

1 JAMES J. PISANELLI (Nevada Bar No. 4027)  
[JJP@pisanellibice.com](mailto:JJP@pisanellibice.com)

2 TODD L. BICE (Nevada Bar No. 4534)  
[TLB@pisanellibice.com](mailto:TLB@pisanellibice.com)

3 DEBRA L. SPINELLI (Nevada Bar No. 9695)  
[DLS@pisanellibice.com](mailto:DLS@pisanellibice.com)

4 PISANELLI BICE  
400 South 7<sup>th</sup> Street, Suite 300  
5 Las Vegas, NV 89101  
6 Tel: 702.214.2100

7 BRAD D. BRIAN (*Pro Hac Vice Forthcoming*)  
[brad.brian@mto.com](mailto:brad.brian@mto.com)

8 MICHAEL R. DOYEN (*Pro Hac Vice Forthcoming*)  
[michael.doyen@mto.com](mailto:michael.doyen@mto.com)

9 BETHANY W. KRISTOVICH (*Pro Hac Vice Forthcoming*)  
[bethany.kristovich@mto.com](mailto:bethany.kristovich@mto.com)

10 MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, Fiftieth Floor  
Los Angeles, California 90071-3426  
11 Tel: 213.683.9100/Fax: 213.687.3702

12 E. STRATTON HORRES, JR. (*Pro Hac Vice Forthcoming*)  
[Stratton.Horres@wilsonelser.com](mailto:Stratton.Horres@wilsonelser.com)

13 KAREN L. BASHOR, (Nevada Bar No. 11913)  
[Karen.Bashor@wilsonelser.com](mailto:Karen.Bashor@wilsonelser.com)

14 WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP  
300 South Fourth Street, 11<sup>th</sup> Floor  
15 Las Vegas, Nevada 89101-6014  
16 Tel: 702.727.1400/Fax: 702.727.1401

17 Attorneys for Plaintiffs MGM RESORTS INTERNATIONAL, MANDALAY  
18 RESORT GROUP, MANDALAY BAY, LLC, MGM RESORTS FESTIVAL  
19 GROUNDS, LLC, and MGM RESORTS VENUE MANAGEMENT, LLC

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 MGM RESORTS INTERNATIONAL,  
23 MANDALAY RESORT GROUP,  
24 MANDALAY BAY, LLC f/k/a MANDALAY  
CORP., MGM RESORTS FESTIVAL  
25 GROUNDS, LLC, MGM RESORTS VENUE  
MANAGEMENT, LLC

26 Plaintiffs,

27 vs.

28 CARLOS ACOSTA; EMMANUEL AFFRAN;  
GREG AGUAYO; LILLIAN AGUIRRE;

Case No.

**COMPLAINT FOR DECLARATORY  
RELIEF**

1 DIONNDRA ALEXANDER; LESLIE  
ALWORTH; ENRIQUE ARGUETA; SHANE  
2 ARMSTRONG; IMARI AUSBIE; TINA  
MARIE AVERY; JEFFREY BACHMAN;  
3 JOSEPH I. BALAS; BREANNA GRACE  
FRANCL BALDRIDGE; MALINDA  
4 BALDRIDGE; COLE BALDWIN; PAUL  
BALFOUR; ALICIA BEATTY; ELIZABETH  
5 BEATTY; MATTHEW BEATTY; BRANDY  
BEAVER; BRANDON CHARLES BECKETT;  
6 TINA BEDARTES; CHICO BELSER;  
CHRISTI BERAN; KAREN BERNEY;  
7 JENNIFER L. BITHELL; RUSSELL BLECK;  
AARON BOUPHAPRASEUTH; JOSHUA  
8 BRADY; CHANDRA BRIDGES; CRAIG  
ALAN BROCKETT; DEBBIE BROCKETT;  
9 KALI BROCKETT; LEXIA BROCKETT;  
CAITLIN BRUNNER; ANDRE BRYANT;  
10 JORI BUCKLAND; TIFFANIE BUEHLER;  
ANTHONY BURNS; ANDRETTI CAGE;  
11 KIMBERLY CALDERON; EARLLITRA  
DANIELLE CARTER; ATHENA CASTILLA;  
12 SHAYLA CATALDO; TEQUELA  
CHAPPELL; SAVANNA CHASCO; DANNY  
13 CLUFF; GREG CLUFF; CODY COFFER;  
MARKIE COFFER; CONNIE D. COLEMAN;  
14 KIMBERLY COLLINS; SUE ANN  
CORNWELL; DANIEL CORTES; BRETT  
15 COSSAIRT; MANDI CROWDER; CHANELL  
CUELLAR; JUAN CUELLAR; RAINNA  
16 RUSK DAVIS; WHITNEY DAY; JOHN  
DEANE; RACHEL DELAPAZ; HANNAH  
17 DOMINGUEZ; JOMONT DOTTON;  
SANDRA DOUGLAS; MICHAEL DYER;  
18 HUGH JOSEPH DYER III; SONYA ESTERS;  
EMILY EVANS; MICHELLE EVANS;  
19 KRISTINA FALCO; CASSANDRA FIGGERS;  
DEANNA FINLEY; JUDITH FISHER;  
20 BRISTINA FLATT; KENNETH SHAYNE  
FLETCHER; BETH GALOFARO; WILLIAM  
21 GALVEZ; LACY GANN; DANA GETREU;  
COURTNEY GIBSON; JENNIFER GIBSON;  
22 MICHAEL MERCED GILARDINO; JIMMY  
GILMORE; TOMAS GONZALEZ; HEATHER  
23 GOOZE; MICHAEL GREENFIELD; JULIAN  
HAMILTON; ANGEL HANDLIN; DARREL  
24 HANDLIN; MATTHEW HANSEN; MICHAEL  
HANSSON; CAROL HARDEN; JUSTIN  
25 HARMAN; LAKHESHA HARRIS; TRINO  
HARRIS; JENNIFER HAUT; ELIZABETH  
26 HEFLEY; GABRIELLE HEMPHILL;  
WILLIAM HENNING; RICHARD CRAIG  
27 HERMANN; MARIO HERRERA;  
JACQUELYN HOFFING; MARCELLA  
28 HOFFMAN; BRITTANY HORTON; MEGAN

1 IANNUZZI; LUCA ICLODEAN; DMOREA  
JACKSON; JARON ANTHONY JAMERSON;  
2 ANGELINA JAMES; COREY JOHNSON;  
DEANDRE JOHNSON; JAYNELLE  
3 JOHNSON; JOHANNA JOHNSON; SARAH  
JOHNSON; EDGAR T. JONES; CHIQUANA  
4 JOSHUA; MYLES KALK; AUTUM  
KAPINKIN; JAWAUNDO W. KIMMONS;  
5 WILLIAM KING; NIKKOLE KNIGHT;  
ANGELL KNITTLE; ANNA KOPP; DAVID  
6 KRONBERG; LORI KRUMME; MARY  
LYNN KUEFFNER; ATHEA LAVIN; AMIAH  
7 LEE; ERIKA LEE; LISA LEE; NICK LEMAY;  
ALAN I. LEVITT; CHARLES LEXION;  
8 YOLANDA LIZARDO; GABRIELA  
LOMAGLIO; VICENTE LOPEZ; SHAWNA  
9 LOTT; JOSHUA LUIZ; JOY LUJAN;  
BRITTANY MACKAY; KERI MAHER;  
10 CHRISTIAN MARQUEZ; TRACI  
MARSHALL; RICHARD MASUCCI;  
11 LINDSEY MATA; TRAVIS MATHESON;  
STEVE MCBEE; DENISE MCCLELLAN;  
12 LONNIE MCCORVEY; LYNNE MCCUE;  
TAMIKA MCGILL; CARMEN MCKINLEY;  
13 CLEVELAND MCMATH; DOREEN  
MEDINA; TREZA MEKHAIL; PAIGE  
14 MELANSON; ROSEMARIE MELANSON;  
STEPHANIE MELANSON; STEPHEN  
15 MELANSON; ESTATE OF AUSTIN MEYER;  
ROMEO MEYER; ROBERT MILLER;  
16 PHYLYSSA MONTOYA; ALYSSA MOORE;  
KATRINA MORGAN; SHANCELA MYERS;  
17 MARIROSE NAING; ANTHONY DON E.  
NOARBE; AMBER NORCIA; ELSA NUNEZ;  
18 ROSE O'TOOLE; KUULEI OTIS; STACIE  
OWENS; CHAD PACKARD; KAYCEE  
19 PAUL; ELISA PEREZ; ANGELA MARIE  
PERRY; JEREMY PICKETT; JOSE PLAZA;  
20 MACKENZIE PLUTA; DARRIAN PORTER;  
LAURA A. PUGLIA; KARMJIT RAJU;  
21 JASMINE REIN; STANLEY RENDON; LEA  
RICHMOND; ISRAEL RIVERA; TONIA  
22 ROCHELEAU; MICHAEL ROLLAND;  
MARK RUSSELL; VINCENT SAGER;  
23 CHRISTOPHER SALINAS; LENEA  
SAMPSON; ALYSSA SANDS; JOSEPH  
24 SARTIN; SARAH SCARLETT; SHAWN  
SCARLETT; SHAYLENNE SCARLETT; KIM  
25 SCHMITZ; ALISON SHEEHE;  
CHRISTOPHER SHUEMAKER; BREANNA  
26 SKAGEN; JENNIFER SKOFF; CHEYENNE  
SLOAN; EDEN SMITH; JASPER SMITH;  
27 YVONNE SMITH; MARTIN SOLANO;  
SHELBY STALKER; CHRIS STEWART;  
28 GREGORY TAVERNITE; SAM TAYLOR;

1 WENDY TAYLOR-HILL; REGINALD  
2 THARPS; CHRISTINA THEBEAU; DAVID  
3 W. THERIAULT; BREYANA THOMAS;  
4 GABRIELLE THOMAS; SAVANNAH  
5 THOMAS; STEVEN THOME; ALVA BRUCE  
6 TILLEY; MARIYA TORO; KATHRYN  
7 TRESSLER; JENNIFER A. TURNER;  
8 DEBORAH URRIZAGA; WILLIAM F.  
9 VANDERVEER; FRANK VEALENCIS;  
10 TAMARA VEALENCIS; REGINA VIOLA;  
11 ALYSSA WALKER; TIKIESHA WASP;  
12 DONALD WELTY; ZACHARY WILCOX;  
13 JORDAN WILKINSON; JEFFERY  
14 WILLIAMS; TERACIO WILLIAMS; GARY  
15 "OPIE" ALLEN WISE; JOHN YONTS; JAMIE  
16 ZALESKI; JANET ZMYEWSKI; THOMAS  
17 ZMYEWSKI,

18 DEFENDANTS.

**INTRODUCTION**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1. On October 1, 2017, Stephen Paddock carried out a mass attack at the Route 91 Harvest Festival in Las Vegas, Nevada.
2. Paddock intended to inflict mass injury, death and destruction. He killed 58 persons and injured some 500 others. Paddock’s attack resulted in the highest number of deaths of any mass shooting in the Nation’s history.
3. Security for the concert was provided by Contemporary Services Corporation, whose security services have been certified by the Secretary of Homeland Security for protecting against and responding to acts of mass injury and destruction.
4. Recognizing the national interest in such events, and in the development and deployment of services certified by the Secretary of Homeland Security to prevent and respond to such events, Congress has provided original and exclusive federal jurisdiction for any claims of injuries arising out of or relating to mass violence where services certified by the Department were deployed.
5. Plaintiff MGM Resorts Festival Grounds, LLC owns and operates the Las Vegas Village, at 3901 South Las Vegas Boulevard, Las Vegas, Nevada 89119, where the Route 91 Harvest Festival was held. Plaintiff Mandalay Bay, LLC owns and operates the Mandalay Bay resort, which is adjacent to Las Vegas Village. Plaintiff MGM Resorts International is the parent corporation, with an indirect 100% interest in Mandalay Bay, LLC, and MGM Resorts Festival Grounds. Plaintiff MGM Resorts Venue Management, LLC is a Nevada limited liability company.
6. Paddock carried out his mass attack on the concert from a room on the 32nd floor of the Mandalay Bay resort.
7. Following Paddock’s attack, over 2,500 individuals (“Claimants”) have brought lawsuits, or threatened to bring lawsuits, against Plaintiffs MGM Resorts Festival Grounds, LLC, MGM Resorts International, Mandalay Bay, LLC, Mandalay Resort Group, and MGM Resorts Venue Management, LLC (collectively, “the MGM Parties”), alleging that the MGM Parties (among others) are liable for deaths, injuries, and emotional distress resulting from Paddock’s

1 attack. Claimants subsequently voluntarily dismissed these cases before they could be resolved,  
2 apparently with the intent of refileing.

3 8. Named as defendants in this case are Claimants who have brought lawsuits (which  
4 they subsequently voluntarily dismissed) against the MGM Parties, alleging claims arising from  
5 Paddock's attack, and persons who, through counsel, have threatened to bring such claims against  
6 the MGM Parties.

7 9. Congress has enacted legislation to support the development of new technologies  
8 and services to prevent and respond to mass violence. That legislation, the Support Anti-  
9 Terrorism by Fostering Effective Technologies Act of 2002, 6 U.S.C. §§ 441-444 (also known by  
10 the acronym, the "SAFETY Act"), provides a calibrated balance of remedies and limitations on  
11 liabilities arising from mass attacks committed on U.S. soil where services certified by the  
12 Department of Homeland Security were deployed.

13 10. In the case of Paddock's mass attack, certified technologies or services were  
14 deployed by a professional security company, Contemporary Services Corporation ("CSC"),  
15 which was employed as the Security Vendor for the Route 91 concert. As alleged in more detail  
16 below, Paddock's mass attack meets the requirements of the SAFETY Act as set forth in the  
17 statute and the Regulations promulgated by the Department of Homeland Security.

18 11. Defendants' actual and threatened lawsuits implicate the services provided by CSC  
19 because they implicate security at the concert, for example security training, emergency response,  
20 evacuation, and adequacy of egress.

21 12. As a result, the SAFETY Act applies to and governs all actions and any claims  
22 arising out of or relating to Paddock's mass attack. There are five key aspects of the Act and  
23 implementing regulations promulgated by the Department of Homeland Security as authorized and  
24 contemplated by the SAFETY Act. 6 C.F.R. § 25.1 et seq.

25 13. First, the SAFETY Act creates a "Federal cause of action for claims arising out of  
26 [or] relating to" an act of mass violence where certified services were deployed and where such  
27 claims may result in losses to the Seller of the services. 6 U.S.C. § 442(a)(1).

28 14. Second, the SAFETY Act expressly provides the federal courts with "original and

1 exclusive jurisdiction over all actions for any claim for loss” arising out of or related to such an  
2 attack. 6 U.S.C. § 442(a)(2).

3 15. Third, as confirmed by the Secretary’s implementing regulations promulgated after  
4 enactment of the SAFETY Act, the federal cause of action created by the statute is the exclusive  
5 claim available in such circumstances. 6 U.S.C.

6 § 442(a)(1). The regulations state: “There shall exist only one cause of action for loss of property,  
7 personal injury, or death for performance or non-performance of the Seller’s Qualified Anti-  
8 Terrorism Technology in relation to an Act of Terrorism.” 6 C.F.R. § 25.7(d).

9 16. Fourth, the regulations further provide that “Such cause of action may be brought  
10 only against the Seller of the Qualified Anti-Terrorism Technology and may not be brought  
11 against the buyers, the buyers’ contractors, or downstream users of the Technology, the Seller’s  
12 suppliers or contractors, or any other person or entity.” 6 C.F.R. § 25.7(d).

13 17. Fifth, to ensure compensation for victims in appropriate cases, the SAFETY Act  
14 requires that the Seller “obtain liability insurance of such types and in such amounts as shall be  
15 required in accordance with this section and certified by the Secretary to satisfy otherwise  
16 compensable third-party claims arising out of, relating to, or resulting from an act of terrorism.” 6  
17 U.S.C. § 443(a)(1).

18 18. Congress enacted the SAFETY Act in recognition of the strong national interest in  
19 encouraging the development and use of technologies and services that can help prevent and  
20 respond to mass violence. The Act does so in part by assurance of limited liability in the  
21 unfortunate event that an incident of mass violence occurs and injuries occur despite the  
22 deployment of such technology. The Act also does so by creating original and exclusive  
23 jurisdiction for the resolution of all controversies in federal court. 6 U.S.C. § 442(a)(2).

24 19. The SAFETY Act expressly provides the federal courts with original and exclusive  
25 jurisdiction over “all actions for and any claims for loss [or] injury” arising out of or relating to a  
26 mass attack where certified services were provided and where such claims *may* result in losses to  
27 the seller of those services. The Act and the associated regulations make clear that any such claim  
28 against the MGM Parties must be dismissed.





1 28. Plaintiffs are informed and believe and thereon allege that Defendant Greg Aguayo  
2 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
4 Nevada.

5 29. Plaintiffs are informed and believe and thereon allege that Defendant Lillian  
6 Aguirre is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
8 Las Vegas, Nevada.

9 30. Plaintiffs are informed and believe, and thereon allege, that defendant Dionndra  
10 Alexander is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
11 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
12 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*  
13 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
14 BC684047.

15 31. Plaintiffs are informed and believe and thereon allege that Defendant Leslie  
16 Alworth is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
17 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
18 Las Vegas, Nevada.

19 32. Plaintiffs are informed and believe, and thereon allege, that defendant Enrique  
20 Argueta is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
23 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

24 33. Plaintiffs are informed and believe, and thereon allege, that defendant Shane  
25 Armstrong is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
26 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
27 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Athena Castilla v.*  
28 *MGM*, filed October 18, 2017, in the Los Angeles Superior Court (“LASC”), case number

1 BC680193.

2 34. Plaintiffs are informed and believe, and thereon allege, that defendant Imari Ausbie  
3 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
6 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

7 35. Plaintiffs are informed and believe, and thereon allege, that defendant Tina Marie  
8 Avery is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
9 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
10 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
11 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

12 36. Plaintiffs are informed and believe and thereon allege that Defendant Jeffrey  
13 Bachman is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
14 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
15 Las Vegas, Nevada.

16 37. Plaintiffs are informed and believe and thereon allege that Defendant Joseph I.  
17 Balas is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened  
18 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
19 Nevada.

20 38. Plaintiffs are informed and believe, and thereon allege, that defendant Breanna  
21 Grace Franci Baldrige is a resident of the State of Nevada. Defendant has previously filed a  
22 lawsuit (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs,  
23 asserting claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in  
24 *Baldrige, et al. v. MGM*, filed January 18, 2018, in Clark County District Court (“Clark  
25 County”), case number A-18-767981-C.

26 39. Plaintiffs are informed and believe, and thereon allege, that defendant Malinda  
27 Baldrige is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
28 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims

1 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Baldrige, et al. v.*  
2 *MGM*, filed January 18, 2018, in Clark County District Court (“Clark County”), case number A-  
3 18-767981-C.

4 40. Plaintiffs are informed and believe, and thereon allege, that defendant Cole  
5 Baldwin is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 41. Plaintiffs are informed and believe and thereon allege that Defendant Paul Balfour  
10 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
11 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
12 Nevada.

13 42. Plaintiffs are informed and believe and thereon allege that Defendant Alicia Beatty  
14 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
15 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
16 Nevada.

17 43. Plaintiffs are informed and believe and thereon allege that Defendant Elizabeth  
18 Beatty is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened  
19 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
20 Nevada.

21 44. Plaintiffs are informed and believe and thereon allege that Defendant Matthew  
22 Beatty is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened  
23 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
24 Nevada.

25 45. Plaintiffs are informed and believe, and thereon allege, that defendant Brandy  
26 Beaver is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 46. Plaintiffs are informed and believe, and thereon allege, that defendant Brandon  
3 Charles Beckett is a resident of the State of Nevada. Defendant has previously filed a lawsuit  
4 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting  
5 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*  
6 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
7 BC684047.

8 47. Plaintiffs are informed and believe and thereon allege that Defendant Tina Bedartes  
9 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
10 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
11 Nevada.

12 48. Plaintiffs are informed and believe, and thereon allege, that defendant Chico Belser  
13 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
14 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
15 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
16 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

17 49. Plaintiffs are informed and believe, and thereon allege, that defendant Christi Beran  
18 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
19 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
20 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
21 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

22 50. Plaintiffs are informed and believe and thereon allege that Defendant Karen Berney  
23 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
24 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
25 Nevada.

26 51. Plaintiffs are informed and believe, and thereon allege, that defendant Jennifer L.  
27 Bithell is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 52. Plaintiffs are informed and believe, and thereon allege, that defendant Russell  
4 Bleck is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,  
7 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

8 53. Plaintiffs are informed and believe, and thereon allege, that defendant Aaron  
9 Bouphapraseuth is a resident of the State of Nevada. Defendant has previously filed a lawsuit  
10 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting  
11 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*  
12 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
13 BC684047.

14 54. Plaintiffs are informed and believe and thereon allege that Defendant Joshua Brady  
15 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
16 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
17 Nevada.

18 55. Plaintiffs are informed and believe, and thereon allege, that defendant Chandra  
19 Bridges is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 56. Plaintiffs are informed and believe, and thereon allege, that defendant Craig Alan  
24 Brockett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
25 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
26 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
27 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

28 57. Plaintiffs are informed and believe, and thereon allege, that defendant Debbie

1 Brockett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
2 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
3 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
4 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

5 58. Plaintiffs are informed and believe, and thereon allege, that defendant Kali Brockett  
6 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 59. Plaintiffs are informed and believe, and thereon allege, that defendant Lexia  
11 Brockett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
14 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

15 60. Plaintiffs are informed and believe, and thereon allege, that defendant Caitlin  
16 Brunner is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Brunner v. MGM*, filed  
19 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-  
20 764745-C.

21 61. Plaintiffs are informed and believe, and thereon allege, that defendant Andre  
22 Bryant is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 62. Plaintiffs are informed and believe, and thereon allege, that defendant Jori  
27 Buckland is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Buckland v. MGM*, filed  
2 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-  
3 764741-C.

4 63. Plaintiffs are informed and believe and thereon allege that Defendant Tiffanie  
5 Buehler is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
6 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
7 Las Vegas, Nevada.

8 64. Plaintiffs are informed and believe and thereon allege that Defendant Anthony  
9 Burns is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened  
10 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
11 Nevada.

12 65. Plaintiffs are informed and believe, and thereon allege, that defendant Andretti  
13 Cage is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
14 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
15 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
16 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

17 66. Plaintiffs are informed and believe, and thereon allege, that defendant Kimberly  
18 Calderon is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
19 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
20 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,  
21 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-  
22 767288-C.

23 67. Plaintiffs are informed and believe, and thereon allege, that defendant Earllitra  
24 Danielle Carter is a resident of the State of Nevada. Defendant has previously filed a lawsuit  
25 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting  
26 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*  
27 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
28 BC684047.

1           68.     Plaintiffs are informed and believe, and thereon allege, that defendant Athena  
2 Castilla is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Athena Castilla v. MGM*,  
5 filed October 18, 2017, in the Los Angeles Superior Court (“LASC”), case number BC680193.

6           69.     Plaintiffs are informed and believe, and thereon allege, that defendant Shayla  
7 Cataldo is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Cataldo v. MGM*, filed  
10 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-  
11 764738-C.

12           70.     Plaintiffs are informed and believe, and thereon allege, that defendant Tequila  
13 Chappell is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
14 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
15 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
16 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

17           71.     Plaintiffs are informed and believe and thereon allege that Defendant Savanna  
18 Chasco is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened  
19 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
20 Nevada.

21           72.     Plaintiffs are informed and believe, and thereon allege, that defendant Danny Cluff  
22 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26           73.     Plaintiffs are informed and believe and thereon allege that Defendant Greg Cluff is  
27 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert  
28 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.



1           74.     Plaintiffs are informed and believe and thereon allege that Defendant Cody Coffe  
2 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
4 Nevada.

5           75.     Plaintiffs are informed and believe, and thereon allege, that defendant Markie  
6 Coffe is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10           76.     Plaintiffs are informed and believe, and thereon allege, that defendant Connie D.  
11 Coleman is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Gasper, et al. v. MGM*, filed  
14 November 20, 2017, in Los Angeles Superior Court (“LASC”), case number BC684143

15           77.     Plaintiffs are informed and believe, and thereon allege, that defendant Kimberly  
16 Collins is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
19 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

20           78.     Plaintiffs are informed and believe and thereon allege that Defendant Sue Ann  
21 Cornwell is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
22 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
23 Las Vegas, Nevada.

24           79.     Plaintiffs are informed and believe, and thereon allege, that defendant Daniel  
25 Cortes is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1           80.     Plaintiffs are informed and believe, and thereon allege, that defendant Brett  
2 Cossairt is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6           81.     Plaintiffs are informed and believe and thereon allege that Defendant Mandi  
7 Crowder is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
8 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
9 Las Vegas, Nevada.

10          82.     Plaintiffs are informed and believe and thereon allege that Defendant Chanell  
11 Cuellar is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened  
12 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
13 Nevada.

14          83.     Plaintiffs are informed and believe and thereon allege that Defendant Juan Cuellar  
15 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
16 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
17 Nevada.

18          84.     Plaintiffs are informed and believe, and thereon allege, that defendant Rainna Rusk  
19 Davis is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23          85.     Plaintiffs are informed and believe and thereon allege that Defendant Whitney Day  
24 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
25 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
26 Nevada.

27          86.     Plaintiffs are informed and believe and thereon allege that Defendant John Deane is  
28 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert

1 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

2 87. Plaintiffs are informed and believe, and thereon allege, that defendant Rachel  
3 DelaPaz is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
6 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

7 88. Plaintiffs are informed and believe, and thereon allege, that defendant Hannah  
8 Dominguez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
9 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
10 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*  
11 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
12 BC684047.

13 89. Plaintiffs are informed and believe, and thereon allege, that defendant Jomont  
14 Dotton is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
17 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

18 90. Plaintiffs are informed and believe, and thereon allege, that defendant Sandra  
19 Douglas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 91. Plaintiffs are informed and believe, and thereon allege, that defendant Michael  
24 Dyer is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
25 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
26 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
27 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

28 92. Plaintiffs are informed and believe, and thereon allege, that defendant Hugh Joseph

1 Dyer III is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
2 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
3 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
4 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

5 93. Plaintiffs are informed and believe, and thereon allege, that defendant Sonya Esters  
6 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 94. Plaintiffs are informed and believe and thereon allege that Defendant Emily Evans  
11 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
12 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
13 Nevada.

14 95. Plaintiffs are informed and believe, and thereon allege, that defendant Michelle  
15 Evans is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 96. Plaintiffs are informed and believe, and thereon allege, that defendant Kristina  
20 Falco is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
23 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

24 97. Plaintiffs are informed and believe, and thereon allege, that defendant Cassandra  
25 Figgers is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 98. Plaintiffs are informed and believe and thereon allege that Defendant Deanna  
2 Finley is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened  
3 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
4 Nevada.

5 99. Plaintiffs are informed and believe, and thereon allege, that defendant Judith Fisher  
6 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 100. Plaintiffs are informed and believe, and thereon allege, that defendant Bristina Flatt  
11 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
14 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

15 101. Plaintiffs are informed and believe, and thereon allege, that defendant Kenneth  
16 Shayne Fletcher is a resident of the State of Nevada. Defendant has previously filed a lawsuit  
17 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting  
18 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*  
19 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
20 BC684047.

21 102. Plaintiffs are informed and believe and thereon allege that Defendant Beth Galofaro  
22 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
23 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
24 Nevada.

25 103. Plaintiffs are informed and believe, and thereon allege, that defendant William  
26 Galvez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 104. Plaintiffs are informed and believe and thereon allege that Defendant Lacy Gann is  
3 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert  
4 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

5 105. Plaintiffs are informed and believe and thereon allege that Defendant Dana Getreu  
6 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
7 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
8 Nevada.

9 106. Plaintiffs are informed and believe, and thereon allege, that defendant Courtney  
10 Gibson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 107. Plaintiffs are informed and believe and thereon allege that Defendant Jennifer  
15 Gibson is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened  
16 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
17 Nevada.

18 108. Plaintiffs are informed and believe, and thereon allege, that defendant Michael  
19 Merced Gilardino is a resident of the State of Nevada. Defendant has previously filed a lawsuit  
20 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting  
21 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*  
22 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
23 BC684047.

24 109. Plaintiffs are informed and believe and thereon allege that Defendant Jimmy  
25 Gilmore is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
26 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
27 Las Vegas, Nevada.

28 110. Plaintiffs are informed and believe, and thereon allege, that defendant Tomas

1 Gonzalez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
2 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
3 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
4 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

5 111. Plaintiffs are informed and believe, and thereon allege, that defendant Heather  
6 Gooze is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Gooze v. MGM*, filed  
9 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-  
10 764718-C.

11 112. Plaintiffs are informed and believe, and thereon allege, that defendant Michael  
12 Greenfield is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
13 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
14 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v.*  
15 *MGM*, filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number  
16 BC687120.

17 113. Plaintiffs are informed and believe, and thereon allege, that defendant Julian  
18 Hamilton is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
19 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
20 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
21 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

22 114. Plaintiffs are informed and believe and thereon allege that Defendant Angel  
23 Handlin is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
24 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
25 Las Vegas, Nevada.

26 115. Plaintiffs are informed and believe and thereon allege that Defendant Darrel  
27 Handlin is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
28 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in

1 Las Vegas, Nevada.

2 116. Plaintiffs are informed and believe, and thereon allege, that defendant Matthew  
3 Hansen is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
6 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

7 117. Plaintiffs are informed and believe and thereon allege that Defendant Michael  
8 Hansson is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
9 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
10 Las Vegas, Nevada.

11 118. Plaintiffs are informed and believe, and thereon allege, that defendant Carol Harden  
12 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 119. Plaintiffs are informed and believe and thereon allege that Defendant Justin  
17 Harman is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
18 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
19 Las Vegas, Nevada.

20 120. Plaintiffs are informed and believe, and thereon allege, that defendant Lakhesha  
21 Harris is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
24 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

25 121. Plaintiffs are informed and believe, and thereon allege, that defendant Trino Harris  
26 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,



1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 122. Plaintiffs are informed and believe, and thereon allege, that defendant Jennifer Haut  
3 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
6 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

7 123. Plaintiffs are informed and believe and thereon allege that Defendant Elizabeth  
8 Hefley is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened  
9 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
10 Nevada.

11 124. Plaintiffs are informed and believe and thereon allege that Defendant Gabrielle  
12 Hemphill is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
13 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
14 Las Vegas, Nevada.

15 125. Plaintiffs are informed and believe and thereon allege that Defendant William  
16 Henning is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
17 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
18 Las Vegas, Nevada.

19 126. Plaintiffs are informed and believe, and thereon allege, that defendant Richard  
20 Craig Hermann is a resident of the State of Nevada. Defendant has previously filed a lawsuit  
21 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting  
22 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*  
23 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
24 BC684047.

25 127. Plaintiffs are informed and believe, and thereon allege, that defendant Mario  
26 Herrera is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 128. Plaintiffs are informed and believe and thereon allege that Defendant Jacquelyn  
3 Hoffing is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
4 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
5 Las Vegas, Nevada.

6 129. Plaintiffs are informed and believe, and thereon allege, that defendant Marcella  
7 Hoffman is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
10 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

11 130. Plaintiffs are informed and believe, and thereon allege, that defendant Brittany  
12 Horton is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 131. Plaintiffs are informed and believe and thereon allege that Defendant Megan  
17 Iannuzzi is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
18 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
19 Las Vegas, Nevada.

20 132. Plaintiffs are informed and believe, and thereon allege, that defendant Luca  
21 Iclodean is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Iclodean v. MGM*, filed  
24 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-  
25 764716-C.

26 133. Plaintiffs are informed and believe, and thereon allege, that defendant Dmorea  
27 Jackson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 134. Plaintiffs are informed and believe, and thereon allege, that defendant Jaron  
4 Anthony Jamerson is a resident of the State of Nevada. Defendant has previously filed a lawsuit  
5 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting  
6 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*  
7 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
8 BC684047.

9 135. Plaintiffs are informed and believe, and thereon allege, that defendant Angelina  
10 James is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 136. Plaintiffs are informed and believe, and thereon allege, that defendant Corey  
15 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 137. Plaintiffs are informed and believe, and thereon allege, that defendant DeAndre  
20 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
23 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

24 138. Plaintiffs are informed and believe, and thereon allege, that defendant Jaynelle  
25 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1           139. Plaintiffs are informed and believe, and thereon allege, that defendant Johanna  
2 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6           140. Plaintiffs are informed and believe, and thereon allege, that defendant Sarah  
7 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
10 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

11           141. Plaintiffs are informed and believe, and thereon allege, that defendant Edgar T.  
12 Jones is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16           142. Plaintiffs are informed and believe, and thereon allege, that defendant Chiquana  
17 Joshua is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21           143. Plaintiffs are informed and believe and thereon allege that Defendant Myles Kalk is  
22 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert  
23 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

24           144. Plaintiffs are informed and believe and thereon allege that Defendant Autum  
25 Kapinkin is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
26 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
27 Las Vegas, Nevada.

28           145. Plaintiffs are informed and believe, and thereon allege, that defendant Jawaundo W.

1 Kimmons is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
2 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
3 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*  
4 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
5 BC684047.

6 146. Plaintiffs are informed and believe, and thereon allege, that defendant William  
7 King is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,  
10 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-  
11 767288-C.

12 147. Plaintiffs are informed and believe and thereon allege that Defendant Nikkole  
13 Knight is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened  
14 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
15 Nevada.

16 148. Plaintiffs are informed and believe, and thereon allege, that defendant Angell  
17 Knittle is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 149. Plaintiffs are informed and believe and thereon allege that Defendant Anna Kopp is  
22 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert  
23 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

24 150. Plaintiffs are informed and believe, and thereon allege, that defendant David  
25 Kronberg is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 151. Plaintiffs are informed and believe and thereon allege that Defendant Lori Krumme  
2 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
4 Nevada.

5 152. Plaintiffs are informed and believe, and thereon allege, that defendant Mary Lynn  
6 Kueffner is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 153. Plaintiffs are informed and believe and thereon allege that Defendant Athea Lavin  
11 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
12 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
13 Nevada.

14 154. Plaintiffs are informed and believe, and thereon allege, that defendant Amiah Lee is  
15 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 155. Plaintiffs are informed and believe, and thereon allege, that defendant Erika Lee is  
20 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
23 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

24 156. Plaintiffs are informed and believe, and thereon allege, that defendant Lisa Lee is a  
25 resident of the State of Nevada. Defendant has previously filed a lawsuit (which was subsequently  
26 voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising from the  
27 October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*, filed  
28 November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1           157. Plaintiffs are informed and believe, and thereon allege, that defendant Nick Lemay  
2 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6           158. Plaintiffs are informed and believe, and thereon allege, that defendant Alan I. Levitt  
7 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Gasper, et al. v. MGM*, filed  
10 November 20, 2017, in Los Angeles Superior Court (“LASC”), case number BC684143

11           159. Plaintiffs are informed and believe, and thereon allege, that defendant Charles  
12 Lexion is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16           160. Plaintiffs are informed and believe, and thereon allege, that defendant Yolanda  
17 Lizardo is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21           161. Plaintiffs are informed and believe and thereon allege that Defendant Gabriela  
22 Lomaglio is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
24 Las Vegas, Nevada.

25           162. Plaintiffs are informed and believe, and thereon allege, that defendant Vicente  
26 Lopez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 163. Plaintiffs are informed and believe, and thereon allege, that defendant Shawna Lott  
3 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Lott v. MGM*, filed  
6 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-  
7 764736-C.

8 164. Plaintiffs are informed and believe, and thereon allege, that defendant Joshua Luiz  
9 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
12 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

13 165. Plaintiffs are informed and believe, and thereon allege, that defendant Joy Lujan is  
14 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
17 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

18 166. Plaintiffs are informed and believe and thereon allege that Defendant Brittany  
19 MacKay is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
20 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
21 Las Vegas, Nevada.

22 167. Plaintiffs are informed and believe, and thereon allege, that defendant Keri Maher  
23 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
24 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
25 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
26 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

27 168. Plaintiffs are informed and believe and thereon allege that Defendant Christian  
28 Marquez is a resident of the State of Nevada. Defendant has, through counsel, asserted or



1 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
2 Las Vegas, Nevada.

3 169. Plaintiffs are informed and believe, and thereon allege, that defendant Traci  
4 Marshall is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
7 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

8 170. Plaintiffs are informed and believe, and thereon allege, that defendant Richard  
9 Masucci is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
12 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

13 171. Plaintiffs are informed and believe, and thereon allege, that defendant Lindsey  
14 Mata is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,  
17 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-  
18 767288-C.

19 172. Plaintiffs are informed and believe, and thereon allege, that defendant Travis  
20 Matheson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
21 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
22 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*  
23 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
24 BC684047.

25 173. Plaintiffs are informed and believe, and thereon allege, that defendant Steve McBee  
26 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 174. Plaintiffs are informed and believe and thereon allege that Defendant Denise  
3 McClellan is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
4 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
5 Las Vegas, Nevada.

6 175. Plaintiffs are informed and believe, and thereon allege, that defendant Lonnie  
7 McCorvey is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
8 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
9 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*  
10 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
11 BC684047.

12 176. Plaintiffs are informed and believe, and thereon allege, that defendant Lynne  
13 McCue is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
14 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
15 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,  
16 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-  
17 767288-C.

18 177. Plaintiffs are informed and believe, and thereon allege, that defendant Tamika  
19 McGill is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 178. Plaintiffs are informed and believe and thereon allege that Defendant Carmen  
24 McKinley is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
25 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
26 Las Vegas, Nevada.

27 179. Plaintiffs are informed and believe, and thereon allege, that defendant Cleveland  
28 McMath is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *McMath v. MGM*, filed  
3 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-  
4 764720-C.

5 180. Plaintiffs are informed and believe, and thereon allege, that defendant Doreen  
6 Medina is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 181. Plaintiffs are informed and believe and thereon allege that Defendant Treza  
11 Mekhail is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
12 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
13 Las Vegas, Nevada.

14 182. Plaintiffs are informed and believe, and thereon allege, that defendant Paige  
15 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
16 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
17 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*  
18 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-  
19 18-767288-C.

20 183. Plaintiffs are informed and believe, and thereon allege, that defendant Rosemarie  
21 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
22 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
23 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*  
24 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-  
25 18-767288-C.

26 184. Plaintiffs are informed and believe, and thereon allege, that defendant Stephanie  
27 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
28 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims

1 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*  
2 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-  
3 18-767288-C.

4 185. Plaintiffs are informed and believe, and thereon allege, that defendant Stephen  
5 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
6 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
7 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*  
8 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-  
9 18-767288-C.

10 186. Plaintiffs are informed and believe, and thereon allege that on October 1, 2017,  
11 decedent Austin Meyer, was a resident of the State of Nevada. Plaintiffs are informed and believe  
12 and thereon allege that Defendant, the Estate of Austin Meyer, has, through counsel, made claims  
13 against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada, or,  
14 alternatively, has indicated an intent to make such claims in the future (such as by way of the  
15 filing of a separate lawsuit – now dismissed, by way of a letter of representation of counsel, or by  
16 way of an evidence preservation letter from counsel).

17 187. Plaintiffs are informed and believe, and thereon allege, that defendant Romeo  
18 Meyer is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
19 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
20 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
21 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

22 188. Plaintiffs are informed and believe, and thereon allege, that defendant Robert  
23 Miller is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
24 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
25 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
26 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

27 189. Plaintiffs are informed and believe, and thereon allege, that defendant Phyllyssa  
28 Montoya is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
3 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

4 190. Plaintiffs are informed and believe, and thereon allege, that defendant Alyssa  
5 Moore is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 191. Plaintiffs are informed and believe and thereon allege that Defendant Katrina  
10 Morgan is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
12 Las Vegas, Nevada.

13 192. Plaintiffs are informed and believe, and thereon allege, that defendant Shancela  
14 Myers is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
17 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

18 193. Plaintiffs are informed and believe, and thereon allege, that defendant Marirose  
19 Naing is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 194. Plaintiffs are informed and believe, and thereon allege, that defendant Anthony  
24 Don E. Noarbe is a resident of the State of Nevada. Defendant has previously filed a lawsuit  
25 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting  
26 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*  
27 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
28 BC684047.

1           195. Plaintiffs are informed and believe, and thereon allege, that defendant Amber  
2 Norcia is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6           196. Plaintiffs are informed and believe and thereon allege that Defendant Elsa Nunez is  
7 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert  
8 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

9           197. Plaintiffs are informed and believe, and thereon allege, that defendant Rose  
10 O’Toole is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14           198. Plaintiffs are informed and believe, and thereon allege, that defendant Kuulei Otis  
15 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19           199. Plaintiffs are informed and believe and thereon allege that Defendant Stacie Owens  
20 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
21 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
22 Nevada.

23           200. Plaintiffs are informed and believe and thereon allege that Defendant Chad Packard  
24 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
25 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
26 Nevada.

27           201. Plaintiffs are informed and believe, and thereon allege, that defendant Kaycee Paul  
28 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
3 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

4 202. Plaintiffs are informed and believe, and thereon allege, that defendant Elisa Perez is  
5 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 203. Plaintiffs are informed and believe, and thereon allege, that defendant Angela  
10 Marie Perry is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
11 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
12 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*  
13 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
14 BC684047.

15 204. Plaintiffs are informed and believe, and thereon allege, that defendant Jeremy  
16 Pickett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
19 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

20 205. Plaintiffs are informed and believe, and thereon allege, that defendant Jose Plaza is  
21 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
24 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

25 206. Plaintiffs are informed and believe, and thereon allege, that defendant Mackenzie  
26 Pluta is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 207. Plaintiffs are informed and believe, and thereon allege, that defendant Darrian  
3 Porter is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
6 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

7 208. Plaintiffs are informed and believe and thereon allege that Defendant Laura A.  
8 Puglia is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened  
9 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
10 Nevada.

11 209. Plaintiffs are informed and believe, and thereon allege, that defendant Karmjit Raju  
12 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 210. Plaintiffs are informed and believe and thereon allege that Defendant Jasmine Rein  
17 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
18 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
19 Nevada.

20 211. Plaintiffs are informed and believe, and thereon allege, that defendant Stanley  
21 Rendon is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Spencer, et al. v. Paddock*,  
24 filed October 17, 2017, in Los Angeles Superior Court (“LASC”), case number BC680065.

25 212. Plaintiffs are informed and believe and thereon allege that Defendant Lea  
26 Richmond is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
28 Las Vegas, Nevada.



1           213. Plaintiffs are informed and believe, and thereon allege, that defendant Israel Rivera  
2 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6           214. Plaintiffs are informed and believe and thereon allege that Defendant Tonia  
7 Rocheleau is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
8 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
9 Las Vegas, Nevada.

10           215. Plaintiffs are informed and believe and thereon allege that Defendant Michael  
11 Rolland is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
12 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
13 Las Vegas, Nevada.

14           216. Plaintiffs are informed and believe and thereon allege that Defendant Mark Russell  
15 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
16 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
17 Nevada.

18           217. Plaintiffs are informed and believe, and thereon allege, that defendant Vincent  
19 Sager is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,  
22 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

23           218. Plaintiffs are informed and believe and thereon allege that Defendant Christopher  
24 Salinas is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened  
25 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
26 Nevada.

27           219. Plaintiffs are informed and believe, and thereon allege, that defendant Lenea  
28 Sampson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Sampson v. MGM*, filed  
3 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-  
4 764733-C.

5 220. Plaintiffs are informed and believe and thereon allege that Defendant Alyssa Sands  
6 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
7 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
8 Nevada.

9 221. Plaintiffs are informed and believe, and thereon allege, that defendant Joseph Sartin  
10 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 222. Plaintiffs are informed and believe, and thereon allege, that defendant Sarah  
15 Scarlett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,  
18 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

19 223. Plaintiffs are informed and believe, and thereon allege, that defendant Shawn  
20 Scarlett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,  
23 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

24 224. Plaintiffs are informed and believe, and thereon allege, that defendant Shaylenne  
25 Scarlett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,  
28 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

1           225. Plaintiffs are informed and believe and thereon allege that Defendant Kim Schmitz  
2 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
4 Nevada.

5           226. Plaintiffs are informed and believe and thereon allege that Defendant Alison  
6 Sheehe is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened  
7 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
8 Nevada.

9           227. Plaintiffs are informed and believe, and thereon allege, that defendant Christopher  
10 Shuemaker is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
11 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
12 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*  
13 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
14 BC684047.

15           228. Plaintiffs are informed and believe, and thereon allege, that defendant Breanna  
16 Skagen is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,  
19 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

20           229. Plaintiffs are informed and believe and thereon allege that Defendant Jennifer Skoff  
21 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
22 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
23 Nevada.

24           230. Plaintiffs are informed and believe, and thereon allege, that defendant Cheyenne  
25 Sloan is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,  
28 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-

1 767288-C.

2 231. Plaintiffs are informed and believe and thereon allege that Defendant Eden Smith is  
3 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert  
4 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

5 232. Plaintiffs are informed and believe, and thereon allege, that defendant Jasper Smith  
6 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 233. Plaintiffs are informed and believe, and thereon allege, that defendant Yvonne  
11 Smith is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
14 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

15 234. Plaintiffs are informed and believe and thereon allege that Defendant Martin  
16 Solano is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened  
17 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
18 Nevada.

19 235. Plaintiffs are informed and believe, and thereon allege, that defendant Shelby  
20 Stalker is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,  
23 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-

24 767288-C.

25 236. Plaintiffs are informed and believe and thereon allege that Defendant Chris Stewart  
26 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
27 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
28 Nevada.

1           237. Plaintiffs are informed and believe, and thereon allege, that defendant Gregory  
2 Tavernite is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6           238. Plaintiffs are informed and believe and thereon allege that Defendant Sam Taylor is  
7 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert  
8 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

9           239. Plaintiffs are informed and believe, and thereon allege, that defendant Wendy  
10 Taylor-Hill is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
11 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
12 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*  
13 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
14 BC684047.

15           240. Plaintiffs are informed and believe, and thereon allege, that defendant Reginald  
16 Tharps is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
19 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

20           241. Plaintiffs are informed and believe and thereon allege that Defendant Christina  
21 Thebeau is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
22 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
23 Las Vegas, Nevada.

24           242. Plaintiffs are informed and believe, and thereon allege, that defendant David W.  
25 Theriault is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1           243. Plaintiffs are informed and believe, and thereon allege, that defendant Breyana  
2 Thomas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6           244. Plaintiffs are informed and believe, and thereon allege, that defendant Gabrielle  
7 Thomas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,  
10 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

11           245. Plaintiffs are informed and believe, and thereon allege, that defendant Savannah  
12 Thomas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,  
15 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

16           246. Plaintiffs are informed and believe, and thereon allege, that defendant Steven  
17 Thome is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21           247. Plaintiffs are informed and believe, and thereon allege, that defendant Alva Bruce  
22 Tilley is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26           248. Plaintiffs are informed and believe and thereon allege that Defendant Mariya Toro  
27 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
28 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,

1 Nevada.

2 249. Plaintiffs are informed and believe, and thereon allege, that defendant Kathryn  
3 Tressler is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Tressler v. MGM*, filed  
6 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-  
7 764722-C.

8 250. Plaintiffs are informed and believe, and thereon allege, that defendant Jennifer A.  
9 Turner is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
12 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

13 251. Plaintiffs are informed and believe and thereon allege that Defendant Deborah  
14 Urrizaga is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
16 Las Vegas, Nevada.

17 252. Plaintiffs are informed and believe, and thereon allege, that defendant William F.  
18 Vanderveer is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
19 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
20 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*  
21 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
22 BC684047.

23 253. Plaintiffs are informed and believe, and thereon allege, that defendant Frank  
24 Vealencis is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
25 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
26 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*  
27 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
28 BC684047.

1           254. Plaintiffs are informed and believe, and thereon allege, that defendant Tamara  
2 Vealencis is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
3 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
4 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*  
5 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
6 BC684047.

7           255. Plaintiffs are informed and believe and thereon allege that Defendant Regina Viola  
8 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
9 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
10 Nevada.

11           256. Plaintiffs are informed and believe, and thereon allege, that defendant Alyssa  
12 Walker is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16           257. Plaintiffs are informed and believe, and thereon allege, that defendant Tikiesha  
17 Wasp is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21           258. Plaintiffs are informed and believe, and thereon allege, that defendant Donald  
22 Welty is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26           259. Plaintiffs are informed and believe, and thereon allege, that defendant Zachary  
27 Wilcox is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising



1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 260. Plaintiffs are informed and believe, and thereon allege, that defendant Jordan  
4 Wilkinson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
5 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
6 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*  
7 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
8 BC684047.

9 261. Plaintiffs are informed and believe, and thereon allege, that defendant Jeffery  
10 Williams is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 262. Plaintiffs are informed and believe, and thereon allege, that defendant Teracio  
15 Williams is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,  
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 263. Plaintiffs are informed and believe, and thereon allege, that defendant Gary “Opie”  
20 Allen Wise is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which  
21 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims  
22 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*  
23 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number  
24 BC684047.

25 264. Plaintiffs are informed and believe, and thereon allege, that defendant John Yonts  
26 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was  
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising  
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 265. Plaintiffs are informed and believe and thereon allege that Defendant Jamie Zaleski  
3 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to  
4 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
5 Nevada.

6 266. Plaintiffs are informed and believe and thereon allege that Defendant Janet  
7 Zmyewski is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
8 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
9 Las Vegas, Nevada.

10 267. Plaintiffs are informed and believe and thereon allege that Defendant Thomas  
11 Zmyewski is a resident of the State of Nevada. Defendant has, through counsel, asserted or  
12 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in  
13 Las Vegas, Nevada.

14 **JURISDICTION AND VENUE**

15 268. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. § 1331 and 6  
16 U.S.C. §442(a). As alleged hereinabove, the SAFETY Act expressly provides for original and  
17 exclusive federal jurisdiction over actions arising from or relating to acts of mass violence where  
18 technologies or services certified by the Secretary of Homeland Security were deployed. At the  
19 time of Paddock’s mass attack at the Route 91 concert, security services were provided by  
20 Contemporary Services Corporation as the Security Vendor for the Route 91 Harvest Festival.  
21 CSC’s security services were certified by the Secretary of Homeland Security under the SAFETY  
22 Act.

23 269. This Court has personal jurisdiction over Defendants because they are residents of  
24 the State of Nevada and are therefore subject to the general personal jurisdiction of this Court.

25 270. Venue is proper in this Judicial District pursuant to 28 U.S.C.  
26 § 1391(b)(1) because one or more of the Defendants are known to reside, or upon information and  
27 belief, do reside, within this Judicial District.

**FIRST CAUSE OF ACTION FOR DECLATORY RELIEF**

**(By Plaintiffs against all Defendants)**

1  
2  
3 271. Plaintiffs reallege and incorporate by reference, as though fully set forth, the  
4 allegations of paragraphs 1-270, above.

5 272. Following Paddock’s mass attack on the concert, over 2,500 individuals have either  
6 sued the MGM Parties, or threatened to sue the MGM Parties, for claims alleged to arise from or  
7 relate to the attack. Several hundred individuals filed suit, and before the issues could be joined or  
8 resolved, they dismissed their claims, apparently with the intent of refileing.

9 273. Each Defendant either (a) has previously filed suit (and then dismissed it) against  
10 one or more of the MGM Parties relating to the Paddock attack, or (b) through counsel has stated  
11 an intention to sue the MGM Parties relating to the attack. There is no pending litigation between  
12 Plaintiffs and Defendants relating to the attack.

13 274. The claims alleged in the now-dismissed lawsuits include claims of alleged  
14 negligence by the MGM Parties and others, including CSC, in protecting and safeguarding persons  
15 including those Defendants who attended the Route 91 Festival.

16 275. Defendants’ actual and threatened lawsuits implicate the services provided by CSC  
17 because they implicate security at the concert, including training, emergency response, evacuation  
18 and adequacy of egress.

19 276. These claims are subject to the SAFETY Act, because (a) they arise from and relate  
20 to an act of mass violence meeting the statutory requirements; (b) CSC provided security at the  
21 concert, deploying services certified by the Department of Homeland Security under the SAFETY  
22 Act to protect against or respond to such an attack; and (c) the claims may therefore result in loss  
23 to CSC as the “Seller” of such certified services.

24 277. The claims threatened against the MGM Parties by certain Defendants, through  
25 counsel, also inevitably fall under the SAFETY Act for the very same reasons: (a) they arise from  
26 and relate to an act of mass violence meeting the statutory requirements; (b) CSC provided  
27 security at the concert, deploying services certified by the Department of Homeland Security  
28 under the SAFETY Act to protect against or respond to such an attack; and (c) the claims may

1 therefore result in loss to CSC as the “Seller” of such certified services. If Defendants were injured  
2 by Paddock’s assault, as they allege, they were inevitably injured both because Paddock fired from  
3 his window *and* because they remained in the line of fire at the concert. Such claims inevitably  
4 implicate security at the concert—and may result in loss to CSC.

5         278. The SAFETY Act applies to claims “arising out of, relating to, or resulting from an  
6 act of terrorism.”

7         279. The SAFETY Act defines an act of terrorism: An act meets the requirements if the  
8 act is (i) “unlawful” (ii) “causes harm to a person ... in the United States,” and (iii) “uses or  
9 attempts to use ... weapons ... designed or intended to cause mass ... injury.” 6 U.S.C. §  
10 444(2)(B). There is no requirement in the statute or regulations of an ideological motive or  
11 objective for the attack for it to meet the requirements of the SAFETY Act.

12         280. Paddock’s mass attack satisfies the requirements of the SAFETY Act and the  
13 regulations: (i) it was “unlawful,” (ii) it resulted in death or injury to hundreds of persons in the  
14 United States, and (iii) it involved weapons and other instrumentalities that were designed and  
15 intended to cause, and which in fact caused, mass injury and death. Those weapons and  
16 instrumentalities included rifles modified with bump stocks to spray fully automatic gun fire;  
17 high-capacity magazines capable of holding between 60 and 100 rounds; and illegal incendiary  
18 rounds intended to blow up the fuel tanks adjacent to the concert. Paddock used these weapons  
19 and instrumentalities to fire hundreds of rounds at the crowd, and he fired incendiary rounds  
20 which struck the fuel tanks but, fortunately, missed the fuel.

21         281. The post-attack investigation revealed that Paddock brought in his van, which he  
22 parked in the hotel garage, 90 pounds of explosives, consisting of 20 two-pound containers of  
23 exploding targets, 10 one-pound containers of exploding targets and 2 twenty-pound bags of  
24 explosive precursors.

25         282. No MGM Party attempted to commit, knowingly participated in, aided, abetted,  
26 committed, or participated in any conspiracy to commit any act of terrorism of criminal act related  
27 to mass attack perpetrated by Stephen Paddock at the Route 91 Harvest Festival in Las Vegas,  
28 Nevada, on October 1, 2017.

1           283. The Secretary of Homeland Security may make a determination that conduct in  
2 question meets the statutory requirement, but neither the Act nor the regulations requires a formal  
3 certification. The Statute provides that the Secretary shall have exclusive authority to certify  
4 services, but the authority to determine whether an act of mass violence meets the statutory  
5 requirements is not exclusive to the Secretary.

6           284. Public statements by the Secretary of Homeland Security concerning the attack  
7 make clear that the attack meets the requirements of the SAFETY Act; indeed, based on the plain  
8 language of the statute, the regulations, and the facts, no other determination could be possible.

9           285. In congressional testimony on November 30, 2017, the Acting Secretary of  
10 Homeland Security noted the emphasis of “terrorists and other violent criminals ... on attacking  
11 soft targets,” including “recent tragedies in Nevada.” The Acting Secretary went on to note that  
12 the “SAFETY Act Program” “provide[s] critical incentives for the development and deployment  
13 of anti-terrorism technologies by providing liability protections for ‘qualified anti-terrorism  
14 technologies,’” which applies to a number of large sports and entertainment venues nationwide.

15           286. In a May 2018 release, Department of Homeland Security noted that “mass  
16 shootings” in various places, including at a “concert,” aim “to kill and maim unsuspecting  
17 individuals” and thereby fall within the Department’s “primary mission” “to prevent terrorist  
18 attacks within the U.S, reduce the vulnerability of the U.S. to terrorism, and minimize the damage  
19 and assist in the recovery from terrorist attacks that do occur, including those in ST-CPs [soft-  
20 targets-crowded places].” Department of Homeland Security, *Soft Targets and Crowded Places*  
21 *Security Plan Overview*, May 2018, at page 2. The report goes on to note that the protections of  
22 the SAFETY Act have been “approved for open venues such as sports arenas and stadia” – such as  
23 the venue for the Route 91 Festival. *Id.* at p. 17.

24           287. The Department continues its critical work to prevent and respond to mass  
25 violence. In Congressional testimony on May 15, 2018, the Secretary testified that DHS is  
26 “seeking to ramp up ‘soft target’ security efforts,” noting that DHS programs “address threats to  
27 soft targets – including schools, *entertainment venues*, major events, and public spaces” (emphasis  
28 added). Further, on June 4, 2018, DHS announced that it had “developed a ST-CP Security

1 Enhancement and Coordination Plan,” which has not been made public. The plan addresses “the  
2 increased emphasis *by terrorists* and other extremist actors to leverage less sophisticated methods  
3 to inflict harm in public areas ... such as parks, ... *special event venues*, and similar facilities.”

4 See <https://www.dhs.gov/publication/securing-soft-targets-and-crowded-spaces> (emphasis added).

5 288. The SAFETY Act creates a single, exclusive federal cause of action for claims for  
6 injuries arising out of or relating to acts of mass violence where services certified by the  
7 Department of Homeland Security were deployed in defense against, response to, or recovery  
8 from such act and such claims result or may result in loss to the Seller.

9 289. Pursuant to the SAFETY Act, the Department of Homeland Security has certified  
10 the services provided by CSC. The DHS Certification recognizes CSC’s security services as  
11 appropriate for preventing and responding to acts of mass violence. 6 U.S.C. § 441; *see also* 48  
12 C.F.R. § 50.201.

13 290. CSC’s security services Certified by DHS include “Physical Security”; “Access  
14 Control”; and “Crowd Management.”

15 291. CSC’s Certified Crowd Management Services include:

- 16 • “Awareness of venue-specific emergency response protocols and evacuation  
17 procedures to include emergency alert and mass-notification systems and sheltering procedures”;
- 18 • “Pre-event venue / event safety inspections”;
- 19 • “Facilitation of crowd movement during ingress, circulation, sheltering in place,  
20 emergency evacuations, and egress”;
- 21 • “Pre-event coordination and multi-agency collaboration with public safety  
22 agencies”;
- 23 • “Selection, vetting, and training of employees.”

24 292. As alleged above, CSC was employed as the Security Vendor for the Route 91  
25 concert. CSC’s responsibilities at the Route 91 Harvest Festival included providing the following  
26 DHS Certified Services:

- 27 • “perimeter security, event access, festival grounds event security”;
- 28 • “Staff[ing] inner perimeter and gates”;

- 1 • “Protect[ing] against unauthorized access”;
- 2 • “early warning ... of perimeter breaches”;
- 3 • “Secur[ing] internal festival grounds”;
- 4 • “Patrol[ing] festival floor grounds and assist[ing] patrons with any security related
- 5 issues”;
- 6 • pre-event planning for “Security and Safety”;
- 7 • “Emergency response” and “evacuation,” including evacuation for “terrorist threat”
- 8 and “ensur[ing] that the exit routes and gates remain unobstructed.”

9 293. For the reasons set forth above, the SAFETY Act creates an exclusive cause of  
10 action for any claims arising out of relating to Paddock’s mass attack and such claims may result  
11 in loss to the Seller. Under the SAFETY Act, there “shall exist only one cause of action for loss  
12 of property, personal injury, or death. 6 C.F.R. 25.7 (d).

13 294. Such cause of action “may be brought only against the Seller of the Qualified Anti-  
14 Terrorism Technology and may not be brought against the buyers, the buyer’s contractors, or  
15 downstream users of the Technology, the Seller’s suppliers or contractors, or any other person or  
16 entity.” 6 C.F.R. 25.7 (d). The SAFETY Act precludes any liability on the part of Plaintiffs to  
17 Defendants relating to Paddock’s mass attack.

18 295. In addition, the SAFETY Act provides that for any covered claims arising out of or  
19 relating to an act of mass violence where certified services were provided, “the government  
20 contractor defense applies in such a lawsuit,” which provides a complete defense to liability. 6  
21 U.S.C. 442(d)(1). The government contractor defense precludes any finding of liability on the part  
22 of Plaintiffs to Defendants relating to Paddock’s mass attack.

23 296. An actual and justiciable controversy exists between Plaintiffs and Defendants  
24 concerning the applicability of the SAFETY Act. Plaintiffs assert that the SAFETY Act precludes  
25 any liability for any claims arising out of or relating to Paddock’s mass attack, whereas, on  
26 information and belief, Defendants deny that the Act applies or that it precludes liability on their  
27 claims against Plaintiffs.

28 297. A judicial declaration as to whether the SAFETY Act applies and precludes

1 liability on Defendants’ claims against the Plaintiffs is necessary at this time so that the parties  
2 may ascertain their rights, and avoid the significant judicial waste that would occur if the lawsuits  
3 were allowed to proceed in the absence of a finding as to the applicability of the SAFETY Act.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiffs MGM Parties pray for judgment against Defendants, and each of  
6 them, as follows:

- 7 1. For a judicial declaration that:
  - 8 a. Defendants’ claims arising from the attack by Stephen Paddock on October 1, 2017  
9 in Las Vegas, Nevada are subject to and governed by the SAFETY Act, 6 U.S.C. §  
10 441 et seq.;
  - 11 b. the SAFETY Act precludes any finding of liability against Plaintiffs for any claim  
12 for injuries arising out of or related to Paddock’s mass attack, without prejudice to  
13 Defendants’ rights to pursue claims against the “Seller” under the Act, including to  
14 obtain proceeds of insurance that any such Seller was required by the Act to  
15 maintain;
  - 16 c. Plaintiffs have no liability of any kind to Defendants, or any of them, arising from  
17 the Paddock’s mass attack; and
- 18 2. For such other and further legal or equitable relief as the Court deems just and proper.

19 DATED: July 13, 2018

PISANELLI BICE

20

21 By:                         /s/ James J. Pisanelli                        

22 JAMES J. PISANELLI (Nevada Bar No. 4027)

[JJP@pisanellibice.com](mailto:JJP@pisanellibice.com)

23 TODD L. BICE (Nevada Bar No. 4534)

[TLB@pisanellibice.com](mailto:TLB@pisanellibice.com)

24 DEBRA L. SPINELLI (Nevada Bar No. 9695)

[DLS@pisanellibice.com](mailto:DLS@pisanellibice.com)

25 PISANELLI BICE

          400 South 7<sup>th</sup> Street, Suite 300

          Las Vegas, NV 89101

26

27

28



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Attorneys for Plaintiffs MGM RESORTS  
INTERNATIONAL, MANDALAY RESORT GROUP,  
MANDALAY BAY, LLC, MGM RESORTS  
FESTIVAL GROUNDS, LLC, and MGM RESORTS  
VENUE MANAGEMENT, LLC

JS 44 (Rev. 06/17)

### CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<p><b>I. (a) PLAINTIFFS</b>                  MGM RESORTS INTERNATIONAL, MANDALAY RESORT GROUP,                  MANDALAY BAY, LLC, MGM RESORTS FESTIVAL GROUNDS, LLC, and                  MGM RESORTS VENUE MANAGEMENT, LLC</p> <p><b>(b)</b> County of Residence of First Listed Plaintiff <u>Clark County</u>                  (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p><b>(c)</b> Attorneys (Firm Name, Address, and Telephone Number)</p>	<p><b>DEFENDANTS</b>                  CARLOS ACOSTA, EMMANUEAL AFFRAN, GREGE AGUAYO, LILLIAN AGUIRRE,                  DIONNDRA ALEXANDER, LESLIE ALSWORTH, ENRIQUE ARGUETA, SHANE                  ARMSTRONG, IMARI AUSBIE, TINA MARIE AVERY, JEFFREY BACHMAN, et al.                  County of Residence of First Listed Defendant <u>Clark County</u>                  (IN U.S. PLAINTIFF CASES ONLY)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF                  THE TRACT OF LAND INVOLVED.</p> <p>Attorneys (If Known)</p>
---	---

<p><b>II. BASIS OF JURISDICTION</b> (Place an "X" in One Box Only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p><b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td></td> <td>PTF</td> <td>DEF</td> <td></td> <td>PTF</td> <td>DEF</td> </tr> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	PTF	DEF		PTF	DEF																				
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

<b>CONTRACT</b>	<b>TORTS</b>	<b>FORFEITURE/PENALTY</b>	<b>BANKRUPTCY</b>	<b>OTHER STATUTES</b>
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p><b>PERSONAL INJURY</b></p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p><b>PERSONAL PROPERTY</b></p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157
			<p><b>PROPERTY RIGHTS</b></p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<p><b>REAL PROPERTY</b></p> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<p><b>CIVIL RIGHTS</b></p> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<p><b>PRISONER PETITIONS</b></p> <p><b>Habeas Corpus:</b></p> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <p><b>Other:</b></p> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<p><b>LABOR</b></p> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<p><b>SOCIAL SECURITY</b></p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
		<p><b>IMMIGRATION</b></p> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<p><b>FEDERAL TAX SUITS</b></p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

**V. ORIGIN** (Place an "X" in One Box Only)

1 Original Proceeding     2 Removed from State Court     3 Remanded from Appellate Court     4 Reinstated or Reopened     5 Transferred from Another District (specify)     6 Multidistrict Litigation - Transfer     8 Multidistrict Litigation - Direct File

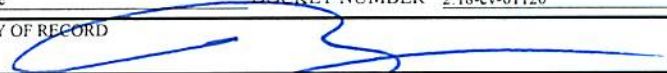
**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. §§ 2201 and 2202

Brief description of cause: Declaratory judgment under 28 U.S.C. §§ 2201-02 that the Support Anti-Terrorism by Fostering Effective Technologies Act of 2002 ("SAFETY Act"), 6 U.S.C. §§ 441-44, applies, and that Plaintiffs cannot be held liable for deaths, injuries, or other damages arising from Stephen Paddock's attack.

**VII. REQUESTED IN COMPLAINT:**     CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.    **DEMAND \$**    CHECK YES only if demanded in complaint: **JURY DEMAND:**     Yes     No

**VIII. RELATED CASE(S) IF ANY** (See instructions):    JUDGE Richard F. Boulware    DOCKET NUMBER 2:18-cv-01120

DATE 7/13/18    SIGNATURE OF ATTORNEY OF RECORD 

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Nevada

MGM RESORTS INTERNATIONAL, MANDALAY RESORT GROUP, MANDALAY BAY, LLC, MGM RESORTS FESTIVAL GROUNDS, LLC, and MGM RESORTS VENUE MANAGEMENT, LLC

Plaintiff(s)

v.

Civil Action No.

CARLOS ACOSTA, EMMANUEAL AFFRAN, GREGE AGUAYO, LILLIAN AGUIRRE, DIONNDRA ALEXANDER, LESLIE ALSWORTH, ENRIQUE ARGUETA, SHANE ARMSTRONG, IMARI AUSBIE, TINA MARIE AVERY, et al.

Defendant(s)

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: \_\_\_\_\_

Signature of Clerk or Deputy Clerk

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_ , who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 \_\_\_\_\_ .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc: