

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - LAW DIVISION**

TANER BAYRAMLI,)	
)	
Plaintiff,)	
)	
v.)	No.
)	
NORTHERN ILLINOIS GAS COMPANY)	
d/b/a NICOR GAS COMPANY;)	<i>PLAINTIFF DEMANDS</i>
TOM DASE MANAGEMENT, L.L.C.;)	<i>TRIAL BY JURY</i>
)	
Defendants.)	

COMPLAINT AT LAW

Plaintiff, TANER BAYRAMLI, by and through his attorneys, CLIFFORD LAW OFFICES, P.C., and complaining of Defendants, NORTHERN ILLINOIS GAS COMPANY d/b/a NICOR GAS COMPANY (hereinafter “NICOR”), and TOM DASE MANAGEMENT, L.L.C. (hereinafter “DASE”) and each of them, and in support thereof, states:

**COUNT I – NEGLIGENCE – NORTHERN ILLINOIS GAS COMPANY
d/b/a NICOR GAS COMPANY**

1. On and before May 6, 2026, TANER BAYRAMLI, resided at a condominium building located at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.
2. On and before May 6, 2026, the building at 1279 Harding Avenue in Des Plaines, Cook County, Illinois contained natural gas service lines, gas piping, gas appliances, mechanical systems, and related gas infrastructure intended for the delivery and use of natural gas.
3. On and before May 6, 2026, defendant, NICOR, was a major natural gas utility in Illinois regulated by the Illinois Commerce Commission (ICC).
4. On and before May 6, 2026, defendant, NICOR, supplied natural gas to the building located at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

5. On May 5, 2026, defendant, NICOR, received complaints of gas odor at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

6. On May 5, 2026, NICOR dispatched an agent and/or employee to 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

7. On May 5, 2026, NICOR's agent and/or employee performed a cursory and inadequate investigation into a gas leak at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

8. On May 5, 2026, despite receiving complaints of gas odor at 1279 Harding Avenue in Des Plaines, Cook County, Illinois, NICOR took no action to correct the dangerous condition.

9. On and before May 6, 2026, defendant, NICOR, knew or, through the exercise of ordinary care, should have known that dangerous conditions existed at 1279 Harding Avenue in Des Plaines, Cook County, Illinois involving the leakage, escape, accumulation, and/or migration of natural gas.

10. On and before May 6, 2026, defendant, NICOR, failed to take reasonable measures to inspect the dangerous condition.

11. On and before May 6, 2026, defendant, NICOR, failed to take reasonable measures to repair the dangerous condition.

12. On and before May 6, 2026, defendant, NICOR, failed to take reasonable measures to monitor the dangerous condition.

13. On and before May 6, 2026, defendant, NICOR, failed to take reasonable measures to warn occupants of the dangerous condition.

14. On and before May 6, 2026, defendant, NICOR, failed to take reasonable measures to correct the dangerous condition.

15. On or before May 6, 2026, natural gas escaped the appropriate lines and/or pipes and/or appliances and accumulated within the building at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

16. On May 6, 2026, less than 12 hours after NICOR received complaints, the escaped natural gas ignited and caused an explosion and/or fire at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

17. On and before May 6, 2026, TANER BAYRAMLI was lawfully occupying a condominium at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

18. On May 6, 2026, as a result of the gas fire and/or explosion at 1279 Harding Avenue in Des Plaines, Cook County, Illinois, TANER BAYRAMLI sustained serious personal and pecuniary injuries.

19. On and before May 6, 2026, defendant, NICOR, owed a duty to safely supply natural gas to the building at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

20. On and before May 6, 2026, defendant, NICOR, had a responsibility, through its authorized/apparent agents and/or employees, to respond to complaints of gas leaks, the smell of gas, and/or hazardous conditions when notified.

21. On and before May 6, 2026, defendant, NICOR, had a responsibility, through its authorized/apparent agents and/or employees, to investigate gas leaks and rectify any unsafe conditions in a timely fashion.

22. On and before May 6, 2026, defendant, NICOR, owed a duty to notify occupants at 1279 Harding Avenue in Des Plaines, Cook County, Illinois of any potential gas leaks and immediate needs to evacuate the building at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

23. On and before May 6, 2026, defendant, NICOR, had a duty to possess and apply the knowledge and use the skill and care ordinarily used by a reasonably careful Natural Gas Supplier under the same or similar circumstances.

24. On and before May 6, 2026, defendant NICOR, through its authorized/apparent agents and/or employees, was negligent in one or more of the following ways:

- a. Failed to exercise due care in the supply of natural gas to the building at 1279 Harding Avenue in Des Plaines, Cook County, Illinois;
- b. Failed to reasonably inspect the gas lines at 1279 Harding Avenue in Des Plaines, Cook County, Illinois;
- c. Failed to maintain gas pipes and other means of supply in a reasonably safe manner and condition;
- d. Failed to properly and sufficiently monitor the means of natural gas delivery to 1279 Harding Avenue in Des Plaines, Cook County, Illinois;
- e. Failed to inspect individual condominium units at 1279 Harding Avenue in Des Plaines, Cook County, Illinois to identify the source of the natural gas leak;
- f. Failed to prevent leaking natural gas at 1279 Harding Avenue in Des Plaines, Cook County, Illinois;
- g. Failed to notify occupants of a dangerous condition and of the dangers of remaining inside of the building at 1279 Harding Avenue in Des Plaines, Cook County, Illinois;
- h. Failed to notify all interested parties, including DASE, of a gas leak at 1279 Harding Avenue in Des Plaines, Cook County, Illinois;
- i. Failed to timely respond to complaints of gaseous odor at 1279 Harding Avenue in Des Plaines, Cook County, Illinois;
- j. Failed to implement, maintain, and follow an emergency plan;
- k. Failed to take necessary actions, including but not limited to, emergency shutdown, valve shut-off, and/or pressure reduction, in response to a gas leak;
- l. Failed to have and follow written rupture identification procedures;
- m. Failed to evacuate occupants despite knowledge of dangerous gas conditions;
- n. Failed to appropriately train its operators and employees on the appropriate response to a suspected gas leak; and/or,
- o. Was otherwise careless and negligent.

25. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions, TANER BAYRAMLI, sustained multiple traumatic injuries of personal, pecuniary and permanent nature.

26. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions, TANER BAYRAMLI, incurred expenses and significant damage to real and personal property.

WHEREFORE, Plaintiff, TANER BAYRAMLI, demands judgement against Defendant, NORTHERN ILLINOIS GAS COMPANY d/b/a NICOR GAS COMPANY, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT II – NEGLIGENCE – TOM DASE MANAGEMENT, L.L.C.

1. On and before May 6, 2026, TANER BAYRAMLI, resided at a condominium building located at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

2. On and before May 6, 2026, the building at 1279 Harding Avenue in Des Plaines, Cook County, Illinois contained natural gas service lines, gas piping, gas appliances, mechanical systems, and related gas infrastructure intended for the delivery and use of natural gas.

3. On and before May 6, 2026, defendant, DASE, operated, managed, maintained, and/or controlled the condominium building located at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

4. On May 5, 2026, defendant, DASE, received complaints about gas odor at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

5. On May 5, 2026, defendant DASE made no efforts to inspect or correct the dangerous condition despite receiving complaints about gas odor at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

6. On and before May 6, 2026, defendant, DASE, failed to take reasonable measures to inspect the dangerous condition.

7. On and before May 6, 2026, defendant, DASE, failed to take reasonable measures to repair the dangerous condition.

8. On and before May 6, 2026, defendant, DASE, failed to take reasonable measures to monitor the dangerous condition.

9. On and before May 6, 2026, defendant, DASE, failed to take reasonable measures to warn occupants of the dangerous condition.

10. On and before May 6, 2026, defendant, DASE, failed to take reasonable measures to correct the dangerous condition.

11. On or before May 6, 2026, natural gas escaped natural gas escaped the appropriate lines and/or pipes and/or appliances and accumulated within the building at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

12. On May 6, 2026, less than 12 hours after DASE received complaints, the escaped natural gas ignited and caused an explosion and/or fire at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

13. On and before May 6, 2026, defendants, DASE, knew or, through the exercise of ordinary care, should have known that dangerous conditions existed on at 1279 Harding Avenue in Des Plaines, Cook County, Illinois involving the leakage, escape, accumulation, and/or migration of natural gas.

14. On and before May 6, 2026, TANER BAYRAMLI was lawfully occupying a condominium at 1279 Harding Avenue in Des Plaines, Cook County, Illinois.

15. On and before May 6, 2026, defendant, DASE, owed a duty to maintain the building at 1279 Harding Avenue in Des Plaines, Cook County, Illinois in a reasonably safe condition and to take reasonable precautions to detect, prevent, repair, warn of, and/or remediate dangerous gas conditions.

16. On and before May 6, 2026, defendant DASE, through its authorized/apparent agents and/or employees, was negligent in one or more of the following ways:

- a. Failed to properly inspect 1279 Harding Avenue in Des Plaines, Cook County, Illinois for dangerous gas conditions;
- b. Failed to inspect individual condominium units at 1279 Harding Avenue in Des Plaines, Cook County, Illinois to identify the source of the natural gas leak;
- c. Failed to properly maintain gas lines, gas appliances, valves, connectors, regulators, and related equipment;
- d. Failed to repair known or reasonably discoverable gas leaks;
- e. Failed to comply with applicable building codes, fire codes, utility regulations, and safety standards;
- f. Failed to warn occupants and lawful entrants of dangerous gas conditions;
- g. Allowed combustible natural gas to accumulate within the building at 1279 Harding Avenue in Des Plaines, Cook County, Illinois;
- h. Failed to implement reasonable gas leak detection measures;
- i. Failed to implement, maintain, and follow an emergency plan;
- j. Failed to adequately train, supervise, or retain maintenance personnel;
- k. Failed to evacuate occupants despite knowledge of dangerous gas conditions; and/or,
- l. Was otherwise careless and negligent.

17. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions, TANER BAYRAMLI, sustained multiple traumatic injuries of personal, pecuniary and permanent nature.

18. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions, TANER BAYRAMLI, incurred expenses and significant damage to real and personal property.

WHEREFORE, Plaintiff, TANER BAYRAMLI, demands judgement against Defendant, TOM DASE MANAGEMENT, L.L.C., in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00).

/s/ Bradley M. Cosgrove
Attorneys for Plaintiff

Bradley M. Cosgrove
Scott J. Kater
Charles R. Haskins
CLIFFORD LAW OFFICES, P.C.
120 North LaSalle Street, 36th Floor
Chicago, Illinois 60602
(312) 899-9090
Firm I.D. No. 32640
bmc@cliffordlaw.com
sjk@cliffordlaw.com
crh@cliffordlaw.com