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IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF MULTNOMAH

JULEE O’NEIL,

Plaintiff,

v.

TRADER JOE’S COMPANY, a corporation,

Defendant.

No.

**COMPLAINT**

(Personal Injury- Products Liability)

**CLAIM SUBJECT TO  
MANDATORY ARBITRATION**

JURY TRIAL DEMANDED

PRAYER AMOUNT \$10,000

(Fee authority ORS 21.160(1)(a)  
\$170.00)

The plaintiff Julee O’Neil demands a jury trial and alleges:

1.

At all times herein mentioned, the defendant Trader Joe’s Company, herein after referred to as “Trader Joe’s”, was and is a corporation authorized to and engaged in business at multiple locations in Oregon, including a store located at 4121 NE Halsey St, Portland, Multnomah County, Oregon.

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2.

On or about June 14, 2025, the plaintiff Julee O’Neil was a customer in the said store located at 4121 NE Halsey St, when she purchased a 52 fluid ounce bottle of orange juice with pulp, which was labeled TRADER JOE’S ORGANIC ORANGE JUICE, which was for sale to the general public.

3.

On or about June 19, 2025, the plaintiff Julee O’Neil was finishing the said Orange Juice, when she felt like there was a large piece of pulp in her mouth. When she pulled it out, however, it was the finger tip end of a rubber glove, which she thought might have also contained the end of a human finger in the glove tip or in the pulp of the Orange Juice, which she may have inadvertently swallowed or ingested as well.

4.

The plaintiff Julee O’Neil was gagging and felt nauseated and had a burning sensation in her mouth. She was and is concerned that the human hand that was in the tip of the glove was also severed and was part of the pulp she had been periodically drinking.

5.

On June 19, 2025 the plaintiff Julee O’Neil went to the Urgent Care to seek medical attention because of the burning sensation in her mouth and the gagging and nausea, which she was feeling for potentially swallowing the tip of a human finger.

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1 6.

2 The Trader Joe's Organic Orange Juice that was sold to the plaintiff was in a  
3 defective condition when it left Trader Joe's possession in that the rubber glove tip and  
4 potential tip of a human finger would not have been expected by the ordinary customer  
5 with ordinary knowledge and they would not have anticipated that the tip of a human  
6 finger or the tip of a rubber glove would have been left in the Orange Juice as part of  
7 the manufacturing process.

8 7.

9 More than 30 days prior to the commencement of this lawsuit, the plaintiff Julee  
10 O'Neil gave written notice, within the meaning of ORS 20.080, to the defendant  
11 Trader Joe's for payment of \$10,000 for settlement of the plaintiff Julee O'Neil's  
12 damage claims.

13 8.

14 The defendant Trader Joe's failed, refused or neglected to tender the \$10,000 or  
15 any portion thereof.

16 9.

17 The plaintiff Julee O'Neil is entitled to recover her reasonable attorneys fees  
18 and costs, under ORS 20.080, in an amount to be set by the Court pursuant to ORCP  
19 68.

20 WHEREFORE, the Plaintiff Julee O'Neil prays for a Judgment against the Defendant  
21 Trader Joe's Company, for the sum of \$10,000 in damages, together with her reasonable  
22 attorneys fees, pursuant to ORS 20.080, in an amount to be set by the Court under ORCP 68,  
23 as well as plaintiff's costs and disbursement incurred herein.

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DATED this 20<sup>th</sup> of April, 2026.

FURNISS, SHEARER & LEINEWEBER

/s/ Anthony W. Furniss

By: Anthony W. Furniss, OSB# 730961  
Of Attorneys for Plaintiff  
Trial Attorney: Anthony W. Furniss  
[tony@fslaw.com](mailto:tony@fslaw.com)

PLAINTIFF DEMANDS TRIAL BY JURY

/s/ Anthony W. Furniss

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