Filed in District Court
State of Minnesota
1/28/2026 10:22 AM

STATE OF MINNESOTA DISTRICT COURT

COUNTY OF WADENA SEVENTH JUDICIAL DISTRICT

PERSONAL INJURY

Macy Wynn,

Plaintiff,

v. **Summons**

Moment in Time Dance Company, LLC,

Defendant.

THIS SUMMONS IS DIRECTED TO DEFENDANTS, ABOVE-NAMED:

1. **YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the court and there may be no Court file number on this Summons.

2. **YOU MUST REPLY WITHIN 21 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this Summons a written response called an Answer within 21 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at Tyroler Injury Law, 434 Hale Avenue N, Suite 130, Oakdale, Minnesota 55128.

3. **YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

4. **YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not Answer within 21 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond. A Default Judgment can then be

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entered against you for the relief requested in the Complaint.

5. **LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.

6. **ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

Tyroler Leonard Injury Law

Dated: December 30, 2025

By: _____

Colin Peterson (0392414)
Isaac Tyroler (0390296)
Attorneys for Plaintiff
434 Hale Avenue N., Suite 130
Oakdale, MN 55128
Phone: 612-429-3155
Fax: 651-401-6028

MINNESOTA JUDICIAL BRANCH

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STATE OF MINNESOTA DISTRICT COURT

COUNTY OF WADENA SEVENTH JUDICIAL DISTRICT

PERSONAL INJURY

Macy Wynn,

Plaintiff,

v. **Complaint**

Moment in Time Dance Company, LLC,

Defendant.

Plaintiff for her cause of action against the above-named Defendant states and alleges that:

Nature of the Action

1. This is a civil action for monetary damages arising out of an incident in a dance studio where a young dancer was told to perform a dangerous maneuver without appropriate instruction, supervision, or safety precautions. While performing the maneuver, the dancer fell to the floor, suffering serious and permanent injuries to her head and neck.

Parties

2. Plaintiff Macy Wynn is a resident of Wadena County, Minnesota.

3. Defendant Moment in Time Dance Company, LLC is a limited liability company doing business in the State of Minnesota with the principal office address located in Wadena County, Minnesota.

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4. At all relevant times, Defendant Moment in Time Dance Company, LLC owned and operated a dance studio located in Wadena County, Minnesota.

5. At all relevant times, Defendant Moment in Time Dance Company, LLC employed coaches, instructors, and other staff members.

6. At all relevant times, Defendant Moment in Time Dance Company, LLC was vicariously and/or contractually liable for the actions and inactions of its agents and employees.

Jurisdiction

7. The Court has jurisdiction over Defendant and venue is proper in Wadena County under Minn. Stat. § 542.09.

Facts

8. On or about December 12, 2024, Plaintiff Macy Wynn was participating in a scheduled dance practice at Defendant Moment in Time Dance Company, LLC's dance studio.

9. At said time and place, Plaintiff Macy Wynn was preparing for an upcoming recital and upon the direction of Defendant was attempting an unfamiliar dance maneuver where she was thrown into the air.

10. Upon information and belief, Plaintiff and the other dancers on her team had not been appropriately trained by Defendant to perform the maneuver safely.

11. While performing the maneuver, Plaintiff was dropped, landing forcefully on her head and neck.

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12. Plaintiff experienced immediate pain, weakness, dizziness, and lightheadedness.

13. Defendant failed to appropriately and timely respond to Plaintiff's medical emergency.

14. Eventually, Plaintiff was taken to a local emergency department where it was determined she needed more advanced trauma care than was available at that emergency department.

15. Plaintiff was transferred by helicopter to Children's Hospital and Clinics in Minneapolis, Minnesota

16. Consultations with specialists were ordered, and Plaintiff received an MRI of her spine the following morning which revealed a compression injury.

17. As a result of the fall at the dance studio, Plaintiff has suffered serious and permanent injuries.

Negligence

18. Plaintiff re-alleges all paragraphs above.

19. Defendant Moment in Time Dance Company, LLC either knew or should have known that the dance maneuver posed an unreasonable risk of injury to participants, especially in the absence of appropriate instruction, supervision, and safety precautions.

20. Defendant Moment in Time Dance Company, LLC, was negligent in failing to provide appropriate instruction, supervision, and safety precautions for their

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dancers.

21. Defendant Moment in Time Dance Company, LLC, was negligent in failing to appropriately respond to Plaintiff's medical emergency.

22. Defendant Moment in Time Dance Company, LLC was in other ways negligent in connection with the December 12, 2024 incident at the dance studio.

23. As a direct and proximate result of the Defendant Moment in Time Dance Company, LLC's negligence, Plaintiff sustained significant and permanent injuries.

Economic Damages

24. As a direct and proximate result of the Defendant Moment in Time Dance Company, LLC's negligence, Plaintiff has incurred and will continue to incur medical and rehabilitative expenses all to her damages in the sum presently estimated to be in excess of $50,000.

25. As a direct and proximate result of the Defendant Moment in Time Dance Company, LLC's negligence, Plaintiff has incurred a loss of earnings and a reduction of earning capacity all to her damages in the sum presently estimated to be in excess of $50,000.

Non-Economic Damages

26. As a direct and proximate result of the Defendant Moment in Time Dance Company, LLC's negligence, Plaintiff has suffered and will continue to suffer bodily and mental damages including but not limited to pain, discomfort, emotional distress,

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loss of quality of life, and loss of enjoyment of life, all to her economic damage in a sum presently estimated to be in excess of $50,000.

Prayer for Relief

WHEREFORE, Plaintiff Macy Wynn prays for a judgment against the Defendant for a reasonable amount in excess $50,000, together with costs, disbursements, and statutory prejudgment interest herein.

Tyroler Leonard Injury Law

Dated: December 30, 2025

By: _____

Colin Peterson (0392414)
Isaac Tyroler (0390296)
Attorneys for Plaintiff
434 Hale Avenue N., Suite 130
Oakdale, MN 55128
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Acknowledgement Required by Minn. Stat. § 549.211, subd. 2

I hereby acknowledge that, pursuant to Minn. Stat. § 549.211(2), costs disbursements and reasonable attorney and witness fees may be awarded to the opposing party or parties in this litigation if this Court should find I acted in bad faith, asserted a claim or defense that is frivolous and that is costly to the other party, asserted an unfounded position solely to delay the ordinary course of the proceedings or to harass, or committed a fraud upon the Court.

Tyroler Leonard Injury Law

Dated: December 30, 2025

By: _____

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