

CAUSE NO. **2021-73871**

NHAN HUYNH NGUYEN, M.D., ESQUIRE § IN THE DISTRICT COURT OF  
AS NEXT FRIEND OF N.D.N, A MINOR, §  
REUBEN ESCOBEDO, CONSTANCE §  
AVILEZ, LAURA REGALDO, BELINDA §  
MANCILLAS AND AUSTIN PACHECO §

*Plaintiffs,*

V.

**61st**  
JUDICIAL DISTRICT

LIVE NATION WORLDWIDE, INC., LIVE §  
NATION ENTERTAINMENT, INC., LIVE §  
NATION MARKETING, INC., SCOREMORE, §  
LLC, SCOREMORE MGMT, LLC, §  
SCOREMORE HOLDINGS, LLC, §  
SASCHA STONE GURRFREUND, DARRYL §  
PLATT, ASM GLOBAL PARENT, INC., §  
ASM GLOBAL, LLC, MARK MILLER, §  
KEITH BUTLER, TREY HICKS A/K/A §  
TREY HICKS PUBLIC RELATIONS, A/K/A §  
TREY HICKS PR A/K/A THPR, JACQUES §  
BERMAN WEBSTER A/K/A TRAVIS SCOTT §

*Defendants.*

HARRIS COUNTY, TEXAS

**PLAINTIFFS' ORIGINAL PETITION, JURY DEMAND  
AND RULE 193.7 NOTICE**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiffs, NHAN HUYNH NGUYEN, M.D., ESQUIRE, AS NEXT FRIEND OF N.D.N,  
A MINOR, REUBEN ESCOBEDO, JOSH MAY, INDIVIDUALLY AND AS NEXT FRIEND  
OF ZENOVIA MAY AND ISABELLA MAY, MINORS AND LAURA REGALADO, file this  
Original Petition, Jury Demand and Rule 193.7 Notice.

**I.**  
**DISCOVERY CONTROL PLAN**

1.1 Plaintiff intends to conduct discovery under Level 3. *See* TEX. R. Civ. P. 190.

**II.**  
**PARTIES**

2.1 Plaintiff, NHAN HUNYN NGUYEN, AS NEXT FRIEND OF N.D.N., A MINOR, is an individual who resides in Houston, Harris County, Texas. Plaintiff NHAN HUNYN NGUYEN, M.D., ESQUIRE's last four (4) digits of his social security number are XXX-XX- and Texas Driver's License No is XXXX. Plaintiff N.D.N.'s social security number is XXX-XX-X. He does not have a Texas Driver's License.

2.2 Plaintiff, REUBEN ESCOBEDO, is an individual who resides in Houston, Harris County, Texas. Plaintiff REUBEN ESCOBEDO's last four (4) digits of his social security number are XXX-XX-6312 and Texas Driver's License No is XXXX.

2.3 Plaintiff, CONSTANCE AVILEZ, is an individual who resides in Houston, Harris County, Texas. Plaintiff CONSTANCE AVILEZ's last four (4) digits of his social security number are XXX-XX-3168 and Texas Driver's License No is XXXX.

2.4 Plaintiff, LAURA REGALADO, is an individual who resides in Houston, Harris County, Texas. Plaintiff LAURA REGALADO's last four (4) digits of his social security number are XXX-XX- and Texas Driver's License No is XXXX.

2.5 Plaintiff, BELINDA MANCILLAS, is an individual who resides in Houston, Harris County, Texas. Plaintiff BELINDA MANCILLAS's last four (4) digits of his social security number are XXX-XX-2168 and Texas Driver's License No is XXXX.

2.6 Plaintiff, AUSTIN PACHECO, is an individual who resides in Houston, Harris County,

Texas. Plaintiff AUSTIN PACHECO's last four (4) digits of his social security number are XXX-XX-2168 and Texas Driver's License No is XXXX.

2.7 Defendant, LIVE NATION WORLDWIDE, INC., is a corporation registered to conduct business in Texas and conducting a substantial amount of business in Texas on a continuous and systematic basis. Defendant LIVE NATION WORLDWIDE, INC., may be served with process through its registered agent, Corporate Creations Network, Inc., 5444 Westheimer #1000, Houston, TX 77056. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand that this Defendant answer in its true name, if it differs from that outlined above.

2.8 Defendant, LIVE NATION ENTERTAINMENT, INC., is a corporation registered to conduct business in Texas and conducting a substantial amount of business in Texas on a continuous and systematic basis. Defendant LIVE NATION ENTERTAINMENT, INC., may be served with process through its registered agent, Corporate Creations Network, Inc., 5444 Westheimer #1000, Houston, TX 77056. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand this Defendant answer in its true name, if it differs from that outlined above.

2.9 Defendant, LIVE NATION MARKETING, INC., is a corporation registered to conduct business in Texas and conducting a substantial amount of business in Texas on a continuous and systematic basis. Defendant LIVE NATION MARKETING, INC., may be served with process through its registered agent, Corporate Creations Network, Inc., 5444 Westheimer #1000, Houston, TX 77056. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand this Defendant

answer in its true name, if it differs from that outlined above.

2.10 Defendant, DARRYL PLATT, is an individual who resides at 2614 Sunshade Ct, Pearland, TX 77584. This Defendant is thus a Texas citizen. He may be served at that address or wherever he may be found. This Defendant is the Director of Operations for the LIVE NATION Defendants in Houston. This Defendant undertook and had an independent duty of care to ensure a safe concert and safe concert operations, as well as, to screen and vet concert personnel to ensure they were properly experienced, trained, and otherwise qualified to conduct safe concert operations, having been personally involved in the same. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand this Defendant answer in its true name, if it differs from that outlined above. Defendant SCOREMORE, LLC, is a limited liability company registered to conduct business in Texas and having its principal office, principal place of business, and corporate headquarters located at 5704 West Highway 290, Austin, TX 78735. One or more of this Defendant's members are citizens of Texas. Therefore, this Defendant is a citizen of Texas. This Defendant conducts a substantial amount of business in Texas on a continuous and systematic basis. Defendant SCOREMORE, LLC may be served with process through its registered agent, Sascha Gutfreund, 5704 West Highway 290, Austin, TX 78735. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand this Defendant answer in its true name, if it differs from that outlined above.

2.11 Defendant, SCOREMORE MGMT, LLC, is a limited liability company registered to conduct business in Texas and having its principal office, principal place of business, and

corporate headquarters located at 5704 West Highway 290, Austin, TX 78735. One or more of this Defendant's members are citizens of Texas. Therefore, this Defendant is a citizen of Texas. This Defendant conducts a substantial amount of business in Texas on a continuous and systematic basis. Defendant SCOREMORE MGMT, LLC may be served with process through its registered agent, Sascha Gutfreund, 5704 West Highway 290, Austin, TX 78735. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand this Defendant answer in its true name, if it differs from that outlined above.

2.12 Defendant, SCOREMORE HOLDINGS, LLC, is a limited liability company registered to conduct business in Texas and having its principal office, principal place of business, and corporate headquarters located at 5704 West Highway 290, Austin, TX 78735. One or more of this Defendant's members are citizens of Texas. Therefore, this Defendant is a citizen of Texas. This Defendant conducts a substantial amount of business in Texas on a continuous and systematic basis. Defendant SCOREMORE HOLDINGS, LLC may be served with process through its registered agent, Corporate Creations Network, Inc., 5444 Westheimer #1000, Houston, TX 77056. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand this Defendant answer in its true name, if it differs from that outlined above.

2.13 Defendant, SASCHA STONE GUTTFREUND, is an individual who resides at 12208 Pratolina Dr, Austin, TX 78739. This Defendant is the Manager of SCOREMORE Defendants. This Defendant undertook and had an independent duty of care to ensure a safe concert and safe concert operations, as well as, to screen and vet concert personnel to ensure they were property experienced, trained, and otherwise qualified to conduct safe concert operations, having been

personally involved in the same. He may be served at that address or wherever he may be found. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand this Defendant answer in its true name, if it differs from that outlined above.

2.14 Defendant, ASM GLOBAL PARENT, INC., is a corporation registered to conduct business in Texas and conducting a substantial amount of business in Texas on a continuous and systematic basis. Defendant ASM GLOBAL PARENT, INC., may be served with process through its registered agent, Corporation Service Company dba CSC - Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, TX 78701-3218. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand this Defendant answer in its true name, if it differs from that outlined above.

2.15 Defendant, ASM GLOBAL, LLC, is a limited liability company registered to conduct business in Texas and conducting a substantial amount of business in Texas on a continuous and systematic basis. Defendant ASM GLOBAL, LLC, may be served with process through its registered agent, Corporation Service Company dba CSC - Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, TX 78701-3218. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand this Defendant answer in its true name, if it differs from that outlined above.

2.16 Defendant, MARK MILLER, is an individual who resides at 10060 Plantation Mill Pl, Apt. P, Missouri City, Texas 77459. This Defendant is a Texas citizen. This Defendant is the General Manager of NRG Park and an Executive with ASM GLOBAL in Houston. This

Defendant undertook and had an independent duty of care to ensure a safe concert and safe concert operations as well as to screen and vet concert personnel to ensure they were property experienced, trained, and otherwise qualified to conduct safe concert operations, having been personally involved in the same. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand this Defendant answer in its true name, if it differs from that outlined above.

2.17 Defendant, KEITH BUTLER, is an individual who resides at 14238 Royal Hill Dr., Houston, Texas 77083. This Defendant is thus a Texas citizen. This Defendant is the Senior Manager of NRG Park accounts with ASM GLOBAL in Houston. This Defendant undertook and had an independent duty of care to ensure a safe concert and safe concert operations as well as to screen and vet concert personnel to ensure they were property experienced, trained, and otherwise qualified to conduct safe concert operations, having been personally involved in the same. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand this Defendant answer in its true name, if it differs from that outlined above.

2.18 Defendant, TREY HICKS, is an individual who resides at 2602 Broken Oak Dr, Austin, TX 78745. This Defendant is a Texas citizen. He may be served at that address or wherever he may be found. Plaintiffs request a citation. On information and belief, this Defendant does business under the assumed names, "Trey Hicks Public Relations, "Trey Hicks PR," and/or "THPR." Plaintiff additionally asserts all rights and request all relief under Texas Rule of Civil Procedure 28 and demand that this Defendant answer in its true name, if it differs from that outlined above.

2.19 Defendant, JACQUES BERMAN WEBSTER II A/K/A TRAVIS SCOTT (“SCOTT”), is an individual who resides in Harris County, Texas. This Defendant is a Texas citizen. He may be served at 12710 Tenaya Falls Drive, Cypress, Texas 77429 or wherever he may be found. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand that this Defendant answer in its true name, if it differs from that outlined above.

2.20 Defendant, CACTUS JACK RECORDS, LLC, is a Texas limited liability company registered to conduct business in Texas and conducting business in Texas on a continuing and systematic basis. At least one member of this company is a Texas citizen. This Defendant is a Texas citizen. CACTUS JACK RECORDS, LLC may be served with process through its registered agent, eResidentAgent, Inc., 823 Congress Avenue, Suite P-4, Austin, TX 78701. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand that this Defendant answer in its true name, if it differs from that outlined above.

### **III. JURISDICTION & VENUE**

3.1 This Court has jurisdiction of the subject matter of this action, and the amount in controversy is above its minimum jurisdictional limits. All other jurisdictional prerequisites and conditions precedent to suit have been met.

3.2 This Court has personal jurisdiction over Defendants, because all or a substantial part of the events giving rise to this dispute occurred in Texas and this lawsuit arises out of a tort, Defendants committed in Texas. This Court, otherwise has personal jurisdiction over Defendants, due to the fact they are citizens of Texas, conduct a substantial amount of business



in Texas, and/or have continuous, systematic contacts with Texas.

3.3 This case cannot be removed to federal court because no federal question exists, at least one (1) Defendant is a citizen of Texas, and complete diversity does not exist between the parties. *See* 28 U.S.C. § 1441. Removal, would therefore have no basis in law or fact, and an improper removal would subject Defendants to an award of costs, expenses, and fees, including, but not limited to, attorney's fees under 28 U.S.C. § 1447(c).

3.4 Venue is proper in Harris County, Texas pursuant to TEX. CIV. PRAC. & REM. CODE § 15.002(a) because the events giving rise to this action occurred in whole or substantial part in this county. Further, Harris County is a convenient forum and venue to Defendants, maintaining this litigation in this forum would not work as a substantial injustice on Defendants, and the interests of justice dictate this litigation be maintained in this forum and venue.

#### **IV. FACTUAL BACKGROUND**

4.1 On November 5, 2021, Defendants were all involved in the planning, advertising marketing and production, of a large outdoor concert at NRG Park in Houston, known as the Astroworld Festival. Most of these Defendants have promoted and produced similar events on numerous occasions, in the past. At a number of the previously produced events, there have been severe security and safety problems, which inevitably led to injuries by a great number of the concert attendees. In spite of having had the benefit of hindsight on the types of potential safety problems which could arise, another catastrophic even occurred at this concert, which led to the death of at least eight (8) concert attendees, and countless other injuries. Defendants are the owners, operators, promoters, public relations representatives, and/or organizers of the concert and/or owners and operators of the premises. Defendants, individually and

collectively, all had and assumed the duty and responsibility for ensuring safe concert operations. Defendants, individually and collectively, further made representations to concertgoers that "safety and security are always our top priority" and that they would "ensure a safe, secure, and positive environment is provided for all attendees, artists, and staff". It is apparent that Defendants' motivation for profit lead needlessly to the injuries and deaths.

4.2 On November 5, 2021, Plaintiffs paid for tickets to, and attended the Astroworld Festival at NRG Park in Houston, Harris County, Texas. Plaintiffs were legally invitees to NRG Park. Plaintiffs suffered serious bodily injuries and mental anguish when the uncontrolled crowd at the concert surged the stage. In the dense throng, certain Plaintiffs were shoved, pushed, knocked down, trampled on and crushed.

4.3 Hours prior to Plaintiffs incurring severe injuries, other concertgoers stormed a security gate at the park, overwhelming the security personnel while trampling other concert attendees. Plaintiffs' injuries were the inevitable and predictable result of Defendants' conscious disregard of the extreme risks of harm to concertgoers, which had been escalating for hours and still Defendants made the conscious decision to let the show continue, despite the extreme risks of harm to concertgoers.

4.4 During the ongoing show, performed by Defendant Jacques Webster a/k/a Travis Scott, there were multiple reports of concertgoers being trampled, patrons losing consciousness, patrons being unable to breath (due to profound insufficiency of crowd control), inadequate water, deficient security and a lack of exit routes. Many people were hurt, and so few emergency personnel were provided by Defendants. Therefore, patrons themselves, had to conduct CPR on their fellow concertgoers and yet, Defendants made the conscious decision to continue with the show.

4.5 Due to Defendants' active decision to let the show go on, the concert continued to get increasingly dangerous and deadly for concertgoers. The Defendants' actions led directly to the death of at least eight (8) people and injuries to scores of other concertgoers.

4.6 Long before this concert, Defendant Jacques Webster a/k/a Travis Scott had been known to promote dangerous and reckless social media posts to his fans before concerts. Earlier in 2021, his social media accounts showed he recklessly encouraged fans to breach the barriers and otherwise, actively encouraged a culture of violence.

4.7 In 2019, many of these Defendants were involved in a previous Astroworld Festival at NRG Park. Sadly. The same type of safety and overcrowding problems, occurred at this concert, which resulted in numerous injuries. Unfortunately, Defendants apparently refused to learn from these previous events, instead allowing them to be repeat such serious complications, with even worse and more deadly consequences.

4.8 The festival's founder and main performer, Defendant, SCOTT, had a long history of actively encourages the fans to "rage" at the events. SCOTT, expressly encouragement of violence, has previously resulted in serious ferocity at numerous past concerts.

- In 2015, SCOTT was arrested for disorderly conduct in Chicago for inciting violence at a concert by encouraging fans to breach barricades;
- In 2017, SCOTT was arrested and for inciting a riot in Arkansas at a concert;
- In 2017, a fan was paralyzed at a SCOTT concert in New York City after a raucous crowd, incited by SCOTT, pushed the fan off a balcony.

4.9 All of this was known to Defendants at all relevant times, and certainly prior to the time the first patron entered NRG Park on November 5, 2021.

4.10 Defendants failed to properly plan and conduct the concert in a safe manner. Instead, they consciously ignored the extreme risks of harm to concertgoers, and, in some cases

actively encouraged and fomented dangerous behaviors. Defendants' gross negligence caused Plaintiffs' injuries. Plaintiffs have sustained damages, far in excess of the jurisdictional limits of this Court.

**V.**  
**NEGLIGENCE OF DEFENDANTS**

5.1 Plaintiffs incorporate all other paragraphs by reference herein fully.

5.2 Plaintiffs would show Defendants had ownership and/or control over the instrumentality and/or activities in question and had a duty to exercise the degree of care, of a person of ordinary prudence would use to avoid harm under circumstances, similar to those described herein.

5.3 Plaintiffs' injuries were proximately caused by Defendants' negligent, careless and reckless disregard of this duty.

5.4 The negligent, careless, and reckless disregard and breach of this duty consisted of, but is not limited to, the following acts and omissions:

- a. failing to provide a safe environment for concertgoers;
- b. failing to perform concert operations in a safe, reasonable, and prudent manner;
- c. failing to maintain, follow, and enforce policies and procedures for safe concerts and concert operations;
- d. failing to recognize and remediate known safety hazards;
- e. failing to provide proper, safe equipment and competent personnel;
- f. failing to provide adequate security personnel;
- g. failing to provide adequate medical personnel;
- h. failing to institute precautionary measures to protect concertgoers;
1. failing to maintain safety equipment in good working order;

- j. violating industry standards and best practices for safe concerts, concert operations, concert ingress/egress, and concert crowd control;
- k. failing to properly train, supervise, monitor and retain employees and contractors;
- l. failing to adequately warn or make safe dangers or conditions of which Defendants had actual or constructive knowledge;
- m. failing to use ordinary care as a reasonable company would under the same or similar circumstances;
- n. undertaking duties to provide a safe concert and safe concert operations and negligently executed such duties, to the detrimental reliance of concertgoers;
- o. undertaking and assuming a duty to make safe dangerous conditions on the premises, and failing to use reasonable care in doing so;
- p. undertaking a duty to screen and vet concert personnel to ensure they were properly experienced, trained, and otherwise qualified to conduct safe concert operations;
- q. undertaking a duty to ensure that the concert was conducted consistent with safe operating practice;
- r. creating a dangerous condition and failing to prevent injury to others, where it reasonably appeared or should have appeared to Defendants that Plaintiff, in exercise of their lawful rights, were likely to have been injured by creation of such a dangerous situation, and failing to correct, make safe, or adequately warn about this condition; and
- s. such additional acts of negligence and gross negligence, which will be established as this case progresses.

5.5 Plaintiff further asserts the doctrine of *res ipsa loquitur*.

## **VI. GROSS NEGLIGENCE OF DEFENDANTS**

6.1 Plaintiffs incorporate all other paragraphs by reference here fully.

6.2 The acts or omissions described above, when viewed from Defendants' standpoint, involved an extreme degree of risk considering the probability and magnitude of the potential harm to Plaintiffs and others. Defendants had actual, subjective awareness of this risk but

proceeded with conscious indifference to the rights, safety, and welfare of Plaintiffs and others.

6.3 Plaintiffs would further show the injuries and damages in which Plaintiffs sustained, as a result of the incident in question, were caused by the gross negligence of Defendants, acting by and through their employees, agents, officers and representatives, in the course and scope of their employment for said Defendants. Plaintiffs would further show Defendants ratified and failed to repudiate their agents' gross negligence.

6.4 As such, Defendants are grossly negligent and should be subjected to exemplary damages.

## **VII. DAMAGES**

7.1 Plaintiff seeks recovery of the following damages, where were a direct and proximate result of the occurrence made the basis of this lawsuit and Defendants' acts and omissions outlined below:

- a. physical pain and suffering in the past;
- b. physical pain and suffering, which will in all likelihood, be sustained in the future;
- c. mental anguish sustained in the past;
- d. mental anguish sustained that will in all likelihood will be sustained in the future;
- e. reasonable and necessary medical expenses incurred in the past;
- f. reasonable and necessary medical expenses that will in all likelihood be incurred in the future;
- g. exemplary damages; and
- h. any and all other damages to which Plaintiffs are justly entitled, as shown through the course of this proceeding.

## **VIII.**

## **RULE 47 STATEMENT OF MONETARY RELIEF SOUGHT**

8.1 Plaintiffs prefer the jury determine the fair amount of compensation for Plaintiffs' damages. However, Rule 47 of the Texas Rules of Civil Procedure, requires Plaintiffs to provide a statement regarding the amount of monetary relief sought. Accordingly, Plaintiffs states that monetary relief of over \$1,000,000, in an amount to be determined by the jury, is being sought.

## **IX. RULE 193.7 NOTICE**

9.1 Pursuant to Texas Rule of Civil Procedure 193.7, Plaintiffs hereby give notice that Plaintiffs intend to use all discovery instruments produced in this case at trial. Such discovery documents include, but are not limited to, all documents Defendants have produced in response to Plaintiffs' written discovery requests.

**X.  
NOTICE TO PRESERVE EVIDENCE**

10.1 Plaintiffs hereby request and demand, Defendants, along with their agents, attorneys, and insurers, preserve, maintain, and place a litigation hold on all documents, communications, tangible things, and electronically stored information that arise out of or relate to the incident made the basis of this suit. Plaintiffs further request and demand that Defendants not destroy, alter, move, modify, reconfigure, replace, destroying, or discard of any portions of the premises, the premises' appurtenances, any equipment which was involved in, or present at the subject property at the time of the incident in question, any other physical evidence, documents, communications, and electronically stored information (ESI) related to the subject concert. Defendants should preserve all phones, tables, and other electronic devices. Failure to maintain such items will constitute "spoliation" of the evidence and may subject Defendants to sanctions.

**XI.  
DUTY TO DISCLOSE**

11.1 Pursuant to Texas Rule of Civil Procedure 194.1, Defendants are required to provide the information or material described in Rule 194.2, 194.3 and 194.4 without awaiting a discovery request from Plaintiff.

**XII.  
DEMAND FOR JURY TRIAL**

12.1 Plaintiffs hereby demand a jury trial on this matter and tender the appropriate jury fee.

**XIII.  
PRAYER**

13.1 For these reasons, Plaintiffs pray, Defendants be cited to appear and answer herein, and, upon a final hearing of the cause, judgment be entered for the Plaintiff and against Defendants for:



- a. Actual damages above the jurisdictional minimum of the Court, further outlined above;
- b. Pre-judgment and post-judgment interest at the maximum rate allowed by law;
- c. All costs of court;
- d. Exemplary damages; and
- e. All other relief to which Plaintiffs are justly entitled.

Respectfully submitted,

**BRENT COON & ASSOCIATES**

By: /s/ Brent W. Coon

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