

**PAUL GRIECO, ESQ.**  
**LANDSKRONER • GRIECO • MADDEN, LLC**  
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## **CURRICULUM VITAE**

### **PERSONAL**

Born April 8, 1964 Brooklyn, New York  
1989 Admitted to New York Bar  
1994 Admitted to United States District Court - Eastern and Southern Districts of New York  
1995 Admitted to Ohio Bar  
1998 Admitted to United States District Court - Northern District of Ohio  
2003 Admitted to United States District Court - Southern District of Ohio

### **EDUCATION**

1986 B.A., University of Vermont  
1989 J.D., Case Western Reserve University

### **EMPLOYMENT**

2003- Present: Principal - Landskroner • Grieco • Madden, LLC  
Civil Litigation, wrongful death, product liability, personal injury, medical malpractice, insurance, contract, class action litigation, business litigation, and criminal defense.

1995 - 2002: Landskroner Law Firm, Ltd.  
Civil Litigation, wrongful death, product liability, personal injury, medical malpractice, insurance, contract, class action litigation, and criminal defense.

1989-1995: New York Legal Aid Society - Criminal Defense Division  
Criminal misdemeanor and felony case load, representing clients at all court appearances including arraignments, grand jury proceedings, pre-trial hearings and trial.

### **PROFESSIONAL MEMBERSHIPS**

- Ohio State Bar Association (OSBA)
- Ohio Association for Justice (OAJ) - Board of Trustees (2007- )
- American Association for Justice (AAJ)
- The Justinian Forum
- The Cleveland Academy of Trial Attorneys (CATA); Board of Trustees (2008- )

## **PUBLICATIONS AND LECTURES**

- Fraternal Order of Police Labor Law Workshop – Annual Speaker
- Cleveland Communicator – Fraternal Order of Police Newsletter: “Your Rights as a Plaintiff”
- Ohio State Bar Association – Basics of Civil Litigation Seminar
- National Business Institute Seminars
  - Adjusting the Automobile Injury Claim in Ohio
  - How to Win Your Next Soft Tissue Injury Trial
  - How to Litigate Your First Civil Trial in Ohio
- Cleveland Bar Association - New Lawyer Training Program
- The Cheshire Cheese Club of Cleveland - The Truth Behind Tort Reform
- Cleveland Clinic Sports Medicine Course - Medical Malpractice Tort Reform in Ohio

## **NON-PROFESSIONAL MEMBERSHIPS AND AFFILIATIONS**

- The Rotsky Foundation for Mentors
- The Club at Key Center

## **SAMPLE AWARDS/VERDICTS**

### **2008 John Doe v. Jane Doe**

Plaintiff was out for a Sunday morning ride on his motorcycle when Defendant failed to yield the right of way and struck Plaintiff knocking him off his motorcycle. Plaintiff sustained fractures to his leg, requiring surgery.

**Settlement: \$180,000**

### **2008 Jane and John Doe v. XYZ Car Company**

Plaintiff Jane Doe was driving home from work when she was forced to swerve to avoid another vehicle. As she swerved her vehicle went out of control, and rolled several times, causing the roof to crush and collapse inwards. As the roof crushed inwards, Plaintiffs head struck the roof causing a burst fracture to her cervical spine rendering her a quadriplegic.

**Settlement: Confidential**

### **2008 John Doe v. ABC Cable Installation Company**

Plaintiff was an employee of Defendant, required to install cables between utility poles. During installation, while climbing a tree, Plaintiff fell causing serious injury. Plaintiff filed suit against his employer for failing to provide proper fall protection and a safe working environment.

**Settlement: \$200,000**

2007 **John Doe v. XYZ Fitness Club**

Plaintiff was lifting weights at a fitness club when the lifting equipment he was using malfunctioned, causing excessive weight to fall. As a result of the falling weights, Plaintiff sustained serious injuries, requiring several surgeries.

**Settlement: Confidential**

2007 **John Doe a minor v. ABC Campgrounds**

Plaintiff was sexually abused by a camp counselor while attending an overnight summer camp. Defendant was negligent in its hiring practices of counselors.

**Settlement: Confidential**

2006 **Estate of John Roa, Jr. v. John D. Winlock, Jr.**

Defendant, a co-worker of Decedent, punched Decedent in the head one time, killing him while the two were at work.

**Judgment: \$2,000,000**

2005 **Stamper v. Daniel P. Lytton, et al.**

Plaintiff was walking his dog when Defendant's dog, who was not restrained, ran from backyard toward Plaintiff and hit Plaintiff, causing him to fall.

**Settlement: \$175,000**

2005 **Carpenter v. Dr. Elbert, D.D.S.**

Plaintiff sought dental care from Defendant dentist. Defendant advised Plaintiff she needed her wisdom tooth extracted. Upon extracting the tooth, Defendant fractured Plaintiff's jaw. Defendant failed to obtain the necessary informed consent from Plaintiff prior to extracting the tooth.

**Settlement: \$110,000**

2005 **Jane Doe, a minor v. Dr. X and ABC Hospital**

Medical negligence case arising out of Plaintiff's birth. Defendant doctor and hospital, knowing that baby was in a breech position just prior to delivery, failed to follow proper procedures and did not perform a c-section delivery. As a result of failing to do a c-section the baby became stuck in the mother's birth canal, requiring substantial force and traction to remove the baby, which caused a brachial plexus injury. Plaintiff developed Erb's palsy.

**Settlement: Confidential**

2005 **Jane Doe v. XYZ School and John Doe**

Plaintiff was sexually abused by a school worker while she was residing on school premises.

**Settlement: Confidential**

2004 **Kekelis v. Mack**

Plaintiff was injured when Defendant hit and flipped her vehicle while driving under the influence of alcohol (DUI) causing a rotator cuff tear necessitating surgical repair and placement of a Mitek Anchor in his shoulder.

**Jury Verdict: \$82,000.00, plus attorneys' fees**

**Final Judgment: \$112,000.00**

2003 **Todd Reber v. Lovejoy Steel**

Plaintiff was employed at Lovejoy Steel in Portage County as a material handler and saw operator. As part of his job responsibilities he was required to work within steel bar pin racks. As Plaintiff was in the process of moving steel bars within the racks, a several ton steel bar rolled out of the rack onto Plaintiff's foot. Plaintiff sustained a serious crush injury which led to a complete transmetatarsal amputation. Suit was filed against Plaintiff's employer, Lovejoy Steel, based upon their knowledge of a dangerous condition; knowledge that if an employee was subjected by his employer to such dangerous condition, harm would be a substantial certainty, and that Lovejoy Steel, under such circumstances and with such knowledge, did act to require Mr. Reber to work within the dangerous condition.

**Jury Verdict: \$700,000**

2003 **John Doe v. T Supermarkets**

Plaintiff was working in a T Supermarket as a sales vendor. Plaintiff was required to use one of the supermarket's rolling step ladders to retrieve a sales display from a shelf. The ladder was negligently maintained by the supermarket, was unsafe, and caused Plaintiff to fall, injuring his back.

**Settlement: \$155,000**

2002 **Jane Doe v. Doctor X**

Medical negligence case for alleged negligent intubation of a 70-year-old female patient while undergoing an exploratory surgical procedure, resulting in Adult Respiratory Distress Syndrome (ARDS).

**Settlement: Confidential**

2002 **Estate of Gregory K. Rhoades v. Summit Tower Services Inc., et al.**

Decedent, Gregory Rhoades, worked as a tower erector for Defendant Summit Tower Services. In October 1998, Summit was contracted by Defendant GPD to erect a 180-foot cell tower in Newton Falls, Ohio. Toward the end of the project, Mr. Rhoades was working at the top of the tower when he began the process of rappelling down the tower and suddenly lost control, falling 180 feet to his death. Suit was filed against Summit Tower based upon their knowledge of a dangerous process on their job site; knowledge that if an employee was subjected by his employment to such dangerous a process, harm would be a substantial certainty; and that Summit Tower, under such circumstances and with such knowledge, did act or require Mr. Rhoades to continue to perform the dangerous process of rappelling. Suit was also filed against GPD Services based upon the theory that as a general contractor, GPD Services actively participated in directing the activity that resulted in Mr. Rhoades' death.

**Settlement: \$375,000**

2001 **Betty Carter, et al. v. Zurich U.S.**

Decedent Plaintiff's brother was crushed to death by a truck while working on a loading dock at his place of employment. The truck driver had no insurance. Plaintiff filed a claim against Decedent's employer for insurance coverage under the employer's uninsured/underinsured automobile insurance policy.

**Settlement: \$485,000**

2001 **Estate of Jane Doe v. XYZ Company, et al.**

Decedent was a 34-year-old single mother who was employed as a flagger on a road construction site. While working, she was struck and killed by an underinsured Defendant. A claim was brought not only against the driver of the vehicle that struck and killed Decedent, but also against the Decedent's employer for insurance coverage under the employer's uninsured/underinsured automobile insurance policy.

**Settlement: Confidential**

2001 **Estate of John Doe v. ABC Hospital**

Decedent was taken to ABC Hospital following his attempted suicide from a drug overdose. Decedent was admitted to the inpatient psychiatric floor of the hospital and placed on suicide watch. Within less than 24 hours of being admitted, Decedent was found hanging by a bedsheet in the bathroom of his room. Plaintiff alleged not only negligence on the part of the hospital and its staff, but also negligent design of the psychiatric facility.

**Settlement: Confidential**

2001 **Delores Auber v. Marc Glassman, Inc. et al.**

Plaintiff was exiting a Marc's store with her shopping cart when the cart suddenly dropped into a hole in the pavement, pulling Plaintiff to the ground. The Plaintiff

sustained a broken hip. Plaintiff brought suit against Marc's as well as the landlord/owner of the property who was ultimately responsible for the sidewalk where Plaintiff fell.

**Settlement: \$90,000**

2000 **In re: The Estate of John Doe, a minor**

Plaintiff's decedent was a four-year-old boy killed as an unrestrained front seat passenger in a motor vehicle accident. The child was killed as a result of the impact from the airbag which was triggered by the motor vehicle accident.

**Settlement Pre-Suit:\$700,000**

2000 **The Estate of Jane Doe v. ABC Trust**

Plaintiff Jane Doe, deceased, was a 66-year-old retired county worker residing in an apartment complex on Cleveland's east side. Ms. Doe was single with no children. A fire broke out in the first floor laundry room of her building in the early morning hours. The fire was determined to be of human origin. There had been at least five previous fires of human origin in the laundry rooms of buildings in this complex, and one in her building. The complex also had a history of vagrants living in apartment laundry rooms. All other tenants escaped, but Ms. Doe was killed in the fire. Plaintiffs alleged the apartment complex was negligent in failing to provide adequate security to protect its residents. Defendant contended this was arson and nothing could be done to prevent the fire.

**Settlement at trial: Confidential**

(Co-Counsel: Johnnie L. Cochran, Jr., Esq.)

2000 **John Doe, a minor v. ABC Organization**

Plaintiff, a young man attending a camp function, was struck in the face by an illegal explosive device being used as a stage prop during a theater skit. After being rushed to the hospital the Plaintiff underwent significant surgery on his face and required further plastic surgery approximately one year later.

**Settlement Pre-Suit:Confidential**

1998 **The Estate of Max Harrell (deceased) v. Gaylord Foundry Equipment Co., et al.**

Plaintiff, Max Harrell, deceased, was a 61-year-old man working at an aluminum coring foundry when a solenoid gassing valve stuck open causing sulfur dioxide gas to leak into the ambient work air. Mr. Harrell was a known asthmatic and was exposed to the gas causing an asthma attack which resulted in suffocation and death. The widow brought suit alleging product defect and failure to warn. Defendants contended the employer misused the product and Plaintiff should not have been working in that environment.

**Settlement at trial: \$575,000**

(Co-counsel: The Keenan Law Firm)

1998 **Zenaida Caraballo v. Thomas R. Gannon, et al.**

Plaintiff was a tenant in an apartment building owned by Defendant owner and leased to Defendant landlord. She was descending a stairway leading to the ground floor when she fell, fracturing her ankle. The stairway had no handrail. Plaintiff alleged that Defendants were negligent in failing to provide a handrail on the stairway as required by law and that she fell due to the lack of the handrail. Defendants contended that Plaintiff must have removed that handrail and that the lack of a handrail was not the proximate cause of Plaintiff's fall. Defendant owner further contended that he had no notice of the missing handrail and that he was not responsible for maintaining the premises because he leased the building to the Defendant landlord.

**Jury Verdict: \$25,000**  
**Also awarded prejudgment interest**

1997 **Ralph DePolo, et al. v. John G. Pasalis, M.D.**

Plaintiff was a 67-year-old man who presented to the Defendant urologist on referral from his general physician for concerns related to microscopic blood in his urine. Plaintiff also had a urinary tract infection and hesitation in his stream of urine. Defendant performed numerous tests to screen the prostate, but neglected to pay attention to the results of an IVP film which indicated a suspicious area in the bladder. Plaintiff was next seen by the Defendant one year later on follow up with gross blood in his urine. The Defendant treated the prostate, but ignored the bladder over the course of the next six months. Plaintiff sought a second opinion and was diagnosed with a huge bladder tumor. Eventually, his bladder was removed and he was left with a stoma and an external pouch for urine retention.

**Jury Verdict: \$300,000**

1997 **John Doe v. ABC Hospital and physicians**

Plaintiff was admitted to the hospital emergency room with complaints of stomach pains. He was diagnosed with gall stones and stabilized. Two days later, the treating surgeon recommended gall bladder surgery. Plaintiff was not a candidate for a surgical procedure because of other health concerns including hypertension, cardiomegaly, sleep apnea, morbid obesity and a history of psychiatric treatment. The patient underwent the procedure and during the reversal from anesthesia, he suffered a hypoxic injury leaving him in a comatose state.

**Settlement: \$3,200,000**

(Co-counsel: The Keenan Law Firm)