) Generally, the failure of the Defendant to act with a degree of care commensurate with existing circumstances.

7.

Defendant's actions and omissions were the direct and proximate cause of Plaintiff's injuries and damages, and as such, Defendant is liable unto Plaintiff for all injuries and damages she suffered as a result of this incident, under all applicable laws including, but not limited to the Louisiana Products Liability Act, LSA-R.S. 9:2800.52 et seq.

Page 3 of 5

Kencie Brunson

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East Baton Rouge Parish
Deputy Clerk Of Court

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8.

At all times pertinent hereto, the pressure cooker was being utilized by Plaintiff in a manner reasonably anticipated by the manufacturer.

9.

The splash of boiling hot water on Plaintiff's body caused severe injuries, including but not limited to third and/or fourth degree burns to her arms, chest, stomach, face, and underarms.

10.

Plaintiff has been required to undergo medical, surgical, rehabilitative, and related care and treatment for her injuries.

11.

At the time of this filing, Plaintiff still receives burn scraping and treatment but has permanent scarring and disfigurement as a result of the explosion.

12.

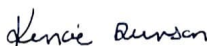
At all times pertinent hereto, Defendant acted through its authorized employees, servants, agents and/or apparent agents.

13.

Plaintiff, **SHANA STEWART**, shows that as a direct and proximate result of the negligence and fault of Defendant herein, she suffered the following non-exclusive list of damages, all past, present and future, for which she is entitled to be compensated from Defendant in an amount which is just and reasonable:

- a) Medical and related expenses;
- b) Physical injury;
- c) Pain and suffering;
- d) Scarring;
- e) Disfigurement;
- f) Embarrassment;
- g) Disability;
- h) Mental injury;
- i) Mental anguish and distress;
- j) Loss of enjoyment of life; and
- k) Other items of damage which may be shown through discovery or at trial.

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East Baton Rouge Parish
Deputy Clerk Of Court

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WHEREFORE, Plaintiff, **SHANA STEWART**, prays that after due proceedings are had that there be judgment in her favor and against Defendant, **STARK GROUP**, in an amount which is just and reasonable in the premises, plus legal interest thereon from the date of judicial demand until paid and for all costs of these proceedings, and for all other general and equitable relief allowed by law.

RESPECTFULLY SUBMITTED:

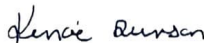


Venese M. Morgan, Esq. #57508
The Law Office of Venese M. Morgan, LLC
412 N. 4th Street, Suite 102
Baton Rouge, LA 70802
225-310-1110 (P)
225-308-2687 (F)
venese@vmorganlawfirm.com
ATTORNEY FOR PLAINTIFF

PLEASE HOLD SERVICE ON DEFENDANT:

Stark Group, LLC
Through the Louisiana Long Arm Statute
13850 Central Ave Ste 200,
Chino, California, 91710

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Deputy Clerk Of Court

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CITATION

(Long Arm LSA R.S. 13:3205 et seq.)

SHANA STEWART
(Plaintiff)

NUMBER C-762461 "26"

VS

19th JUDICIAL DISTRICT COURT

PARISH OF EAST BATON ROUGE

STARK GROUP LLC
(Defendant)

STATE OF LOUISIANA

TO: STARK GROUP LLC, D/B/A STARK USA. D/B/A STARK TOOLS USA

GREETINGS:

Attached to this citation is a certified copy of a petition or other legal pleading that has been filed with the Clerk of Court for East Baton Rouge Parish ("Clerk of Court") and in which service upon you was requested by the filing party. Please read the petition for information concerning any claims that may have been asserted against you.

You are required to file an answer to the petition or other legal pleading in the Clerk of Court's Civil Department located at 300 North Boulevard, Suite 3301, Baton Rouge, Louisiana, and you must do so within **30 DAYS** of the date you were served with the petition.

If you fail to file an answer or other legal pleading, a default judgment may be rendered against you. Any questions you may have seeking legal advice should be directed to an attorney at law, not the Clerk of Court.

This citation was issued by the Clerk of Court for East Baton Rouge Parish, on **APRIL 28, 2025**.



Kenzie Brunson

Deputy Clerk of Court for
Doug Welborn, Clerk of Court

Requesting Attorney: **MORGAN, VENESE M.**
(408) 910-3813

*Also attached are the following documents:
PETITION FOR DAMAGES

JEANSONNE & REMONDET

A LIMITED LIABILITY COMPANY

ATTORNEYS AT LAW

MICHAEL J. REMONDET, JR.

Licensed in Louisiana and Texas

miker@jeanrem.com

200 WEST CONGRESS STREET, SUITE 1100

POST OFFICE BOX 91530

LAFAYETTE, LOUISIANA 70509-1530

PHONE (337) 237-4370

FAX (337) 235-2011

www.jeanrem.com

ONE CANAL PLACE
365 CANAL STREET, SUITE 1660
NEW ORLEANS, LOUISIANA 70130
PHONE (504) 524-7333
FAX (504) 524-3339

Please Reply to Lafayette Office

September 24, 2025

East Baton Rouge Parish Clerk of Court
PO Box 1991
Baton Rouge, LA 70821-1991

Re: Shana Stewart v. Stark Group, LLC
19th JDC C-762461 Sect. 26

Dear Clerk:

Enclosed please find an Answer to Plaintiff's Original Petition for Damages With Demand for Jury, Request for Notice of Trial Date and Jury Order regarding the above referenced case. Please present the Jury Order to the appropriate judge for signature, then file the originals into the record and send an executed copy of the Jury Order to all counsel.

Additionally, I ask that you stamp a copy of same with the date of filing and return it to me.

By copy of this correspondence, a copy of the enclosed is being forwarded to all counsel of record.

Thank you in advance for your assistance in this matter.

With kindest regards and best wishes, I remain

Sincerely,



MICHAEL J. REMONDET, JR.

MJR/lm

Enclosures

10/8/25

CC: Ms. Venese M. Morgan

SHANA STEWART	*	19 TH JUDICIAL DISTRICT COURT
VERSUS	*	DOCKET NO. C-762461 SECT. 26
STARK GROUP, LLC D/B/A STARK USA	*	EAST BATON ROUGE PARISH
D/B/A STARK TOOLS USA	*	STATE OF LOUISIANA

ANSWER TO PLAINTIFF'S PETITION FOR DAMAGES WITH
DEMAND FOR JURY

NOW INTO COURT, through undersigned counsel, comes and appears STARK GROUP, LLC., who make answer to the plaintiff's Petition for Damages, as follows:

1.

The paragraph which precedes the first numbered paragraph is denied for lack of sufficient information in which to justify a belief therein.

2.

The allegations found in Paragraph 1 is admitted as to the status of Stark Group, LLC., the allegations of liability or fault are denied.

3.

The allegations found in Paragraph 2 are denied for lack of sufficient information in which to justify a belief therein.

4.

The allegations found in Paragraph 3 are denied for lack of sufficient information in which to justify a belief therein.

5.

The allegations found in Paragraph 4 are denied for lack of sufficient information in which to justify a belief therein.

6.

The allegations found in Paragraph 5 and its subparts are denied.

7.

The allegations found in Paragraph 6 are denied.

8.

The allegations found in Paragraph 7 are denied.

9.

The allegations found in Paragraph 8 are denied.

10.

The allegations of Paragraph 9 are denied for lack of sufficient information in which to justify a belief therein.

11.

The allegations of Paragraph 10 are denied for lack of sufficient information in which to justify a belief therein.

12.

The allegations of Paragraph 11 are denied for lack of sufficient information to justify a belief therein.

13.

The allegations of Paragraph 12 are denied for lack of sufficient information in which to justify a belief therein.

14.

The allegations of Paragraph 13 are denied for lack of sufficient information to justify a belief therein.

AND NOW, further responding, these defendants aver the following:

15.

In the event that the plaintiff is guilty of contributory fault, contributory fault is pled as an elimination or reduction of any recovery.

16.

In the event that third party fault caused or contributed to the event, third party fault is pled as an elimination or reduction of any recovery.

17.

In the event that the plaintiff has failed to mitigate damages, mitigation is pled as an elimination or reduction of any recovery.

18.

In the event that the product was used in an unforeseeable manner, or in an event that the product's instructions were not followed by the plaintiff and the plaintiff caused or contributed to her injury, the plaintiff's fault is pled as an elimination or reduction of any recovery.

19.

This defendant pleads the defenses provided by Non-Louisiana Products Liability Act R.S. 9:2800.52, et. Seq.

20.

This defendant avers that they were not on notice of defect on or in the product that would give rise to liability.

21.

This defendant notes that there is diversity of citizenship between the parties and that the defendant is unaware of the plaintiff's alleged value of her claim.

22.

The defendant reserves the right to remove this matter to federal court once the amount in controversy has been established.

23.

This defendant hereby requests and demands a trial by jury on all issues so triable.

WHEREFORE, premises considered, defendant, STARK GROUP, LLC, prays that its answer to the plaintiff's Petition for Damages be deemed good and sufficient, and that after the lapse of all legal delays and due proceedings are had, there be judgment rendered in its favor and against the plaintiff dismissing her claims with prejudice and at plaintiff's costs and for all other general and equitable relief to which this defendant may be entitled and/or allowed by law.

FURTHER, this defendant be allowed a trial by jury on all issues upon the proper posting of a bond.

Respectfully submitted,

JEANSONNE & REMONDET

BY:


MICHAEL J. REMONDET, JR. (# 21046)

GARRETT M. BOUDREAUX (# 41163)

200 West Congress, Suite 1100

Post Office Box 91530

Lafayette, Louisiana 70509

Telephone: (337) 237-4370

Facsimile: (337) 235-2011

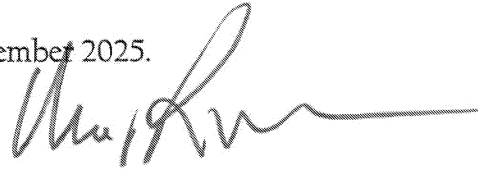
MikeR@jeanrem.com garrettb@jeanrem.com

ATTORNEYS FOR DEFENDANT,
STARK GROUP, LLC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing has this day been forwarded by facsimile, email, and/or deposited in the United States Mail, postage prepaid and properly addressed to all known counsel of record.

Lafayette, Louisiana this 21st day of September 2025.



MICHAEL J. REMONDET, JR.

SHANA STEWART * 19TH JUDICIAL DISTRICT COURT
VERSUS * DOCKET NO. C-762461 SECT. 26
STARK GROUP, LLC D/B/A STARK USA * EAST BATON ROUGE PARISH
D/B/A STARK TOOLS USA * STATE OF LOUISIANA

REQUEST FOR NOTICE OF TRIAL DATE

TO THE CLERK OF COURT in and for the above Parish:

PLEASE TAKE NOTICE that undersigned counsel, attorney for parties listed, does hereby request written notice of the date of trial of the above matter, as well as notice of hearings (whether on merits or otherwise), orders, judgments and interlocutory decrees, and any and all formal steps taken by the parties herein, the Judge or any member of Court, as provided in the Louisiana Code of Civil Procedure, particularly Articles 1572, 1913 and 1914 thereof.

Respectfully submitted,

JEANSONNE & REMONDET

BY: 

MICHAEL J. REMONDET, JR. (# 21046)
GARRETT M. BOUDREAUX (# 41163)
200 West Congress, Suite 1100
Post Office Box 91530
Lafayette, Louisiana 70509
Telephone: (337) 237-4370
Facsimile: (337) 235-2011
MikeR@jeanrem.com; garrettb@jeanrem.com
ATTORNEYS FOR DEFENDANT,
STARK GROUP, LLC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing has this day been forwarded by facsimile, email, and/or deposited in the United States Mail, postage prepaid and properly addressed to all known counsel of record.

Lafayette, Louisiana this 04 day of September 2025.


MICHAEL J. REMONDET, JR.

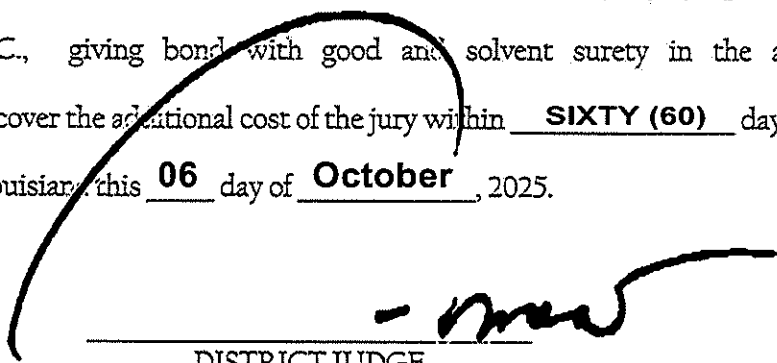
OCT 17 2025

SHANA STEWART	*	19 TH JUDICIAL DISTRICT COURT
VERSUS	*	DOCKET NO. C-762461 SECT. 26
STARK GROUP, LLC D/B/A STARK USA	*	EAST BATON ROUGE PARISH
D/B/A STARK TOOLS USA	*	STATE OF LOUISIANA

JURY ORDER

CONSIDERING defendant, STARK GROUP, LLC., requests for a trial by jury:


IT IS ORDERED that in the event the amount in dispute meets or exceeds the jurisdictional requirement of this Court for a trial by jury, that this matter be tried by a jury upon defendant, STARK GROUP, LLC., giving bond with good and solvent surety in the amount of \$ TBD, to cover the additional cost of the jury within SIXTY (60) days of trial. Baton Rouge, Louisiana, this 06 day of October, 2025.



DISTRICT JUDGE
JUDGE RICHARD "CHIP" MOORE, III

Respectfully submitted,

JEANSONNE & REMONDET

BY: 
 MICHAEL J. REMONDET, JR. (# 21046)
 GARRETT M. BOUDREAUX (# 41163)
 200 West Congress, Suite 1100
 Post Office Box 91530
 Lafayette, Louisiana 70509
 Telephone: (337) 237-4370
 Facsimile: (337) 235-2011
MikeR@jeanrem.com;
garettb@jeanrem.com
 ATTORNEYS FOR DEFENDANT,
 STARK GROUP, LLC.

SHANA STEWART	*	19 TH JUDICIAL DISTRICT COURT
VERSUS	*	DOCKET NO. C-762461 SECT. 26
STARK GROUP, LLC D/B/A STARK USA	*	EAST BATON ROUGE PARISH
D/B/A STARK TOOLS USA	*	STATE OF LOUISIANA

NOTICE OF FILING OF NOTICE OF REMOVAL

TO: SHANA STEWART
Through her attorney of record
Ms. Venese M. Morgan
The Law Office of Venese M. Morgan, LLC
412 N. 4th St., Suite 102
Baton Rouge, LA 70802
venese@vmorganlawfirm.com

PLEASE TAKE NOTICE that defendant, STARK GROUP, LLC, appearing specifically and solely for this purpose, and with full reservation of all rights, exceptions, and defenses, has on the 13th day of April 2026, removed the plaintiff's suit to the United States District Court for the Middle District of Louisiana, on the grounds stated in the Notice of Removal filed therewith, a copy of which is attached hereto as Exhibit "A."

Respectfully submitted,

JEANSONNE & REMONDET



MICHAEL J. REMONDET, JR. (#21046)
GARRETT M. BOUDREAUX (#41163)
Post Office Box 91530
Lafayette, LA 70509
Telephone: (337) 237-4370
MikeR@JeanRem.com; GarrettB@JeanRem.com
ATTORNEYS FOR DEFENDANT,
STARK GROUP, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system and has been served via email on all counsel of record.

Lafayette, Louisiana on this 13th day of April 2026.


MICHAEL J. REMONDET, JR.

DEC 09 2025

SHANA STEWART

DOCKET NO.: 762461 SEC. 26

VERSUS

19TH JUDICIAL DISTRICT COURT

PARISH OF EAST BATON ROUGE

STARK GROUP, LLC D/BA STARK USA
D/B/A STARK TOOLS USA

STATE OF LOUISIANA

RESPONSES TO INTERROGATORIES

To: STARK GROUP, LLC D/BA STARK USA D/B/A STARK TOOLS USA

Through their Attorneys of Record

MICHAEL J. REMONDET, JR. (#21046)

GARRETT M. BOUDREAUX (#41163)

200 West Congress, Suite 1100

P.O. Box 91530

Lafayette, LA 70509

Phone: 337.237.4370

Facsimile: 337.235.2011

Email: MikeR@jeanrem.com; Gaarrettb@jeanrem.com

NOW COMES, Plaintiff, SHANA STEWART, through undersigned counsel, who responds to Defendants' *Interrogatories and Requests for Production of Documents* as follows:

GENERAL STATEMENT

Plaintiff reserves her right to continue to supplement these responses as information and/or documents become ascertainable and available.

These responses are made without prejudice to the rights of plaintiff to provide additional evidence at the time of trial.

**INCORPORATION OF OBJECTIONS INTO RESPONSES
TO DISCOVERY REQUESTS**

Plaintiff makes general objections to the following discovery requests and incorporates each one of those objections into each response as if specifically stated therein.

Any specific objection set forth in each response is in addition to the foregoing/previous objections and, unless specifically stated otherwise, Plaintiff's responses are limited in accordance with each of those objects. Plaintiff responds to these discovery requests without waiving or intending to waive, but on the contrary, preserving and intending to preserve: (a) the right to object, on the grounds of competency, privilege, relevance, or materiality, or any other proper ground, to the use of such documents or information for any purpose, in whole or in part, in any subsequent proceedings, in this action or in any other action; (b) the right to object on any ground, at any time, to interrogatories, or other discovery procedures involving or relating to the subject of the interrogatory to which Plaintiff has responded herein; and, (c) the right at any time to revise, correct, add to, or clarify any of the objections and responses made herein.

Furthermore, an inadvertent production of any document shall not constitute a waiver of any privilege or any other ground for objecting to discovery with respect to such document or any other document, or with respect to the subject matter thereof or the information contained therein; nor shall such inadvertent production waive Plaintiff's right to demand that such document be returned or to object to the use of the document or other information contained therein during this or any other proceeding.

ANSWERS TO INTERROGATORIES

INTERROGATORY NUMBER 1:

Please provide the following:

- (a) Your full name;**
- (b) Any nicknames or aliases which you have used or by which you are known;**
- (c) Your date of birth;**
- (d) Your Social Security number.**
- (e) Your driver's license number and the state of issue;**
- (f) Your complete mailing address; and**
- (g) Any former residence address at which you have resided during the past ten (10) years, including the dates you resided at each address.**

RESPONSE TO INTERROGATORY NUMBER 1:

- (a) SHANA SHANTA STEWART**
- (b) N/A**
- (c) [REDACTED]**
- (d) [REDACTED]**
- (e) Mississippi-800786809**
- (f) 2131 Elm Hills Pike, Apt # E118, Memphis, TN 37210**
- (g) Current-2131 Elm Hills Pike, Apt # E118, Memphis, TN 37210**
2021-2025-11201 Plank Road, Apt# 69, Baton Rouge, LA 70811
2019-2020-McClelland Drive Apt 7, Baton Rouge, LA
2018 (4 months) Ferriday, LA
2004-2018 -328 M Street, Woodville, MS 39664

INTERROGATORY NUMBER 2:

If you contend that you lost any wages or income or suffered an impairment of earning capacity as a result of the incident alleged in the Petition, please state:

- (a) The total value of your lost wages or income to the present date**
- (b) The dates you were unable to work and**
- (c) The total value of your claim for impairment of future earnings capacity**

RESPONSE TO INTERROGATORY NUMBER 2:

OBJECTION: This Interrogatory seeks the disclosure of information unrelated to the subject accident, and as such, it is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiver of this objection, Plaintiff responds:

Client has been on Social Security Disability since 1980.

INTERROGATORY NUMBER 3:

Please identify your current employer and all prior employers for the past ten (10) years, giving names and last known addresses of the employer(s), dates of employment, and identify your immediate supervisor in each such employment, your pay rate at the beginning and termination of each employment, the reasons for leaving each employment and whether any pre-employment physical examination was made, the name of the employer requiring the examination, and the name and address of the physician performing the examination.

RESPONSE TO INTERROGATORY NUMBER 3:

OBJECTION: This Interrogatory seeks the disclosure of information unrelated to the subject accident, and as such, it is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiver of this objection, Plaintiff responds:

Client has been on Social Security Disability since 1980.

INTERROGATORY NUMBER 4:

Do you have any other source of income other than any wages or salary earned in any employment described above? If yes, please describe in detail each other source of income, the amount of such income, and when you received such income.

RESPONSE TO INTERROGATORY NUMBER 4:

Yes, Social Security Disability

Amount: \$973.00

When received: Monthly

INTERROGATORY NUMBER 5:

Please describe all medical treatment which you have received during the ten (10) years preceding the date of the accident described in your Petition, to include:

- (a) The dates on which the treatment was received**
- (b) The name and address of the physician or other provider of medical services from whom you received such treatment**
- (c) The name and address of any hospital, clinic, or other provider of medical services where you received such treatment and**
- (d) The reason for and nature of the treatment.**

RESPONSE TO INTERROGATORY NUMBER 5:

Objection – Unduly burdensome. This interrogatory is unduly burdensome as medical witnesses have made entries in medical records making it burdensome to require Plaintiff to list the health care providers, dates, contents, etc. which Defendants seek in this discovery. Medical records available to Defendants fulfill Plaintiff's obligation to supply this type of information.

Without waiver of this objection, Plaintiff responds:

See attached medical records from Lane Regional Medical Center and Baton Rouge Medical Center. Plaintiff reserves the right to supplement this response if additional information becomes available.

INTERROGATORY NUMBER 6:

Please list by name and address every pharmacy or store from which you have obtained prescription medications during the last ten (10) years.

RESPONSE TO INTERROGATORY NUMBER 6:

DeLee's Pharmacy, 251 US Hwy 61 North, Madison, La

City Drug Store, 616 Main Steet, Woodville, MS 39669

Walgreens, 6485 Groom Road, Baker, LA 70714

Jerk's Pharmacy, 1404 Academy Street, Centerville, MS 39361

INTERROGATORY NUMBER 7:

Please describe all medical treatment, which you have received since the date of the accident described in your Petition, to include:

- (a) The name and address of the physician or other provider of medical services from whom you received such treatment**
- (b) The name and address of any hospital, clinic, or other provider of medical services where you received such treatment**
- (c) The reason for and nature of the treatment**
- (d) The amount of medical expenses incurred and**
- (e) Please describe each injury or complaint you claim to have incurred as a result of the subject accident, including the extent and duration of each.**

RESPONSE TO INTERROGATORY NUMBER 7:

Objection – Unduly burdensome. This interrogatory is unduly burdensome as medical witnesses have made entries in medical records making it burdensome to require Plaintiff to list the health care providers, dates, contents, etc. which Defendants seek in this discovery. Medical records available to Defendants fulfill Plaintiff's obligation to supply this type of information.

Without waiver of this objection, Plaintiff responds:

See attached medical records from Lane Regional Medical Center and Baton Rouge Medical Center. Plaintiff reserves the right to supplement this response if additional information becomes available.

INTERROGATORY NUMBER 8:

Please provide the name, address and telephone number of your family physician.

RESPONSE TO INTERROGATORY NUMBER 8:

Jennifer Lanehart, 451 Bank Street, Woodville, MS 39669, Telephone: 601.883.3421

INTERROGATORY NUMBER 9:

If prior to or subsequent to the date of institution of this proceeding you have sued or made claim, either on your own behalf or on behalf of anyone else, to recover damages for personal injury, worker's compensation benefits, medical expenses, disability benefits, or other insurance benefits, please state for each such suit or claim:

- (a) When, where and against whom such suit or claim was instituted**
- (b) When and by what means such suit or claim was terminated or resolved, whether by judgment, compromise, settlement, or otherwise**

RESPONSE TO INTERROGATORY NUMBER 9:

- A) When: 2001
Where: Baton Rouge, LA
Against who: Plaintiff is unable to recall as it has been over (20) years since the accident occurred.
- B) 2001, Settlement
- C) Plaintiff reserves the right to supplement this response if additional information becomes available.

INTERROGATORY NUMBER 10:

With regard to the facts and circumstances set forth in your Petition, please state the name and present or last known address of each person who:

- (a) Witnessed the incidents described; or**
- (b) Has any knowledge of facts relevant to the said incidents.**

RESPONSE TO INTERROGATORY NUMBER 10:

Refer to doctor, burn unit specialist, police report witnesses, EMTs, police officer, any witnesses called upon by the defendants, any and all doctors named in any and all medical reports from Lane Regional Medical Center and Baton Rouge Medical Center provided herein, and the following witnesses:

Paisley Bynum (daughter), 11021 Plank Road Apt# 69, Baton Rouge, LA 70811
Mary Johnson (neighbor), 11021 Plank Road Apt# 68, Baton Rouge, LA 70811

Plaintiff reserves the right to supplement this response if additional information becomes available.

INTERROGATORY NUMBER 11:

- (a) **If the incidents described in the Petition were reported to any person or entity, please state: (a) When and where such report was made; and**
- (b) **The present whereabouts of such report.**

RESPONSE TO INTERROGATORY NUMBER 11:

Refer to doctor, burn unit specialist, police report witnesses, EMTs, police officer, any witnesses called upon by the defendants, any and all doctors named in any and all medical reports from Lane Regional Medical Center and Baton Rouge Medical Center provided herein. Plaintiff reserves the right to supplement this response if additional information becomes available.

INTERROGATORY NUMBER 12:

Were any photographs or motion pictures taken of the accident scene or of any object or person involved in the accident? If so, please supply:

- (a) **The date on which each such photograph film was taken**
- (b) **The name and address of the person who now has custody of the**
- (c) **photographs or pictures and**
- (d) **Whether you will, without a motion to produce, furnish a copy of each such photograph or motion picture to undersigned counsel, and if so, please advise how and when such may be made available.**

RESPONSE TO INTERROGATORY NUMBER 12:

See Attachments. Plaintiff reserves the right to supplement this response if additional information becomes available.

INTERROGATORY NUMBER 13:

Were any investigations, inspections, measurements or tests made or taken with respect to the accident, the accident scene or any object involved in the accident? If so, please state:

- (a) **The name and address of the person who conducted each test, inspection or measurement**
- (b) **The place where each investigation, test, inspection, or measurement was performed and**
- (c) **The name and address of the person now having custody of any written report concerning each test, inspection or measurement.**

RESPONSE TO INTERROGATORY NUMBER 13:

None at this time. However, discovery is ongoing. Plaintiff reserves the right to supplement this response if additional information becomes available.

INTERROGATORY NUMBER 14:

With respect to any person whom you have contacted or consulted as a possible witness to give expert opinion testimony or whom you may or will call as an expert witness at the trial of this matter, state the following:

- (a) **Name and address**
- (b) **Name and address of such person's employer or organization with which he is associated in any professional capacity; and**
- (c) **The field in which he is to be offered as an expert.**

RESPONSE TO INTERROGATORY NUMBER 14:

None at this time. However, discovery is ongoing. Plaintiff reserves the right to supplement this response if additional information becomes available.

INTERROGATORY NUMBER 15:

Are you or your attorney aware of the existence of any written or recorded statement made by or for any party or witness? If so, please state:

- (a) The name, employer, occupation and last known address of the person or persons taking the statement**
- (b) The name and last known address of the person now in possession of the original statement and**
- (c) By way of a request for production of documents, please furnish a copy of each statement.**

RESPONSE TO INTERROGATORY NUMBER 15:

None at this time. However, discovery is ongoing. Plaintiff reserves the right to supplement this response if additional information becomes available.

INTERROGATORY NUMBER 16:

Please state the amount in damages which you believe you are entitled to recover as a result of the injuries you allegedly sustained in the accident described in the petition.

RESPONSE TO INTERROGATORY NUMBER 16:

Damages exceed the amount of \$75,000.00. However, the exact amount of damages sought is unknown at this time. Plaintiff reserves the right to supplement this response if additional information becomes available.

INTERROGATORY NUMBER 17:

Were you involved in any automobile and/or other accidents at any time prior or subsequent to the subject accident? If so, please state the dates of the accidents, the names and addresses of the insurance adjusters, any injuries incurred, medical treatment received, the disposition of the claims, and the names and addresses of any witnesses to the accidents.

RESPONSE TO INTERROGATORY NUMBER 17:

Refer to the response to Interrogatory #9.

INTERROGATORY NUMBER 18:

If you have ever been arrested, give the dates, charges, locations of arrest (state and county or parish), disposition of each such charge (i.e., were you convicted, found guilty, charged *nolle prosequi*, entered a plea of *nolo contendere*, etc.), and the sentence imposed, including dates served, if any, as a result of each arrest and prosecution.

RESPONSE TO INTERROGATORY NUMBER 18:

N/A. Client has never been arrested.

INTERROGATORY NUMBER 19:

Please describe all activities, including, but not limited to employment, if applicable, which you claim that you no longer can perform as a result of the incident forming the basis of this litigation.

RESPONSE TO INTERROGATORY NUMBER 19:

Ms. Stewart has burns to her hands that often cause stiffness, weakness, and reduced range of motion because of scar tissue and contractures. She has difficulty with fine motor tasks such as writing, buttoning clothes, typing, handling small objects. She also struggles with gripping or lifting objects, repetitive tasks requiring hand strength such as cooking, cleaning, opening jars, and using tools and any tasks requiring full arm extension or rotation when joints stiffen.

Ms. Stewart's burn injuries and skin grafts have limited her mobility and stamina. She struggles with heavy lifting, strenuous activities, extended overhead movements, exercise that stretches or compresses burned areas, and activities that cause friction on grafted skin such as certain sports, scrubbing, carrying backpacks.

Ms. Stewart's severe burns create tightness around the face and neck. She has trouble with turning the head fully, facial expressions or eyelid movement (depending on burn location), eating certain foods if mouth mobility is reduced, shaving, makeup application, or facial hygiene.

Ms. Stewart's damaged skin and nerves has changed temperature regulation which has caused limitations such as, she can no longer work in hot environments (kitchens, outdoor labor, exercise in heat), cannot stay in the sun for extended periods, use hot tubs, saunas, or heated tools and the burned skin is also sensitive to cold cannot handle long exposures to cold.

Ms. Stewart's grafted or healed skin has been fragile for months causing her difficulties and limitations such as swimming in chlorinated pools (irritation risk), wearing tight or rough clothing, contact sports, and any jobs or chores that require protective gear that rubs the skin.

This accident has also created issues that affect both mental health and confidence. She struggles with attending social activities (due to scarring or anxiety), participating in public-facing roles and activities that trigger memories of the accident.

INTERROGATORY NUMBER 20:

Have you ever at any time filed a claim Social Security benefit, Veterans Administration benefits, Unemployment Compensation benefits, Workman's Compensation benefits, Disability Insurance benefits, Maintenance and Cure or any other benefits not specifically named herein? If so, please identify the agency with which the claim was filed, the date the claim was filed, whether the claim was approved or rejected, and if rejected, the reason for the rejection.

RESPONSE TO INTERROGATORY NUMBER 20:

Yes. Social Security Disability filed in 1980 and the claim was approved.

INTERROGATORY NUMBER 21:

Please state the source of payment or coverage to plaintiff for payment of medical bills, and hospitalization including but not limited to Social Security, Medicare, or Medicaid and, if so, give contact information on the source, ID number, etc.

RESPONSE TO INTERROGATORY NUMBER 21:

HUMANA MEDICARE PPO

INTERROGATORY NUMBER 22:

Please list by name and address every health insurance plan which has covered you during the last ten (10) years.

RESPONSE TO INTERROGATORY NUMBER 22:

2023- Current-HUMANA MEDICARE PPO

2015-Medicare

1980-Medicaid

INTERROGATORY NUMBER 23:

Please list all medications, intoxicants, or other narcotics (including alcohol, prescription, and non-prescription drugs) that you had consumed in the twenty-four (24) hour period preceding the accident made the subject of this lawsuit, including the amount, dosage, time and place consumed. If said medication was a prescription medication, please describe why such medication was being consumed and by whom it was being prescribed.

RESPONSE TO INTERROGATORY NUMBER 23:

See attached medical records from Lane Regional Medical Center and Baton Rouge Medical Center.

ANSWERS TO REQUEST FOR PRODUCTION OF DOCUMENT

REQUEST FOR PRODUCTION NUMBER. 1:

In paragraph 3 of the petition, you claim that the plaintiff purchased the product from Walmart app. Please produce any and all documents associated with that sale, including, but not limited to, the receipt, and any and all documentation.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 1:

See attached receipt of proof of purchase.

REQUEST FOR PRODUCTION NUMBER. 2:

In Paragraph 4 of your petition for damages, the plaintiff claims she utilized the pressure cooker again for the third time. Please produce a description on the other two times and any and all photographs or other evidence which support the plaintiff's claims that the pressure cooker suddenly, without warning, exploded.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 2:

Ms. Stewart always read the safety instructions before using the stovetop pressure cooker. She inspected the pot, lid, gasket, vent, and valve to ensure they were clean and undamaged. For her first use, she did not boil plain water; instead, she "seasoned" the cooker with a mild first cycle. She also avoided using metal utensils inside the pot.

She added the required amount of liquid, then placed the food inside without exceeding the max fill line. Before sealing the cooker, she confirmed the vent pipe was clear and the silicone seal was properly positioned.

She locked the lid by turning it clockwise and checked the cover-lock indicator. She then placed the pressure regulator onto the vent.

Ms. Stewart set the cooker on a compatible stove, turned the heat to high to build steam, and watched for a steady, slow release. When the cooker reached stable pressure, she reduced the heat and began timing.

After cooking, she turned off the heat and allowed the pressure to drop naturally. She did not open the lid until the indicator showed it was safe, then removed the pressure regulator and opened the lid carefully. She took out the hot food and cleaned the pot, lid, gasket, and regulator. She regularly inspected the gasket and stored the cooker with the lid off or inverted to prevent odors and damage.

REQUEST FOR PRODUCTION NUMBER 3:

Please produce any documents in support of Paragraph 5 of the plaintiff's Petition for Damages including subparts. Please produce any and all names and addresses of any and all witnesses that will support the claims presented in Paragraph 5 of the plaintiff's Petition for Damages.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 3:

None at this time. Plaintiff reserves the right to supplement this response if additional information becomes available.

REQUEST FOR PRODUCTION NUMBER 4:

Please produce any and all documents and please produce the name and addresses of any and all witnesses that will support the claims presented in Paragraph 6 of the plaintiff's Petition for Damages.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 4:

None at this time. Plaintiff reserves the right to supplement this response if additional information becomes available.

REQUEST FOR PRODUCTION NUMBER 5:

Please produce any and all documents and please produce the name and addresses of any and all witnesses that will support the claims presented in Paragraph 7 of the plaintiff's Petition for Damages.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 5:

None at this time. Plaintiff reserves the right to supplement this response if additional information becomes available.

REQUEST FOR PRODUCTION NUMBER 6:

Please produce any and all documents and please produce the name and addresses of any and all witnesses that will support the claims presented in Paragraph 8 of the plaintiff's Petition for Damages.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 6:

Paisley Bynum (daughter), 11021 Plank Road Apt# 69, Baton Rouge, LA 70811

REQUEST FOR PRODUCTION NUMBER 7:

Please produce any and all documents and please produce the name and addresses of any and all witnesses that will support the claims presented in Paragraph 9 of the plaintiff's Petition for Damages.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 7:

Refer to Response to Interrogatory #10

REQUEST FOR PRODUCTION NUMBER 8:

Please produce any and all medical, including surgical rehabilitation and related care as alleged in Paragraph 10 of the plaintiff's Petition for Damages.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 8:

Refer to attachments of medical records from both Lane Regional Medical Center and Baton Rouge General Medical Center.

REQUEST FOR PRODUCTION NUMBER 9:

Please produce any and all photographs and documents of whatever kind that supports the plaintiff's claim in Paragraph 11 for damages sought.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 9:

Refer to attachments of photos of injuries.

REQUEST FOR PRODUCTION NUMBER 10:

If you are making a claim for loss of wages as a result of the incident complained of, provide a copy of your complete federal and state wage and income tax returns, filed either individually or jointly, in the last five (5) years, including all W-2 Forms and Schedules.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 10:

See Response to Interrogatory # 2

REQUEST FOR PRODUCTION NUMBER 11:

Please produce copies of all of your health and medical records, hospital records, receipts for payments of medical bills, and any and all other records relating to your physical and mental health, examinations and treatment by any and all healthcare providers, whether before or after the accident giving rise to this suit and sign the enclosed Medical Authorization and return same to undersigned counsel for Defendants.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 11:

Refer to attachments of medical records from both Lane Regional Medical Center and Baton Rouge General Medical Center and attached signed Medical Authorization forms.

REQUEST FOR PRODUCTION NUMBER 12:

Please produce a copy of any statements taken in regard to the accident, which is the subject of this litigation.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 12:

See Response to Interrogatory # 10

REQUEST FOR PRODUCTION NUMBER 13:

Please produce color copies of any photographs motion pictures, films, drawings, diagrams, sketches, videotapes, and other pictorial evidence depicting the accident scene or of any object or person involved in the accident.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 13:

Refer to attachments of photos of injuries.

REQUEST FOR PRODUCTION NUMBER 14:

Please produce copies of any written reports concerning any inspections, measurements, or tests made or taken with respect to the accident scene or any object involved in the accident and/or any written reports concerning any investigation of the accident in question.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 14:

See Response to Interrogatory # 10

REQUEST FOR PRODUCTION NUMBER 15:

Please provide copies of any written or recorded statements in your possession made by or for any party or witness.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 15:

See Response to Interrogatory # 10

REQUEST FOR PRODUCTION NUMBER 16:

Please produce any and all correspondence, letters of guarantee, statements, receipts, or itemizations of any and all payments issued by any source on your behalf, as well as any medical funding agreements with third parties, for payment of medical bills, and hospitalization including but not limited to Social Security, Medicare, or Medicaid, and provide the source's contact information, ID number, etc.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 16:

None at this time. Plaintiff reserves the right to supplement this response if additional information becomes available.

REQUEST FOR PRODUCTION NUMBER 17:

Please produce a photocopy of the front and back of your Medicare Card, if you are a Medicare recipient.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 17:

Please see attached insurance card from Humana.

REQUEST FOR PRODUCTION NUMBER 18:

Please sign and return the attached Authorization to Release Employment/Personnel Records.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 18:

Please see attached signed Authorization to Release Employment/Personnel Records

REQUEST FOR PRODUCTION NUMBER 19:

Please sign and return the attached Tax Information Authorization and Request for Copy or Transcript of Tax Forms.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 19:

N/A as my client has been receiving Social Security Disability since 1980 and has never filed taxes.

REQUEST FOR PRODUCTION NUMBER 20:

Please produce a copy of the front and back of your driver's license and sign and return the attached Authorization to Release Louisiana Driver's License Information.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 20:

Please see attached a copy of the front and back of our client's driver's license and signed Authorization to Release Louisiana Driver's License Information

REQUEST FOR PRODUCTION NUMBER 21:

Please sign and return the attached Authorization to Release Social Security Earnings Information.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 21:

Please see attached signed Authorization to Release Social Security Earnings Information

REQUEST FOR PRODUCTION NUMBER 22:

Please sign and return the attached Authorization to Release Social Security Disability Records.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 22:

Please see attached and signed Authorization to Release Social Security Disability Records.

REQUEST FOR PRODUCTION NUMBER 23:

Please sign the attached Centers for Medicare and Medicaid Services Form if you are a recipient or eligible for receiving benefits from either Medicare and/or Medicaid.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 23:

Please see attached and signed Centers for Medicare and Medicaid Services Form.

REQUEST FOR PRODUCTION NUMBER 24:

If you are a Medicare and/or Medicaid recipient, please produce a copy of any and all Conditional Payment summaries or estimates prepared by Medicare/ CMS in connection with these claims you are making in this lawsuit and a screen print from "mymedicare.gov" showing the amount of any conditional payments in connection with the claim you are making.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 24:

None at this time. Plaintiff reserves the right to supplement this response if additional information becomes available.

REQUEST FOR PRODUCTION NUMBER 25:

Please produce a copy of the front and back of every health plan and/or medical benefits card for any coverage or payment of your medical expenses that you have had during the last ten (10) years, including but not limited to employer sponsored health plans; health insurance policies and/or plans, including Health Maintenance Organizations, Exclusive Provider Organizations, Consumer Driven Health Plans, High Deductible Health Plans, Health Reimbursement Arrangements, Health Savings Account qualified or compatible plans and Health Savings Accounts, Personal Care Accounts, Point of Service Product or plans, Fee for Service plans, and Preferred Provider Organizations, COBRA plans; medical payments policies; indemnity plans; health reimbursement arrangements; employee stipends for healthcare and/or medical expenses; Medicare and Medicare Supplement plans; Medicaid and/or Children's Health Insurance plans; Dual Special Needs Plans; Marketplace or Affordable Care Act plans; short-term, temporary, or limited duration health insurance plans; supplemental health policies; hospital policies; accident policies; prescription policies; or prescription discount policies.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 25:

Refer to response to request for production of documents# 17

REQUEST FOR PRODUCTION NUMBER 26:

Please produce copies of any and all evidence of out-of-pocket costs and/or cost-sharing, including estimates of benefits and receipts for copayments, coinsurance, deductibles, balance billing amounts for non-network providers, cost of non-covered services, and any other amounts which you have paid or are owed by you to a medical provider, including physicians, hospitals, clinics, facilities, or pharmacies, for treatment you relate to the accident made basis of this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 26:

None at this time. Plaintiff reserves the right to supplement this response if additional information becomes available.

REQUEST FOR PRODUCTION NUMBER 27:

Please sign and return the attached Penal Records Authorization.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 27:

Please see attached and signed Penal Records Authorization

REQUEST FOR PRODUCTION NUMBER 28:

Please sign and return the attached Insurance Benefits Authorization.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 28:

Please see attached and signed Insurance Benefits Authorization.

REQUEST FOR PRODUCTION NUMBER 29:

Copies of any and all documents upon which you intend to prove any claim you may have made against Defendants.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 29:

Medical records from both Lane Regional Medical Center and Baton Rouge General Medical Center, photos and any and all demonstrative evidence used by the defendant or defendant's counsel at trial. Plaintiff reserves the right to supplement this response if additional information becomes available.

REQUEST FOR PRODUCTION NUMBER 30:

All documents identified, described, or mentioned in your answers to the interrogatories propounded by Defendants.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 30:

Refer to response to request for production of documents# 29. Plaintiff reserves the right to supplement this response if additional information becomes available.

REQUEST FOR PRODUCTION NUMBER 31:

All pleadings, depositions, settlement documents, accident reports, and medical records and bills pertaining to any previous claim or lawsuit for personal injuries filed by you for any reason during the five (5) year time period before the incident through the present.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 31:

There are no previous claims or lawsuits for personal injuries filed by Ms. Stewart for any reason during the five (5) year time period before the incident through the present.

REQUEST FOR PRODUCTION NUMBER 32:

All reports prepared by any expert retained by you with regard to the incident which is the subject of your Petition.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER. 32:

Please see response to Interrogatory # 14

SHANA STEWART

DOCKET NO.: 762461 SEC. 26

VERSUS

19TH JUDICIAL DISTRICT COURT

PARISH OF EAST BATON ROUGE

STARK GROUP, LLC D/BA STARK USA
D/B/A STARK TOOLS USA

STATE OF LOUISIANA

AFFIDAVIT

STATE OF LOUISIANA

PARISH OF EAST BATON ROUGE

BEFORE ME, the undersigned authority personally came and appeared,


SHANA STEWART

plaintiff, who after being duly sworn did depose and say that she has reviewed the foregoing answers to interrogatories and that the same are true and correct to the best of her information, knowledge and belief.



SHANA STEWART

SWORN TO AND SUBSCRIBED BEFORE ME, this 25th day of November, 2025.



NOTARY PUBLIC
Venese M. Morgan, LSBA 37508

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing has served upon STARK GROUP, LLC D/BA STARK USA D/B/A STARK TOOLS USA through their Attorneys of Record, MICHAEL J. REMONDET, JR. and GARRETT M. BOUDREAUX via email at MikeR@jeanrem.com and Gaarrettb@jeanrem.com, on or about the 25th day of November, 2025 at Baton Rouge, Louisiana.



Venese M. Morgan, Esq.







