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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

19 Plaintiffs,

20 vs.

21 DAVID AASE; GARY AASE; MARK
ABRAHAM; ANDREA ABRAMS;
22 DANIEL ABRAMS; LUKE ADAM;
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

Case No.

**COMPLAINT FOR
DECLARATORY RELIEF**

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 CARLSTROM; 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; GENA 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 STACEE 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;
 LYNDSEY 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 GHAAHYASI; 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. GRIJÁLBA; JENNIFER
23 GRIMM; GABRIEL GUERRERO;
24 MIGUEL GUERRERO; MIKERRA
25 GUERRERO; TRISHA GUERRERO;
26 ESTATE OF ROCIO GUILLÉN; 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;
NICHOLAS 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; NIKOLAS
2 LJUBIC; ELVIA LLAMAS; 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 MAIO; CLAUDIA MAJALCA;
6 EMILY MAJER; BRIAN MALLETTE;
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 MOZDA; 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 PETTERSON;
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; JANAE
 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 SHETH;
 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; PARISSE
 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
2 WILKEN; ANNA WILLIAMS; JOSEPH
3 N. WILLIAMS; STANLEY
4 WILLIAMS; JAMES WILLIAMSON;
5 MARCUS WILSON; MCKAYLA
6 WILSON; KATELYN WING; KERRY
7 WISDEN; ANTHONY WOOD;
8 SHAWNA WOOD; JAEGER
9 WOODSON; JADE WRIGHT; JEFF
10 WRIGHT; TOME XAYAVONG;
11 BRETT YEAKEL; SHAWNA YORK;
12 BRANDON YOUNG; LAURA
13 ZARATE; SHANNON ZEEMAN; AND
14 SHARLA ZOTEA,

Defendants.

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).

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*,

28

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 Alcala 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.

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 Treanisha 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.

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.

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 Cochrane 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.

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.

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.

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.

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

2 BRAD D. BRIAN

3 MICHAEL R. DOYEN

4 BETHANY W. KRISTOVICH

5
6 By: /s/ Michael R. Doyen

7 MICHAEL R. DOYEN

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9 INTERNATIONAL, MANDALAY RESORT
10 GROUP, MANDALAY BAY, LLC, MGM
11 RESORTS FESTIVAL GROUNDS, LLC, and
12 MGM RESORTS VENUE MANAGEMENT,
13 LLC
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