



1 **FAC**
2 ROBERT T. EGLET, ESQ.
3 Nevada Bar No. 3402
4 ROBERT M. ADAMS, ESQ.
5 Nevada Bar No. 6551
6 **EGLET ADAMS**
7 400 South Seventh Street, Suite 400
8 Las Vegas, Nevada 89101
9 Telephone: (702) 450-5400
10 Facsimile: (702) 450-5451
11 Email: eservice@egletlaw.com
12 *Attorneys for Plaintiffs*

DISTRICT COURT
CLARK COUNTY, NEVADA

13 EDDIE JUNIOR BLOCKER; an Individual;
14 SANDRA JEAN MCDOUGAL, an Individual.

Case No.: A-21-828545-C
Dept. No.: XIX

Plaintiffs,

v.

FIRST AMENDED COMPLAINT AND
DEMAND FOR JURY TRIAL

15 COMEDY ON DECK TOURS, INC., a
16 Nevada corporation; GARY GRIEP, an
17 Individual; ROE BUS OWNER; an
18 Individual; DOE INDIVIDUALS 1 through
19 40; ROE CORPORATIONS 1 through 40;
20 DOE INSTALLERS 1 through 40; ROE
21 SELLERS 1 through 40; DOE EMPLOYEES
22 1 through 40; ROE DESIGNERS 1 through
23 40; ROE MANUFACTURERS 1 through 40;
24 ROE BUS DESIGNERS 1 through 40; ROE
25 BUS MANUFACTURERS 1 through 40;
26 ROE BUS DISTRIBUTORS 1 through 40;
27 ROE BUS COMPONENT PART
28 DESIGNERS 1 through 40; ROE BUS
COMPONENT PART MANUFACTURERS
1 through 40; ROE BUS COMPONENT
PART DISTRIBUTORS 1 through 40; DOE
NEGLIGENT EMPLOYERS 1 through 40;
DOE NEGLIGENT EMPLOYEES 1 through
40; ROE NEGLIGENT CORPORATIONS 1
through 40,

Arbitration Exemption Requested:
Damages Exceed \$50,000.00

Defendants.

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EGLET ADAMS

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FIRST AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL

COMES NOW Plaintiffs, by and through their attorneys of record, Robert T. Eglet, Esq. and Robert M. Adams, Esq. of the law firm of EGLET ADAMS, and hereby demand a trial by jury and complain and allege against Defendants as follows:

I.

PARTIES AND JURISDICTION

1. That all incidents described herein occurred in the County of Mohave, State of Arizona.

2. That Plaintiff, EDDIE JUNIOR BLOCKER, is and at all times pertinent hereto was, a resident of County of Volusia, State of Florida.

3. That Plaintiff, SANDRA JEAN MCDUGAL, is and at all times pertinent hereto was, a resident of County of Lauderdale, State of Alabama.

4. That upon information and belief, Defendant GARY GRIEP is, and at all times pertinent hereto was, a resident of the County of Clark, State of Nevada.

5. That upon information and belief, Defendant COMEDY ON DECK TOURS, INC. is, and at all times pertinent hereto was, a Nevada corporation authorized to do, and doing business in the County of Clark, State of Nevada.

6. That upon information and belief, and at all times relevant herein, Defendant, COMEDY ON DECK TOURS , INC., was the owner of a tour bus that was driven by Defendant GARY GRIEP at the time of the motor vehicle collision that forms the basis of this Complaint.

7. That at all times relevant herein, Defendant, GARY GRIEP, was an employee and/or agent of COMEDY ON DECK TOURS, INC and was acting within the scope of his employment with Defendant COMEDY ON DECK TOURS, INC.

8. That at all pertinent times hereto, Defendant GARY GRIEP, was an employee and/or representative and/or agent of Defendants named herein, including ROE COMPANIES 1 through 40.

9. That at all pertinent times hereto, Defendant GARY GRIEP was acting within the course and scope of his employment with Defendants named herein, including ROE COMPANIES

1 1 through 40.

2 10. That pursuant to NRS 41.130, Defendants, including but not limited to COMEDY
3 ON DECK TOURS, INC., are vicariously liable for the damages caused by their employee's
4 actions and negligence.

5 11. That Defendants DOES 1 through 40, and ROE CORPORATIONS 1 through 40,
6 were acting within the course and scope of their employment, service and/or agency, with the other
7 Defendants, the Defendants and each of them, are vicariously liable for the injuries and damages
8 sustained by Plaintiffs as alleged herein.

9 12. That Defendants DOES 1 through 40, and ROE CORPORATIONS 1 through 40,
10 were acting in concert with the other Defendants, the Defendants and each of them, are vicariously
11 and jointly and severally liable for the injuries and damages sustained by Plaintiffs as alleged herein.

12 13. Plaintiffs allege that each named Defendant herein designated as ROE BUS
13 OWNER; an Individual; DOE INDIVIDUALS 1 through 40; ROE CORPORATIONS 1 through
14 40; DOE INSTALLERS 1 through 40; ROE SELLERS 1 through 40; DOE EMPLOYEES 1
15 through 40; ROE DESIGNERS 1 through 40; ROE MANUFACTURERS 1 through 40; ROE BUS
16 DESIGNERS 1 through 40; ROE BUS MANUFACTURERS 1 through 40; ROE BUS
17 DISTRIBUTORS 1 through 40; ROE BUS COMPONENT PART DESIGNERS 1 through 40;
18 ROE BUS COMPONENT PART MANUFACTURERS 1 through 40; ROE BUS COMPONENT
19 PART DISTRIBUTORS 1 through 40; DOE NEGLIGENT EMPLOYERS 1 through 40; DOE
20 NEGLIGENT EMPLOYEES 1 through 40; and ROE NEGLIGENT CORPORATIONS 1 through
21 40, are legally responsible for the events and happenings herein referred to and proximately caused
22 damages to Plaintiffs as alleged herein. Plaintiffs will seek leave of Court to amend this Complaint
23 to insert the true names and capacities of such Defendants when same have been ascertained and
24 will further seek leave to join said Defendants in these proceedings.

25 14. That the true names and capacities, whether individual, corporate, associate,
26 partnership or otherwise, of the defendants herein designated as ROE BUS OWNER; an Individual;
27 DOE INDIVIDUALS 1 through 40; ROE CORPORATIONS 1 through 40; DOE INSTALLERS
28 1 through 40; ROE SELLERS 1 through 40; DOE EMPLOYEES 1 through 40; ROE DESIGNERS

1 1 through 40; ROE MANUFACTURERS 1 through 40; ROE BUS DESIGNERS 1 through 40;
2 ROE BUS MANUFACTURERS 1 through 40; ROE BUS DISTRIBUTORS 1 through 40; ROE
3 BUS COMPONENT PART DESIGNERS 1 through 40; ROE BUS COMPONENT PART
4 MANUFACTURERS 1 through 40; ROE BUS COMPONENT PART DISTRIBUTORS 1 through
5 40; DOE NEGLIGENT EMPLOYERS 1 through 40; DOE NEGLIGENT EMPLOYEES 1 through
6 40; and ROE NEGLIGENT CORPORATIONS 1 through 40, are unknown to Plaintiffs, who
7 therefore sue said defendants by such fictitious names. Plaintiffs will seek leave of the Court to
8 insert the true names and capacities of such defendants when the same have been ascertained and
9 will further seek leave to join said defendants in these proceedings.

10 **II.**

11 **GENERAL ALLEGATIONS**

12 15. That on or about January 22, 2021, in the County of Mohave, State of Arizona,
13 Plaintiffs were passengers on a commercial tour bus owned by Defendant COMEDY ON DECK
14 TOURS, INC. (hereinafter “COMEDY ON DECK TOURS”), traveling to Grand Canyon West,
15 outside the boundaries of Grand Canyon National Park, when the tour bus, a 2017 Freightliner,
16 traveling in excess of the speed limit, rolled, and landed on its side (the “Collision”).

17 16. That as a direct and proximate result of the negligence of Defendants, and each of
18 them, the Collision occurred and Plaintiffs sustained personal injuries, all or some of which
19 conditions may be permanent and disabling, and all to Plaintiffs’ damage in a sum in excess of
20 Fifteen Thousand Dollars (\$15,000.00).

21 17. That as a direct and proximate result of the negligence of Defendants, and each of
22 them, Plaintiffs, received medical and other treatment for the aforementioned injuries, and that
23 said services, care, and treatment is continuing and shall continue in the future, all to Plaintiffs’
24 damages.

25 18. That as a direct and proximate result of the negligence of Defendants, and each of
26 them, Plaintiffs, are entitled to recover damages for the pain, suffering, anxiety, disability,
27 emotional distress, physical injuries, and medical treatment, both past and future, all of which are
28 damages recoverable by him, in an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

1 19. That as a direct and proximate result of the negligence of Defendants, and each of
2 them, Plaintiffs, suffered loss of enjoyment of life, all of which are damages recoverable by
3 Plaintiffs, an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

4 20. That as a direct and proximate result of the negligence of Defendants, and each of
5 them, Plaintiffs, have limited recreational activities, which have caused and shall continue to
6 cause Plaintiffs' physical impairment, mental anguish, and loss of enjoyment of life, in a
7 presently unascertainable amount.

8 21. That as a direct and proximate result of the aforementioned negligence of
9 Defendants, and each of them, Plaintiffs, have sustained a loss of earning capacity, past and future,
10 as well as a loss of wages.

11 22. That as a further direct and proximate result of the aforementioned negligence of
12 Defendants, and each of them, Plaintiffs, have suffered a loss of past and future household
13 services in an amount to be proven at trial.

14 23. That as a direct and proximate result of the aforementioned negligence of
15 Defendants, and each of them, Plaintiffs have been required to engage the services of an attorney,
16 incurring attorney's fees and costs to bring this action.

17 **III.**

18 **FIRST CAUSE OF ACTION**

19 **(Negligence Against All Defendants)**

20 24. Plaintiffs repeat and re-allege the allegations of the preceding paragraphs of the
21 Complaint as though fully set forth herein and incorporates the same herein by reference.

22 25. That Defendants owed a duty of care to Plaintiffs, to operate the commercial tour
23 bus in a reasonably safe manner.

24 26. That Defendants, breached that duty of care by causing the commercial tour bus to
25 roll over and land on its side.

26 27. That as a direct and proximate result of the negligence of Defendants, a motor
27 vehicle collision occurred and Plaintiffs sustained personal injuries, all or some of which
28 conditions may be permanent and disabling, and all to Plaintiffs' damage in a sum in excess of

1 Fifteen Thousand Dollars (\$15,000.00).

2 28. That as a direct and proximate result of the negligence of Defendants, Plaintiffs,
3 received medical and other treatment for the aforementioned injuries, and that said services, care,
4 and treatment is continuing and shall continue in the future, all to Plaintiffs' damages.

5 29. That as a direct and proximate result of the negligence of Defendants, Plaintiffs are
6 entitled to recover damages for the pain, suffering, anxiety, disability, emotional distress, physical
7 injuries and medical treatment, both past and future, all of which are damages recoverable by
8 Plaintiffs, in an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

9 30. That as a direct and proximate result of the negligence of Defendants, and each of
10 them, Plaintiffs suffered a loss of enjoyment of life, all of which are damages recoverable by
11 Plaintiffs, an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

12 31. That as a direct and proximate result of the negligence of Defendants, Plaintiffs
13 have limited recreational activities, which have caused and shall continue to cause them physical
14 impairment, mental anguish, and loss of enjoyment of life, in a presently unascertainable amount.

15 32. That as a direct and proximate result of the aforementioned negligence of
16 Defendants, Plaintiffs have sustained loss of earning capacity, past and future, as well as a loss of
17 wages.

18 33. That as a further direct and proximate result, Plaintiffs have suffered a loss of past
19 and future household services in an amount to be proven at trial.

20 34. That as a direct and proximate result of the aforementioned negligence of
21 Defendants, Plaintiffs have been required to engage the services of an attorney, incurring
22 attorney's fees and costs to bring this action.

23 **IV.**

24 **SECOND CAUSE OF ACTION**

25 **(Negligence *Per Se* Against Defendant GARY GRIEP)**

26 35. Plaintiffs repeat and re-allege the allegations of the preceding paragraphs of the
27 Complaint as though fully set forth herein and incorporates the same herein by reference.

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1 36. That at all times mentioned herein, there were in force statutes, ordinances, and
2 regulations prohibiting the conduct exhibited by Defendant GARY GRIEP.

3 37. That Plaintiffs were members of the class of persons for whose protection said
4 statutes, ordinances, and regulations were enacted or promulgated.

5 38. That the acts of Defendant GARY GRIEP, as described herein, violated, Nevada
6 statutes, ordinances and regulations, specifically, NRS 484B.223, et. seq., which constitutes
7 negligence *per se*.

8 39. That Plaintiffs sustained injuries that were the type that said statutes, ordinances,
9 and regulations were intended to prevent.

10 40. That as a direct and proximate result of the acts of Defendant GARY GRIEP,
11 Plaintiffs sustained personal injuries, all or some of which conditions may be permanent and
12 disabling, and all to Plaintiffs' damages in a sum in excess of Fifteen Thousand Dollars
13 (\$15,000.00).

14 41. That as a direct and proximate result of the acts of Defendant GARY GRIEP,
15 Plaintiffs received medical and other treatment for the aforementioned injuries, and that said
16 services, care, and treatment is continuing and shall continue in the future, all to Plaintiffs'
17 damages.

18 42. That as a direct and proximate result of the negligence of Defendant GARY GRIEP,
19 Plaintiffs are entitled to recover damages for the pain, suffering, anxiety, disability, emotional
20 distress, physical injuries and medical treatment, both past and future, all of which are damages
21 recoverable by Plaintiffs in an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

22 43. That as a direct and proximate result of the negligence of Defendants, and each of
23 them, Plaintiffs suffered a loss of enjoyment of life, all of which are damages recoverable by
24 Plaintiffs, an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

25 44. That as a direct and proximate result of the acts of Defendant GARY GRIEP,
26 Plaintiffs have limited recreational activities, which have caused and shall continue to cause them
27 physical impairment, mental anguish, and loss of enjoyment of life, in a presently unascertainable
28 amount.

1 45. That as a further direct and proximate result of the aforementioned acts of
2 Defendant GARY GRIEP, Plaintiffs have suffered a loss of past and future household services
3 in an amount to be proven at trial.

4 46. That as a direct and proximate result of the aforementioned negligence of
5 Defendant GARY GRIEP, Plaintiffs have sustained loss of earning capacity, past and future, as
6 well as a loss of wages.

7 47. That as a direct and proximate result of the aforementioned acts of Defendant
8 GARY GRIEP, Plaintiffs have been required to engage the services of an attorney, incurring
9 attorney's fees and costs to bring this action.

10 V.

11 **THIRD CAUSE OF ACTION**

12 **(Negligent Entrustment of Vehicle Against Defendant COMEDY ON DECK)**

13 48. Plaintiffs repeat and re-allege the allegations of the preceding paragraphs of the
14 Complaint as though fully set forth herein and incorporates the same herein by reference.

15 49. That Defendants, and each of them, owed a duty of care to Plaintiffs.

16 50. That Defendant, COMEDY ON DECK knew or should have known that Defendant
17 GARY GRIEP, was inexperienced, incompetent, and/or unfit to drive the subject commercial
18 vehicle, a tour bus.

19 51. That Defendants, and each of them, breached that duty to Plaintiffs, by knowingly
20 entrusting a commercial vehicle, a tour bus, to an inexperienced, incompetent, and/or unfit person.

21 52. That Defendant GARY GRIEP's inexperience, incompetence, and/or unfitness to
22 drive the tour bus was a substantial factor in causing injury and damages to Plaintiffs.

23 53. That as a direct and proximate result of the acts of Defendants, and each of them, a
24 collision occurred and Plaintiffs sustained personal injuries, all or some of which conditions may
25 be permanent and disabling, and all to Plaintiffs' damages in a sum in excess of Fifteen Thousand
26 Dollars (\$15,000.00).

27 54. That as a direct and proximate result of the acts of Defendants, and each of them,
28 Plaintiffs received medical and other treatment for the aforementioned injuries, and that said

1 services, care, and treatment is continuing and shall continue in the future, all to Plaintiffs’
2 damages.

3 55. That as a direct and proximate result of the negligence of Defendants, and each of
4 them, Plaintiffs, is entitled to recover damages for the pain, suffering, anxiety, disability, emotional
5 distress, physical injuries and medical treatment, both past and future, all of which are damages
6 recoverable by Plaintiffs, in an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

7 56. That as a direct and proximate result of the negligence of Defendants, and each of
8 them, Plaintiffs suffered a loss of enjoyment of life, all of which are damages recoverable by
9 Plaintiffs, an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

10 57. That as a direct and proximate result of the acts of Defendants, and each of them,
11 Plaintiffs have limited recreational activities, which have caused and shall continue to cause them
12 physical impairment, mental anguish, and loss of enjoyment of life, in a presently unascertainable
13 amount.

14 58. That as a direct and proximate result of the aforementioned negligence of
15 Defendants, and each of them, Plaintiffs have sustained loss of earning capacity, past and future,
16 as well as a loss of wages.

17 59. That as a further direct and proximate result of the aforementioned acts of
18 Defendants, and each of them, Plaintiffs have suffered a loss of past and future household services
19 in an amount to be proven at trial.

20 60. That as a direct and proximate result of the aforementioned acts of Defendants, and
21 each of them, Plaintiffs have been required to engage the services of an attorney, incurring
22 attorney’s fees and costs to bring this action.

23 **VI.**

24 **FOURTH CAUSE OF ACTION**

25 **(Vicarious Liability/Respondeat Superior Against Defendant COMEDY ON DECK)**

26 61. Plaintiffs repeat and re-allege the allegations of the preceding paragraphs of the
27 Complaint as though fully set forth herein and incorporates the same herein by reference.

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1 62. That at all times mentioned herein, Defendant GARY GRIEP was an employee of
2 Defendant COMEDY ON DECK.

3 63. That upon information and belief, at the time of the Collision, Defendant GARY
4 GRIEP was acting within the course and scope of his employment with Defendant COMEDY ON
5 DECK while driving Defendant COMEDY ON DECK’s Vehicle.

6 64. That upon information and belief, at the time of the Collision, Defendant GARY
7 GRIEP was on a business errand on behalf of Defendant COMEDY ON DECK or furthering a
8 business purpose of Defendant COMEDY ON DECK.

9 65. That upon information and belief, Defendant GARY GRIEP was under Defendant
10 COMEDY ON DECK’s control at the time of the Collision.

11 66. That upon information and belief, the relationship between Defendant COMEDY
12 ON DECK and Defendant GARY GRIEP is that of superior and subordinate.

13 67. That as Defendant GARY GRIEP’s employer, Defendant COMEDY ON DECK is
14 vicariously liable for all of Defendant GARY GRIEP’s actions, omissions and inactions performed
15 within the course and scope of his agency, ostensible agency, joint venture, contractual or
16 employment relationship with Defendant COMEDY ON DECK.

17 68. That as a direct and proximate result of the acts of Defendants, and each of them,
18 Plaintiffs are entitled to a judgment against Defendant COMEDY ON DECK stating that it is
19 vicariously liable for all of Defendant GARY GRIEP’s actions herein.

20 69. That as a direct and proximate result of the acts of Defendants, and each of them, a
21 collision occurred and Plaintiffs sustained personal injuries, all or some of which conditions may
22 be permanent and disabling, and all to Plaintiffs’ damages in a sum in excess of Fifteen Thousand
23 Dollars (\$15,000.00).

24 70. That as a direct and proximate result of the acts of Defendants, and each of them,
25 Plaintiffs received medical and other treatment for the aforementioned injuries, and that said
26 services, care, and treatment is continuing and shall continue in the future, all to Plaintiffs’
27 damages.

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1 71. That as a direct and proximate result of the negligence of Defendants, and each of
2 them, Plaintiffs are entitled to recover damages for the pain, suffering, anxiety, disability,
3 emotional distress, physical injuries and medical treatment, both past and future, all of which are
4 damages recoverable by Plaintiffs, in an amount in excess of Fifteen Thousand Dollars
5 (\$15,000.00).

6 72. That as a direct and proximate result of the negligence of Defendants, and each of
7 them, Plaintiffs suffered a loss of enjoyment of life, all of which are damages recoverable by
8 Plaintiffs, an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

9 73. That as a direct and proximate result of the acts of Defendants, and each of them,
10 Plaintiffs have limited recreational activities, which have caused and shall continue to cause them
11 physical impairment, mental anguish, and loss of enjoyment of life, in a presently unascertainable
12 amount.

13 74. That as a direct and proximate result of the aforementioned negligence of
14 Defendants, and each of them, Plaintiffs have sustained loss of earning capacity, past and future,
15 as well as a loss of wages.

16 75. That as a further direct and proximate result of the aforementioned acts of
17 Defendants, and each of them, Plaintiffs have suffered a loss of past and future household services
18 in an amount to be proven at trial.

19 76. That as a direct and proximate result of the aforementioned acts of Defendants, and
20 each of them, Plaintiffs have been required to engage the services of an attorney, incurring
21 attorney's fees and costs to bring this action.

22 **VII.**

23 **FIFTH CAUSE OF ACTION**

24 **(Negligent Hiring, Training, Retention, and Supervision Against Defendant COMEDY ON**
25 **DECK)**

26 77. Plaintiffs repeat and re-allege the allegations of the preceding paragraphs of the
27 Complaint as though fully set forth herein and incorporates the same herein by reference.

28 78. That Defendant COMEDY ON DECK had a duty to properly and adequately hire,

1 train, retain, and supervise personnel under its control so as to avoid unreasonable risk of harm to
2 the general public.

3 79. That Defendant COMEDY ON DECK was responsible for the hiring, training,
4 retaining, supervision, and control of its employees and/or agents, including Defendant GARY
5 GRIEP, and as a direct and proximate result of Defendant COMEDY ON DECK’s negligence in
6 hiring, training, supervising, and controlling its employees and/or agents, including Defendant
7 GARY GRIEP, Plaintiffs suffered injuries and damages as herein alleged.

8 80. That as a direct and proximate result of the acts of Defendants, and each of them, a
9 collision occurred and Plaintiffs sustained personal injuries, all or some of which conditions may
10 be permanent and disabling, and all to Plaintiffs’ damages in a sum in excess of Fifteen Thousand
11 Dollars (\$15,000.00).

12 81. That as a direct and proximate result of the acts of Defendants, and each of them,
13 Plaintiffs received medical and other treatment for the aforementioned injuries, and that said
14 services, care, and treatment is continuing and shall continue in the future, all to Plaintiffs’
15 damages.

16 82. That as a direct and proximate result of the negligence of Defendants, and each of
17 them, Plaintiffs are entitled to recover damages for the pain, suffering, anxiety, disability,
18 emotional distress, physical injuries and medical treatment, both past and future, all of which are
19 damages recoverable by Plaintiffs, in an amount in excess of Fifteen Thousand Dollars
20 (\$15,000.00).

21 83. That as a direct and proximate result of the negligence of Defendants, and each of
22 them, Plaintiffs suffered a loss of enjoyment of life, all of which are damages recoverable by
23 Plaintiffs, an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

24 84. That as a direct and proximate result of the acts of Defendants, and each of them,
25 Plaintiff, have limited recreational activities, which have caused and shall continue to cause them
26 physical impairment, mental anguish, and loss of enjoyment of life, in a presently unascertainable
27 amount.

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1 85. That as a direct and proximate result of the aforementioned negligence of
2 Defendants, and each of them, Plaintiffs have sustained loss of earning capacity, past and future,
3 as well as a loss of wages.

4 86. That as a further direct and proximate result of the aforementioned acts of
5 Defendants, and each of them, Plaintiffs have suffered a loss of past and future household services
6 in an amount to be proven at trial.

7 87. That as a direct and proximate result of the aforementioned acts of Defendants, and
8 each of them, Plaintiffs have been required to engage the services of an attorney, incurring
9 attorney's fees and costs to bring this action.

10 **VIII.**

11 **SIXTH CAUSE OF ACTION**

12 **(Negligent Infliction of Emotional Distress Against All Defendants)**

13 88. That Plaintiffs repeat and reallege each and every allegation set forth in this
14 Complaint, as though the same were fully set forth herein.

15 89. That Defendants negligently caused the collision and subsequent injuries to
16 Plaintiffs.

17 90. That as a direct and proximate result of the acts, omissions, and conduct of
18 Defendants, Plaintiffs have suffered severe emotional distress.

19 91. That Plaintiffs suffered serious emotional distress due to the negligent conduct of
20 Defendants, and each of them, and that the injuries sustained by Plaintiffs were caused solely and
21 proximately by Defendants and without any negligence of Plaintiffs contributing thereto.

22 92. That as a direct and proximate result of the acts of Defendants, and each of them, a
23 collision occurred and Plaintiffs sustained personal injuries, all or some of which conditions may
24 be permanent and disabling, and all to Plaintiffs' damages in a sum in excess of Fifteen Thousand
25 Dollars (\$15,000.00).

26 93. That as a direct and proximate result of the acts of Defendants, and each of them,
27 Plaintiffs received medical and other treatment for the aforementioned injuries, and that said
28 services, care, and treatment is continuing and shall continue in the future, all to Plaintiffs'

1 damages.

2 94. That as a direct and proximate result of the negligence of Defendants, and each of
3 them, Plaintiffs are entitled to recover damages for the pain, suffering, anxiety, disability,
4 emotional distress, physical injuries and medical treatment, both past and future, all of which are
5 damages recoverable by Plaintiffs, in an amount in excess of Fifteen Thousand Dollars
6 (\$15,000.00).

7 95. That as a direct and proximate result of the negligence of Defendants, and each of
8 them, Plaintiffs suffered a loss of enjoyment of life, all of which are damages recoverable by
9 Plaintiffs, an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

10 96. That as a direct and proximate result of the acts of Defendants, and each of them,
11 Plaintiffs have limited recreational activities, which have caused and shall continue to cause them
12 physical impairment, mental anguish, and loss of enjoyment of life, in a presently unascertainable
13 amount.

14 97. That as a direct and proximate result of the aforementioned negligence of
15 Defendants, and each of them, Plaintiffs have sustained loss of earning capacity, past and future,
16 as well as a loss of wages.

17 98. That as a further direct and proximate result of the aforementioned acts of
18 Defendants, and each of them, Plaintiffs have suffered a loss of past and future household services
19 in an amount to be proven at trial.

20 99. That as a direct and proximate result of the aforementioned acts of Defendants, and
21 each of them, Plaintiffs have been required to engage the services of an attorney, incurring
22 attorney's fees and costs to bring this action.

23 **IX.**

24 **PRAYER FOR RELIEF**

25 WHEREFORE, Plaintiffs pray for judgment against Defendants, and each of them, as
26 follows:

- 27 1. General damages in an amount in excess of \$15,000.00;
28 2. Compensatory damages in an amount in excess of \$15,000.00;

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3. Special damages in an amount in excess of \$15,000.00;
4. Medical and incidental expenses incurred and to be incurred;
5. For punitive damages in an amount to be determined at trial;
6. Damages for past and future pain, suffering, mental anguish, and loss of enjoyment of life;
7. Damages for a loss of past and future household services;
8. Loss of past and future earning capacity and lost wages;
9. Costs of suit, reasonable attorney fees, interest incurred herein; and
10. For such other and further relief as is just and proper.

Dated this 18th day of February, 2021.

EGLET ADAMS

/s/ Robert T. Eglet, Esq.
ROBERT T. EGLET, ESQ.
Nevada Bar No. 3402
ROBERT M. ADAMS, ESQ.
Nevada Bar No. 6551
400 South Seventh Street, Suite 400
Las Vegas, Nevada 89101
Email: eservice@egletlaw.com
Attorneys for Plaintiffs

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DEMAND FOR JURY TRIAL

Plaintiffs, by and through their attorneys of record, **EGLET ADAMS**, hereby demand a jury trial of all of the issues in the above matter.

Dated this 18th day of February, 2021.

EGLET ADAMS

/s/ Robert T. Eglet, Esq.
ROBERT T. EGLET, ESQ.
Nevada Bar No. 3402
ROBERT M. ADAMS, ESQ.
Nevada Bar No. 6551
400 South Seventh Street, Suite 400
Las Vegas, Nevada 89101
Email: eservice@egletlaw.com
Attorneys for Plaintiffs