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IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

FILED
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RICHARD R. ROOPER, CLERK

ERIC NYSTROM,)
)
Plaintiff,)
)
v.)
)
NASHVILLE HOCKEY CLUB LP,)
d/b/a NASHVILLE PREDATORS,)
)
Defendants.)

E.V.
D.C.
No. 17C3224
Workers' Compensation

COMPLAINT

Comes now the Plaintiff, Eric Nystrom, and for his cause of action in this workers' compensation case would show unto the Court as follows:

1. This is a proceeding under and by virtue of the Tennessee Workers' Compensation Law, T.C.A. §50-6-101 *et seq.* The Plaintiff and the Defendant, Nashville Hockey Club LP, d/b/a Nashville Predators (referred to herein as "Employer" and/or "Nashville Predators"), were subject to and operating under the Tennessee Workers' Compensation Law at the time of the work accidents that are the subject of this Complaint.

2. The Plaintiff was a resident of Nashville, Tennessee at the times the work injuries in this Complaint occurred. The Defendant is a Limited Partnership with its principal place of business located at 501 Broadway, Nashville, Davidson County, Tennessee. Defendant's Registered Agent for Service of Process is Michelle Kennedy, 501 Broadway, Nashville, Tennessee 37203-3980.

3. On or about September 4, 2013 (left hip injury, including leg), November 15, 2013 (concussion injury), and January 12, 2014 (cervical injury), the Plaintiff Eric Nystrom, while acting in the course and scope of his employment as a professional hockey player for the Nashville Predators, suffered the above-specified work injuries. Plaintiff immediately reported these work injuries to his Employer, Nashville Predators. Moreover, the Nashville Predators had actual knowledge of each of Plaintiff's work injuries specified in this paragraph.

4. The Defendant Nashville Predators accepted each of Plaintiff's above-specified workers' compensation injury claims as compensable. Furthermore, the Defendant provided Plaintiff with authorized medical care and treatment for each of Plaintiff's above-specified work injuries.

5. As a result of the work injuries that are the subject of this workers' compensation Complaint, the Plaintiff was temporarily and totally disabled for a period of time. Furthermore, he retains a permanent partial disability as a consequence of his above-specified work injuries while employed by the Nashville Predators.

6. A Benefit Review Conference ("BRC") was held in this matter on September 27, 2017 at the Tennessee Department of Labor and Workforce Development, Bureau of Workers' Compensation ("BWC"). Unfortunately, the BRC resulted in an impasse, which was issued formally in a Benefit Review Report on September 29, 2017.

WHEREFORE, the Plaintiff prays as follows:

1. For a judgment against Defendants in the amount of any unpaid temporary total disability benefits, all reasonable and necessary medical expenses incurred or which will be incurred in the future for the above-specified specified work

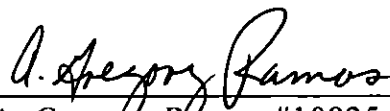
injuries, including lifetime medical benefits for the specified work injuries, and for an award of permanent disability benefits to which Plaintiff is entitled under the Tennessee Workers' Compensation Law. Plaintiff respectfully requests that said award be made in a lump sum.

2. For a judgment against Defendant in the amount of discretionary costs that Plaintiff is determined by this Court to be entitled to relating to any and all fees charged by treating physicians for the purpose of giving a deposition, as well as any and all other deposition expenses, and any and all other incidental expenses necessitated by the prosecution of Plaintiff's cause of action.

3. For a judgment assessing the costs of this litigation to the Defendant.

4. For such other general relief to which Plaintiff may be entitled.

Respectfully submitted,



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