

Thanos Simoudis, Esq. (SBN 314930)
David F. Merabi, Esq. (SBN 300410)
Michael Domingo, Esq. (SBN321851)
Culver City Legal, LLP,
5670 Wilshire Blvd. Suite 1370
Los Angeles CA 90036
Telephone: (310) 600-7881
Facsimile: (424) 336-1529
info@culverlegal.com

Electronically FILED by
Superior Court of California,
County of Los Angeles
4/04/2023 3:03 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By K. Parenteau, Deputy Clerk

Attorneys for Plaintiffs,
CARLA THOMAS;
JAMES THOMAS;
AALIYAH AGUILAR

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

CARLA THOMAS, an individual;
JAMES THOMAS, an individual;
AALIYAH AGUILAR, an individual,
Plaintiff,

v.

LIVE NATION ENTERTAINMENT,
INC., a corporation; NPB COMPANIES,
INC., a corporation; CROWDRX, INC., a
corporation; PHIL RUFFIN, an individual;
FRONT GATE TICKETING
SOLUTIONS, LLC, a corporation; and
DOES 1 to 100, inclusive,
Defendants

Case No.: 23SMCV01468

COMPLAINT FOR DAMAGES:

1. **NEGLIGENCE**
2. **PREMISES LIABILITY**
3. **BREACH OF CONTRACT**
4. **NEGLIGENT HIRING, TRAINING,
RETENTION AND SUPERVISION**
5. **RESPONDEAT SUPERIOR**

Location: Los Angeles County Superior Court
Santa Monica Courthouse
1725 Main Street
Santa Monica, CA 90401

COMES NOW Plaintiffs, CARLA THOMAS, JAMES THOMAS, and AALIYAH AGUILAR, by and through their attorneys, CULVER CITY LEGAL, L.L.P., in their claim for damages against Defendants, LIVE NATION ENTERTAINMENT, INC.; NPB COMPANIES, INC.; CROWDRX, INC.; PHIL RUFFIN; FRONT GATE TICKETING SOLUTIONS, LLC; and DOES 1 to 100, inclusive, and alleges as follows:

1 **I. INTRODUCTION**

2 1. On the day of the incident, May 14, 2022, Plaintiffs were at the Las Vegas Festival
3 Grounds located at 311 W. Sahara Ave., Las Vegas, NV 89109 (the “PREMISES”). They were
4 attending a musical concert in the PREMISES dubbed Lovers and Friends Festival (“the
5 FESTIVAL”). Their event tickets placed them in an area in the PREMISES with no seats, and
6 attendees were required to stand, shoulder to shoulder, for the duration of the event.

7 2. As a result of the negligence of the Defendants, a sea of attendees to the FESTIVAL
8 surged toward Plaintiffs. Plaintiffs CARLA and AALIYAH were at the time sitting on the concrete
9 ground to relax their legs while waiting for the long lull between performances. The surging crowd
10 caused Plaintiffs to be pushed, shoved, knocked down, dragged, trampled, and smashed by other
11 attendees (the “INCIDENT”). As a result of the INCIDENT, Plaintiffs sustained serious injuries
12 and required emergency, and ongoing, medical examination and treatment.

13 **II. JURISDICTION AND VENUE**

14 3. Pursuant to *California Code of Civil Procedure section 395.5* because Defendant
15 LIVE NATION has its principal place of business located at 9348 Civic Center Drive, Beverly
16 Hills, CA 90210. Having its corporate office and regularly conducting business in California,
17 Defendant LIVE NATION has a substantial, continuous and systematic contact with this forum to
18 satisfy traditional notions of fair play and substantial justice pursuant to *California Code of Civil*
19 *Procedure section 410.10*. Pursuant to *California Code of Civil Procedure section 395*, an action
20 for injury to person may be filed where the defendants, or some on them reside at the
21 commencement of the action.

22 4. The damages asserted in this Complaint exceed the jurisdictional minimums of this
23 Court.

24 **II. THE PARTIES**

25 **A. Plaintiffs**

26 5. Plaintiff CARLA THOMAS (Plaintiff “CARLA”) is an individual residing in the
27 county of San Bernardino.

28 6. Plaintiff JAMES THOMAS (Plaintiff “JAMES”) is an individual residing in the

1 county of San Bernardino.

2 7. Plaintiff AALIYAH AGUILAR (Plaintiff “AALIYAH”) is an individual residing in
3 Tempe, Arizona. Plaintiff AALIYAH was a minor at the time of the incident subject of this action
4 (DOB: 10/06/2004). She is now of majority age.

5 **B. Defendants**

6 8. Plaintiffs are informed and believe and thereon allege that Defendant LIVE
7 NATION ENTERTAINMENT, INC. (Defendant “LIVE NATION”), is a corporation duly
8 organized and existing under the laws of the State of Delaware with principal place of business
9 located at 9348 Civic Center Drive, Beverly Hills, CA 90210. Defendant LIVE NATION’s
10 registered agent, upon whom process may be served, is CORPORATE CREATIONS NETWORK,
11 INC. located at 5901 W. Century Blvd., #750, Los Angeles, CA 90045. On information and belief,
12 Defendant LIVE NATION leased the PREMISES where the INCIDENT took place. Defendant
13 LIVE NATION was responsible for organizing, promoting, selecting, and hiring the artists, security
14 personnel, ticketing or booking agents, and medical emergency personnel for the FESTIVAL.
15 Defendant LIVE NATION had a duty to implement and execute a security plan to keep everyone
16 attending, visiting and/or doing business at the PREMISES safe. Defendant LIVE NATION had a
17 duty to safeguard the PREMISES and provide adequate security to prevent violent incidents from
18 taking place at the PREMISES and/or during the FESTIVAL. Defendant LIVE NATION had a
19 further duty to properly and adequately hire, train and supervise its employees and agents so as to
20 be able to detect and thus prevent violent incidents during the FESTIVAL.

21 9. Plaintiffs are informed and believe and thereon allege that Defendant NPB
22 COMPANIES, INC. (Defendant “NPB”), is a corporation duly organized and existing under the
23 laws of the State of Kansas located at 77 S. 7th Street, Kansas City, KS 66101. Defendant NPB’s
24 registered agent, upon whom process may be served, is NATIONAL REGISTERED AGENTS,
25 INC. located at 112 SW 7th Street, Ste 3C, Topeka, KS 66603. On information and belief, defendant
26 NPB is an event and personal security provider, and was responsible for providing security at the
27 PREMISES during the FESTIVAL. Defendant NPB had a duty to implement and execute a security
28 plan to keep everyone attending, visiting and/or doing business at the PREMISES safe. Defendant

1 NPB had a duty to safeguard the PREMISES and provide adequate security to prevent violent
2 incidents from taking place at the PREMISES and/or during the FESTIVAL. Defendant NPB had
3 a further duty to properly and adequately hire, train and supervise its employees and agents so as
4 to be able to detect and thus prevent violent incidents during the FESTIVAL.

5 10. Plaintiffs are informed and believe and thereon alleges that Defendant CROWDRX,
6 INC. (Defendant "CROWDRX"), is a corporation duly organized and existing under the laws of the
7 State of New York located at 115 E 34th Street, Ste 1181, New York NY 10156. Defendant
8 CROWDRX may be served process through its Chief Executive Officer, Andrew Bazos, located at
9 115 E. 34th Street, Ste 1181, New York, NY 10156. On information and belief, Defendant
10 CROWDRX is an on-site medical service and planning provider, and was responsible for providing
11 on-site medical services at the PREMISES during the FESTIVAL. Defendant CROWDRX had a
12 duty to attend to and provide urgent medical care to attendees who are hurt or injured while
13 attending THE FESTIVAL in the PREMISES. Defendant CROWDRX had a further duty to
14 properly and adequately hire, train and supervise its employees and agents so as to be able to
15 provide urgent medical care to attendees who are hurt or injured while attending THE FESTIVAL.

16 11. Plaintiffs are informed and believe and thereon alleges that Defendant PHIL
17 RUFFIN is an individual residing in Las Vegas, Nevada. On information and belief, Defendant
18 PHIL RUFFIN owned and operated the PREMISES, the Las Vegas Festival Grounds, at the time
19 of the INCIDENT.

20 12. Plaintiffs are informed and believe and thereon alleges that Defendant FRONT
21 GATE TICKETING SOLUTIONS, LLC (Defendant "FRONT GATE"), is a corporation duly
22 organized and existing under the laws of the State of Texas located at 115 E 34th Street, Ste 1181,
23 Austin, TX 10156. Defendant FRONT GATE may be served process through its Chief Executive
24 Officer, Andrew Bazos, located at 115 E. 34th Street, Ste 1181, New York, NY 10156. On
25 information and belief, Defendant FRONT GATE is a ticket sales and distribution company and
26 was an entity responsible for the sale and distribution of tickets to the FESTIVAL occurring at the
27 time of the INCIDENT. Defendant FRONT GATE had a further duty to properly and adequately
28 hire, train and supervise its employees and agents at the FESTIVAL.

1 **C. Other Defendants**

2 13. The true names and/or capacities of DOES 1 to 100, inclusive, whether individual,
3 corporate, associate, public, or otherwise, are presently unknown to Plaintiffs, who therefore sues
4 said Defendants by such fictitious names.

5 14. Plaintiffs are informed and believe and thereon allege that DOES 1 to 100, inclusive,
6 are residents of, or businesses, or public entities operating within the State of Las Vegas and/or
7 California.

8 15. Plaintiffs are informed and believe and thereon allege that each of DOES 1 to 100,
9 inclusive, were in some manner responsible for the events and happenings referred to herein, and
10 thereby proximately caused Plaintiffs' injuries and damages.

11 16. Plaintiffs are informed and believe and thereon allege that the Defendants, and each
12 of them, were the agents and employees of each of the other Defendants, and that at all times
13 mentioned herein, were acting within the scope, purpose, and/or authority of that agency and/or
14 employment with the full knowledge, permission, consent, and/or authorization of each of the other
15 Defendants, named and unnamed.

16 17. Each reference in this complaint to "Defendant," "Defendants," or a specifically
17 named Defendant refers to each of the DOE defendants sued under fictitious names.

18 18. The allegations in this complaint stated on information and belief are likely to have
19 evidentiary support after a reasonable opportunity for further investigation and discovery.

20
21 **IV. FACTS**

22 19. On May 14, 2022, at approximately 10:00 pm, Plaintiffs were at the PREMISES for
23 the FESTIVAL, with tickets that they purchased through Defendant FRONT GATE.

24 20. Several celebrity performers were invited to perform in the FESTIVAL. These
25 celebrity performers performed one after the other, with lulls in between. On information and belief,
26 these celebrity performers were selected, hired, and invited by Defendant LIVE NATION at the
27 PREMISES for the FESTIVAL.

28 21. Plaintiffs' tickets placed them in a section of the PREMISES where there are no

1 seats and attendees to the FESTIVAL are required to stand for the duration of the FESTIVAL (“the
2 SECTION”).

3 22. Plaintiffs noticed that the PREMISES was crowded, with very little to no security
4 or event personnel monitoring the SECTION where Plaintiffs were. On information and belief,
5 over 31,000 patrons were in attendance at the PREMISES for the FESTIVAL.

6 23. During a lull in the performances, Plaintiffs CARLA and AALIYAH sat down on
7 the concrete ground, as some others did, to relax their legs a bit.

8 24. On information and belief, a loud noise within the PREMISES led to a belief that a
9 shooting had occurred and/or that gun was drawn. A sea of people in the PREMISES then surged
10 toward Plaintiffs location, pushing Plaintiffs against the other attendees in the FESTIVAL.
11 Plaintiffs were pushed, smashed, dragged, kicked, stepped on, trampled and crushed to the ground
12 by the surging crowd. Plaintiffs felt frightened, shocked, anxious and light-headed during the entire
13 ordeal.

14 25. Plaintiffs screamed for help from the event organizers and security, but none came.

15 26. Plaintiffs screamed for emergency medical care for their injuries, but none came.

16 27. Plaintiffs fortunately were able to extricate themselves away from the rushing crowd
17 and chaos, and out of the PREMISES to safety.

18 28. On information and belief, all of the Defendants were responsible for providing
19 security and crowd control services for the FESTIVAL, and worked in conjunction with each other
20 to design, prepare and administer those services at the PREMISES.

21 29. On information and belief, all Defendants worked in conjunction with each other to
22 design, prepare and administer emergency and on-site medical services at the PREMISES during
23 the FESTIVAL.

24 30. Defendants knew or should have known that with the large number of crowd that
25 was present in the FESTIVAL, persons present in the PREMISES would be exposed to surges from
26 the crowd at the slightest sign of panic and alarm, and that persons in the SECTION where Plaintiffs
27 were could, and would be, pushed, knocked down, stepped on, dragged, trampled, and crushed by
28 other persons in the surge. Such crowd surges in the PREMISES, including other similar premises

1 and sections at other similar concert venues, are typical and occur frequently; a fact known to
2 Defendants as they are in the specific business of holding, promoting, and producing concerts for
3 the biggest names in the entertainment industry. Here, the crowd surge in the PREMISES was an
4 event that was foreseeable, as the FESTIVAL is an annual event where superstars in the
5 entertainment world are invited and is therefore attended by a record number of people. The
6 slightest alarm would trigger a dangerous and often times life-threatening tsunami of people.

7 31. Despite high foreseeability that persons in the PREMISES, such as Plaintiffs in the
8 SECTION, could and would be injured by a crowd surge in the PREMISES, Defendants failed to
9 employ adequate, properly trained, monitored, and supervised reasonable security, safety and
10 medical provision measures to prevent those persons from being knocked down, stepped on,
11 trampled, dragged on, and crushed without adequate medical service provision.

12 32. Defendants failed to take basic, reasonable steps to prevent Plaintiffs' injuries. Their
13 negligence includes, but is not limited to, insufficient security, insufficient training and supervision,
14 insufficient crowd control, insufficient medical provision, and insufficient management and
15 organization.

16 33. Defendants failed to provide a safe venue, one that provided adequate signs and
17 warnings that would have guided the crowd into a particular emergency exit route in the event of
18 an alarm or emergency.

19 34. As a result of the INCIDENT, Plaintiffs suffered serious injuries that required
20 medical care and treatment. Plaintiffs CARLA and AALIYAH specifically required emergency
21 medical care following the INCIDENT. Plaintiffs also suffered general damages arising from the
22 INCIDENT, as they experienced, among other things, fear for their safety, fear of death, anxiety,
23 and depression.

24 35. Plaintiffs' earning capacity were also diminished as a result of the INCIDENT.

25
26 **FIRST CAUSE OF ACTION AGAINST EACH DEFENDANT**

27 **(Negligence Against All Defendants)**

28 36. Plaintiffs refer to and incorporate by reference the allegations contained in

1 paragraphs 1 through 35, as though fully set forth herein with the same force and effect.

2 37. Defendants had a duty to use reasonable care to secure, safeguard, and protect guests
3 attending the FESTIVAL. Defendants breached their duty of care by failing to take reasonable steps
4 to ensure the safety of Plaintiffs and prevent them from being injured while attending the
5 FESTIVAL.

6 38. Defendants had reason to know of dangerous conditions created by the huge number
7 of FESTIVAL attendees in the PREMISES, including the SECTION where Plaintiffs were, such
8 as crowd surges brought about by the slightest alarms within the PREMISES leading to attendees
9 being pushed, shoved, knocked down, dragged, stepped on, trampled and crushed by the rushing
10 crowd. Defendants also had reason to know of the dangers created by the lack of sufficient signs
11 and warnings in the event of emergency.
12

13 39. Defendants had a duty to take reasonable and appropriate measures to protect all
14 invitees from harm. Defendants were well aware that surges by the huge number of FESTIVAL
15 attendees in the PREMISES, including the SECTION where Plaintiffs were, are typical and occur
16 frequently; a fact known to Defendants as they are in the specific business of holding, promoting,
17 and producing concerts for the biggest names in the entertainment industry. Here, the surge of
18 crowd in the PREMISES was an event that was foreseeable, as the FESTIVAL is an annual event
19 where superstars in the entertainment world are invited and is therefore attended by a record number
20 of people. The slightest alarm would trigger a dangerous and often times life-threatening tsunami
21 of people.
22

23 40. Despite their knowledge, Defendants breached the aforementioned duty by failing
24 to take basic reasonable steps to prevent Plaintiffs' injuries. Those steps include, but are not limited
25 to, providing sufficient security, sufficient training and supervision, sufficient crowd control,
26 sufficient medical provision, sufficient management and organization, among other security and
27 safety measures.

28 41. As a direct and proximate result of Defendants' aforementioned acts and/or

omissions, Plaintiffs suffered serious injuries that required medical care and treatment. Plaintiffs CARLA and AALIYAH specifically required emergency medical care following the INCIDENT. Plaintiffs also suffered general damages arising from the INCIDENT, as they experienced, among other things, fear for their safety, fear of death, anxiety, and depression.

42. Plaintiffs' earning capacity were also diminished as a result of the INCIDENT.

43. The total of Plaintiffs' special and general damages are not fully ascertained at this time, but they are in an amount greater than the jurisdictional limits of this court.

SECOND CAUSE OF ACTION AGAINST EACH DEFENDANT

(Premises Liability Against All Defendants)

44. Plaintiffs refer to and incorporate by reference the allegations contained in paragraphs 36 through 43, as though fully set forth herein with the same force and effect.

45. Defendants, with knowledge of crowd surges of FESTIVAL attendees, especially in the SECTION where Plaintiff were, and other similar sections in concert venues, failed to maintain the PREMISES in a safe condition and failed to provide adequate security, training and supervision, medical provision and crowd control in order to keep the FESTIVAL attendees safe while at the PREMISES.

46. Said crowd surges at the FESTIVAL, and other similar concert at similar venues, were of such nature and frequency so as to create a dangerous condition upon Defendants' premises.

47. Defendants had actual and constructive notice of the said dangerous condition(s), and they failed to make the premises safe by providing adequate security, training and supervision, medical provision and crowd control measures, and failed to warn persons, including Plaintiffs, of that dangerous condition. This actual and constructive notice is the exact reason why Defendants

1 employed the security services of Defendant NPB and the local police, and the on-site medical
2 services of Defendant CROWDRX.

3 48. As a direct and proximate result of Defendants' aforementioned acts and/or
4 omissions, Plaintiffs suffered serious injuries that required medical care and treatment. Plaintiffs
5 also suffered general damages arising from the INCIDENT, as they experienced, among other
6 things, fear for their safety, fear of death, anxiety, and depression.

7 49. Plaintiffs' earning capacity were also diminished as a result of the INCIDENT.

8 50. The total of Plaintiffs' special and general damages are not fully ascertained at this
9 time, but they are in an amount greater than the jurisdictional limits of this court.
10

11
12 **THIRD CAUSE OF ACTION AGAINST EACH DEFENDANT**

13
14 **(Breach of Contract Against All Defendants)**

15 51. Plaintiffs refer to and incorporate by reference the allegations contained in
16 paragraphs 44 through 50, as though fully set forth herein with the same force and effect.

17 52. Defendants promoted and organized the FESTIVAL at the PREMISES.

18 53. Defendants sold and Plaintiffs purchased their respective tickets to the FESTIVAL
19 during the INCIDENT.

20 54. Defendants worked in conjunction with each other to implement and execute a
21 security plan to keep everyone attending, visiting and/or doing business at the PREMISES safe.
22 Defendants had a duty to provide adequate security to prevent violent incidents from taking place
23 at the PREMISES and/or during the FESTIVAL. Defendants had a duty to properly and adequately
24 hire, train and supervise its employees and agents so as to be able to detect and thus prevent violent
25 incidents during the FESTIVAL. Defendants had a duty to attend to and provide urgent medical
26 care to attendees who are hurt or injured while attending the FESTIVAL in the PREMISES.

27 55. Defendants breached these duties in that they failed to take basic, reasonable steps
28 to prevent Plaintiffs' injuries. Their negligence includes, but is not limited to, insufficient security,

1 insufficient training and supervision, insufficient crowd control, insufficient medical provision, and
2 insufficient management and organization.

3 56. Defendants further breached these duties in that they failed to provide a safe venue,
4 one that provided adequate signs and warnings that would have prevented the INCIDENT from
5 happening, and one that would have guided the rushing crowd into a particular emergency exit
6 route and not towards the SECTION where Plaintiffs were.

7 57. As a result of the INCIDENT, Plaintiffs suffered serious injuries that required
8 medical care and treatment. Plaintiffs also suffered general damages arising from the INCIDENT,
9 as they experienced, among other things, fear for their safety, fear of death, anxiety, and depression.

10 58. Plaintiffs' earning capacity were also diminished as a result of the INCIDENT.

11 59. The total of Plaintiffs' special and general damages are not fully ascertained at this
12 time, but they are in an amount greater than the jurisdictional limits of this court.

13 14 **FOURTH CAUSE OF ACTION AGAINST EACH DEFENDANT**

15 **(Negligent Hiring, Training, Retention and Supervision Against All Defendants)**

16 60. Plaintiffs refer to and incorporate by reference the allegations contained in
17 paragraphs 51 through 59, as though fully set forth herein with the same force and effect.

18 61. Defendants, and each of them, either directly or by and through their agents,
19 employees, and/or servants, acting within that capacity and with the full knowledge, permission,
20 consent, and/or authorization of the employer and/or principal, promoted, organized, produced and
21 held the FESTIVAL.

22 62. Defendants, and each of them, either directly or by and through their agents,
23 employees, and/or servants, acting within that capacity and with the full knowledge, permission,
24 consent, and/or authorization of the employer and/or principal, organized, promoted, selected and
25 hired artists, security and on-site medical personnel to provide security and on-site medical services
26 at the FESTIVAL.

27 63. Defendants, and each of them, either directly or by and through their agents,
28 employees, and/or servants, acting within that capacity and with the full knowledge, permission,

1 consent, and/or authorization of the employer and/or principal, were hired to design, implement
2 and execute the security plan for the FESTIVAL, including crowd control and on-site emergency
3 medical provision.

4 64. Defendants, and each of them, failed to properly design, implement and execute an
5 adequate security and emergency medical plan during the FESTIVAL. An uncontrolled crowd
6 surge occurred, and Plaintiffs were physically, mentally and emotionally harmed. The crowd surge
7 occurred by reason of Defendants' failure to provide adequate security and emergency medical
8 provisions.

9 65. Defendants, and each of them, were unfit or incompetent to design, implement,
10 and/or execute a security and emergency medical services for the FESTIVAL. Defendants, and
11 each of them, were not properly trained and/or supervised to provide sufficient security, training
12 and supervision, crowd control, on-site medical provision, and management and organization
13 during the FESTIVAL.

14 66. Defendants, and each of them, knew or should have known that they were unfit or
15 incompetent to design, implement and/or execute the security plan for the FESTIVAL, including a
16 provision for adequate on-site emergency medical services.

17 67. It was due to Defendants unfitness and incompetence that Plaintiffs were harmed
18 and injured. Had Defendants, and each of them, been properly trained and/or supervised, Plaintiffs
19 would not have been harmed.

20 68. Defendants' negligence, and each of them, in hiring, training and supervision
21 constitutes a substantial factor in causing Plaintiffs' harm.

22
23 **FIFTH CAUSE OF ACTION AGAINST EACH DEFENDANT**

24 ***(Respondeat Superior Against All Defendants)***

25 69. Plaintiffs refer to and incorporate by reference the allegations contained in
26 paragraphs 60 through 68, as though fully set forth herein with the same force and effect.

27 70. Defendants, and each of them, either directly or by and through their agents,
28 employees, and/or servants, acting within that capacity and with the full knowledge, permission,

1 consent, and/or authorization of the employer and/or principal, were responsible for organizing,
2 promoting, producing and holding the FESTIVAL.

3 71. Defendants, and each of them, either directly or by and through their agents,
4 employees, and/or servants, acting within that capacity and with the full knowledge, permission,
5 consent, and/or authorization of the employer and/or principal, were hired to design, implement
6 and execute the security plan for the FESTIVAL, including crowd control and on-site emergency
7 medical provision.

8 72. Defendants failed to provide a safe venue for the FESTIVAL. As a result of the
9 INCIDENT, Plaintiffs suffered serious injuries that required medical care and treatment.

10 73. It was in the course and scope of Defendants employment, and each of them, that
11 Plaintiffs were injured. Defendants' employees and/or agents' acts or omissions that are the direct
12 and proximate cause of Plaintiffs' physical and emotional injuries resulting to economic and non-
13 economic damages. Defendants, and each of them, are responsible for the acts and omissions of
14 their employees and/or agents performed in accordance with their duties and for the benefit of
15 Defendants, and each of them.

16
17 **PRAYER FOR DAMAGES**

18 WHEREFORE, the Plaintiffs, CARLA THOMAS, JAMES THOMAS, and AALIYAH
19 AGUILAR prays for judgment against the Defendants LIVE NATION ENTERTAINMENT, INC.,
20 NBP COMPANIES, INC.; CROWDRX, INC.; PHIL RUFFIN; FRONT GATE TICKETING
21 SOLUTIONS, LLC; and DOES 1 to 100, inclusive, and each of them, as follows:

22
23 **FIRST CAUSE OF ACTION:**

- 24 1. For General Damages in a sum to be ascertained at the time of trial;
25 2. For medical and health care expenses in a sum to be ascertained at the time of trial;
26 3. For future medical and health care expenses in a sum to be ascertained at the time of trial;
27 4. For all incidental expenses in a sum to be ascertained at the time of trial;
28 5. For loss of income;

1 6. For costs of suit incurred herein; and

2 7. For such other and further relief as this Court may deem just and proper.

3
4 SECOND CAUSE OF ACTION:

5 1. For General Damages in a sum to be ascertained at the time of trial;

6 2. For medical and health care expenses in a sum to be ascertained at the time of trial;

7 3. For future medical and health care expenses in a sum to be ascertained at the time of trial;

8 4. For all incidental expenses in a sum to be ascertained at the time of trial;

9 5. For loss of income;

10 6. For costs of suit incurred herein; and

11 7. For such other and further relief as this Court may deem just and proper.

12
13 THIRD CAUSE OF ACTION:

14 1. For General Damages in a sum to be ascertained at the time of trial;

15 2. For medical and health care expenses in a sum to be ascertained at the time of trial;

16 3. For future medical and health care expenses in a sum to be ascertained at the time of trial;

17 4. For all incidental expenses in a sum to be ascertained at the time of trial;

18 5. For loss of income;

19 6. For costs of suit incurred herein; and

20 7. For such other and further relief as this Court may deem just and proper.

21
22 FOURTH CAUSE OF ACTION:

23 1. For General Damages in a sum to be ascertained at the time of trial;

24 2. For medical and health care expenses in a sum to be ascertained at the time of trial;

25 3. For future medical and health care expenses in a sum to be ascertained at the time of trial;

26 4. For all incidental expenses in a sum to be ascertained at the time of trial;

27 5. For loss of income;

28 6. For costs of suit incurred herein; and

1 7. For such other and further relief as this Court may deem just and proper.
2

3 FIFTH CAUSE OF ACTION:

4 1. For General Damages in a sum to be ascertained at the time of trial;

5 2. For medical and health care expenses in a sum to be ascertained at the time of trial;

6 3. For future medical and health care expenses in a sum to be ascertained at the time of trial;

7 4. For all incidental expenses in a sum to be ascertained at the time of trial;

8 5. For loss of income;

9 6. For costs of suit incurred herein; and

10 7. For such other and further relief as this Court may deem just and proper.
11

12 DATED: March 21, 2023

CULVER CITY LEGAL, L.L.P.

/s/ Michael Domingo

By _____

Michael Domingo, Esq.

Thanos Simoudis, Esq.

David F. Merabi, Esq.

Attorneys for Plaintiff

CARLA THOMAS, JAMES THOMAS,

AALIYAH AGUILAR