

<b>STATE OF MICHIGAN</b> JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE 39TH	<b>SUMMONS</b>	<b>CASE NO.</b>
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Court address

425 N Main St. Judicial Building 3rd Floor Adrian, MI 49221

Court telephone no.

517-264-4597

Plaintiff's name(s), address(es), and telephone no(s).

 KENDALL TAYLOR  
 705 North Union  
 Tecumseh, MI 49286

v

Defendant's name(s), address(es), and telephone no(s).

 BENJAMIN CELANI, VINCENT CELANI, SB VB  
 GRAND RAPIDS, LLC dba HIGH LIFE FARMS, VB  
 CHESANING, LLC, KIVA BRANDS INC., KIVA  
 MANUFACTURING INC., and MOUNTAIN HIGH  
 PRODUCTS, LLC

Plaintiff's attorney, bar no., address, and telephone no.

 Shyler Engel, P75720  
 Shyler Engel, PLLC  
 50346 Van Dyke Ave  
 Shelby Township, MI 48317  
 (586) 739-2000

**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

**Domestic Relations Case**

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

**Civil Case**

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in ☐ this court, ☐ \_\_\_\_\_ Court, where it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_.
- The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

**SUMMONS****NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk
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\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

**SUMMONS**

Case No. \_\_\_\_\_

**PROOF OF SERVICE**

TO PROCESS SERVER: You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

**CERTIFICATE / AFFIDAVIT OF SERVICE / NONSERVICE**☐ **OFFICER CERTIFICATE**

OR

☐ **AFFIDAVIT OF PROCESS SERVER**

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

Being first duly sworn, I state that I am a legally competent adult, and I am not a party or an officer of a corporate party (MCR 2.103[A]), and that: (notarization required)

- ☐ I served personally a copy of the summons and complaint,  
☐ I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint,

together with \_\_\_\_\_

List all documents served with the summons and complaint

\_\_\_\_\_ on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

- ☐ I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee	Miles traveled	Fee	
\$		\$	
Incorrect address fee	Miles traveled	Fee	TOTAL FEE
\$		\$	\$

Signature \_\_\_\_\_

Name (type or print) \_\_\_\_\_

Title \_\_\_\_\_

Subscribed and sworn to before me on \_\_\_\_\_, \_\_\_\_\_ County, Michigan.  
 Date

My commission expires: \_\_\_\_\_ Signature: \_\_\_\_\_  
 Date Deputy court clerk/Notary public

Notary public, State of Michigan, County of \_\_\_\_\_

**ACKNOWLEDGMENT OF SERVICE**

I acknowledge that I have received service of the summons and complaint, together with \_\_\_\_\_  
 Attachments

\_\_\_\_\_ on \_\_\_\_\_  
 Day, date, time

Signature \_\_\_\_\_ on behalf of \_\_\_\_\_



**STATE OF MICHIGAN  
39TH CIRCUIT COURT**

KENDALL TAYLOR

Plaintiff,

v.

Case No.:

BENJAMIN CELANI, VINCENT CELANI,  
SB VB GRAND RAPIDS, LLC dba HIGH  
LIFE FARMS, VB CHESANING, LLC,  
KIVA BRANDS INC., KIVA  
MANUFACTURING INC., and  
MOUNTAIN HIGH PRODUCTS, LLC

Defendants.

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Shyler Engel (P75720)  
Shyler Engel, PLLC  
*Attorney for the Plaintiff*  
50346 Van Dyke Avenue  
Shelby Township, MI 48317  
(586) 739-2000  
[shyler@shylerlaw.com](mailto:shyler@shylerlaw.com)

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*There is no other pending or resolved civil action arising out of  
the transaction or occurrence alleged in the complaint.*

**COMPLAINT**

Plaintiff KENDALL TAYLOR brings this action to secure actual and exemplary damages, with costs, interests and attorney's fees against Defendants BENJAMIN CELANI, VINCENT CELANI, SB VB GRAND RAPIDS LLC, doing business as HIGH LIFE FARMS, VB CHESANING, LLC, KIVA BRANDS INC., KIVA MANUFACTURING INC., and MOUNTAIN HIGH PRODUCTS, LLC jointly and severally for their unlawful, wanton and reckless or otherwise grossly negligent, and negligent cultivation, proliferation, processing, packaging, distribution, and delivery of marijuana that caused her to be poisoned and endure

actual and incidental injury, occurring on June 28, 2021 and thereafter within the State of Michigan, Lenawee County, and in support of her Complaint, states:

## **I. THE PARTIES**

1. Plaintiff KENDALL TAYLOR is an adult individual who resides at 705 North Union Street in Tecumseh, Michigan.
2. Defendant BENJAMIN CELANI is an adult individual who is believed to reside in the State of Michigan.
3. Defendant VINCENT CELANI is an adult individual who is believed to reside in the State of California.
4. Defendant VB CHESANING, LLC is a Corporation registered in the State of Michigan, incorporated from a place of business at 40600 Ann Arbor Road E, Suite 201 in Plymouth, Michigan, with a primary place of business at 624 Brady St in Chesaning, Michigan.
5. Defendant SB VB GRAND RAPIDS, LLC is a Corporation registered in the State of Michigan, incorporated from a place of business at 40600 Ann Arbor Road E, Suite 201 in Plymouth, Michigan, with multiple places of business throughout Michigan.
6. Defendant KIVA BRANDS INC. is a Corporation registered in the State of Delaware, certified to do business or conduct affairs in Michigan from a place of business at 2900 West Road STE 500, East Lansing, Michigan, with a principal place of business at 2300 North Loop Road in Alameda, California.

7. Defendant KIVA MANUFACTURING INC. is a Corporation registered in the State of Delaware, with a principal place of business at 2300 North Loop Road in Alameda, California.
8. Defendant MOUNTAIN HIGH PRODUCTS, LLC. is a Corporation registered in the State of Colorado, with a principal and physical place of business at 716 Valtec Court, Units A, D and E in Boulder, Colorado.

## **II. JURISDICTION AND VENUE**

9. Plaintiff is a resident of Lenawee County, Michigan.
10. Defendants conducted business in Lenawee County, Michigan.
11. This matter concerns events occurring in Lenawee County, Michigan.
12. This matter has in controversy more than \$25,000.
13. Venue is proper under MCL 600.1629 because the acts of Defendants causing Plaintiff's injuries occurred in Lenawee County, Michigan.

## **III. ALLEGATIONS**

14. Defendants BENJAMIN CELANI, VINCENT CELANI, SB VB GRAND RAPIDS, LLC dba HIGH LIFE FARMS, VB CHESANING, LLC, KIVA BRANDS INC., KIVA MANUFACTURING INC., and MOUNTAIN HIGH PRODUCTS, LLC are involved in the cultivation, proliferation, processing, packaging, distribution, delivery, and sale of marijuana throughout the United States.

15. Defendant SB VB GRAND RAPIDS, LLC does business as HIGH LIFE FARMS in the State of Michigan.
16. HIGH LIFE FARMS maintains four active Class C grower licenses, a Processor License, and a Provisioning Center License awarded by and under the authority vested in the Marijuana Regulatory Agency of the State of Michigan under the Michigan Regulation and Taxation of Marijuana Act.
17. BENJAMIN CELANI and VINCENT CELANI are the primary owners and chief operators of SB VB GRAND RAPIDS, LLC and VB CHESANING, LLC.
18. BENJAMIN CELANI and VINCENT CELANI and/or their corporate entities SB VB GRAND RAPIDS, LLC and/or VB CHESANING, LLC have business relationships with KIVA BRANDS INC., KIVA MANUFACTURING INC., and MOUNTAIN HIGH PRODUCTS, LLC.
19. Defendant KIVA BRANDS INC. maintains licenses for Manufacturing and Commercial Distribution issued by the Department of Cannabis Control of the State of California.
20. Defendant KIVA BRANDS INC. has not been issued any license by the Marijuana Regulatory Agency of the State of Michigan.
21. Defendant KIVA MANUFACTURING INC. maintains licenses for Manufacturing and Commercial Distribution issued by the Department of Cannabis Control of the State of California.
22. Defendant KIVA MANUFACTURING INC. has not been issued any license by the Marijuana Regulatory Agency of the State of Michigan.

23. Defendant MOUNTAIN HIGH PRODUCTS, LLC. maintains licenses for Manufacturing and Commercial Distribution issued by the Department of Cannabis Control of the State of Colorado.
24. Defendant MOUNTAIN HIGH PRODUCTS, LLC. has not been issued any license by the Marijuana Regulatory Agency of the State of Michigan.
25. Defendant MOUNTAIN HIGH PRODUCTS, LLC does business as WANA BRANDS in many jurisdictions throughout the United States.
26. At sometime prior to June 28, 2021 one or more Defendants, their officers, agents, associates, and/or employees arranged for a “vendor day” at Kai Cannabis, a licensed Medical Marijuana Provisioning Center and Adult Use Marijuana Retailer located 1579 W. Maumee St in Adrian, Michigan.
27. On June 28, 2021, Plaintiff was employed as a team lead at the Kai Cannabis Co., and was approximately seven months pregnant.
28. On June 28, 2021, two employees, agents, or associates of one or more Defendants appeared at Kai Cannabis and gave a brief presentation regarding HIGH LIFE FARMS, and new edible product lines.
29. At some time during the vendor day, one of persons engaged on behalf of one or more of the Defendants remarked on the pregnancy of the Plaintiff.
30. During the Defendants’ presentation, Defendants agents made statements regarding the quality of the products and the reputation of the Defendants.



31. During the Defendants' presentation, assurances were made that the Defendants' product samples to be consumed contained no marijuana, Tetrahydrocannabinol (THC), Cannabidiol (CBD), or any other drug.
32. The Defendants then delivered products to Kai Cannabis team members, and left the Kai Cannabis premises.
33. After the completion of her work shift, Plaintiff entered her car and consumed a majority of the products delivered to her by Defendants in the Kai Cannabis parking lot.
34. Plaintiff did not consume the product marked KIVA CONFECTIONS Pineapple "Petra Cannabis Free Mints", bearing markings "4 Mints per package" "DOES NOT CONTAIN CANNABIS 0 MG THC, "Made by KIVA MANUFACTURING, INC., nutrition information, trade dress, and contact information.
35. Plaintiff consumed the product marked WANA Exotic Yuzu "Non Medicated Sample Sour Gummies" bearing markings "4.5g per serving 9g per container," nutrition information, trade dress, and contact information.
36. Plaintiff consumed the product marked "Strawberries and Cream Nuggies" Sample Only Contains NO THC" from a black ziplock bag.
37. Plaintiff consumed the product marked "Peanut Butter Nuggies" "Sample Only Contains NO THC" from a white ziplock bag.
38. Plaintiff consumed the product marked "KIVA" "Camino Gummies Midnight Blueberry" bearing markings "Produced by HIGH LIFE FARMS" "Unmedicated Sample" "Contains no THC/CBD" "Not for Resale" from a white ziplock bag.
39. Plaintiff had the expectation that the products received were ordinary food products.



40. After roughly fifteen to thirty minutes Plaintiff began to feel the impairing, intoxicating, paranoia inducing, and euphoric effects of THC while driving home, and recognized that she had been drugged.
41. Plaintiff arrived at her home without physical injury.
42. Plaintiff experienced severe emotional distress, including but not limited to panic, racing thoughts, fear, hopelessness, loss of consciousness, memory loss, disorientation, dysphoria, anxiety, and psychosis.
43. Plaintiff experienced severe physical discomfort, including but not limited to sweating, convulsing, general sickness, imbalance, temperature swings, and feeling her unborn child squirm, jerk, and twist inside her womb.
44. Plaintiff drank excessive amounts of water in attempt to flush the drugs.
45. Plaintiff experienced difficulty becoming restful and falling asleep.
46. Plaintiff provided a urine sample for diagnostic analysis the following day, which tested positive for THC.
47. Plaintiff learned that all members of the Kai Cannabis team who ingested the products delivered by Defendants also experienced the effects of THC.
48. Plaintiff suspects that she had consumed an amount of THC that constitutes an overdose.
49. Plaintiff continued to experienced severe emotional distress, bouts of panic attacks, fear, mental anguish worrying about complications of the pregnancy and the health of her first child caused by this incident.
50. Plaintiff delivered her first born child, with seemingly no complications on September 15, 2021.

51. Plaintiff continues to experience emotional distress and mental anguish worrying that the ingestion of a toxic dose of THC during pregnancy may cause schizophrenia or early onset of schizophrenia for her child.

52. Plaintiff is no longer employed at Kai Cannabis.

#### **IV. CLAIMS FOR RELIEF**

##### **COUNT I**

##### **Strict Liability for Defective Products *Against All Defendants***

53. Plaintiff incorporates the allegations of the above paragraphs as if fully restated herein.

54. At all relevant times all Defendants owed a duty to Plaintiff and to the public in general to:

- a. properly manufacture its products,
- b. properly label its products,
- c. properly monitor its supply chain to prevent diversion
- d. properly test its products, and
- e. properly abide by state regulation.

55. Defendants breached these duties by committing or omitting the following acts:

- a. failing to properly manufacture its products,
- b. failing to properly label its products,
- c. failing to monitor its supply chain to prevent diversion
- d. failing to properly test its products, and

- e. failing to abide by state regulation.
56. The products were not reasonably safe when it left the control of Defendants.
  57. The products contained THC.
  58. The products did not bear labels indicating the presence of THC.
  59. The products did not bear labels indicating the concentration or amount of THC.
  60. Some of the products appear to have been procured by Defendants from California and Colorado.
  61. The delivery of marijuana products from foreign states is criminal under both state and federal law.
  62. The products and conduct alleged are made illegal by Federal Controlled Substances Act of 1971.
  63. The products and conduct alleged are made illegal by Michigan Public Health Code.
  64. The products and conduct alleged did not comply with the Department of Licensing and Regulatory Affairs Bureau of Regulation Rule 420, generally.
  65. Food items containing THC are unreasonably dangerous for ordinary consumption, such that consumption of such product is unreasonable dangerous if not contemplated by the ordinary consumer, making the product defective *per se*.
  66. When the products left the control of Defendants, a technically feasible alternative cultivation practice was available that would have prevented the harm without significantly impairing the usefulness or desirability of the product to users and without creating equal or greater risk of harm to others.



67. When the products left the control of Defendants, a technically feasible alternative proliferation practice was available that would have prevented the harm without significantly impairing the usefulness or desirability of the product to users and without creating equal or greater risk of harm to others.
68. When the products left the control of Defendants, a technically feasible alternative processing practice was available that would have prevented the harm without significantly impairing the usefulness or desirability of the product to users and without creating equal or greater risk of harm to others.
69. When the products left the control of Defendants, a technically feasible alternative distribution practice was available that would have prevented the harm without significantly impairing the usefulness or desirability of the product to users and without creating equal or greater risk of harm to others.
70. These breaches of duty proximately caused the Plaintiff, *inter alia*, to become unexpectedly impairing her ability to drive while driving, risking death or serious permanent injury, intoxicating her for several hours, causing paranoia, severe emotional distress, panic, racing thoughts, fear, hopelessness, loss of consciousness, memory loss, disorientation, dysphoria, anxiety, and psychosis, severe physical discomfort, sweating, convulsing, general sickness, temperature swings, and feeling her unborn child squirm, jerk, and twist inside her womb, and weeks of fear and anxiety of unsuccessful child birth, early delivery, or complications with child birth itself, and involvement of Child Protective Services at and after birth.
71. As a direct and proximate result of the conduct of all Defendants, Plaintiff will suffer permanently worrying about child development regarding this incident that may cause

early onset of a latent or otherwise produce a mental disorder or deficiency of her child, most notably schizophrenia, a genetically-linked condition, from which Plaintiff's mother does suffer.

72. The Defendants are strictly liable for the injuries sustained by the Plaintiff.

PLAINTIFF REQUESTS that this court enter judgment against ALL DEFENDANTS in an amount that will fairly and adequately compensate Plaintiff's injuries, together with the costs of this action, interest, and attorney fees.

COUNT II  
Negligence *per se*  
*Against All Defendants*

69. Plaintiff incorporates the allegations of the above paragraphs as if fully restated herein.

70. Plaintiff alleges the conduct specifically described within Paragraphs 53 through 68 additionally constitute negligence *per se* on behalf of all Defendants.

PLAINTIFF REQUESTS that this court enter judgment against ALL DEFENDANTS in an amount that will fairly and adequately compensate Plaintiff's injuries, together with the costs of this action, interest, and attorney fees.

COUNT III  
Negligence  
*Against All Defendants*

71. Plaintiff incorporates the allegations of the above paragraphs as if fully restated herein.

72. Plaintiff alleges the conduct specifically described within Paragraphs 53 through 68 additionally constitute negligence on behalf of all Defendants.

PLAINTIFF REQUESTS that this court enter judgment against ALL DEFENDANTS in an amount that will fairly and adequately compensate Plaintiff's injuries, together with the costs of this action, interest, and attorney fees.

COUNT IV  
Gross Negligence  
*Against All Defendants*

73. Plaintiff incorporates the allegations of the above paragraphs as if fully restated herein.

74. Plaintiff alleges the conduct specifically described within Paragraphs 53 through 68 additionally constitute gross negligence on behalf of all Defendants.

PLAINTIFF REQUESTS that this court enter judgment against ALL DEFENDANTS in an amount that will fairly and adequately compensate Plaintiff's injuries, exemplary damages, together with the costs of this action, interest, and attorney fees.

COUNT V  
Breach of Implied Warranty  
*Against All Defendants*

75. Plaintiff incorporates the allegations of the above paragraphs as if fully restated herein.

76. The products was not reasonably fit for the uses or purposes anticipated or reasonably foreseen by Defendants when it left Defendants' control.

77. As a proximate result of the breach of implied warranty by Defendants, Plaintiff was injured as previously described.

PLAINTIFF REQUESTS that this court enter judgment against ALL DEFENDANTS in an amount that will fairly and adequately compensate Plaintiff for her injuries, together with the costs of this action, interest, and attorney fees.



**COUNT VI**  
**Breach of Express Warranty**  
*Against All Defendants*

78. Plaintiff incorporates the allegations of the above paragraphs as if fully restated herein.

79. Defendants expressly warranted, represented, and stated that its product did not contain any THC.

80. Plaintiff relied on the representation or statement of express warranty as previously described.

81. The Defendants representations were misrepresentations.

82. Plaintiff was proximately injured through the breach of express warranty in the manner previously described.

PLAINTIFF REQUESTS that this court enter judgment against Defendants in an amount that will fairly and adequately compensate Plaintiff for her injuries, together with the costs of this action, interest, and attorney fees.

**COUNT VII**  
**Relief under the Michigan Consumer Protection Act**  
*Against All Defendants*

88. Plaintiff incorporates the allegations of the above paragraphs as if fully restated herein.

89. Plaintiff is a person who has suffered a loss within the meaning of MCL 445.911(2).

Pursuant to MCL 445.911(2), Plaintiff requests a monetary judgment for the actual damages sustained or \$250, whichever is greater, together with reasonable attorney fees, interest, and costs.

COUNT VIII  
Drug Dealer Liability under MCL 691.1601, et seq (DDLA)  
*Against All Defendants*

88. Plaintiff incorporates the allegations of the above paragraphs as if fully restated herein.
89. The purpose of the Drug Dealer Liability Act "is to provide actions for civil damages against persons who participated in illegal marketing of controlled substances for injuries caused by illegal use of controlled substances in order to ... [ c ] ompensate persons injured as a result of illegal marketing of controlled substances; ... [ and to] [ a ] ssess the cost of illegal marketing of controlled substances against persons who profit from that market." MCL 691.1601(2).
90. Defendants are Level 4 participants under MCL 691.1063.
91. Defendants market area is in Lenewee County, the State of Michigan, and across the United States.
92. Defendants failed in their numerous duties, including diversion and to controlling their enterprise supply chain, and abide by federal and state laws and regulations, including diversion.
93. Defendants failed to ensure the safety of public at large.

PLAINTIFF REQUESTS that this court enter judgment against Defendants in an amount that will fairly and adequately compensate Plaintiff for her injuries, and exemplary damages, together with the costs of this action, interest, and attorney fees.

## **V. PRAYER FOR RELIEF**

WHEREAS neither any relief has been provided nor curative act has been undertaken by any Defendant despite the notice and request of the Plaintiff;

WHEREAS at the time of the filing of the Complaint, information has been made unavailable to the Plaintiff that has been denied by the Defendants despite her requests, or is otherwise unknowable to the Plaintiff, and as such information will otherwise become available to her as prosecution of this matter progresses, Plaintiff reserves the right to amend this complaint to include new parties and new claims as new information is attained in discovery;

WHEREAS BENJAMIN CELANI operates a marijuana enterprise in Michigan, and VINCENT CELANI operates a marijuana enterprise in California, and a trier of fact may determine that the products she consumed were trafficked into Michigan from Colorado and California by BENJAMIN CELANI and VINCENT CELANI, with the assistance of their agents in violation of state and federal law, under the guise of their corporate entities;

WHEREAS SB VB GRAND RAPIDS, LLC dba HIGH LIFE FARMS, VB CHESANING, LLC, are mere instrumentalities or alter egos of BENJAMIN CELANI and VINCENT CELANI used merely to attain licenses from the Marijuana Regulatory Agency to and engage in marijuana business in Michigan;

WHEREAS absent state licensure requirements, the marijuana enterprises of SB VB GRAND RAPIDS, LLC dba HIGH LIFE FARMS, VB CHESANING, LLC are solely the marijuana affairs of BENJAMIN CELANI and VINCENT CELANI;

WHEREAS Defendants BENJAMIN CELANI and VINCENT CELANI acted intentionally, recklessly and wantonly, and fraudulently or grossly negligent with full knowledge of illegality of importing foreign marijuana into Michigan is contrary to state and federal law;



WHEREAS if the court were to pierce the corporate veil, BENJAMIN CELANI and VINCENT CELANI could be made to pay the amounts owed under any judgment that enters;

WHEREAS this honorable court has authority to render judgment and issue an Order in Equity and under statutory authority of the State of Michigan, and otherwise;

WHEREFORE, Plaintiff REQUESTS that this honorable Court pierce the corporate veil and hold Defendants BENJAMIN CELANI and VINCENT CELANI personally liable for the conduct of any agent of VB CHESANING and SB VB GRAND RAPIDS LLC, doing business as HIGH LIFE FARMS;

WHEREFORE Plaintiff REQUESTS that this honorable Court enter judgment against Defendant BENJAMIN CELANI and VINCENT CELANI LLC, SB VB GRAND RAPIDS LLC, doing business as HIGH LIFE FARMS, VB CHESANING, KIVA BRANDS INC., KIVA MANUFACTURING INC., and MOUNTAIN HIGH PRODUCTS, severally and jointly, in favor of Plaintiff KENDALL TAYLOR awarding:

- A. Actual damages.
- B. Exemplary damages.
- C. Order that Plaintiff recover the costs and expenses of this suit, with pre- and post-judgment interest, and reasonable attorney's fees as provided by law.
- D. Such other and further relief as the Court deems just, necessary and appropriate.

Dated: Tuesday, February 22, 2022

Respectfully Submitted,

SHYLER ENGEL, PLLC



Shyler Engel, P75720

*Attorney for the Plaintiff*

39TH	STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY	JURY DEMAND	CASE NO.
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Court address

425 N. Main St. Judicial Building 3rd Floor Adrian, MI 49221

Court telephone no.

517-264-4597

Plaintiff(s) name(s) KENDALL TAYLOR	v	Defendant(s) name(s) BENJAMIN CELANI, et al.
Plaintiff's address and telephone no. or attorney name, bar no., address, and telephone no. Shyler Engel (P75720) 50346 Van Dyke Avenue Shelby Township, MI 48317 (586) 739-2000		Defendant's address and telephone no. or attorney name, bar no., address, and telephone no.
<input type="checkbox"/> Probate      In the matter of _____		
<input type="checkbox"/> Juvenile      In the matter of _____		

1. I demand a jury trial.

2/22/22  
Date

 P75720  
Signature