

STATE OF MAINE  
ANDROSCOGGIN, SS.

SUPERIOR COURT  
CIVIL ACTION  
DOCKET NO.:

KAITLYN WATT,

Plaintiff,

v.

BATES COLLEGE,

Defendant.

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**COMPLAINT**

**Introduction**

Kaitlyn (“Katie”) Watt was a healthy, high-performing 21-year-old Bates senior and Nordic ski team captain when the college exposed her to a danger it had created and then ignored.



On a windy October 12, 2024, Bates placed a 597-pound KwikGoal bench shelter at the edge of its Russell Street track and left it unsecured, despite explicit manufacturer warnings that it must be anchored at all times and stored in a sheltered area in high winds. Earlier that morning — before Katie ever arrived at the track — the shelter blew across the entire field in the same wind conditions and came to rest on the track where students regularly trained, a dramatic and unmistakable warning that it had become an active airborne hazard.

Bates did nothing. It did not anchor the structure, did not remove it, did not close the track, and did not warn the student-athletes who later arrived to train. Less than ninety minutes after the first incident, as Katie was running with her teammates, the same unanchored shelter again moved or became airborne and struck her, driving her to the ground and causing her to suffer a traumatic brain injury, brain bleeding, and a skull fracture. Once a thriving student and elite athlete with a clear path ahead, Katie now lives every day with the permanent cognitive, emotional, and physical consequences of that preventable event — an invisible brain injury that she must constantly explain and justify just to be understood.

### **Parties and Jurisdiction**

1. Plaintiff Kaitlyn Watt (“Katie”) is a resident of Massachusetts and, at all times relevant, was a senior student at Bates College.
2. Defendant Bates College (“Bates”) is a private educational institution located in Lewiston, Maine, and responsible for the design, ownership, operation, and maintenance of the Russell Street Track and Field Complex, located on its campus.
3. Venue is proper in Androscoggin County pursuant to 14 M.R.S. § 501.
4. This Court has jurisdiction pursuant to 4 M.R.S. § 105.

### **Background**

5. Katie Watt grew up in Concord, New Hampshire, where she excelled academically and athletically at Concord High School, competing on the Nordic skiing, cross country, and track and field teams.
6. After graduating in 2021, she enrolled at Bates College that fall and continued her athletic career as a dedicated member of the Bates Nordic ski team.
7. By October 2024, Katie was a senior and a captain of the Bates Nordic ski team.

8. She was an exceptional athlete—fresh off qualifying for the Boston Marathon and positioned to have the strongest ski season of her career.
9. Katie was also an exceptional student, earning All-Academic honors in her freshman, sophomore, and junior seasons—a formal recognition reserved for student-athletes who excel both in the classroom and in competition.
10. As part of her regular training routine, she ran on the track at the Russell Street Track and Field Complex.
11. Bates had recently completed a reconstruction of the Russell Street Track and Field Complex during the summer of 2024, giving it full control and responsibility over the placement and anchoring of athletic structures.
12. At the edge of the track, Bates had placed two enormous 18-foot, 597-pound KwikGoal bench shelters.
13. The KwikGoal assembly/owner instructions include an explicit warning that:  
  
**“This equipment must be stored in a secure, sheltered area when not in use or in the threat of high winds.”**
14. The same instructions also clearly and repeatedly tell users that the shelters **must be anchored according to the assembly instructions at all times.**
15. The manufacturer’s assembly instructions require the shelters to be secured either with buried concrete footings or six concrete-and-steel anchors.
16. Bates installed neither.
17. Instead, Bates left the shelters resting loosely on the turf.

**October 12, 2024**

18. On the morning of October 12, 2024, forecasts had warned of sustained winds above 20 mph and gusts exceeding 35 mph, and by sunrise those predictions had materialized.

19. At approximately 8:24 a.m., with winds rising, one shelter blew across the entire Russell Street Track and Field, flipping over repeatedly until coming to rest on the track—the exact area where Katie would later be running.
20. Katie was not present at the track during this early-morning incident.
21. Despite clear warning that the shelters had become active airborne hazards, Bates took no action—it did not remove them, secure them, warn students, or restrict track access.
22. Again, Bates left the shelters resting loosely on the turf.
23. Approximately an hour later, Katie and her skiing teammates arrived at the track for a scheduled running test.
24. Katie began running a few warm-up laps with her teammates.
25. At approximately 9:41 a.m., amid continued wind gusts above 30 mph, one of the shelters again moved or became airborne.
26. As Katie ran past, one of the shelters struck her and pinned her down to the track surface.
27. The force of impact broke the shelter.



28. Katie's teammates rushed to her side and found her disoriented and minimally responsive.

### **Katie's Injuries**

29. She was transported initially by ambulance to Central Maine Medical Center and then transported by LifeFlight to Maine Medical Center for emergency neurological care.
30. Katie sustained a left temporal hemorrhagic contusion, a subdural hematoma, and a nondisplaced skull fracture -- serious brain injuries.
31. She has suffered cognitive impairment, emotional disturbance, headaches, and neurological deficits, and continues to experience life-altering symptoms.

### **Count I- Negligence**

32. Bates owed Katie a duty to maintain safe premises, to secure equipment in accordance with manufacturer specifications, and to take reasonable steps to protect students from known hazards.
33. Bates breached this duty in multiple, compounding ways, including but not limited to:
  - a. Failing to install the required buried concrete footings or anchor systems for the shelters—despite having every opportunity to do so during the 2024 field construction and despite manufacturer warnings.
  - b. Ignoring clear weather forecasts predicting high winds and failing to secure or store the shelters in a “secure, sheltered area,” as expressly required by KwikGoal.
  - c. Failing to respond to the 8:24 a.m. warning event, where a shelter blew across the entire field, flipped, and landed on the track—an unmistakable sign of the threat posed by the shelters.
  - d. Allowing students, including Katie, to continue using the track while the shelters remained unsecured and hazardous.

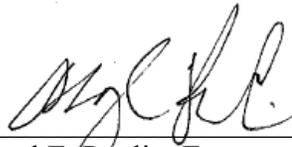
34. As a direct and foreseeable result of these failures, Katie sustained severe, life-altering, and permanent injuries.
35. Katie has and will continue to be forced to navigate her life with a traumatic brain injury.
36. Living with a traumatic brain injury forces Katie, at just 22 years old, to navigate daily fear and uncertainty—never knowing when her brain will fail her on tasks that once felt effortless, and questioning whether every headache, lapse in memory, or moment of fog means she is getting worse.
37. Because her injury is largely invisible, she must constantly explain and justify her limitations simply to be understood, compounding the anguish of having her young adulthood and sense of self permanently altered.

### **Demand for Jury Trial**

Plaintiff requests that her claims be tried to a jury.

Wherefore, Plaintiff requests judgment against the Defendant and damages in an amount to be determined by a jury, including compensatory damages, past and future medical expenses, emotional distress, lost enjoyment of life, together with attorney fees, costs, and such other and further relief as this Court deems just and appropriate.

Dated: November 20, 2025



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