

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

IN THE MARION _____

CAUSE NO. 49D14 11 11 CT 044823

JILL POLET, JAYMIE POLET, ROELAND POLET,)
and JORDYN POLET, a Minor by her Parents and)
Natural Guardians Jill Polet and Roeland Polet;)
TRACY L. GREEN; SUE A. HUMPHREY,)
Guardian of the ESTATE OF BRADLEY C.)
HUMPHREY, a Minor; SUE A. HUMPHREY;)
ESTATE OF NATHAN BYRD, by Its Personal)
Representative Randy Byrd; ESTATE OF GLENN)
GOODRICH, by Its Personal Representative)
Heather Goodrich; JOHN R. HASKELL and)
MARY E. HASKELL, Parents of JENNIFER M.)
HASKELL, Deceased; ESTATE OF MEAGAN)
TOOTHMAN, by Its Personal Representative,)
Melissa L. Oakley; ANDREA VELLINGA;)
MICHAEL VELLINGA, individually and in his)
capacity as Guardian of Andrea Vellinga, an)
incapacitated person; STEVEN C. STOVER, by)
Co-Guardians, Paul J. Joyner and Timothy S.)
Gwaltney; SHANNON WALCOTT; JADE)
WALCOTT, a Minor, by her Parents and Natural)
Guardians Allan Walcott and Shannon Walcott;)
LORI MCGUIRE, JENNIFER MCGUIRE, a Minor,)
by her Mother and Natural Guardian, Lori McGuire;)
MICHELLE DICKSON; KAREN BRUNN;)
TIMOTHY BRUNN; JOSHUA BRUNN, a Minor, by)
his Parents and Natural Guardians, Karen Brunn and)
Timothy Brunn; JESSICA GILLION; BRAD)
SULLIVAN; CAITLYN KAHLENBECK; HALEY)
WAGGONER; MACKENZIE WAGGONER;)
DONNA MAGDZIARZ; LAURA MAGDZIARZ;)
GABRIELLE SPISAK, DANIELLE SPISAK, and)
MAGGIE MULLIN, Minors, by their Mother and)
Natural Guardian, Laura Magdziarz; LISA HITE;)
KYLA-REED BRUMETT, a Minor, by her)
Custodial Grandmother, Lisa Hite; CURTIS HITE;)
AARON M. FREE; NICOLE LUELLEN and JOHN)
LUELLEN; SUE MOORE and RODDY MOORE;)
CRYSTALYN HUEGEN; SHEMATA CHATMAN;)
JEFFREY S. FREPAN; LORI FREPAN; JESSICA)
COLLINS; AMY LODENSTEIN; and)
KYLE D. COVERT)

FILED

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Elizabeth A. White
CLERK OF THE MARION CIRCUIT COURT

Plaintiffs,

vs.)
)
)
 LIVE NATION WORLDWIDE, INC. and/or)
 LIVE NATION TOURING (USA), INC. and/or)
 LIVE NATION ENTERTAINMENT; DAVE)
 LUCAS ENTERTAINMENT GROUP,)
 LLC and/or LUCAS ENTERTAINMENT GROUP,)
 LLC, d/b/a 360 GROUP LLC; MID-AMERICA)
 SOUND CORPORATION; JAMES THOMAS)
 ENGINEERING, INC.; STEVE COHEN)
 PRODUCTIONS, LTD.; TAIT TOWERS;)
 TAIT TOWERS LIGHTING, INC., ATOMIC)
 DESIGN COMPANY; TYLER TRUSS SYSTEMS,)
 INC.; EPIC PRODUCTION TECHNOLOGIES,)
 INC.; INTERNATIONAL ALLIANCE OF)
 THEATRICAL AND STAGE EMPLOYEES;)
 INTERNATIONAL ALLIANCE OF THEATRICAL)
 AND STAGE EMPLOYEES LOCAL NO. 30;)
 LUCKY STAR, INC. (F.S.O. SUGARLAND);)
 SUGARLAND MUSIC, INC.;)
 HAMLAN & COMPANY and ESG SECURITY,)
 INC.)
)
 Defendants.)

COMPLAINT FOR DAMAGES
AND DEMAND FOR TRIAL BY JURY

Come now the Plaintiffs, and assert their claims for damages. In support of their claim for damages, the Plaintiffs allege as follows:

I. NATURE OF CASE

1. On the evening of August 13, 2011, a musical concert was held at the Indiana State Fairgrounds, located in Indianapolis, Marion County, Indiana.
2. The concert (hereinafter referred to as the “Sugarland concert”) was scheduled to feature performing artists, Sara Bareilles and the band performing under the name of Sugarland.
3. In order to facilitate the Sugarland concert performance, a stage was constructed.

4. The Plaintiffs and/or their family members were present at the Sugarland concert on the evening of August 13, 2011.

5. While the Plaintiffs and/or their family members were present at the Sugarland concert, the stage collapsed, resulting in the death and injuries to concert guests and causing damages to the Plaintiffs and their family members.

II. THE PLAINTIFFS

Plaintiffs incorporate paragraphs 1 through 5 as if fully set forth herein.

6. Jill Polet, a resident of Hamilton County, Ohio, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

7. Jaymie Polet, a resident of Hamilton County, Ohio, and a minor at the time of the Sugarland concert and now an adult eighteen years of age, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

8. Jordyn Polet, a ten year old minor resident of Hamilton County, Ohio, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse. Jordyn Polet also witnessed the physical injuries suffered by her mother Jill Polet and her sister, Jaymie Polet and as a result suffered the negligent infliction of emotional distress from the stage collapse.

9. Roeland Polet, a resident of Hamilton County, Ohio, is the husband of Jill Polet and father of Jaymie Polet and Jordyn Polet. Roeland Polet suffered the loss of his wife Jill Polet's consortium and incurred medical expenses for his wife and daughters' injuries as a result of the stage collapse.

10. Tracy L. Green, a resident of Carroll County, Indiana and a single mother of three, was present at the Sugarland concert, and suffered physical and emotional injuries as a result of the stage collapse.

11. Bradley C. Humphrey, a seventeen-year-old minor resident of Marion County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

12. Sue A. Humphrey, mother of Bradley C. Humphrey, was present at the Sugarland concert and witnessed the physical injuries suffered by her son Bradley C. Humphrey and as a result suffered the negligent infliction of emotional distress from the stage collapse.

13. Nathan Byrd, deceased, was a resident of Marion County, Indiana, and an estate has been opened in the Probate Division of Marion Superior Court 8, Marion County, Indiana, under Cause No. 49D08-1108-ES-031250, in which Randy Byrd has been appointed the Estate Administrator to prosecute this claim.

14. Nathan Byrd was present at the Sugarland concert during the course of his employment with International Alliance of Theatrical and Stage Employees Local No. 30 and was killed as a result of the stage collapse. The Estate of Nathan Byrd is not bringing a wrongful death claim against Defendants International Alliance of Theatrical and Stage Employees or International Alliance of Theatrical and Stage Employees Local No. 30.

15. Glenn Goodrich, deceased, was a resident of Marion County, Indiana, and died as a result of the stage collapse. He is survived by his widow, Heather Goodrich, and two minor children. Heather Goodrich is the personal representative of his estate, which has been opened in Marion County to prosecute this claim.

16. Glenn Goodrich was present at the Sugarland concert during the course of his employment with ESG Security, Inc. and was killed as a result of the stage collapse. The Estate of Glenn Goodrich is not bringing a wrongful death claim against Defendant ESG Security, Inc.

17. Jennifer M. Haskell, deceased, was a resident of Delaware County, Indiana, was a “child” as such term is defined by IC § 34-23-2-1, and her parents are prosecuting this claim pursuant to Indiana Code § 34-23-2-1(c).

18. John R. Haskell is the father of Jennifer Haskell and Mary E. Haskell is the mother of Jennifer M. Haskell.

19. Jennifer M. Haskell was present at the Sugarland concert and was killed as a result of the stage collapse.

20. Meagan Toothman, deceased, was a resident of Hamilton County, Ohio, and an estate has been opened in the Probate Court of Hamilton County, Ohio, under Case No. 2011003933, in which Melissa L. Oakley has been appointed the Estate Administrator to prosecute this claim.

21. Meagan Toothman was present at the Sugarland concert and was killed as a result of the stage collapse.

22. Andrea Vellinga, a resident of Madison County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

23. Michael Vellinga, a resident of Madison County, Indiana, is the husband of Andrea Vellinga, and her duly appointed legal guardian. Michael Vellinga has suffered the loss of his wife Andrea Vellinga’s consortium and incurred medical expenses for his wife’s injuries as a result of the stage collapse.

24. Steven Stover, a resident of Marion County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

25. Steven C. Stover, is an incapacitated adult male, and James J. Joyner and Timothy S. Gwaltney are his court appointed Co-Guardians.
26. Shannon Walcott, a resident of Kenton County, Kentucky, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
27. Jade Walcott, a minor under eighteen years of age, is a resident of Kenton County, Kentucky and the daughter of Allan Walcott and Shannon Walcott.
28. Jade Walcott was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
29. Lori McGuire, a resident of Decatur County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
30. Jennifer McGuire, a minor resident of Decatur County, Indiana, and the daughter of Lori McGuire, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
31. Michelle Dickson, a resident of Decatur County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
32. Karen Brunn, a resident of Lake County, Illinois, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
33. Joshua Brunn, a minor resident of Lake County, Illinois was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
34. Timothy Brunn, a resident of Lake County, Illinois, is the husband of Karen Brunn and the Father of Joshua Brunn. Timothy Brunn suffered the loss of his wife Karen Brunn's consortium and incurred medical expenses for his wife and sons' injuries as a result of the stage collapse.

35. Karen Brunn, Joshua Brunn and Timothy Brunn make their claims against each of the named defendants other than Lucky Star, Inc., f/s/o/ Sugarland, and Sugarland Music, Inc.
36. Jessica Gillion, a resident of Delaware County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
37. Brad Sullivan, a resident of Delaware County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
38. Caitlyn Kahlenbeck, a resident of St. Joseph County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
39. Haley Waggoner, a resident of Butler County, Ohio, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
40. MacKenzie Waggoner, a resident of Butler County, Ohio, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
41. Donna Magdziarz, a resident of Lake County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
42. Laura Magdziarz, a resident of Newton County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
43. Gabrielle Spisak, a minor resident of Newton County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
44. Maggie Mullin, a minor resident of Newton County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.
45. Danielle Spisak, a minor resident of Newton County, Indiana, was present at the Sugarland concert and witnessed the physical injuries suffered by her mother Laura Magdziarz, her grandmother Donna Magdziarz and her sisters, Gabrielle Spisak and Maggie Mullins, and as a result suffered the negligent infliction of emotional distress from the stage collapse.

46. Lisa Hite, a resident of Cass County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

47. Kyla-Reed Brumett, an eight year old minor resident of Cass County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse. Kyla-Reed Brumett is the granddaughter of Lisa and Curtis Hite. Lisa Hite is the custodial guardian of Kyla Reed-Brumett.

48. Curtis Hite, a resident of Cass County, Indiana, is the husband of Lisa Hite and grandfather of Kyla-Reed Brumett. Curtis Hite suffered the loss of his wife, Lisa Hite's consortium and incurred medical expenses for his wife and granddaughter's injuries as a result of the stage collapse.

49. Aaron M. Free, a resident of Putnam County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

50. Nicole Luellen, a resident of Henry County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

51. John Luellen, a resident of Henry County, Indiana, is the husband of Nicole Luellen and suffered the loss of her consortium as a result of the stage collapse.

52. Sue Moore, a resident of Shelby County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

53. Roddy Moore, a resident of Shelby County, Indiana, was present at the Sugarland concert and witnessed the physical injuries suffered by his wife Sue Moore and as a result suffered the negligent infliction of emotional distress from the stage collapse and has suffered the loss of her consortium as a result of the stage collapse.

54. Crystalyn Huegen, a resident of Clinton County, Illinois, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

55. Shemata Chatman, a resident of Marion County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

56. Jeffrey S. Frepan, Sr., a resident of Madison County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

57. Lori Frepan, a resident of Madison County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

58. Jessica Collins, a resident of Greene County, Indiana, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

59. Amy Lodenstein, a resident of Kent County, Michigan, was present at the Sugarland concert and suffered physical and emotional injuries as a result of the stage collapse.

60. Kyle D. Covert, a resident of Marion County, Indiana, was present at the Sugarland concert during the course of his employment with International Alliance of Theatrical and Stage Employees Local No. 30 and was injured as a result of the stage collapse.

61. Kyle D. Covert is not bringing an injury claim against Defendants International Alliance of Theatrical and Stage Employees or International Alliance of Theatrical and Stage Employees Local No. 30.

III. THE DEFENDANTS

Plaintiffs incorporate paragraphs 1 through 61 as if fully set forth herein.

62. **Live Nation Worldwide, Inc. and/or Live Nation Touring (USA), Inc. and/or Live Nation Entertainment (“Live Nation”)** is a live events company with its principal place of business located in Beverly Hills, California.

63. Live Nation promoted, produced and booked the Sugarland concert. Live Nation was responsible for overseeing all aspects of the Sugarland concert and coordination of the equipment and people necessary to make the concert to occur safely, including acting as a hub

for communications for the safe operation of the concert, and as such, had duty to ensure the safe operation of the Sugarland concert.

64. **Dave Lucas Entertainment Group, LLC and/or Lucas Entertainment Group, LLC, d/b/a 360 GROUP LLC (“Lucas”)** is a full service concert production and consulting company with its principal place of business located in Indianapolis, Marion County Indiana.

65. Lucas was responsible for booking and producing concerts at the Indiana State Fair Hoosier Lottery Grandstand Stage, including the Sugarland concert, which was to be staged at the Indiana State Fair in Indianapolis, Indiana on August 13, 2011.

66. Lucas was required to perform all reasonable services necessary to ensure the success of the Sugarland concert, including securing appropriate and safe staging, roofing, scaffolding, and towers, assisting in the coordination of all logistics and providing guidance leading up to the Sugarland concert and continuing through the conclusion of the event.

67. As the concert producer, Lucas was required to coordinate the staff and equipment necessary to make the concert occur safely to completion, to acquire and monitor the schedule, and to act as a hub for communications between all parties to generally make the event run safely and smoothly.

68. **Mid-America Sound Corporation (“Mid-America”)** is a concert and events production company with its principal place of business located in Greenfield, Indiana.

69. Mid-America provided the equipment requirements, including sound, lighting, rigging, roofs, staging, and backline for the Sugarland concert. Mid-America provided the design team and the support of its engineers and technicians to design the sound, lighting and rigging for the Sugarland concert.

70. Mid-America had a duty to provide safe equipment and to ensure the stage was constructed in a reasonably safe condition and to ensure appropriate coordination of stage

equipment and activities, and to ensure the stage was not overloaded with equipment related to the Sugarland concert.

71. **James Thomas Engineering, Inc. (“James Thomas”)** is a company that manufactures, engineers and designs trusses and stage roof trusses with its principal place of business located in Knoxville, Tennessee.

72. James Thomas engineered, designed, and manufactured the Sugarland stage roof and truss systems for the Sugarland concert and other services and products used in staging the Sugarland concert.

73. James Thomas had a duty to design and manufacture a safe stage and truss system that would be appropriate and safe for the Sugarland concert performance.

74. **Steve Cohen Productions, Ltd., Tait Towers, Inc., Tate Towers Lighting, Inc., and Atomic Design Company (“Cohen, Tait, and Atomic”)**. Cohen, Tait, and Atomic collaborated for the design, engineering and construction of the Sugarland concert stage, including the TV screen and backdrop that were hung on the truss structure of the stage. Cohen, Tait, and Atomic had a duty to design, engineer and construct the Sugarland concert stage set in a manner that would be safe for persons attending the Sugarland concert.

75. **Tyler Truss Systems, Inc. (“Tyler”)** is a company that designs and manufactures custom and standard aluminum truss systems for concert tours with its principal place of business located in Pendleton, Madison County Indiana.

76. Tyler designed and manufactured the aluminum truss system that was used in the stage truss system for the Sugarland concert.

77. Tyler had a duty to design and manufacture the aluminum truss system in a manner that would be safe for persons attending the concert.

78. **Epic Production Technologies, Inc. (“Epic”)**, is a company that provides oversight of equipment rental and construction as well as technical consultation and staffing at concert events, with its principal United States business located in Oxnard, California.

79. Epic provided lighting, rigging, audio stage equipment, and other services for the Sugarland concert, including the construction of the stage set and equipment, and provided technical consultation for the planning and staging process of the event.

80. Epic had a duty to provide equipment, services, and consultation in a manner that would be safe for persons attending the concert.

81. **International Alliance of Theatrical and Stage Employees/International Alliance of Theatrical and Stage Employees Local No. 30 (“Local No. 30”)** is a union located in Indianapolis, Marion County, Indiana, whose members are involved in the construction and erection of theatrical and concert stages.

82. Local No. 30 was responsible for all phases of construction and erection of the stage scaffolding, setup, production, and the installation and operation of temporary sound, lighting, and audiovisual equipment.

83. Local No. 30 included journeymen, apprentices, deckhands, lead men, riggers and floor assistants for stage scaffolding setup and other services and products used in the staging of the Sugarland concert.

84. Local No. 30 had a duty to construct and erect the stage and equipment in a manner that would be safe for persons attending the Sugarland concert.

85. **Lucky Star, Inc. (F.S.O. Sugarland) and Sugarland Music, Inc. (“Sugarland”)**. Lucky Star, Inc. and Sugarland Music, Inc. are foreign corporations that record and perform music under the name Sugarland, with its principal place of business located in Georgia.

86. Sugarland was scheduled to conduct a music performance at the Sugarland concert.

87. Sugarland had supervisory authority and discretion for stage size, lighting, instruments, trusses, sound equipment and location of sound equipment, and the stage system as well as control of set equipment, backdrop, video screens, and ultimate control over the lighting.

88. Sugarland was not required to perform if Sugarland determined their performance would be impaired or prevented due to inclement weather. The decision whether to cancel the Sugarland concert due to weather conditions was the responsibility of Sugarland.

89. Sugarland failed or refused to cancel the Sugarland concert despite inclement weather.

90. **Hamlan & Company (“Hamlan”).** Hamlan is an Indiana corporation with its principal place of business in Hamilton County, Indiana. Hamlan had responsibility for monitoring weather conditions at the Sugarland concert to assist in any decision to cancel the concert. Hamlan failed in the discharge of their duty to anticipate and monitor the weather conditions at the Sugarland concert, and as a result, Plaintiffs and persons attending the concert were not warned or advised of the approaching weather conditions.

91. **ESG Security, Inc. (“ESG”).** ESG is an Indiana corporation with its principal place of business in Marion County, Indiana. ESG specializes in entertainment event services and onsite security, and provided security services at the Sugarland concert. ESG was in charge of event security, crowd management and emergency evacuation of persons at the Sugarland concert. ESG failed to develop and follow an Emergency Response Plan, and failed to identify and optimize evacuation points for a timely evacuation of persons attending the Sugarland concert.

IV. CLAIMS ASSERTED

Plaintiffs incorporate paragraphs 1 through 91 as if fully set forth herein.

92. The Defendants were responsible for organizing, staging, and presenting the Sugarland concert.

93. The Plaintiffs and/or their family members were present at the Sugarland concert, and were owed a duty by Defendants to provide them with a safe concert environment and use reasonable care in the operation, direction, management, set-up, control, and supervision of the concert. The Defendants negligently breached their duty of reasonable care owed to the Plaintiffs.

94. The Defendants breached their duty owed to the plaintiffs. The Defendants' negligence includes, but are not limited to:

- a. Failure to engineer, design, manufacture and construct the concert stage system in a reasonably safe fashion and condition,
- b. Failure to ensure appropriate coordination and supervision of the concert stage system's construction,
- c. Failure to conduct adequate inspections of the concert stage system to ensure it was safe for the outdoor concert,
- d. Failure to appropriately provide for reasonable direction, control and coordination of the concert event,
- e. Allowing an inadequate and dangerous stage structure to be used at the Sugarland concert,
- f. Failure to provide for appropriate design and layout of the stage area,
- g. Allowing for the stage to be overloaded beyond reasonable engineering tolerances,

- h. Failure to provide and ensure appropriate weather monitoring,
- i. Failure to have reasonable and adequate emergency response plans and systems to deal with adverse weather conditions to provide for concert guests safety,
- j. Failure to appropriately notify and protect the concert attendees concerning the approaching hazardous weather conditions,
- k. Failure to timely and appropriately evacuate the concert area when hazardous conditions were known to be present,
- l. Failure to cancel or postpone the concert for the safety of those in attendance when hazardous weather conditions were known, or should have been known, to be present or approaching.

V. DAMAGES SOUGHT

Plaintiffs incorporate paragraphs 1 through 94 as if fully set forth herein.

95. As a result of the Defendants' failure to exercise reasonable care, the Defendants' conduct proximately caused the deaths of Glenn Goodrich, Nate Byrd, Jennifer M. Haskell, and Meagan Toothman, Plaintiffs in this case (hereinafter identified as "Decedents"). The estates, the estates' legal representatives, statutory representatives, and dependents of the Decedents are entitled to such damages as provided by the Indiana Wrongful Death statute, the Indiana Adult Wrongful Death statute, and the Indiana Child Wrongful Death statute, including but not limited to, medical expenses, funeral and burial expenses, loss of future earnings and support, loss of love and companionship, loss of services, attorney fees for the costs associated with administration of the Decedents' estates, and attorney fees for maintaining this action.

96. Those Plaintiffs suffering personal injury as a direct and proximate result of the Defendants' failure to exercise reasonable care are entitled to damages for past and future

medical and hospital expenses, past and future lost wages and loss of earning capacity, temporary and permanent injuries, pain and suffering, loss of enjoyment of life and all other damages as provided by Indiana law.

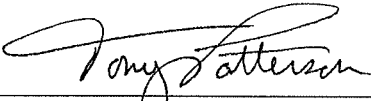
WHEREFORE, Plaintiffs, by counsel, respectfully seek judgment against the Defendants, and each of them, for reasonable damages, for the costs of this action, attorneys' fees, and for any and all other relief that the Court may deem proper under the circumstances.

VI. DEMAND FOR TRIAL BY JURY

Come now Plaintiffs, by counsel, and request a trial by jury of all issues in this cause of action.

Respectfully submitted,

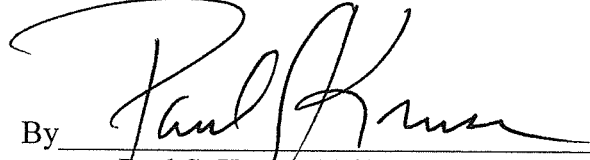
ATTORNEYS FOR JILL POLET, ROELAND POLET, AND
JORDYN POLET AND JAYMIE POLET, MINORS, BY THEIR PARENTS
AND NATURAL GUARDIANS JILL POLET AND ROELAND POLET

By 

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Respectfully submitted,

ATTORNEY FOR TRACY L. GREEN

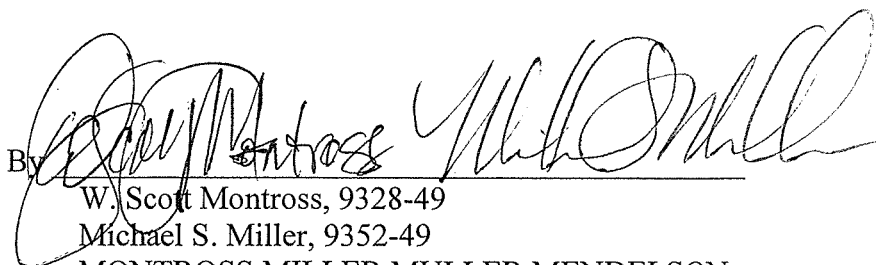
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Respectfully submitted,

ATTORNEYS FOR SUE A. HUMPHREY AND SUE A. HUMPHREY,
AS GUARDIAN OF THE ESTATE OF BRADLEY C. HUMPHREY, A MINOR

By



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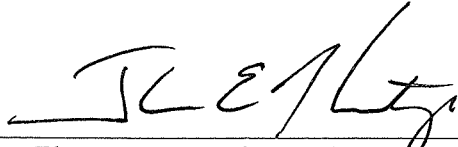
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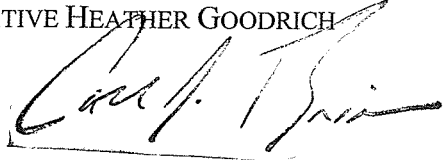
ATTORNEY FOR THE ESTATE OF NATHAN BYRD
BY ITS PERSONAL REPRESENTATIVE RANDY BYRD

By  _____

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Respectfully submitted,

ATTORNEY FOR THE ESTATE OF GLENN GOODRICH
BY ITS PERSONAL REPRESENTATIVE HEATHER GOODRICH



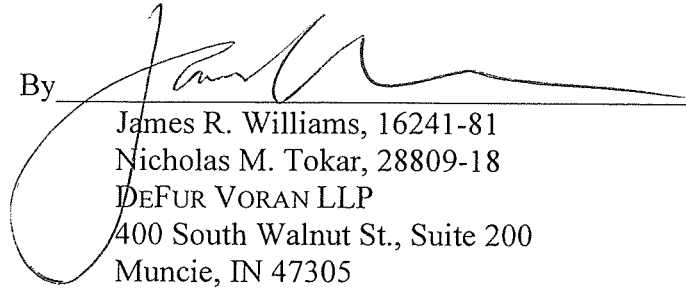
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Respectfully submitted,

ATTORNEYS FOR JOHN R. HASKELL AND MARY E. HASKELL,
PARENTS OF JENNIFER M. HASKELL, DECEASED

By

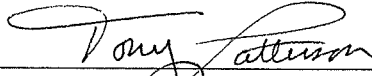


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Respectfully submitted,

ATTORNEYS FOR THE ESTATE OF MEAGAN TOOTHMAN
BY ITS PERSONAL REPRESENTATIVE MELISSA L. OAKLEY

By 
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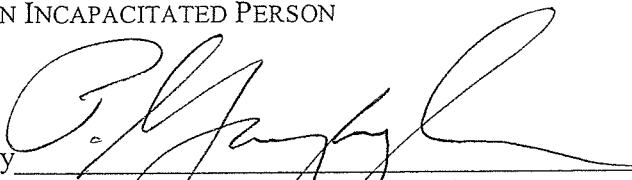
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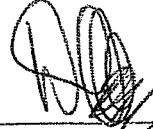
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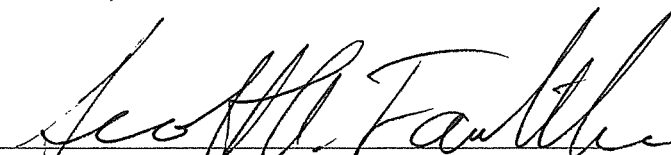
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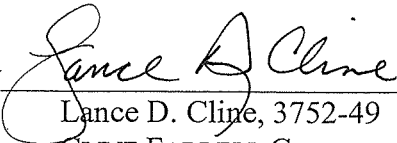
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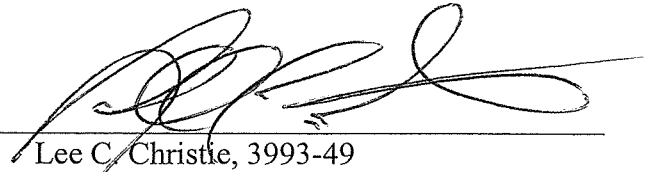
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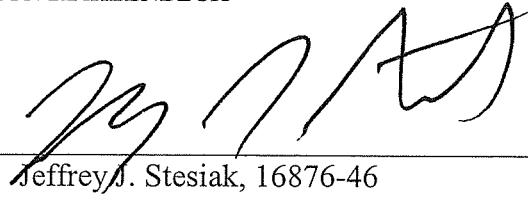
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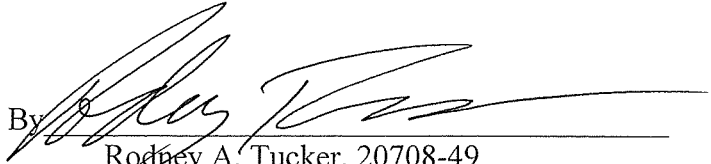
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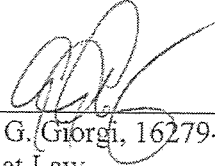
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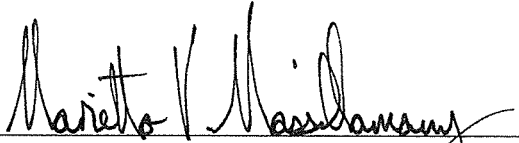
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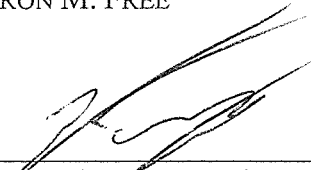
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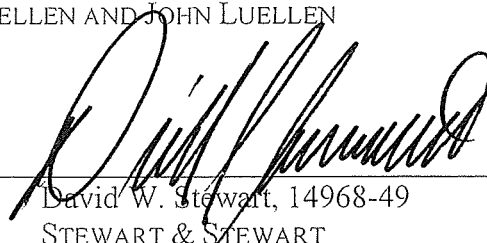
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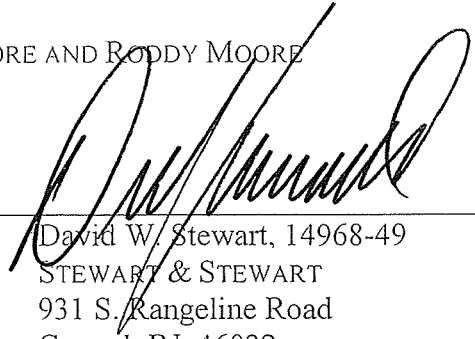
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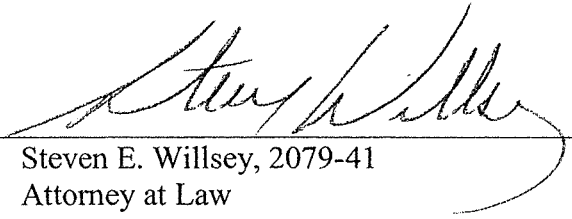
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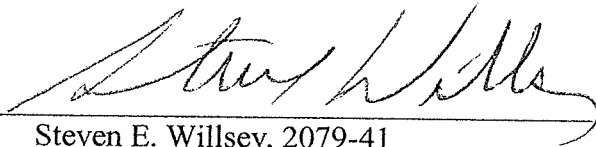
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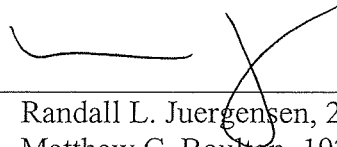
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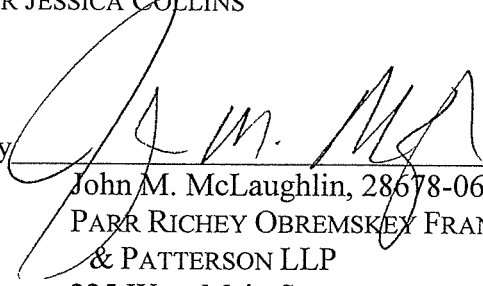
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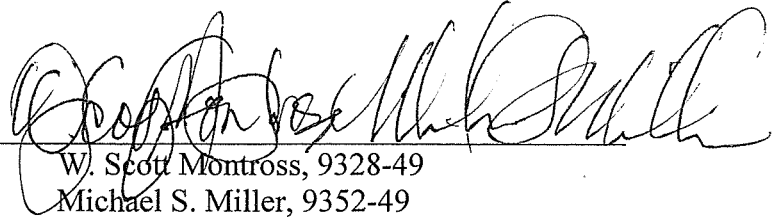


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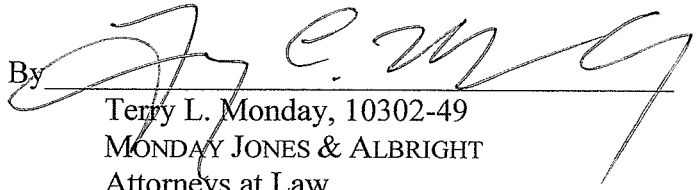
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