

COMMONWEALTH OF KENTUCKY  
MCCRACKEN CIRCUIT COURT  
CIVIL ACTION NO. 21-CI-\_\_\_\_\_  
DIVISION NO. \_\_\_\_\_

JEFF PARKER and/or  
THE CATERING COMPANY, LLC

PLAINTIFF

*Electronically Filed*

VS.

**COMPLAINT**

THE CINCINNATI INSURANCE COMPANY

DEFENDANT

Serve: Steve Corbly  
6200 S. Gilmore Road  
Fairfield, OH 45014

Through: Kentucky Secretary of State  
Commonwealth of Kentucky  
Capitol Building  
Frankfort, KY 40601

The Plaintiff, Jeff Parker and/or The Catering Company, by counsel, for its cause of action against the Defendant, Cincinnati Insurance Company, (“Cincinnati”) states as follows:

COUNT I

1. At all times herein mentioned Plaintiff was a Kentucky Limited Liability Company and the acts and events complained of herein occurred within McCracken County, Kentucky.

2. At all times mentioned herein, Defendant Cincinnati was and is an Ohio corporation and summons should be issued and served upon its process agent, Steve Corbly, 6200 S. Gilmore Road, Fairfield, OH 45014, through the Kentucky Secretary of State, Commonwealth of Kentucky, Capital Building, Frankfort, Kentucky 40601.

3. Plaintiff took out an insurance policy with Defendant that has been in effect from March 1, 2020 to March 1, 2021.

4. At all times mentioned herein, Plaintiff paid the relevant premiums and complied with the terms of the insurance policy.

5. Among other things, this insurance policy covered actual loss of business income and extra expenses sustained as the result of business operations being temporarily shut down or suspended as ordered by a governmental entity with jurisdiction over the business operations. In early 2020, Plaintiff, and other similarly situated businesses, were ordered by the Commonwealth of Kentucky to cease business operations due to the COVID-19 pandemic. Plaintiff timely filed a claim for loss of business income and extra expenses with the Defendant, but the claim was denied.

6. As a result of Defendant's breach of contract, Plaintiff has suffered pecuniary losses.

7. Defendant's actions were willful, malicious, and with a reckless disregard for Plaintiff's rights, and its actions amount to bad faith under common law and in violation of KRS 304.12-230, the Unfair Claims Settlement Practices Act, and Plaintiff is therefore entitled to punitive damages.

Wherefore, Plaintiff demands judgment against Defendant in an amount in excess of Five Thousand (\$5,0000) Dollars; punitive damages; a trial by jury; its costs incurred herein; and any and all other relief to which it may appear entitled.

RESPECTFULLY SUBMITTED,

/s/Mark Edwards

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