

1 BRAD D. BRIAN (State Bar No. 79001)  
 brad.brian@mto.com  
 2 MICHAEL R. DOYEN (State Bar No. 119687)  
 michael.doyen@mto.com  
 3 BETHANY W. KRISTOVICH (State Bar No. 241891)  
 bethany.kristovich@mto.com  
 4 MUNGER, TOLLES & OLSON LLP  
 350 South Grand Avenue  
 5 Fiftieth Floor  
 Los Angeles, California 90071-3426  
 6 Telephone: (213) 683-9100  
 Facsimile: (213) 687-3702  
 7

8 Attorneys for Plaintiffs MGM RESORTS  
 INTERNATIONAL, MANDALAY  
 9 RESORT GROUP, MANDALAY BAY,  
 LLC, MGM RESORTS FESTIVAL  
 10 GROUNDS, LLC, and MGM RESORTS  
 VENUE MANAGEMENT, LLC  
 11

12 UNITED STATES DISTRICT COURT  
 13 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION  
 14

15 MGM RESORTS INTERNATIONAL,  
 MANDALAY RESORT GROUP,  
 16 MANDALAY BAY, LLC, MGM  
 RESORTS FESTIVAL GROUNDS,  
 17 LLC, MGM RESORTS VENUE  
 MANAGEMENT, LLC  
 18

Case No.

**COMPLAINT FOR  
 DECLARATORY RELIEF**

19 Plaintiffs,

20 vs.

21 DAVID AASE; GARY AASE; MARK  
 ABRAHAM; ANDREA ABRAMS;  
 DANIEL ABRAMS; LUKE ADAM;  
 22 ROBERT AGUILAR; GLORIA  
 AGUIRRE; BRIAN AHLERS; ESTATE  
 23 OF HANNAH AHLERS; MARCO  
 ALBERTINI; RENEE ALCALA;  
 24 ERNESTO ALFARO; TENESHA  
 ALFARO; SARA ALLEGRO; ETTA  
 25 ALLEN; LEANNE ALTAMIRANO;  
 RUBEN ALULEMA; ALEX  
 26 ALVAREZ; DANIEL EARL  
 ALVAREZ; JOANNA ALVAREZ;  
 27 LINDSEY ALVAREZ; DANIELLE  
 AMBROSE; ALETHA ANDERSON;  
 28 NATALIE ANDERSON; REBECCA

1 ANN ANDERSON; RYAN  
ANDERSON; SHANNON  
2 ANDERSON; JENNIFER APARICIO;  
BRENDEN ARAUJO; CASSIE  
3 ARDITO; RICHARD ARDITO; JESUS  
ASTUA; LISA AWALT; D.B., A  
4 MINOR; CODI BABCOCK; CHEYENE  
BACON-MERIWEATHER;  
5 CHRISTOPHER BADOREK; TRACEY  
BAKER; SHANNON BALAS;  
6 TIFFANY BALL; MARY BANTA; TED  
BANTA; JASON BANVILLE; TEGAN  
7 BANVILLE; JASMINE BARBUSCA;  
ESTATE OF CARRIE BARNETTE;  
8 TINELLA BARRANCO; RONALD A.  
BARRERAS; DONOVAN BARTHEL;  
9 MONIQUE D. BARTHEL; COURTNEY  
BEAN; BRAD BEAUCHAMP; DAWN  
10 BEAUCHAMP; ALEISA BEBEE;  
ASHLEY BECKER; SEAN BEESON;  
11 JONATHON BELL; ANNALISE  
BELMARES; MEGHAN BELMARES;  
12 JONATHAN BELTRAN; DANIEL R.  
BEST; CARLY BETZLER; TAYLOR  
13 BLAISER; JANNETTE BLAKE;  
PAULA BLAKELEY; JODI  
14 BOATWOOD; AMANDA BOBB;  
DYLAN BODEN; EMILY BODEN;  
15 JOY BODEN; MADDISON BODEN;  
MARK BODEN; CRYSTAL BOLKE;  
16 DIANELLA BONO; MAUREEN  
BONTE; NICOLE BONTEMPO; PAUL  
17 BOONE; KURTIS ANTHONY  
BOWERS; ESTATE OF CANDICE  
18 BOWERS; K.L.A., A MINOR; A.R.B.,  
A MINOR; VEDAMAY BRADFORD;  
19 MICHAEL BRADLEY; CINDY  
BRADSHAW; ROBERT BRADSHAW;  
20 LAUREN BRADY; DAVID BRAKE;  
STEEVE BRANCATO; JAMES  
21 BRIGHTLY; MAILYS BRIGHTLY;  
EDWARD BROWN; ERIKA BROWN;  
22 RONDA BROWN; STEPHANIE  
BROWN; STACEY BROWN-FUSANO;  
23 TAYLER BRUNNER; JOHN BUI;  
TREANESHA LASHONDA BULLION;  
24 TERRY BURK; ANDREA  
BUSTAMANTE; GABRIELLA  
25 BUSTAMANTE; HECTOR  
CABALLERO; HEATHER L. CAIN;  
26 JENNIFER CAMPAS; JENNIFER L.  
CAMPBELL; LYNZEE CAMPBELL;  
27 JULIA CAMPOS; KAREN CANADA;  
INGRID CANELO; RENEE CANELO;  
28 MARY CANICH; EMILY CANTRELL;

1 BRITTNIE NICOLE CARDENAS;  
JESSICA CAREY; KATE CARLIN;  
2 KARI CARLSTRÖM; ALEXANDER  
CARRIAGA; KIMBERLY CARRIAGA;  
3 MATTHEW CARRILLO; IAN  
CARTER; ELIZABETH A.  
4 CARVALHO; CONNOR CASAREZ;  
VANESSA CASE; MICHELLE ANN  
5 CASHMAN; CARLEY CASS; GUS  
CASTILLA; ESTATE OF ANDREA  
6 CASTILLA; MARISSA CASTLE;  
REBECCA CASTRO; ANGELA  
7 CATURA; CHRISTOPHER  
CAYWOOD; KASANDRA  
8 CAYWOOD; KERI CESARIO;  
ROBERT CESARIO; LAUREN  
9 CHAGOLLA; TAMMY J. CHAMBERS;  
DAVID CHATTERTON; MARIE  
10 CHATTERTON; VERONICA  
CHAVEZ; KRISTI CHRISTENSEN;  
11 FABIOLA CINTRON; ROGER  
CINTRON; ALISA CLAWSON; KARA  
12 CLEMENT; LARISSA COBURN;  
DONNA COCHRANE; RICHARD D.  
13 COE; DAVID COLE; JOSEPH COLE;  
DENNIS NEAL COLEMAN;  
14 RONALDO CONCEPCION;  
KATHLEEN CONTI; MELISSA  
15 CONTRI; CHRISTA CONWAY;  
WILLIAM COOK; WENDY COOPER;  
16 PATRICIA COPE; JESSE CORTEZ;  
LISA CORTEZ; DOUGLAS CORUM;  
17 TYLER CRAIG; BRENDA CRANE;  
BRITTANI CRAWFORD; ANTHONY  
18 M. CRESTA; ANTHONY CRISCI;  
PATRICIA CRISS; KIRA M. CROSS;  
19 JOY M. CRUZ; JENNIFER CUEVAS;  
ADRIANNA CULLER; MARISSA J.  
20 CURRIE; TAMMY CURTIS; NICOLE  
CUSICK; ROBERT CUSICK; ESTATE  
21 OF DERRICK D. TAYLOR; ANDREW  
DAHRING; NANCY DAHRING; LISA  
22 DANCEL; LISA MARIE DANIELS;  
PRITESH DAVDA; KYLE DAVID;  
23 JESSICA DAVIES; AMANDA DAVIS;  
ELLEN DAVIS; DEBORAH  
24 DAWKINS; DEANNA DAWSON;  
LORI DAWSON; THOMAS DAY SR.;  
25 ESTATE OF THOMAS DAY; KELSEY  
DAY; NOLAN DAY; WHITNEY DAY;  
26 DIANA DE LA MAZA; ROLAND DE  
LA MAZA; CYNTHIA DEARING;  
27 TAMARA DELAMETER; AMY  
DELAPLANE; ALEJANDRA  
28 DELAROSA; BRETT DELAURA;

1 KORTNEY DELAWAY; NICOLE  
DELGADILLO; LARRY DELGADO;  
2 DANIELLE DELIRA; NICOLE  
DESARACHO; ROBERT DI NONNO;  
3 MIKAELA DIAZ; REGINA  
DIERINGER; RYAN DIERINGER;  
4 DIANA J. DIMITRUK; VANESSA  
DIPOLITO; LAURA DIXON; ROBYN  
5 DOBBS; DANIEL DOMINGUEZ;  
KARIN DONIS; ELYSE DONNELLY;  
6 KYLE L. DONNER; WENDY A.  
DORMER; ALLISON DORR; JESSICA  
7 DOVALINA; JULIE DOVE; EYDIE  
DOYLE; THOMAS DURELL; AMBER  
8 DURHAM; KENDALL  
DUSENBERRY; CHEYENNE  
9 EBERLE; GENÁ ELFELT; DERRICK  
ELLIOTT; JILLIAN ELLIOTT; STACI  
10 ELLIS; STEVE ENCINIAS; SHANYCE  
ENGLISH; MADELYN ENOCHS;  
11 CANDICE ERICKSON; CHRIS  
ERICKSON; KANDIS ERICKSON;  
12 SABRINA ESPARZA; ERNESTO  
ESPINOZA; SORAYA M. ESPINOZA;  
13 LAURA ESTRADA; NICO ESTRADA;  
ESTATE OF STACÉE ETCHEBER;  
14 VINCENT ETCHEBER; BRIANA  
EVANS; CYNTHIA EVANS; DENNIS  
15 EVANS; WENDY EVERETT; KYLE  
EVINGER; ASHLEY FARGO;  
16 MICHELLE FARIAS; ANGELA  
FAVIA; JEFFREY FEIG; RAFAEL  
17 FELICIANO; LAUREN FERGUSON;  
JENNIE FERNANDES; MARYSSA  
18 FIELDS; MELISSA FIERRO; BAYLEE  
FINCHER; BROOKE FINCHER;  
19 MINDY FINCHER; AUSTIN FISHER;  
LYNDSAY FISHER; SUSAN  
20 FITZGERALD; EMILY FLESHER;  
KRISTI FLESHER; ART FLORES;  
21 DANIEL FLORES; STEVEN FLORES;  
JENNIFER FLUEGAL; MARLANA  
22 FOLTZ; DONALD FORSYTH;  
ROCHELLE FORSYTH; KADEDRA  
23 FOWLER; JUSTIN FRAME;  
BRITTANY FRIEND; CYNTHIA  
24 FRISKE; AMANDA FROST; BOBBI  
FRYE; LORRAINE FUENTES; APRIL  
25 GABANY; TINA GALARZA; ERICA  
GALLEGOS; MANDY GALLEGOS;  
26 STEPHANIE GALLEGOS; ESTATE OF  
KERI GALVAN; JUSTIN GALVAN;  
27 R.G., A MINOR; P.G., A MINOR; P.G.,  
A MINOR; CELENA GARCIA;  
28 CHRISTINA GARCIA; ERIC GARCIA;

1 EUGENE GARCIA; RANDY GARCIA;  
2 STACY GARCIA; TERESA GARCIA;  
3 LAURA GARDHOUSE; ELLENOR  
4 GARGANO; JOSE L. GARZA; PAIGE  
5 GASPER; BRITTANY GEBHART;  
6 WILLIAM GEORGIA; GARRETT  
7 GHAYASI; MEILIN GIBBENS; ERIN  
8 GILL; JOHN GILMORE; KYLEE  
9 GLASSCOCK; ROBERT GLAVIS;  
10 TERESA GLAVIS; TRISTI GLOVER;  
11 MICHELL GOBLE; MICHELLE  
12 GOMES; ASHLEY GOMEZ; JULIE  
13 GOMEZ; STEVEN GOMEZ; JEFFREY  
14 ALAN GONSALVES; ANDREA  
15 GONZALES; DANIEL JOSEPH  
16 GONZALES; ALESHA GONZALEZ;  
17 JESUS VINCENT GONZALEZ;  
18 MICHAEL GONZALEZ; MICHAEL  
19 GOODNIGHT; DOREEN GORMAN;  
20 DELORES GRAY; JEANETTE GRAY;  
21 NICOLE GRAY; REGINA GREEN;  
22 DAVID J. GRIJALBA; JENNIFER  
23 GRIMM; GABRIEL GUERRERO;  
24 MIGUEL GUERRERO; MIKERRA  
25 GUERRERO; TRISHA GUERRERO;  
26 ESTATE OF ROCIO GUILLEN; S.J., A  
27 MINOR; A.J., A MINOR; THOMAS  
28 GUNDERSON; TAMMY HISCOX  
GURULE; TAMMY M. GURULE;  
KIMBERLY GUTIERREZ; CRYSTAL  
HADLEY; DEBORAH HALL; STEVEN  
HALL; TRAVIS HALL; MICHELLE  
HAMEL; KIERSTEN HARLING;  
SIMON HARLING; BRANDON  
HARLOW; REGINA ANNE HARRIS;  
LISA HARTZ; MELINDA HAWKINS;  
BREANNA HAYDEN; KILEY  
HAYDEN; KRISTINA HAYDEN;  
LARRY HAYDEN; CORI HAYNES;  
BRYCE HEATHCOAT; JENNIFER  
HEIDT; STEVEN HEIRSHBERG;  
WENDY HEIRSHBERG; BRANDON  
HELMICK; JUSTIN HENDERSON;  
KRISTINE HENDERSON; ANDREA  
HENNING; JUSTIN HEREDIA;  
HEATHER HERNANDEZ; REBECCA  
HERNANDEZ; RICARDO  
HERNANDEZ; EMMITT HICKMAN;  
ERIC HIGGINS; DIANE HILL; TYLER  
HILL; TERESA HIMLEY; JEFF  
HINES; WHITNEY LINN HINNANT;  
LAUREN HITT; KENDRA HOBBS;  
PATRICK HOBBS; LEIGH ANN  
HODGSON; KATHERINE HOEY;  
BRYAN HOFFRICHTER; DONNA

1 HOLDEN; TANNA HOLDERLE;  
ALBERT HOLGUIN; CINDY  
2 HOLGUIN; LISA HOLGUIN; JOHN  
HOLLADAY; MELISSA HOLMQUIST;  
3 VANESSA HOLUB; ALEXIS HOOD;  
TAYLOR HOOD; BRENDAN  
4 HOOLIHAN; BRITTANY HOPKINS;  
MICHELLE HOWLETT; MALISA  
5 HOYME; DEBRA HUDSON; LEANNE  
HUGGINS; LAURIE HULBERT; JULIE  
6 HUNTSINGER; RYAN HUNTSINGER;  
TAYLOR HURWIT; BRET IVEY;  
7 ALICIA JACKSON; THOMAS S.  
JACOBUS; CHRISTOPHER JAKSHA;  
8 PHILIP JARDELL; JOANNA  
JASHIMOTO; AARON E. JENKINS;  
9 JESSICA ANN JENKINS; TERESA  
JENSEN; MIRANDA JESSEN; SARAH  
10 JICK; RENEE JIMENEZ; LANESHIA  
JOHNSON; MONTA JOHNSON;  
11 MICHELLE JONES; MISTY JONES;  
ROB JONES; SHAHEED JONES;  
12 CLARICE KAHIA; TED KALNAS;  
LORI KAMMER; TODD KAMMER;  
13 MICHAEL KAPLISH; MIRTA  
KATNICH; SCOTT KEERAN;  
14 VALERIE MELISSA KEERAN;  
ALAINA KELLY; DEBRA KELLY;  
15 WILLIAM M. KELLY; KYLE  
KENNEDY; BRENDA KENT; KELSI  
16 KESSLER; BRIAN KETTERING;  
YVETTE KETTERING; SANA  
17 KHADER; JOANNA KILMA; JAMES  
KIRK; JUDIE JEAN KIRKSEY;  
18 NICOLE KIRSHNER; MATTHEW  
KLEMMER; REBECCA KNEPPER;  
19 KASH KNUDSON; JAZMAN GLOVER  
KOWALCZYK; MICHAEL  
20 KRETSCHMAR; LAUREN  
CHRISTINE KRUEGER; MADISYN  
21 KUNTZ; SCOTT T. KUNTZ;  
BRITTANY LAJOIE; MICHAEL  
22 LANDRON; BROOKE LANEY;  
LOGAN LAPORTE; MITCHELL  
23 LAPORTE; SUSIE LAPORTE;  
RICHARD LARSON; CHELSEA  
24 LAURENT; JAMIE LAVERY;  
NICHOLAŚ LAWLOR; TIFFANI  
25 LAWYER; SUSAN LEARN; CARA  
LEDERGERBER; RUTH LEGASPI;  
26 DELANE LEIVAS; DELANIE LEONE;  
CATHERINE LESTER; HALEY  
27 LEWIS; JUDITH LEYN; LINDA  
LIEWSUWANPHONG; PRIDEE J.  
28 LIEWSUWANPHONG; SOPHIA

1 LIMA; MICHAEL LJUBIC;  
MICHELLE LJUBIC; NIKÓLAS  
2 LJUBIC; ELVIA LLÁMAS; MANUEL  
LLAMAS; DELANEY LLANUSA;  
3 VALARIE LOERA; LEAH  
LOEWENTHAL; ARLA LONCAR;  
4 BLAKE LONCAR; ALMA LOPEZ;  
KIMBERLY LORING; LETICIA  
5 LUNA; A.M., A MINOR; BO MAGEE;  
KELCY MAÍO; CLAUDIA MAJALCA;  
6 EMILY MAJER; BRIAN MALLETT;  
JEFF MANAHAN; KEVIN  
7 MANAHAN; ASHLEY  
MANSPERGER; THOMAS MARTIN;  
8 ANDREW MARTINEZ; ELISA  
MARTINEZ; REGINA R. MARTINEZ;  
9 SALVADOR MARTINEZ; SOMER  
MARTINEZ; TONY MARTINEZ;  
10 WILLIAM MASON; ADAM MATZ;  
HOLLY MAYES; CHARLES  
11 MAYFIELD; CHRISTINE A.  
MAYFIELD; CHARLES MAYFIELD  
12 IV; GENEVIEVE MAZZA; SHANDE  
MCCANN; KAREN MCCORKLE;  
13 DANIEL MCDONALD; LONTISHA  
MCGILBERRY; JULIE MCGINIS;  
14 CHERISH MCGUIRE; STEPHANIE  
MCKIERNAN; CHERYL  
15 MCPHERSON; MARK MCSHANE;  
ASHLEY-DAWN L. MEAD; DAVID  
16 MEDINA; JOHNATHAN DANIEL  
MEDINA; RACHELLE MELOCOTON;  
17 RAYMOND MERKLEY; JIM  
MERRIFIELD; ESTATE OF PATRICIA  
18 MESTAS; DEREK MILLER; KAYLA  
MILLS; MELISSA MINA; KEITH  
19 MINEO; ROSA MIRANDA;  
ALEXANDRIA MITCHELL; DEBRA  
20 MITCHELL; ROBIN MONTER;  
MICHELLE MONTOYA; DODI  
21 MOORE; LISA MORAN; BAMBI  
RENE MOREAU; SCOTT MOREAU;  
22 BRITNIE L. MORGAN; CANDICE  
MORGAN; ROGER MÓZDA; JILLIAN  
23 MUELLER; JONATHAN MULLIGAN;  
LISA MUNOZ; KEVIN MURPHY;  
24 CHRIS W. MURRAY; SHARMEN  
MURRAY; LISA MUZYCKA; JOSEPH  
25 M. NAPOLI; MARISSA NARVAEZ;  
BRITTANY NEGRETTE; JOANNE  
26 NELSON; ROBERT TROY NELSON;  
MARISA NEWMAN; FRANK  
27 NICASSIO; GREGORY NIX; CHERIE  
NOLL; JEANETTE NUGENT; ANA  
28 NUNEZ; LUIS NUNEZ; ELIZABETH

1 OKORO; LINDSAY OKRAY; BRIAN  
O'LEARY; CARRIE O'LEARY;  
2 VIRGINIA OLEN; RENEE OLIVER;  
LEONA OLSON; CYNTHIA OLVERA;  
3 ARIEL ONTMAN; CLAUDIA  
OROPEZA; MICHELLE OROZCO;  
4 THERESA ORTIZ; TAWANYA OTTO;  
DESTINY PACHECO; ELIJAH  
5 PACHECO; LESLIE LYNN PAIZ;  
ROCKY PALERMO; MELANIE  
6 PALMER; SALLY PALMER; HALEY  
PANNO; KYLIE PANNO; COLLIN  
7 PARKER; ESTATE OF RACHAEL  
PARKER; REIGHLINN PARSLEY;  
8 JASON PARSONS; DAVON  
PATTERSON; MICHAEL  
9 PATTERSON II; JANICE  
PENNINGTON; KIMBERLEE  
10 PEOPLES; ELIZABETH PEREZ; PAUL  
PEREZ; ERIC PERKINS; DENINE  
11 PETERS; DANYALE PETERSON;  
NATHAN PHIPPEN; TRAVIS  
12 PHIPPEN; ESTATE OF JOHN  
PHIPPEN; A.P., A MINOR; BRIAN  
13 PICKENS; BERSABE PINEDA; JACK  
PINKSTON; LEONEL M. PLATA;  
14 KARLEE POE; MYLIKA POPE;  
BRENT POPPEN; KEITH POWERS;  
15 JESSICA PRESTEN; SHAWN PRICE;  
DENISE PROVENCIO; KENDALL  
16 QUIROZ; MAGEE R. SEGAL;  
DOMINIC RABANAL; DIEGO  
17 ARMANDO RAMIREZ; FRANCES  
RAMIREZ; KRYSTAL RAMIREZ;  
18 RENEE RAMIREZ; SARA RAMIREZ;  
ERICA RAMOS; CARISSA RASH;  
19 CODY RASH; DAVID RASMUSSEN;  
MICHELLE RASMUSSEN; JACOB  
20 RATLIFF; JACOB RATLIFF; GLENDA  
REBOLLAR; MATTHEW C. REED;  
21 TRICIA SEAN REED; LYNNE REICK;  
BRODY RENAUD; AMBER RENCH;  
22 JASARA REQUEJO; FRANCISCO  
RESENDIZ; BRENDA RESNICK;  
23 KRISTINA REYES; RALPH REYES;  
TARA REYES; MARION REYNOLDS;  
24 WILLIAM REYNOLDS; STEVEN  
RIBOVICH; MARIE RICE; GINA  
25 RICHARD; MINDY RITTER;  
HEATHER RIVERA; RAYMOND A.  
26 RIVERA; JADE RIXEY; KURT  
ROBERTS; MICHAEL ROBERTSON;  
27 TIMOTHY ROBINSON;  
BERNADETTE ROCHA; JENNIFER  
28 ROCKWELL; SAUL RODRIGUEZ;

1 MICHAEL ROGOZIK; MONICA  
2 ROGOZIK; MARCELINA ROJAS;  
3 CLAUDIA ROMERO; HARRY  
4 ROMERO; SUSAN ROSE; ANNA  
5 ROSS; DIXIE ROYBAL; ESTATE OF  
6 CHRISTOPHER ROYBAL; CHANTEL  
7 RUBIO; LISA RUDBERG; LUCIA  
8 RUDELA; LAURA RUIZ; AMANDA  
9 RUMBLE; JOANNE RUSCONI;  
10 MICHAEL COTY RYE; ERIC RYMER;  
11 RONI RYMER; H.S., A MINOR;  
12 ALLISON SAELEE; JUSTINE SALAS;  
13 VICTORIA SALAS; CRYSTAL  
14 SALAZAR; RENEE SALAZAR; SELSO  
15 SALAZAR; AMANDA SALMON;  
16 AMANDA SAMBRANO; JANA E  
17 SAMBRANO; JEFFERY SAMBRANO;  
18 STEPHEN SAMBRANO; ETHAN  
19 SANCHEZ; GEORGE SANCHEZ;  
20 MARIE SANCHEZ; SAVANNAH  
21 SANCHEZ; TREVOR SANDERS;  
22 ERNESTINE SANDOVAL; CALIA  
23 SANFORD; INA SARKISSIAN; NELA  
24 SARKISSIAN; CASEY SCANDLYN;  
25 ILENE SCANDLYN; DAVID  
26 SCANTLIN; MICHELLE SCANTLIN;  
27 RYAN L. SCANTLIN; DAVID  
28 SCHARMACK; IRENE SCHARMACK;  
REBEKAH SCHEUSSLER; ALICE  
SCHMIDT; JEREMY SCHMIDT ; LISA  
SCHNEIDER; MARK SCHNEIDER;  
MICHELLE SCHONEMAN; ROBERT  
SCHRODE; JONATHAN SCHUSSLER;  
MICHAEL SCOTT; JANET SEEGER;  
ALICIA SEGOVIA; GILBERT  
SEGOVIA; CHERYL SEGUIN; FRED  
SEGUIN; TOMMIE SERRANO;  
DAVID SHERIFF; REMO SHEITH;  
MICHAEL K. SHOLAN; ANTHONY  
SILVA; ELAINE SILVESTRE;  
CHEYENNE NICOLE SIMON; HALEY  
SISNEROS; BUDDY SKIDMORE; LEE  
SKOLNICK; SHELBY SLIFKA;  
JONATHAN SLONIGER; STEPHANIE  
SMARKER; KAREN ELAINE  
SMERBER; AMBER SMITH; DANA L.  
SMITH; RYAN SMITH; RYAN ONEIL  
SMITH; DANIELLE SMUDDE; MISTY  
SNITZER; STEPHANIE  
SOTOMAYOR; KATEY SOUZA;  
CHERYL SPENCER; KEOSCHA E.  
SPENCER; KORTNEY SPENCER;  
MICHELLE E. SPENCER;  
SAVANNAH SPENCER; STEPHANIE  
SPENCER; SUZANNE SPENCER;

1 DAVID SPRING; SHANNON  
2 SPRINGER; TROY SPRINGER;  
3 ROBERT STAGGS; DANIEL  
4 STAPLES; SAMUEL STAPLES;  
5 KRISTINA STAPLES; DAVID  
6 STATTER; VERONICA STATTER;  
7 JEFFREY STEFFENS; KATIE STERN;  
8 PARKER STEVENS; STEVE  
9 STEWART; TAMARA J. STEWART;  
10 MICHAELA STILWELL; DANA  
11 STOUT-WILSON; LINDSAY  
12 STRAGIER; JOSHUA K. STRATTON;  
13 AMBER STREID; SHANDI STRONG;  
14 MICHELLE STUEBE; SUSANNA  
15 SUARD; CLINT SUNDEEN; KELLIE  
16 SUNDEEN; KYLE C. SUNDEEN;  
17 BRANDI SWAN; NICHOLAS  
18 SWARTZ; YVETTE SWARTZ;  
19 LYNNSEY SWEET; B.T., A MINOR;  
20 ERIN TABER; RUBEN  
21 TALAMANTEZ; MARIE TAUTRIM;  
22 MICHAEL TAUTRIM; BRIANNA  
23 TAYLOR; JASON TAYLOR; JOHN  
24 TAYLOR; TIFFANY TAYLOR;  
25 DESIREE TEMPLE; ROCKY  
26 TEPESANO; JANELLE TERKEURST;  
27 DEBORAH THOMAS; JEFFREY  
28 THOMAS; EVAN TILLEMA;  
LINDSAY TILLEMA; JENNIFER  
TILLMAN; JOSHUA TINOCO;  
LANNA TINOCO; SARAH  
TISCARENO; ALFREDO TOLEDO;  
KENNETH TONKOVICH; JOHNNY  
TOSCANO; RHONDA TRASK;  
ROBERT TREMATERRA; HAMIDA  
TRUJILLO; JACQUELYN TRUJILLO;  
LIGIA URIARTE; ALEJANDRA  
URIBE; RICARDO URIBE; LISA  
VALDES; ERIN VALENZUELA;  
JENNIFER VAN VLYMEN;  
NATHALIE VANDERSTAY; GERARD  
VANGERWEN; AMY VIGER;  
JEREMY VIGER; DILLON  
VILLALOBOS; DON VILLALOBOS;  
LISA VILLALOBOS; PARISSA  
VILLALOBOS; PETER VIOLAS;  
CECELIA JOYA WALACH; REBECCA  
WALTMAN; DONALD WASHBROOK  
JR.; AMANDA WECHSLER; CARRIE  
WEIDENKELLER; TRICIA WELCH;  
KEVIN WELLS; SERENA WEST;  
CHRISTOPHER WETZEL; GINA B.  
WHEELER; DEREK WHITE; GREG  
WHITE; VICTORIA WHITE;  
PRESLEY WICK; TRACIE P. WIGHT;

1 STACY WILBANKS; REBECCA  
WILKEN; ANNA WILLIAMS; JOSEPH  
2 N. WILLIAMS; STANLEY  
WILLIAMS; JAMES WILLIAMSON;  
3 MARCUS WILSON; MCKAYLA  
WILSON; KATELYN WING; KERRY  
4 WISDEN; ANTHONY WOOD;  
SHAWNA WOOD; JAEGER  
5 WOODSON; JADE WRIGHT; JEFF  
WRIGHT; TOME XAYAVONG;  
6 BRETT YEAKEL; SHAWNA YORK;  
BRANDON YOUNG; LAURA  
7 ZARATE; SHANNON ZEEMAN; AND  
SHARLA ZOTEA,

8  
9 Defendants.  
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**INTRODUCTION**

1  
2 1. On October 1, 2017, Stephen Paddock carried out a mass attack at the  
3 Route 91 Harvest Festival in Las Vegas, Nevada.

4 2. Paddock intended to inflict mass injury, death and destruction. He  
5 killed 58 persons and injured some 500 others. Paddock’s attack resulted in the  
6 highest number of deaths of any mass shooting in the Nation’s history.

7 3. Security for the concert was provided by Contemporary Services  
8 Corporation, whose security services have been certified by the Secretary of  
9 Homeland Security for protecting against and responding to acts of mass injury and  
10 destruction.

11 4. Recognizing the national interest in such events, and in the  
12 development and deployment of services certified by the Secretary of Homeland  
13 Security to prevent and respond to such events, Congress has provided original and  
14 exclusive federal jurisdiction for any claims of injuries arising out of or relating to  
15 mass violence where services certified by the Department of Homeland Security  
16 were deployed.

17 5. Plaintiff MGM Resorts Festival Grounds, LLC owns and operates the  
18 Las Vegas Village, at 3901 South Las Vegas Boulevard, Las Vegas, Nevada 89119,  
19 where the Route 91 Harvest Festival was held. Plaintiff Mandalay Bay, LLC owns  
20 and operates the Mandalay Bay resort, which is adjacent to Las Vegas Village.  
21 Plaintiff MGM Resorts International is the parent corporation, with 100% interest in  
22 Plaintiff Mandalay Resort Group and an indirect 100% interest in Mandalay Bay,  
23 LLC, and MGM Resorts Festival Grounds. Plaintiff MGM Resorts Venue  
24 Management, LLC is a Nevada limited liability company.

25 6. Paddock carried out his mass attack on the concert from a room on the  
26 32nd floor of the Mandalay Bay resort.

27 7. Following Paddock’s attack, over 2,500 individuals (“Claimants”) have  
28 brought lawsuits, or threatened to bring lawsuits, against Plaintiffs MGM Resorts

1 Festival Grounds, LLC, MGM Resorts International, Mandalay Bay, LLC,  
2 Mandalay Resort Group, and MGM Resorts Venue Management, LLC (collectively,  
3 “the MGM Parties”), alleging that the MGM Parties (among others) are liable for  
4 deaths, injuries, and emotional distress resulting from Paddock’s attack. Claimants  
5 subsequently voluntarily dismissed these cases before they could be resolved,  
6 apparently with the intent of refileing.

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

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

18       10.       In the case of Paddock’s mass attack, certified technologies or services  
19 were deployed by a professional security company, Contemporary Services  
20 Corporation (“CSC”), which was employed as the Security Vendor for the Route 91  
21 concert. As alleged in more detail below, Paddock’s mass attack meets the  
22 requirements of the SAFETY Act as set forth in the statute and the Regulations  
23 promulgated by the Department of Homeland Security.

24       11.       Defendants’ actual and threatened lawsuits implicate the services  
25 provided by CSC because they implicate security at the concert, for example  
26 security training, emergency response, evacuation, and adequacy of egress.

27       12.       As a result, the SAFETY Act applies to and governs all actions and any  
28 claims arising out of or relating to Paddock’s mass attack. There are five key

1 aspects of the Act and implementing regulations promulgated by the Department of  
2 Homeland Security as authorized and contemplated by the SAFETY Act. 6 C.F.R.  
3 § 25.1 et seq.

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

8 14. Second, the SAFETY Act expressly provides the federal courts with  
9 “original and exclusive jurisdiction over all actions for any claim for loss” arising  
10 out of or related to such an attack. 6 U.S.C. § 442(a)(2).

11 15. Third, as confirmed by the Secretary’s implementing regulations  
12 promulgated after enactment of the SAFETY Act, the federal cause of action created  
13 by the statute is the exclusive claim available in such circumstances. 6 U.S.C.  
14 § 442(a)(1). The regulations state: “There shall exist only one cause of action for  
15 loss of property, personal injury, or death for performance or non-performance of  
16 the Seller’s Qualified Anti–Terrorism Technology in relation to an Act of  
17 Terrorism.” 6 C.F.R. § 25.7(d).

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

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

28

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

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

14 20. By this action, the MGM Parties seek a declaratory judgment and  
15 further relief pursuant to the Declaratory Judgment Act, 28 U.S.C. §§ 2201 and  
16 2202, that the MGM parties cannot be held liable to Defendants for deaths, injuries,  
17 or other damages arising from Paddock’s attack.

18 **PARTIES**

19 **A. PLAINTIFFS**

20 21. Plaintiff MGM RESORTS INTERNATIONAL is a Delaware  
21 corporation with its principal place of business in Las Vegas, Nevada. Plaintiff  
22 MGM RESORTS INTERNATIONAL is a citizen of Delaware and Nevada for  
23 purposes of diversity jurisdiction.

24 22. Plaintiff MANDALAY RESORT GROUP is a Nevada corporation  
25 with its principal place of business in Las Vegas, Nevada. MANDALAY RESORT  
26 GROUP is a citizen of Nevada for purposes of diversity jurisdiction.

27 23. Plaintiff, MANDALAY BAY, LLC f/k/a MANDALAY CORP. is a  
28 Nevada limited liability company with a single member, Mandalay Resort

1 Group. Plaintiff MANDALAY BAY, LLC f/k/a MANDALAY CORP is a citizen  
2 of Nevada for purposes of diversity jurisdiction.

3 24. Plaintiff MGM RESORTS FESTIVAL GROUNDS, LLC is a Nevada  
4 limited liability company with a single member, Mandalay Resort Group. Plaintiff  
5 MGM RESORTS FESTIVAL GROUNDS, LLC is a citizen of Nevada for purposes  
6 of diversity jurisdiction.

7 25. Plaintiff MGM RESORTS VENUE MANAGEMENT, LLC is a  
8 Nevada limited liability company with a single member, MGM Resorts  
9 International. Plaintiff MGM RESORTS VENUE MANAGEMENT, LLC is a  
10 citizen of Nevada and Delaware for purposes of diversity jurisdiction.

11 **B. DEFENDANTS**

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

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

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

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

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

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

23           32. Plaintiffs are informed and believe, and thereon allege, that defendant  
24 Robert Aguilar is a resident of the State of California. Defendant has previously  
25 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
26 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
27 in Las Vegas, Nevada. Based on the allegations in that lawsuit, *Aguilar v. MGM*,

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1 Plaintiffs are informed and believe that Defendant is a resident of the County of Los  
2 Angeles, State of California.

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

11 34. Plaintiffs are informed and believe, and thereon allege that on October  
12 1, 2017, decedent Hannah Ahlers, was a resident of the State of California.  
13 Plaintiffs are informed and believe and thereon allege that Defendants, the Estate of  
14 Hannah Ahlers and Brian Ahlers (surviving husband, heir and successor-in-interest)  
15 have, through counsel, made claims against Plaintiffs based upon the October 1,  
16 2017, shooting incident in Las Vegas, Nevada, or, alternatively, has indicated an  
17 intent to make such claims in the future (such as by way of the filing of a separate  
18 lawsuit – now dismissed, by way of a letter of representation of counsel, or by way  
19 of an evidence preservation letter from counsel).

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

24 36. Plaintiffs are informed and believe, and thereon allege, that defendant  
25 Renee Alcalá is a resident of the State of California. Defendant has previously filed  
26 a lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
27 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in  
28 Las Vegas, Nevada. Based on the allegations in that lawsuit, *Huggins, et al. v.*

1 *MGM*, filed February 14, 2018, in the Los Angeles Superior Court (“LASC”), case  
2 number BC694788, Plaintiffs are informed and believe that Defendant is a resident  
3 of the County of Los Angeles, State of California.

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

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

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

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

28

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

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

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

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

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

25           46. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Lindsey Alvarez is a resident of the State of California. Defendant has previously  
27 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
28 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident

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

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

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

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

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

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

26 52. Plaintiffs are informed and believe and thereon allege that Defendant  
27 Shannon Anderson is a resident of the State of California. Defendant has, through  
28

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

3 53. Plaintiffs are informed and believe and thereon allege that Defendant  
4 Jennifer Aparicio is a resident of the State of California, County of Los Angeles.  
5 Defendant has, through counsel, asserted or threatened to assert claims against  
6 Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

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

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

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

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

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

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

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

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

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

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

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

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

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

27           67. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Ted Banta is a resident of the State of California. Defendant has previously filed a

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

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

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

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

17 71. Plaintiffs are informed and believe, and thereon allege that on October  
18 1, 2017, decedent Carrie Barnette, was a resident of the State of California.  
19 Plaintiffs are informed and believe and thereon allege that Defendant, the Estate of  
20 Carrie Barnette, has, through counsel, made claims against Plaintiffs based upon the  
21 October 1, 2017, shooting incident in Las Vegas, Nevada, or, alternatively, has  
22 indicated an intent to make such claims in the future (such as by way of the filing of  
23 a separate lawsuit – now dismissed, by way of a letter of representation of counsel,  
24 or by way of an evidence preservation letter from counsel).

25 72. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Tinella Barranco is a resident of the State of California. Defendant has previously  
27 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
28 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident

1 in Las Vegas, Nevada. Based on the allegations in that lawsuit, *Abraham, et al. v.*  
2 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case  
3 number BC684047, Plaintiffs are informed and believe that Defendant is a resident  
4 of the County of Los Angeles, State of California.

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

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

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

26 76. Plaintiffs are informed and believe and thereon allege that Defendant  
27 Courtney Bean is a resident of the State of California. Defendant has, through  
28

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

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

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

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

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

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

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

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

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

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

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

27           87. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Carly Betzler is a resident of the State of California. Defendant has, through

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

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

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

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

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

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

27 93. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Dylan Boden is a resident of the State of California. Defendant has, through counsel,

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

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

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

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

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

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

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

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

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

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

19           103. Plaintiffs are informed and believe, and thereon allege that on October  
20 1, 2017, decedent Candice Bowers, was a resident of the State of California.  
21 Plaintiffs are informed and believe and thereon allege that the Defendants, the Estate  
22 of Candice Bowers, Kurtis Anthony Bowers (surviving son, heir, and successor-in-  
23 interest), K.L.A. (a minor, heir, and successor-in-interest), and A.R.B. (a minor,  
24 heir, and successor-in-interest), are residents of the County of Los Angeles, State of  
25 California, who have, through counsel, made claims against Plaintiffs based upon  
26 the October 1, 2017, shooting incident in Las Vegas, Nevada, by way of the filing of  
27 a separate lawsuit – now dismissed). The residency of these Defendants was  
28 represented to a court in a Complaint in the dismissed action *Bowers, et al. v. MGM*,

1 filed May 10, 2018, in the Los Angeles Superior Court (“LASC”), case number  
2 BC705803.

3 104. Plaintiffs are informed and believe, and thereon allege, that defendant  
4 Vedamay Bradford is a resident of the State of California. Defendant has previously  
5 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
6 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
7 in Las Vegas, Nevada. Based on the allegations in that lawsuit, *Vanderstay, et al. v.*  
8 *MGM*, filed November 13, 2017, in the Los Angeles Superior Court (“LASC”), case  
9 number BC683403, Plaintiffs are informed and believe that Defendant is a resident  
10 of the County of Los Angeles, State of California.

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

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

23 107. Plaintiffs are informed and believe, and thereon allege, that defendant  
24 Robert (Bobby) Bradshaw is a resident of the State of California. Defendant has  
25 previously filed a lawsuit (which was subsequently voluntarily dismissed) against  
26 one or more of the Plaintiffs, asserting claims arising from the October 1, 2017,  
27 shooting incident in Las Vegas, Nevada. Based on the allegations in that lawsuit,  
28 *Mayfield, et al. v. MGM*, filed December 15, 2017, in the Los Angeles Superior

1 Court (“LASC”), case number BC687120, Plaintiffs are informed and believe that  
2 Defendant is a resident of the County of Ventura, State of California.

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

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

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

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

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

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

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

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

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

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

27           118. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Tayler Brunner is a resident of the State of California. Defendant has, through

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

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

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

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

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

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

26 124. Plaintiffs are informed and believe, and thereon allege, that defendant  
27 Hector Caballero is a resident of the State of California. Defendant has previously  
28 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more

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

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

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

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

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

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

1 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case  
2 number BC684047, Plaintiffs are informed and believe that Defendant is a resident  
3 of the County of Los Angeles, State of California.

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

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

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

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

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

28

1           135. Plaintiffs are informed and believe and thereon allege that Defendant  
2 Brittnie Nicole Cardenas is a resident of the State of California, County of Los  
3 Angeles. Defendant has, through counsel, asserted or threatened to assert claims  
4 against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
5 Nevada.

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

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

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

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

28

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

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

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

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

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

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

27 146. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Michelle Ann Cashman is a resident of the State of California. Defendant has

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

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

10 148. Plaintiffs are informed and believe, and thereon allege that on October  
11 1, 2017, decedent Andrea Castilla, was a resident of the State of California.  
12 Plaintiffs are informed and believe and thereon allege that Defendants, the Estate of  
13 Andrea Castilla, and Gus Castilla (surviving father, heir, and successor-in-interest to  
14 decedent) have, through counsel, made claims against Plaintiffs based upon the  
15 October 1, 2017, shooting incident in Las Vegas, Nevada, or, alternatively, have  
16 indicated an intent to make such claims in the future (such as by way of the filing of  
17 a separate lawsuit – now dismissed, by way of a letter of representation of counsel,  
18 or by way of an evidence preservation letter from counsel). The Defendants are  
19 residents of the County of Orange, State of California, and the residency of these  
20 Defendants was identified to a court in a Complaint in the dismissed action *G.*  
21 *Castilla v. MGM*, filed October 17, 2017, in the Los Angeles Superior Court  
22 (“LASC”), case number BC679987.

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

1 number BC684047, Plaintiffs are informed and believe that Defendant is a resident  
2 of the County of Los Angeles, State of California.

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

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

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

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

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

27 155. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Robert Cesario is a resident of the State of California. Defendant has, through

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

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

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

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

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

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

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

27 162. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Fabiola Cintron is a resident of the State of California. Defendant has previously

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

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

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

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

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

27 167. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Donna Cochran is a resident of the State of California. Defendant has previously

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

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

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

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

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

27 172. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Ronaldo Concepcion is a resident of the State of California. Defendant has

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

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

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

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

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

27 177. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Wendy Cooper is a resident of the State of California. Defendant has, through

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

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

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

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

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

27 182. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Tyler Craig is a resident of the State of California, County of Los Angeles.

1 Defendant has, through counsel, asserted or threatened to assert claims against  
2 Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

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

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

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

19 186. Plaintiffs are informed and believe, and thereon allege, that defendant  
20 Anthony Crisci is a resident of the State of California. Defendant has previously  
21 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
22 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
23 in Las Vegas, Nevada, in *Crisci v. MGM*, filed November 15, 2017, in Clark County  
24 District Court (“Clark County”), case number A-17-764709-C.

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

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

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

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

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

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

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

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

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

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

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

19           198. Plaintiffs are informed and believe, and thereon allege, that defendant  
20 Lisa Dancel is a resident of the State of California. Defendant has previously filed a  
21 lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
22 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in  
23 Las Vegas, Nevada, in *Dancel, et al. v. MGM*, filed October 18, 2017, in the Los  
24 Angeles Superior Court (“LASC”), case number BC680370.

25           199. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Lisa Marie Daniels is a resident of the State of California. Defendant has previously  
27 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
28 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident

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

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

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

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

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

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

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

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

13           207. Plaintiffs are informed and believe, and thereon allege that on October  
14 1, 2017, decedent Thomas Day, Jr., was a resident of the State of California.  
15 Plaintiffs are informed and believe and thereon allege that Defendants, the Estate of  
16 Thomas Day, Jr., and Thomas Day, Sr. (surviving father, heir and successor-in-  
17 interest to decedent), Kelsey Day (surviving daughter, heir and successor-in-interest  
18 to decedent), Nolan Day (surviving son, heir and successor-in-interest to decedent)  
19 and Whitney Day (surviving daughter, heir and successor-in-interest to decedent)  
20 have, through counsel, made claims against Plaintiffs based upon the October 1,  
21 2017, shooting incident in Las Vegas, Nevada, or, alternatively, have indicated an  
22 intent to make such claims in the future (such as by way of the filing of a separate  
23 lawsuit – now dismissed, by way of a letter of representation of counsel, or by way  
24 of an evidence preservation letter from counsel).

25           208. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Cynthia Dearing is a resident of the State of California. Defendant has previously  
27 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
28 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident

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

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

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

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

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

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

28

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

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

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

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

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

25           219. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Mikaela Diaz is a resident of the State of California. Defendant has previously filed  
27 a lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
28 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in

1 Las Vegas, Nevada. Based on the allegations in that lawsuit, *Abraham, et al. v.*  
2 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case  
3 number BC684047, Plaintiffs are informed and believe that Defendant is a resident  
4 of the County of Ventura, State of California.

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

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

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

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

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

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

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

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

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

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

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

25           231. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Allison Dorr is a resident of the State of California. Defendant has previously filed a  
27 lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
28 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in

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

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

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

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

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

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

27 237. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Kendall Dusenberry is a resident of the State of California. Defendant has

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

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

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

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

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

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

1 number BC684047, Plaintiffs are informed and believe that Defendant is a resident  
2 of the County of Los Angeles, State of California.

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

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

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

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

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

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

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

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

11           251. Plaintiffs are informed and believe and thereon allege that Defendant  
12 Soraya M. Espinoza is a resident of the State of California, County of Los Angeles.  
13 Defendant has, through counsel, asserted or threatened to assert claims against  
14 Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

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

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

25           254. Plaintiffs are informed and believe, and thereon allege that on October  
26 1, 2017, decedent Stacey Etcheber, was a resident of the State of California.  
27 Plaintiffs are informed and believe and thereon allege that Defendants, the Estate of  
28 Stacey Etcheber and Vincent Etcheber (surviving husband, heir and successor-in-

1 interest) have, through counsel, made claims against Plaintiffs based upon the  
2 October 1, 2017, shooting incident in Las Vegas, Nevada, or, alternatively, have  
3 indicated an intent to make such claims in the future (such as by way of the filing of  
4 a separate lawsuit – now dismissed, by way of a letter of representation of counsel,  
5 or by way of an evidence preservation letter from counsel).

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

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

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

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

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

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

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

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

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

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

28

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

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

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

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

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

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

27           270. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Brooke Fincher is a resident of the State of California. Defendant has previously

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

27           286. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Brittany Friend is a resident of the State of California. Defendant has previously

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

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

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

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

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

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

27 292. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Tina Galarza is a resident of the State of California. Defendant has, through

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

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

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

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

21 296. Plaintiffs are informed and believe, and thereon allege that on October  
22 1, 2017, decedent Keri Galvan, was a resident of the State of California. Plaintiffs  
23 are informed and believe and thereon allege that Defendants, the Estate of Keri  
24 Galvan, Justin Galvan (surviving spouse, heir, and successor-in-interest to  
25 decedent), R.G. (a minor), P.G. (a minor), and P.G. (a minor), have, through  
26 counsel, made claims against Plaintiffs based upon the October 1, 2017, shooting  
27 incident in Las Vegas, Nevada, or, alternatively, have indicated an intent to make  
28 such claims in the future (such as by way of the filing of a separate lawsuit – now

1 dismissed, by way of a letter of representation of counsel, or by way of an evidence  
2 preservation letter from counsel). The Defendants are residents of the County of Los  
3 Angeles, State of California and the residency of these Defendants was identified to  
4 a court in a Complaint in the dismissed action *Galvan, et al. v. Live Nation*, filed  
5 December 7, 2017, in the Los Angeles Superior Court (“LASC”), case number  
6 BC686248.

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

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

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

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

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

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

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

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

13           305. Plaintiffs are informed and believe, and thereon allege, that defendant  
14 Ellenor Gargano is a resident of the State of California. Defendant has previously  
15 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
16 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
17 in Las Vegas, Nevada, in *Gargano v. Mandalay Bay*, filed February 2, 2018, in  
18 Clark County District Court (“Clark County”), case number A-18-768832-C.

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

23           307. Plaintiffs are informed and believe, and thereon allege, that defendant  
24 Paige Gasper is a resident of the State of California. Defendant has previously filed  
25 two lawsuits (which were subsequently voluntarily dismissed) against one or more  
26 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
27 in Las Vegas, Nevada, in *Gasper v. MGM*, filed October 10, 2017, in Clark County  
28 District Court (“Clark County”), case number A-17-762858, and in *Gasper, et al. v.*

1 *MGM*, filed November 20, 2017, in Los Angeles Superior Court (“LASC”), case  
2 number BC684143.

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

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

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

25 311. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Meilin Gibbens is a resident of the State of California. Defendant has previously  
27 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
28 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident

1 in Las Vegas, Nevada. Based on the allegations in that lawsuit, *Abraham, et al. v.*  
2 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case  
3 number BC684047, Plaintiffs are informed and believe that Defendant is a resident  
4 of the County of Los Angeles, State of California.

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

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

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

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

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

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

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

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

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

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

27           322. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Steven Gomez is a resident of the State of California. Defendant has previously filed

1 a lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
2 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in  
3 Las Vegas, Nevada, in *Mayfield, et al. v. MGM*, filed December 15, 2017, in the Los  
4 Angeles Superior Court (“LASC”), case number BC687120.

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

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

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

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

24 327. Plaintiffs are informed and believe and thereon allege that Defendant  
25 Jesus Vincent Gonzalez is a resident of the State of California, County of Los  
26 Angeles. Defendant has, through counsel, asserted or threatened to assert claims  
27 against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,  
28 Nevada.

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

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

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

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

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

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

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

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

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

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

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

27           339. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Mikerra Guerrero is a resident of the State of California. Defendant has, through

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

3 340. Plaintiffs are informed and believe and thereon allege that Defendant  
4 Trisha Guerrero is a resident of the State of California, County of Los Angeles.  
5 Defendant has, through counsel, asserted or threatened to assert claims against  
6 Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

7 341. Plaintiffs are informed and believe, and thereon allege that on October  
8 1, 2017, decedent Rocio Guillen, was a resident of the State of California. Plaintiffs  
9 are informed and believe and thereon allege that Defendants, the Estate of Rocio  
10 Guillen, Christopher Jaksha (successor-in-interest to decedent), S.J. (a minor,  
11 successor-in-interest), and A.J. (a minor, and successor-in-interest), who have,  
12 through counsel, made claims against Plaintiffs based upon the October 1, 2017,  
13 shooting incident in Las Vegas, Nevada, or, alternatively, have indicated an intent to  
14 make such claims in the future (such as by way of the filing of a separate lawsuit –  
15 now dismissed, by way of a letter of representation of counsel, or by way of an  
16 evidence preservation letter from counsel). The Defendants are residents of the  
17 County of Riverside, State of California and the residency of these Defendants was  
18 identified to a court in a Complaint in the dismissed action *Jaksha, et al. v. MGM*,  
19 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case  
20 number BC684048.

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

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

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

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

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

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

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

25           349. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Travis Hall is a resident of the State of California. Defendant has previously filed a  
27 lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
28 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in

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

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

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

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

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

25 354. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Regina Anne Harris is a resident of the State of California. Defendant has previously  
27 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
28 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident

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

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

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

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

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

27 359. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Kristina Hayden is a resident of the State of California. Defendant has, through

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

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

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

13 362. Plaintiffs are informed and believe, and thereon allege, that defendant  
14 Bryce Heathcoat is a resident of the State of California. Defendant has previously  
15 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
16 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
17 in Las Vegas, Nevada, in *Dancel, et al. v. MGM*, filed October 18, 2017, in the Los  
18 Angeles Superior Court (“LASC”), case number BC680370.

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

25 364. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Steven Heirshberg is a resident of the State of California. Defendant has previously  
27 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
28 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident

1 in Las Vegas, Nevada. Based on the allegations in that lawsuit, *Mayfield, et al. v.*  
2 *MGM*, filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case  
3 number BC687120, Plaintiffs are informed and believe that Defendant is a resident  
4 of the County of Los Angeles, State of California.

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

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

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

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

27 369. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Andrea Henning is a resident of the State of California. Defendant has previously

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

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

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

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

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

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

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

11           376. Plaintiffs are informed and believe, and thereon allege, that defendant  
12 Diane Hill is a resident of the State of California. Defendant has previously filed a  
13 lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
14 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in  
15 Las Vegas, Nevada, in *Hill v. MGM*, filed February 12, 2018, in Clark County  
16 District Court (“Clark County”), case number A-18-769385-C.

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

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

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

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

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

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

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

25           384. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Leigh Ann Hodgson is a resident of the State of California. Defendant has  
27 previously filed a lawsuit (which was subsequently voluntarily dismissed) against  
28 one or more of the Plaintiffs, asserting claims arising from the October 1, 2017,

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

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

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

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

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

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

26 390. Plaintiffs are informed and believe and thereon allege that Defendant  
27 Cindy Holguin is a resident of the State of California. Defendant has, through  
28

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

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

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

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

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

28

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

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

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

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

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

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

27           401. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Debra Hudson is a resident of the State of California. Defendant has previously filed

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

5 402. Plaintiffs are informed and believe, and thereon allege, that defendant  
6 Leanne Huggins is a resident of the State of California. Defendant has previously  
7 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
8 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
9 in Las Vegas, Nevada. Based on the allegations in that lawsuit, *Huggins, et al. v.*  
10 *MGM*, filed February 14, 2018, in the Los Angeles Superior Court (“LASC”), case  
11 number BC694788, Plaintiffs are informed and believe that Defendant is a resident  
12 of the County of Los Angeles, State of California.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

27           423. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Shaheed Jones is a resident of the State of California. Defendant has previously filed

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

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

11 425. Plaintiffs are informed and believe, and thereon allege, that defendant  
12 Ted Kalnas is a resident of the State of California. Defendant has previously filed a  
13 lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
14 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in  
15 Las Vegas, Nevada. Based on the allegations in that lawsuit, *Vanderstay, et al. v.*  
16 *MGM*, filed November 13, 2017, in the Los Angeles Superior Court (“LASC”),  
17 Plaintiffs are informed and believe that Defendant is a resident of the County of Los  
18 Angeles, State of California.

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

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

27 428. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Michael Kaplish is a resident of the State of California. Defendant has previously

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

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

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

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

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

28

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

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

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

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

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

27 438. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Brian Kettering is a resident of the State of California. Defendant has, through

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

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

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

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

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

27 443. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Judie Jean Kirksey is a resident of the State of California. Defendant has previously

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

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

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

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

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

25 448. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Jazman Glover Kowalczyk is a resident of the State of California. Defendant has  
27 previously filed a lawsuit (which was subsequently voluntarily dismissed) against  
28 one or more of the Plaintiffs, asserting claims arising from the October 1, 2017,

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

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

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

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

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

27 453. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Brittany LaJoie is a resident of the State of California. Defendant has previously

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

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

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

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

25 457. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Mitchell LaPorte is a resident of the State of California. Defendant has previously  
27 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
28 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident

1 in Las Vegas, Nevada. Based on the allegations in that lawsuit, *Mayfield, et al. v.*  
2 *MGM*, filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case  
3 number BC687120, Plaintiffs are informed and believe that Defendant is a resident  
4 of the County of Los Angeles, State of California.

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

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

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

25 461. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Jamie Lavery is a resident of the State of California. Defendant has previously filed  
27 a lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
28 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in

1 Las Vegas, Nevada, in *Mayfield, et al. v. MGM*, filed December 15, 2017, in the Los  
2 Angeles Superior Court (“LASC”), case number BC687120.

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

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

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

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

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

27 467. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Delane Leivas is a resident of the State of California, County of Ventura. Defendant

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

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

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

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

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

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

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

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

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

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

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

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

26           479. Plaintiffs are informed and believe, and thereon allege, that defendant  
27 Manuel Llamas is a resident of the State of California. Defendant has previously  
28 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more

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

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

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

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

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

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

24 485. Plaintiffs are informed and believe, and thereon allege, that defendant  
25 Alma Lopez is a resident of the State of California. Defendant has previously filed a  
26 lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
27 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in  
28

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

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

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

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

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

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

27 491. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Claudia Majalca is a resident of the State of California. Defendant has previously

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

27           508. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Charles Mayfield is a resident of the State of California. Defendant has previously

1 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
2 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
3 in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*, filed December 15, 2017, in the  
4 Los Angeles Superior Court (“LASC”), case number BC687120.

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

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

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

27 512. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Genevieve Mazza is a resident of the State of California. Defendant has previously

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

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

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

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

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

26 517. Plaintiffs are informed and believe and thereon allege that Defendant  
27 Julie McGinis is a resident of the State of California. Defendant has, through  
28

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

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

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

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

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

21 522. Plaintiffs are informed and believe, and thereon allege, that defendant  
22 Ashley-Dawn L. Mead is a resident of the State of California. Defendant has  
23 previously filed a lawsuit (which was subsequently voluntarily dismissed) against  
24 one or more of the Plaintiffs, asserting claims arising from the October 1, 2017,  
25 shooting incident in Las Vegas, Nevada, in *Gasper, et al. v. MGM*, filed November  
26 20, 2017, in Los Angeles Superior Court (“LASC”), case number BC684143.

27 523. Plaintiffs are informed and believe and thereon allege that Defendant  
28 David Medina is a resident of the State of California. Defendant has, through

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

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

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

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

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

25 528. Plaintiffs are informed and believe, and thereon allege that on October  
26 1, 2017, decedent Patricia Mestas, was a resident of the State of California.  
27 Plaintiffs are informed and believe and thereon allege that Defendants, the Estate of  
28 Patricia Mestas and Jeremy Schmidt (surviving son, heir and successor-in-interest)

1 have, through counsel, made claims against Plaintiffs based upon the October 1,  
2 2017, shooting incident in Las Vegas, Nevada, or, alternatively, have indicated an  
3 intent to make such claims in the future (such as by way of the filing of a separate  
4 lawsuit – now dismissed, by way of a letter of representation of counsel, or by way  
5 of an evidence preservation letter from counsel).

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

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

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

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

26 533. Plaintiffs are informed and believe and thereon allege that Defendant  
27 Rosa Miranda is a resident of the State of California. Defendant has, through  
28

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

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

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

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

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

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

27 539. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Bambi Rene Moreau is a resident of the State of California. Defendant has

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

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

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

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

26 543. Plaintiffs are informed and believe and thereon allege that Defendant  
27 Roger Mozda is a resident of the State of California. Defendant has, through  
28

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

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

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

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

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

21 548. Plaintiffs are informed and believe and thereon allege that Defendant  
22 Chris W. Murray is a resident of the State of California, County of Los Angeles.  
23 Defendant has, through counsel, asserted or threatened to assert claims against  
24 Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

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

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

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

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

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

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

27           555. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Robert Troy Nelson is a resident of the State of California. Defendant has previously

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

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

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

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

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

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

27 561. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Ana Nunez is a resident of the State of California. Defendant has, through counsel,

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

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

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

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

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

27 566. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Carrie O'Leary is a resident of the State of California. Defendant has previously

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

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

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

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

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

27 571. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Ariel Ontman is a resident of the State of California, County of Los Angeles.

1 Defendant has, through counsel, asserted or threatened to assert claims against  
2 Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

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

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

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

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

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

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

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

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

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

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

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

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

9           584. Plaintiffs are informed and believe, and thereon allege that on October  
10 1, 2017, decedent Rachael Parker, was a resident of the State of California.  
11 Plaintiffs are informed and believe and thereon allege that Defendants, the Estate of  
12 Rachael Parker, Collin Parker (surviving father, heir and successor-in-interest), and  
13 Robin Monter (surviving mother, heir and successor-in-interest) have, through  
14 counsel, made claims against Plaintiffs based upon the October 1, 2017, shooting  
15 incident in Las Vegas, Nevada, or, alternatively, have indicated an intent to make  
16 such claims in the future (such as by way of the filing of a separate lawsuit – now  
17 dismissed, by way of a letter of representation of counsel, or by way of an evidence  
18 preservation letter from counsel).

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

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

27           587. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Davon Patterson is a resident of the State of California. Defendant has, through

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

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

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

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

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

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

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

27 594. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Denine Peters is a resident of the State of California. Defendant has previously filed

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

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

13 596. Plaintiffs are informed and believe, and thereon allege that on October  
14 1, 2017, decedent John Phippen, was a resident of the State of California. Plaintiffs  
15 are informed and believe and thereon allege that Defendants, the Estate of John  
16 Phippen, Amanda Davis (surviving daughter, heir and successor-in interest to  
17 decedent), Travis Phippen (surviving son, heir and successor-in interest to  
18 decedent), Nathan Phippen (surviving son, heir and successor-in interest to  
19 decedent), A.P. (minor and successor in interest to decedent) are residents of the  
20 State of California. Defendants have, through counsel, made claims against  
21 Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada,  
22 or, alternatively, have indicated an intent to make such claims in the future (such as  
23 by way of the filing of a separate lawsuit – now dismissed, by way of a letter of  
24 representation of counsel, or by way of an evidence preservation letter from  
25 counsel). The residency of these Defendants in the County of Los Angeles, State of  
26 California was represented to a court in a Complaint in dismissed action *Mayfield, et*  
27 *al. v. MGM*, filed December 15, 2017, in the Los Angeles Superior Court (“LASC”),  
28 case number BC687120.

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

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

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

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

25           601. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Karlee Poe is a resident of the State of California. Defendant has previously filed a  
27 lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
28 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in

1 Las Vegas, Nevada. Based on the allegations in that lawsuit, *Abraham, et al. v.*  
2 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case  
3 number BC684047, Plaintiffs are informed and believe that Defendant is a resident  
4 of the County of Ventura, State of California.

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

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

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

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

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

9           607. Plaintiffs are informed and believe, and thereon allege, that defendant  
10 Denise Provencio is a resident of the State of California. Defendant has previously  
11 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
12 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
13 in Las Vegas, Nevada, in *Provencio v. MGM*, filed November 15, 2017, in Clark  
14 County District Court (“Clark County”), case number A-17-764708.

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

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

27           610. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Dominic Rabanal is a resident of the State of California. Defendant has previously

1 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
2 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
3 in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*, filed December 15, 2017, in the  
4 Los Angeles Superior Court (“LASC”), case number BC687120.

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

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

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

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

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

27 616. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Erica Ramos is a resident of the State of California. Defendant has, through

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

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

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

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

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

24 621. Plaintiffs are informed and believe, and thereon allege, that defendant  
25 Jacob Ratliff is a resident of the State of California. Defendant has previously filed a  
26 lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
27 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in  
28 Las Vegas, Nevada. Based on the allegations in that lawsuit, *Mayfield, et al. v.*

1 *MGM*, filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case  
2 number BC687120, Plaintiffs are informed and believe that Defendant is a resident  
3 of the County of Los Angeles, State of California.

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

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

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

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

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

26 627. Plaintiffs are informed and believe and thereon allege that Defendant  
27 Brody Renaud is a resident of the State of California. Defendant has, through  
28

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

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

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

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

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

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

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

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

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

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

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

25           638. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Marie Rice is a resident of the State of California. Defendant has previously filed a  
27 lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
28 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in

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

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

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

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

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

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

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

27 645. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Michael Robertson is a resident of the State of California, County of Los Angeles.

1 Defendant has, through counsel, asserted or threatened to assert claims against  
2 Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

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

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

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

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

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

1 number BC687120, Plaintiffs are informed and believe that Defendant is a resident  
2 of the County of Los Angeles, State of California.

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

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

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

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

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

1 number BC684047, Plaintiffs are informed and believe that Defendant is a resident  
2 of the County of Los Angeles, State of California.

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

7 657. Plaintiffs are informed and believe, and thereon allege that on October  
8 1, 2017, decedent Christopher Roybal, was a resident of the State of California.  
9 Plaintiffs are informed and believe and thereon allege that Defendants, the Estate of  
10 Christopher Roybal, and Dixie Roybal (surviving spouse, heir and success-in-  
11 interest to decedent) have, through counsel, made claims against Plaintiffs based  
12 upon the October 1, 2017, shooting incident in Las Vegas, Nevada, or, alternatively,  
13 have indicated an intent to make such claims in the future (such as by way of the  
14 filing of a separate lawsuit – now dismissed, by way of a letter of representation of  
15 counsel, or by way of an evidence preservation letter from counsel). The Defendants  
16 are residents of the County of Riverside, State of California, and the residency of  
17 these Defendants was identified to a court in a Complaint in the dismissed action  
18 *Roybal v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court  
19 (“LASC”), case number BC684046.

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

28

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

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

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

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

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

1 number BC687120, Plaintiffs are informed and believe that Defendant is a resident  
2 of the County of Los Angeles, State of California.

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

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

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

17 667. Plaintiffs are informed and believe, and thereon allege, that defendant  
18 H.S., a minor, is a resident of the State of California. Defendant has previously filed  
19 a lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
20 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in  
21 Las Vegas, Nevada, in *Staples, et al. v. MGM*, filed November 20, 2017, in Los  
22 Angeles Superior Court (“LASC”), case number BC684142.

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

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

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

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

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

25           673. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Selso Salazar is a resident of the State of California. Defendant has previously filed  
27 a lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
28 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in

1 Las Vegas, Nevada. Based on the allegations in that lawsuit, *Mayfield, et al. v.*  
2 *MGM*, filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case  
3 number BC687120, Plaintiffs are informed and believe that Defendant is a resident  
4 of the County of Los Angeles, State of California.

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

9 675. Plaintiffs are informed and believe, and thereon allege, that defendant  
10 Amanda Sambrano is a resident of the State of California. Defendant has previously  
11 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
12 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
13 in Las Vegas, Nevada, in *Spencer, et al. v. Paddock*, filed October 17, 2017, in Los  
14 Angeles Superior Court (“LASC”), case number BC680065.

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

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

27 678. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Stephen Sambrano is a resident of the State of California. Defendant has previously

1 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
2 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
3 in Las Vegas, Nevada, in *Spencer, et al. v. Paddock*, filed October 17, 2017, in Los  
4 Angeles Superior Court (“LASC”), case number BC680065.

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

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

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

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

25 683. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Trevor Sanders is a resident of the State of California. Defendant has previously  
27 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
28 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident

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

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

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

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

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

1 number BC684047, Plaintiffs are informed and believe that Defendant is a resident  
2 of the County of Los Angeles, State of California.

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

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

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

27 691. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Michelle Scantlin is a resident of the State of California. Defendant has previously

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

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

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

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

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

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

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

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

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

25           700. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Robert Schrode is a resident of the State of California. Defendant has previously  
27 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
28 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident

1 in Las Vegas, Nevada. Based on the allegations in that lawsuit, *Abraham, et al. v.*  
2 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case  
3 number BC684047, Plaintiffs are informed and believe that Defendant is a resident  
4 of the County of Los Angeles, State of California.

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

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

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

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

27 705. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Gilbert Segovia is a resident of the State of California. Defendant has previously

1 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
2 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
3 in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*, filed December 15, 2017, in the  
4 Los Angeles Superior Court (“LASC”), case number BC687120.

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

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

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

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

25 710. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Remo Sheth is a resident of the State of California. Defendant has previously filed a  
27 lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
28 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in

1 Las Vegas, Nevada. Based on the allegations in that lawsuit, *Abraham, et al. v.*  
2 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case  
3 number BC684047, Plaintiffs are informed and believe that Defendant is a resident  
4 of the County of Los Angeles, State of California.

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

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

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

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

26 715. Plaintiffs are informed and believe and thereon allege that Defendant  
27 Haley Sisneros is a resident of the State of California. Defendant has, through  
28

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

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

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

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

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

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

27 721. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Karen Elaine Smerber is a resident of the State of California. Defendant has

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

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

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

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

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

25 726. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Danielle Smudde is a resident of the State of California. Defendant has previously  
27 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
28 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident

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

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

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

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

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

25 731. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Keoscha E. Spencer is a resident of the State of California. Defendant has  
27 previously filed a lawsuit (which was subsequently voluntarily dismissed) against  
28 one or more of the Plaintiffs, asserting claims arising from the October 1, 2017,

1 shooting incident in Las Vegas, Nevada. Based on the allegations in that lawsuit,  
2 *Abraham, et al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior  
3 Court (“LASC”), case number BC684047, Plaintiffs are informed and believe that  
4 Defendant is a resident of the County of Los Angeles, State of California.

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

13 733. Plaintiffs are informed and believe, and thereon allege, that defendant  
14 Michelle E. Spencer is a resident of the State of California. Defendant has  
15 previously filed a lawsuit (which was subsequently voluntarily dismissed) against  
16 one or more of the Plaintiffs, asserting claims arising from the October 1, 2017,  
17 shooting incident in Las Vegas, Nevada, in *Spencer, et al. v. Paddock*, filed October  
18 17, 2017, in Los Angeles Superior Court (“LASC”), case number BC680065.

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

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

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

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

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

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

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

1           741. Plaintiffs are informed and believe, and thereon allege, that defendant  
2 Daniel Staples is a resident of the State of California. Defendant has previously filed  
3 a lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
4 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in  
5 Las Vegas, Nevada, in *Staples, et al. v. MGM*, filed November 20, 2017, in Los  
6 Angeles Superior Court (“LASC”), case number BC684142.

7           742. Plaintiffs are informed and believe, and thereon allege, that defendant  
8 Samuel Staples is a resident of the State of California. Defendant has previously  
9 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
10 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
11 in Las Vegas, Nevada, in *Staples, et al. v. MGM*, filed November 20, 2017, in Los  
12 Angeles Superior Court (“LASC”), case number BC684142.

13           743. Plaintiffs are informed and believe, and thereon allege, that defendant  
14 Kristina Staples, an incapacitated person, is a resident of the State of California.  
15 Defendant has previously filed a lawsuit (which was subsequently voluntarily  
16 dismissed) against one or more of the Plaintiffs, asserting claims arising from the  
17 October 1, 2017, shooting incident in Las Vegas, Nevada, in *Staples, et al. v. MGM*,  
18 filed November 20, 2017, in Los Angeles Superior Court (“LASC”), case number  
19 BC684142.

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

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

28

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

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

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

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

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

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

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

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

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

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

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

27           757. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Michelle Stuebe is a resident of the State of California. Defendant has, through

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

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

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

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

24 761. Plaintiffs are informed and believe, and thereon allege, that defendant  
25 Kyle C. Sundeen is a resident of the State of California. Defendant has previously  
26 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
27 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident  
28

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

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

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

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

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

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

25 767. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Erin Taber is a resident of the State of California. Defendant has previously filed a  
27 lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
28 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in

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

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

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

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

27 771. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Brianna Taylor is a resident of the State of California. Defendant has previously

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

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

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

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

23 775. Plaintiffs are informed and believe, and thereon allege that on October  
24 1, 2017, decedent Derrick D. Taylor, was a resident of the State of California.  
25 Plaintiffs are informed and believe and thereon allege that Defendant, the Estate of  
26 Derrick D. Taylor has, through counsel, made claims against Plaintiffs based upon  
27 the October 1, 2017, shooting incident in Las Vegas, Nevada, or, alternatively, has  
28 indicated an intent to make such claims in the future (such as by way of the filing of

1 a separate lawsuit – now dismissed, by way of a letter of representation of counsel,  
2 or by way of an evidence preservation letter from counsel).

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

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

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

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

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

25 781. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Evan Tillema is a resident of the State of California. Defendant has previously filed  
27 a lawsuit (which was subsequently voluntarily dismissed) against one or more of the  
28 Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in

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

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

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

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

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

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

27 787. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Alfredo Toledo is a resident of the State of California. Defendant has, through

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

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

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

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

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

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

27 793. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Jacquelyn Trujillo is a resident of the State of California, County of Los Angeles.

1 Defendant has, through counsel, asserted or threatened to assert claims against  
2 Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

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

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

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

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

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

27 799. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Jennifer Van Vlymen is a resident of the State of California. Defendant has, through

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

3 800. Plaintiffs are informed and believe, and thereon allege, that defendant  
4 Nathalie Vanderstay is a resident of the State of California. Defendant has  
5 previously filed a lawsuit (which was subsequently voluntarily dismissed) against  
6 one or more of the Plaintiffs, asserting claims arising from the October 1, 2017,  
7 shooting incident in Las Vegas, Nevada. Based on the allegations in that lawsuit,  
8 *Vanderstay, et al. v. MGM*, filed November 13, 2017, in the Los Angeles Superior  
9 Court (“LASC”), case number BC683403, Plaintiffs are informed and believe that  
10 Defendant is a resident of the County of Los Angeles, State of California.

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

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

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

1 number BC687120, Plaintiffs are informed and believe that Defendant is a resident  
2 of the County of Los Angeles, State of California.

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

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

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

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

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

27 809. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Cecelia Joya Walach is a resident of the State of California. Defendant has

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

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

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

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

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

28

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

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

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

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

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

27           819. Plaintiffs are informed and believe, and thereon allege, that defendant  
28 Derek White is a resident of the State of California. Defendant has previously filed a

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

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

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

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

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

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

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

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

11           827. Plaintiffs are informed and believe and thereon allege that Defendant  
12 Joseph N. Williams is a resident of the State of California, County of Santa Barbara.  
13 Defendant has, through counsel, asserted or threatened to assert claims against  
14 Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

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

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

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

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

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

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

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

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

25           836. Plaintiffs are informed and believe, and thereon allege, that defendant  
26 Jaeger Woodson is a resident of the State of California. Defendant has previously  
27 filed a lawsuit (which was subsequently voluntarily dismissed) against one or more  
28 of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident

1 in Las Vegas, Nevada. Based on the allegations in that lawsuit, *Mayfield, et al. v.*  
2 *MGM*, filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case  
3 number BC687120, Plaintiffs are informed and believe that Defendant is a resident  
4 of the County of Los Angeles, State of California.

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

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

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

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

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

27 842. Plaintiffs are informed and believe and thereon allege that Defendant  
28 Brandon Young is a resident of the State of California. Defendant has, through

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

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

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

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

15 **JURISDICTION AND VENUE**

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

25 847. In addition, the Court has subject-matter jurisdiction pursuant to 28  
26 U.S.C. § 1332 in that Plaintiffs (by virtue of their incorporation and principal places  
27 of business) are citizens of the States of Delaware and Nevada; Defendants are  
28 citizens of the State of California; and as to some Defendants, the matter in

1 controversy exceeds, exclusive of interest and costs, the sum specified by 28 U.S.C.  
2 § 1332(a). As to Defendants whose claims individually do not meet the amount-in-  
3 controversy threshold of 28 U.S.C. § 1332(a), this Court has supplemental  
4 jurisdiction over such claims under 28 U.S.C. § 1367 because those claims are so  
5 related to claims of parties whose claims do meet the amount-in-controversy  
6 threshold of 28 U.S.C. § 1332(a) that they form part of the same case of controversy  
7 under Article III of the United States Constitution, because all claims arise out of the  
8 same occurrence, viz., the mass attack perpetrated by Stephen Paddock at the Route  
9 91 Harvest Festival in Las Vegas on October 1, 2017.

10 848. This Court has personal jurisdiction over defendants because they are  
11 residents of the State of California and are therefore subject to the general personal  
12 jurisdiction of this Court.

13 849. Venue is proper in this Judicial District pursuant to 28 U.S.C.  
14 § 1391(b)(1) because one or more of the Defendants are known to reside, or upon  
15 information and belief, do reside, within this Judicial District.

16 **FIRST CAUSE OF ACTION FOR DECLATORY RELIEF**

17 **(By Plaintiffs against all Defendants)**

18 850. Plaintiffs reallege and incorporate by reference, as though fully set  
19 forth, the allegations of paragraphs 1-849, above.

20 851. Following Paddock's mass attack on the concert, over 2,500  
21 individuals have either sued the MGM Parties, or threatened to sue the MGM  
22 Parties, for claims alleged to arise from or relate to Paddock's attack. Several  
23 hundred individuals filed suit, and before the issues could be joined or resolved,  
24 they dismissed their claims, apparently with the intent of refileing.

25 852. Each Defendant either (a) has previously filed suit (and then dismissed  
26 it) against one or more of the MGM Parties relating to the Paddock attack, or (b)  
27 through counsel has stated an intention to sue the MGM Parties relating to the  
28

1 attack. There is no pending litigation between Plaintiffs and Defendants relating to  
2 the attack.

3 853. The claims alleged in the now-dismissed lawsuits include claims of  
4 alleged negligence by the MGM Parties and others, including CSC, in protecting  
5 and safeguarding persons including those Defendants who attended the Route 91  
6 Festival.

7 854. Defendants' actual and threatened lawsuits implicate the services  
8 provided by CSC because they implicate security at the concert, including training,  
9 emergency response, evacuation and adequacy of egress.

10 855. These claims are subject to the SAFETY Act, because (a) they arise  
11 from and relate to an act of mass violence meeting the statutory requirements; (b)  
12 CSC provided security at the concert, deploying services certified by the  
13 Department of Homeland Security under the SAFETY Act to protect against or  
14 respond to such an attack; and (c) the claims may therefore result in loss to CSC as  
15 the "Seller" of such certified services.

16 856. The claims threatened against the MGM Parties by certain Defendants,  
17 through counsel, also inevitably fall under the SAFETY Act for the very same  
18 reasons: (a) they arise from and relate to an act of mass violence meeting the  
19 statutory requirements; (b) CSC provided security at the concert, deploying services  
20 certified by the Department of Homeland Security under the SAFETY Act to protect  
21 against or respond to such an attack; and (c) the claims may therefore result in loss  
22 to CSC as the "Seller" of such certified services. If Defendants were injured by  
23 Paddock's assault, as they allege, they were inevitably injured both because  
24 Paddock fired from his window *and* because they remained in the line of fire at the  
25 concert. Such claims inevitably implicate security at the concert—and may result in  
26 loss to CSC.

27 857. The SAFETY Act applies to claims "arising out of, relating to, or  
28 resulting from an act of terrorism."

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

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

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

21           861. No MGM Party attempted to commit, knowingly participated in, aided,  
22 abetted, committed, or participated in any conspiracy to commit any act of terrorism  
23 of criminal act related to mass attack perpetrated by Stephen Paddock at the Route  
24 91 Harvest Festival in Las Vegas, Nevada, on October 1, 2017.

25           862. The Secretary of Homeland Security may make a determination that  
26 conduct in question meets the statutory requirement, but neither the Act nor the  
27 regulations requires a formal certification. The Statute provides that the Secretary  
28 shall have exclusive authority to certify services, but the authority to determine

1 whether an act of mass violence meets the statutory requirements is not exclusive to  
2 the Secretary.

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

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

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

25 866. The Department continues its critical work to prevent and respond to  
26 mass violence. In Congressional testimony on May 15, 2018, the Secretary testified  
27 that DHS is “seeking to ramp up ‘soft target’ security efforts,” noting that DHS  
28 programs “address threats to soft targets – including schools, *entertainment venues*,

1 major events, and public spaces” (emphasis added). Further, on June 4, 2018, DHS  
2 announced that it had “developed a ST-CP Security Enhancement and Coordination  
3 Plan,” which has not been made public. The plan addresses “the increased emphasis  
4 *by terrorists* and other extremist actors to leverage less sophisticated methods to  
5 inflict harm in public areas ... such as parks, ... *special event venues*, and similar  
6 facilities.” See [https://www.dhs.gov/publication/securing-soft-targets-and-crowded-](https://www.dhs.gov/publication/securing-soft-targets-and-crowded-spaces)  
7 spaces (emphasis added).

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

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

17 869. CSC’s security services Certified by DHS include “Physical Security”;  
18 “Access Control”; and “Crowd Management.”

19 870. CSC’s Certified Crowd Management Services include:

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

1 871. As alleged above, CSC was employed as the Security Vendor for the  
2 Route 91 concert. CSC’s responsibilities at the Route 91 Harvest Festival included  
3 providing the following DHS Certified Services:

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

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

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

25 874. In addition, the SAFETY Act provides that for any covered claims  
26 arising out of or relating to an act of mass violence where certified services were  
27 provided, “the government contractor defense applies in such a lawsuit,” which  
28 provides a complete defense to liability. 6 U.S.C. 442(d)(1). The government

1 contractor defense precludes any finding of liability on the part of Plaintiffs to  
2 Defendants relating to Paddock's mass attack.

3 875. An actual and justiciable controversy exists between Plaintiffs and  
4 Defendants concerning the applicability of the SAFETY Act. Plaintiffs assert that  
5 the SAFETY Act precludes any liability for any claims arising out of or relating to  
6 Paddock's mass attack, whereas, on information and belief, Defendants deny that  
7 the Act applies or that it precludes liability on their claims against Plaintiffs.

8 876. A judicial declaration as to whether the SAFETY Act applies and  
9 precludes liability on Defendants' claims against the Plaintiffs is necessary at this  
10 time so that the parties may ascertain their rights, and avoid the significant judicial  
11 waste that would occur if the lawsuits were allowed to proceed in the absence of a  
12 finding as to the applicability of the SAFETY Act.

13 **PRAYER FOR RELIEF**

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

16 1. For a judicial declaration that:

- 17 a. Defendants' claims arising from the attack by Stephen Paddock on  
18 October 1, 2017 in Las Vegas, Nevada are subject to and governed by  
19 the SAFETY Act, 6 U.S.C. § 441 et seq.;
- 20 b. the SAFETY Act precludes any finding of liability against Plaintiffs  
21 for any claim for injuries arising out of or related to Paddock's mass  
22 attack, without prejudice to Defendants' rights to pursue claims against  
23 the "Seller" under the Act, including to obtain proceeds of insurance  
24 that any such Seller was required by the Act to maintain;
- 25 c. Plaintiffs have no liability of any kind to Defendants, or any of them,  
26 arising from the Paddock's mass attack; and

27 2. For such other and further legal or equitable relief as the Court deems  
28 just and proper.

1 DATED: July 13, 2018

MUNGER, TOLLES & OLSON LLP  
BRAD D. BRIAN  
MICHAEL R. DOYEN  
BETHANY W. KRISTOVICH

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By:           /s/ Michael R. Doyen            
MICHAEL R. DOYEN

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