

Section 1: Claimant Information

Last Name Estate of Lamar McGlothurn	First Name	Middle Initial	
Inmate or Patient Identification Number (if applicable)	Business Name (if applicable)		
Telephone Number (310) 477-1700	Email Address rglassman@panish.law		
Mailing Address 11111 Santa Monica Blvd. Suite 700	City Los Angeles	State CA	Zip 90025
Is the claimant under 18 years of age? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Insured Name (Insurance Company Subrogation)		
Is this an amendment to a previously existing claim? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Existing Claim Number(if applicable)	Existing Claimant Name (if applicable)	

Section 2: Attorney or Representative Information

Last Name Glassman	First Name Robert	Middle Initial	
Telephone Number (310) 477-1700	Email Address rglassman@panish.law		
Mailing Address 11111 Santa Monica Blvd. Suite 700	City Los Angeles	State CA	Zip 90025

Section 3: Claim Information

State Agencies or Employees Against Whome the Claim is Filed Santa Monica Mountains Conservancy	Date of Incident 7/9/25
Late Claim Application (Claims filed more than 6 months after the date of incident require a late application, which you can provide here by explaining why the claim is being filed late. For more info, please see Gov Code sec 911.4)	

Dollar Amount of Claim In excess of the jurisdictional limit for unlimited civil cases in California	Civil Case Type (Required, if amount is more than \$10, 000) <input type="checkbox"/> Limited (\$25,000 or less) <input checked="" type="checkbox"/> Non-Limited (over \$25,000)
--	--

Dollar Amount Explanation
In excess of the jurisdictional limit for unlimited civil cases in California

Incident Location
King Gillette Ranch, Calabasas

Specific Damage or Injury Description

Wrongful death of 8-year-old boy, Lamar McGlothurn, pre-death pain and suffering by Lamar
Negligent infliction of emotional distress by Lamar's parents, Madeline
Eaton and Kevin Shrestha

Circumstances That Led to Damage or Injury

A dangerous condition at King Gillette Ranch killed Lamar McGlothurn while he was attending Camp Wildcraft. His parents witnessed the death of their son. MRCA, Camp Wildcraft and Gomez Tree and Landscape were on notice of the dangerous condition but failed to remedy it before it killed Lamar. The MRCA is a partnership between the Santa Monica Mountains Conservancy, which is a state agency established by the Legislature and the Conejo Recreation and Park District and the Rancho Simi Recreation and Park District. Please see attached.

Explain why you believe the state is responsible for the damage or injury.

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Section 4: Automobile Claim Information

Does the claim involve a state vehicle? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Vehicle License Number (if known)	State Driver Name (if known)
Has a claim been filed with your insurance carrier? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Insurance Carrier Name	Insurance Claim Number
Have you received an insurance payment for this damage or injury? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Amount Received (if any)	Amount of Deductible (if any)

Section 5: Notice and Signature

I declare under penalty of perjury under the laws of the State of California that all the information I have provided is true and correct to the best of my information and belief. I further understand that if I have provided information that is false, intentionally incomplete, or misleading I may be charged with a felony punishable by up to four years in state prison and/or a fine of up to \$10,000 (Penal Code section 72).

Signature Robert Glassman <small>Digitally signed by Robert Glassman Date: 2025.11.13 10:12:30 -08'00'</small>	Printed Name Robert Glassman	Date 11/13/25
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Instructions

- Include a check or money order for \$25, payable to the State of California.
 - \$25 filing fee is not required for amendments to existing claims.
- Confirm all sections relating to this claim are complete and the form is signed.
- Attach copies of any documentation that supports your claim. Do not submit originals.

Mail the claim form and all attachments to:

Office of Risk and Insurance
Management Government Claims
Program
P.O. Box 989052, MS 414
West Sacramento, CA 95798-9052

Claim forms can also be delivered to:

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707 3rd Street, 1st Floor
West Sacramento, CA 95605

Department of General Services Privacy Notice on Information Collection

This notice is provided pursuant to the Information Practices Act of 1977, California Civil Code Sections 1798.17 & 1798.24 and the Federal Privacy Act (Public Law 93-579).

The Department of General Services (DGS), Office of Risk and Insurance Management (ORIM) is requesting the information specified on this form pursuant to Government Code Section 910.

The principal purpose for requesting this data is to process claims against the state. The information provided will/may be disclosed to a person or to another agency where the transfer is necessary for the agency to perform its constitutional or statutory duties; the use is compatible with a purpose for which the information was collected; and the use or transfer is accounted for in accordance with California Civil Code Section 1798.25.

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Department Privacy Policy

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Access to Your Information

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DGS ORIM

Public Records Officer

707 3rd St., West Sacramento, CA 95605

Section 1: Claimant Information

Last Name Eaton	First Name Madeline	Middle Initial	
Inmate or Patient Identification Number (if applicable)	Business Name (if applicable)		
Telephone Number (310) 477-1700	Email Address rglassman@panish.law		
Mailing Address 11111 Santa Monica Blvd. Suite 700	City Los Angeles	State CA	Zip 90025
Is the claimant under 18 years of age? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Insured Name (Insurance Company Subrogation)		
Is this an amendment to a previously existing claim? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Existing Claim Number(if applicable)	Existing Claimant Name (if applicable)	

Section 2: Attorney or Representative Information

Last Name Glassman	First Name Robert	Middle Initial	
Telephone Number (310) 477-1700	Email Address rglassman@panish.law		
Mailing Address 11111 Santa Monica Blvd. Suite 700	City Los Angeles	State CA	Zip 90025

Section 3: Claim Information

State Agencies or Employees Against Whome the Claim is Filed Santa Monica Mountains Conservancy	Date of Incident 7/9/25
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Incident Location
King Gillette Ranch, Calabasas

Specific Damage or Injury Description
Wrongful death of 8-year-old boy, Lamar McGlothurn, pre-death pain and suffering by Lamar
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Circumstances That Led to Damage or Injury
A dangerous condition at King Gillette Ranch killed Lamar McGlothurn while he was attending Camp Wildcraft. His parents witnessed the death of their son. MRCA, Camp Wildcraft and Gomez Tree and Landscape were on notice of the dangerous condition but failed to remedy it before it killed Lamar. The MRCA is a partnership between the Santa Monica Mountains Conservancy, which is a state agency established by the Legislature and the Conejo Recreation and Park District and the Rancho Simi Recreation and Park District. Please see attached.

Explain why you believe the state is responsible for the damage or injury.
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Does the claim involve a state vehicle? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Vehicle License Number (if known)	State Driver Name (if known)
Has a claim been filed with your insurance carrier? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Insurance Carrier Name	Insurance Claim Number
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Signature Robert Glassman <small>Digitally signed by Robert Glassman Date: 2025.11.13 10:03:10 -08'00'</small>	Printed Name Robert Glassman	Date 11/13/25
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Last Name Shrestha	First Name Kevin	Middle Initial	
Inmate or Patient Identification Number (if applicable)	Business Name (if applicable)		
Telephone Number (310) 477-1700	Email Address rglassman@panish.law		
Mailing Address 11111 Santa Monica Blvd. Suite 700	City Los Angeles	State CA	Zip 90025
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Signature Robert Glassman <small>Digitally signed by Robert Glassman Date: 2025.11.13 10:07:12 -08'00'</small>	Printed Name Robert Glassman	Date 11/13/25
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1 PANISH | SHEA | RAVIPUDI LLP
ROBERT S. GLASSMAN, State Bar No. 269816
2 *rglassman@panish.law*
JOSEPH J. O'HANLON, State Bar No. 356356
3 *johanlon@panish.law*
11111 Santa Monica Boulevard, Suite 700
4 Los Angeles, California 90025
Telephone: 310.477.1700
5 Facsimile: 310.477.1699

6 Attorneys for Claimants

7
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**

11 THE ESTATE OF LAMAR MCGLOTHURN,
by and through its Successor-in-Interest
12 MADELINE EATON, MADELINE EATON,
an Individual, KEVIN SHRESTHA, an
13 Individual,

14 Claimants,

15 v.

16 MOUNTAINS RECREATION &
CONSERVATION AUTHORITY, a public
17 entity, CAMP WILDCRAFT LLC, GOMEZ
LANDSCAPE & TREE CARE, INC.

18 Respondent.
19

Case No.

**GOVERNMENT CLAIM AGAINST
STATE OF CALIFORNIA – SANTA
MONICA CONSERVANCY**

20
21 Claims for damages are hereby made against the STATE OF CALIFORNIA – SANTA
22 MONICA MOUNTAINS CONSERVANCY (“Respondent”) at Office of Risk and Insurance,
23 Management Government Claims Program, P.O. Box 989052, MS 414, West Sacramento, CA
24 95798, in an amount in excess of the minimum jurisdictional limits of the Superior Court of the
25 State of California. In support of said claim, the following information is submitted:

- 26 1. **Claimants:** THE ESTATE OF LAMAR MCGLOTHURN, by and through its
27 Successor-in-Interest MADELINE EATON, MADELINE EATON, an Individual, and KEVIN
28 SHRESTHA, an Individual.

1 2. **Address to which Claimants request correspondence to be mailed:** PANISH |
 2 SHEA | RAVIPUDI LLP, c/o Robert Glassman, Esq., 11111 Santa Monica Boulevard, Suite 700,
 3 Los Angeles, CA 90025; (310) 477-1700.

4 3. **Location of the Incident:** King Gillette Ranch, 26800 Mulholland Hwy,
 5 Calabasas, CA 91302 ("SUBJECT LOCATION").

6 4. **Description of Incident:** On the afternoon of July 9, 2025 at King Gillette Ranch
 7 in Calabasas, a massive tree branch snapped off an old and decaying oak tree and killed an 8-year-
 8 old boy named Lamar McGlothurn. Lamar’s mother and father were there to pick him up from
 9 Camp Wildcraft and tragically witnessed their son’s death.

10 This was not the first time a big branch fell from that tree however. In fact, on several
 11 recent occasions, the Mountains Recreation & Conservation Authority (“MRCA”) and Camp
 12 Wildcraft and its owners, Benny Ferdman and Shari Davis, actually knew branches were
 13 dangerously dropping from that tree. And yet, Camp Wildcraft and MRCA inexplicably directed
 14 groups of young children to play, paint and rest directly under the tree. That is exactly what
 15 Lamar was doing when he was tragically killed by the falling branch. Moreover, MRCA and
 16 Camp Wildcraft were on notice that oak trees at King Gillette Ranch in the lawn across from the
 17 pond and picnic areas that Camp Wildcraft were to utilize in the summer of 2025 had been
 18 evaluated as long ago as 2008 and 2017 and were found to be unhealthy and problematic. In fact,
 19 numerous trees had to be removed for safety reasons. Still, no one did anything before the subject
 20 branch dropped on Lamar and killed him.

21 Recent reports and California Public Records Act Requests confirmed officials knew about
 22 the subject tree’s decay before the deadly branch snapped off the tree and killed Lamar. Indeed,
 23 crews at King Gillette Ranch raised concerns about the decaying tree one week before the fatal
 24 incident. The text and emails from the MRCA, which operates King Gillette Ranch, showed that
 25 staff requested the removal of a branch that snapped from the tree on July 2: “Large tree branch
 26 snapped and is being suspended by other branches...Request tree co to address ASAP.” The “tree
 27 co” referred to was Gomez Landscape & Tree Care. A day later, July 3, MRCA Deputy Chief of
 28 Developed Resources/Special Events Manager, Barbara Collins, wrote an email that read in part,

1 "Want you to be aware of this. This is that oak at the front of the park, side lawn across from pond
2 that you are watching. Limb cracked yesterday, a big one...Don't know if this limb cracking has
3 to do with health of the tree, so thought I'd let you know." On the same day, the division chief
4 wrote:

5 "Wow. That was a massive branch. Thank god that no one was
6 seriously hurt or killed. Thank you so much for taking care of this. I
7 would not have been able to sleep at night knowing that branch was
8 just waiting to fall."

9 A text message by Gilbert Gomez at Gomez Landscape & Tree Care also expressed his
10 concerns about the health of the tree, writing, "it is somewhat concerning seeing all the decay at
11 the trunk." The Gomez employee also suggested staff thin the canopy to mitigate risk: "It would
12 be wise to thin the canopy and alleviate end weight at a minimum to mitigate the risk."

13 Merely six days later, on July 9, another branch fell onto picnic tables and killed 8-year-old
14 Lamar, who was attending Camp Wildcraft at the ranch.

15 Arboricultural industry standards, best practices and common sense call for the area
16 surrounding a dangerous tree to be blocked off if the tree poses a threat of harming people.
17 Despite actual notice that the tree was dangerous and dropping branches, no one from MRCA nor
18 Camp Wildcraft nor Gomez Landscape & Tree Care stopped the children from going under the
19 tree's massive canopy. Based on several reports, Camp Wildcraft even directed the campers, like
20 Lamar, to stay within the target zone of the tree on July 9 despite such notice of falling tree limbs
21 capable of killing the children underneath.

22 Further, legal representatives and tree experts on behalf of Lamar's family inspected the
23 subject tree and branch at King Gillette Ranch following the subject incident in July 2025. The
24 inspection revealed significant deterioration and stress signs in the subject oak tree, including
25 recent and older limb losses, bark checking, and potential cavities. Several images document the
26 precarious condition of the main trunk and branches, highlighting areas of previous failures and
27
28

1 ongoing risks.

2 During the site inspection, the lower trunk of the subject valley oak exhibited visible signs
 3 of significant deterioration. A prominent vertical defect was observed on the main stem,
 4 consisting of missing and sloughing bark, discolored and exposed interior wood, and
 5 evidence of fluid staining consistent with past sap flow or exudation. Experts sounded the
 6 trunk and identified some hollowness which often indicates the presence of internal decay,
 7 cavities, or compromised wood structure beneath the bark. The affected area spans a
 8 substantial portion of the trunk circumference and shows characteristics commonly
 9 associated with internal decay, tissue death, and progressive structural compromise.
 10 The presence of degraded wood tissue and separation between dead and live bark
 11 indicates the tree has experienced chronic stress and physiological decline over time. These
 12 conditions likely represent a long-standing defect that would have been observable prior to
 13 the failure event and, in my opinion, constitute a clear visual warning of compromised
 14 structural integrity in the trunk of the tree. The break surface morphology and callus
 15 formation on some limbs strongly suggest a history of recent failures prior to the subject
 16 incident. **The tree’s location in a public-access setting and its known history of recent large**
 17 **limb failure, the condition of the trunk would have warranted further investigation relevant**
 18 **to determining whether reasonable inspections and hazard mitigation were warranted to**
 19 **prevent a failure.**

22 **Based on visible structural defects, multiple prior failures, and a location of**
 23 **foreseeable public occupancy, this was a preventable tree failure, not a spontaneous or**
 24 **unforeseeable act of nature.**

26 5. **Names, Addresses and Telephone Numbers of Witnesses:** **Camp Wildcraft c/o**
 27 **Benny Ferdman, Shari Davis, Makenzie Mulligan, Naomi Peterson; Gomez Landscape & Tree**
 28

1 **Care, Inc.** c/o Gilbert Gomez; **MRCA** c/o Barbara Collins, Dash Stolarz, Brian Baldauf, Matthew
 2 Ribarich, Tim Miller, Scott Hughes, Maribelle Martinez, Jamie Cabral, Richard Flores, Carlos
 3 Espinoza, Joseph Edmiston, Rorie Skei; **Los Angeles Sheriff’s Department** c/o Deputies Leon,
 4 Silva and Grigoryan; **Jan C. Scow Consulting Arborists, LLC** c/o Jan Scow; Lorenzo Mateo,
 5 ISA Certified Arborist; Madline Eaton; Kevin Shrestha

6 6. **Basis of Claim:**

7 King Gillette Ranch is managed and owned by the MRCA and the Santa Monica
 8 Mountains Conservancy.

9 The MRCA is a local government public entity established in 1985 pursuant to the Joint
 10 Powers Act. The MRCA is a partnership between the Santa Monica Mountains Conservancy,
 11 which is a state agency established by the Legislature, and the Conejo Recreation and Park District
 12 and the Rancho Simi Recreation and Park District.

13 Under California law, landowners and operators have a “duty of care” to:

- 14 • Maintain their premises in a reasonably safe condition.
- 15 • Inspect for known or reasonably foreseeable hazards.
- 16 • Address or mitigate tree-related dangers in areas open to public use.

17 **Breach Indicators Present in This Case**

18 **1. Failure to Inspect**

- 19 ◦ The visible decay and dieback were readily apparent with a basic visual
- 20 inspection from the ground.
- 21 ◦ ISA BMPs recommend Level 2 visual tree assessments annually in high-use
- 22 zones.
- 23 ◦ No apparent assessment, documentation, or mitigation was conducted here.

24 **2. Failure to Act on Known Hazards**

- 25 ◦ Prior failures, visible decay, and wound response patterns imply that decay was
- 26 not sudden, an arborist would have flagged the branch and/or tree for mitigation.
- 27 ◦ Evidence shows an existing defect profile and tree structure imbalance, not an
- 28 “Act of God” or sudden, unforeseeable event.

1 **3. Negligent Maintenance Program**

- 2 ◦ No sign (yet) of proactive hazard mitigation (e.g., deadwood removal, cabling,
3 weight reduction, hazard assessments, etc.).

4
5 Further, Claimants are informed and believe, and thereon allege, that Respondents created,
6 owned, built, drafted, engineered, designed, inspected, regulated, modified, directed, supervised,
7 planned, contracted, constructed, managed, serviced, repaired, maintained, used, occupied, and
8 controlled the SUBJECT LOCATION, including the SUBJECT TREE and surrounding area
9 where the SUBJECT INCIDENT occurred.

10 At the time of the SUBJECT INCIDENT, various dangerous conditions existed on, at, and
11 around the SUBJECT LOCATION, including the SUBJECT TREE, that created a substantial and
12 reasonably foreseeable risk of injury or death when such properties were used with due care in a
13 reasonably foreseeable manner. The various dangerous conditions include but are not limited to,
14 the following:

15 (a) The SUBJECT TREE was improperly and dangerously planted, placed,
16 angled, maintained, inspected, and/or controlled by said Respondents prior to, and at the time of,
17 the SUBJECT INCIDENT;

18 (b) The SUBJECT TREE was maintained in a rotten and decayed condition by
19 said Respondents prior to, and at the time of, the SUBJECT INCIDENT;

20 (c) The SUBJECT TREE was overgrown and dangerously leaning towards the
21 area of the SUBJECT LOCATION posing the risk of serious and potentially fatal harm to
22 members of the public, including Claimants, whom would congregate and be present at or near the
23 SUBJECT LOCATION;

24 (d) The roots of SUBJECT TREE were improperly maintained, inspected,
25 and/or controlled prior to, and at the time of the SUBJECT INCIDENT so as to cause and create a
26 dangerous condition;

27 (e) The SUBJECT TREE, as well as other trees located within the SUBJECT
28 LOCATION, was and were planted within an improper and dangerous distance of one another

1 prior to, and at the time of the SUBJECT INCIDENT, so as to cause and create a dangerous
2 condition;

3 (f) The SUBJECT TREE lacked reasonable barricades, support, and/or
4 protective mechanisms prior to, and at the time of the SUBJECT INCIDENT, so as to prevent
5 such trees and/or vegetation from experiencing decay and/or falling over in the manner it did on
6 the day of the SUBJECT INCIDENT, thereby creating a dangerous condition;

7 (g) The SUBJECT TREE and the SUBJECT LOCATION lacked, or failed to
8 have, any, or has or had insufficient and/or defective, warning signs, signals, markings, devices or
9 other forms of warning necessary to alert members of the public of said dangerous conditions;

10 (h) The SUBJECT LOCATION was negligently maintained, repaired, used,
11 occupied, controlled, serviced, and kept so as to pose risk of severe and potentially fatal injury to
12 the public, including Claimants;

13 (i) The combination of the above-referenced conditions created by said
14 Respondents a concealed trap to foreseeable users of the SUBJECT LOCATION, including the
15 Claimants.

16 Claimants contend that the SUBJECT LOCATION and SUBJECT TREE were
17 dangerously and defectively placed, planted, maintained, serviced, planned, designed, drafted,
18 engineered, constructed and positioned, and was either not approved in accordance with standard
19 procedure, regulations and statutes (thereby violating same) or could not reasonably have been
20 approved by any appropriate and responsible governmental entity or any delegates and agents
21 thereof. To the extent the design of the SUBJECT LOCATION, and the trees and/or vegetation
22 surrounding and within the SUBJECT AREA including the SUBJECT TREE, as well as the
23 adjoining area adjacent to SUBJECT TREE and SUBJECT LOCATION, was approved, if any
24 approval was requested and given, the requesting and responding authority(ies)/delegate(s) and
25 agent(s) were incompetent or failed to possess the requisite skills and expertise to render a
26 reasonable evaluation of the benefits, risks and dangers of the design plan as submitted or
27 amended and approved. To the extent the design of the SUBJECT LOCATION, and the trees
28 and/or vegetation surrounding and within the SUBJECT LOCATION including SUBJECT TREE,

1 as well as the adjoining area adjacent to SUBJECT TREE and SUBJECT LOCATION, was
2 approved, said approval was unreasonable and constituted a manifest abuse of discretion, or was
3 otherwise negligent by failing to address the applicable engineering standards and conditions then
4 existing or reasonably contemplated to exist in the future, once said design was implemented.

5 Claimants are informed and believe, and thereon allege, that Respondents had, within the
6 meaning of *Government Code* § 835.2, actual and/or constructive knowledge of the said dangerous
7 and defective conditions of the SUBJECT TREE and SUBJECT LOCATION, and the trees and/or
8 vegetation surrounding and within the SUBJECT LOCATION, for a sufficient period of time prior
9 to the SUBJECT INCIDENT to have taken measures to prevent such incidents due to the
10 longstanding physical appearance and conditions of the SUBJECT LOCATION, and the trees
11 and/or vegetation surrounding and within the SUBJECT LOCATION, as well as the SUBJECT
12 TREE. Claimants are further informed and believe, that Respondents also had actual knowledge
13 of prior incidents, some in proximity to the SUBJECT INCIDENT, for sufficient period of time
14 prior to the SUBJECT INCIDENT to have taken measures to prevent further such incidents.

15 Claimants are further informed and believe, and thereon allege, that said dangerous
16 conditions were a legal, direct, and proximate cause of the injury and damages suffered by the
17 Claimants.

18 Claimants further allege, that Respondents and their agents, associates, employees,
19 contractors (independent or otherwise), consultants, partners, vendors, and/or joint venturers also
20 face liability for Claimants' damages pursuant to *Government Code* §§ 815.2, 815.4 and 820(a),
21 835.2 et seq., for negligently, carelessly, and/or recklessly planting, planning, owning, building,
22 installing, reviewing, evaluating, directing, designing, maintaining, allowing, permitting,
23 regulating, contracting, controlling, servicing, inspecting, repairing, modifying, altering,
24 monitoring, managing, repairing, improving, constructing, controlling, warning or failing to warn
25 of, removing or failing to remove, and/or supervising the SUBJECT TREE and SUBJECT
26 LOCATION, and the trees and/or vegetation surrounding and within the SUBJECT LOCATION
27 and said negligent, careless and reckless acts or failures to act created said dangerous and
28 defective conditions of said properties which legally caused the SUBJECT INCIDENT and the

1 injuries and damages to Claimants as herein alleged.

2 Claimants are informed and believe and thereon allege that Respondents knew, or in the
3 exercise of ordinary care, should have known of the dangerous conditions present at the SUBJECT
4 LOCATION, and each of them, had sufficient time, resources and funds available prior to the
5 SUBJECT INCIDENT to have taken measures to protect against the dangerous conditions, correct
6 the dangerous conditions, and/or warn visitors, including Claimants, of said dangerous conditions.
7 Nonetheless, said Respondents, and each of them, failed to properly maintain the SUBJECT
8 LOCATION, and particularly, the SUBJECT TREE, as well as the trees and/or vegetation
9 surrounding and within the SUBJECT LOCATION, so as to minimize the risk of injury and
10 damages to reasonably careful individuals and/or correct the dangerous conditions. This failure to
11 correct and/or alleviate such dangerous condition proximately caused and/or contributed to the
12 injuries and damages sustained by Claimants.

13 As a legal, direct and proximate cause of the aforementioned conduct of Respondents,
14 Lamar McGlothurn was killed and his parents suffered extreme emotional distress as a result of
15 witnessing their son’s death. Claimants' damages occurred as a direct and proximate result of the
16 dangerous condition, negligence, and failure to warn of the dangerous condition, and unlawful
17 conduct of the Respondents, and each of them.

18 Further, Lamar McGlothurn suffered pre-death pain and suffering pursuant to Code of
19 Civil Procedure Sec. 377.34.

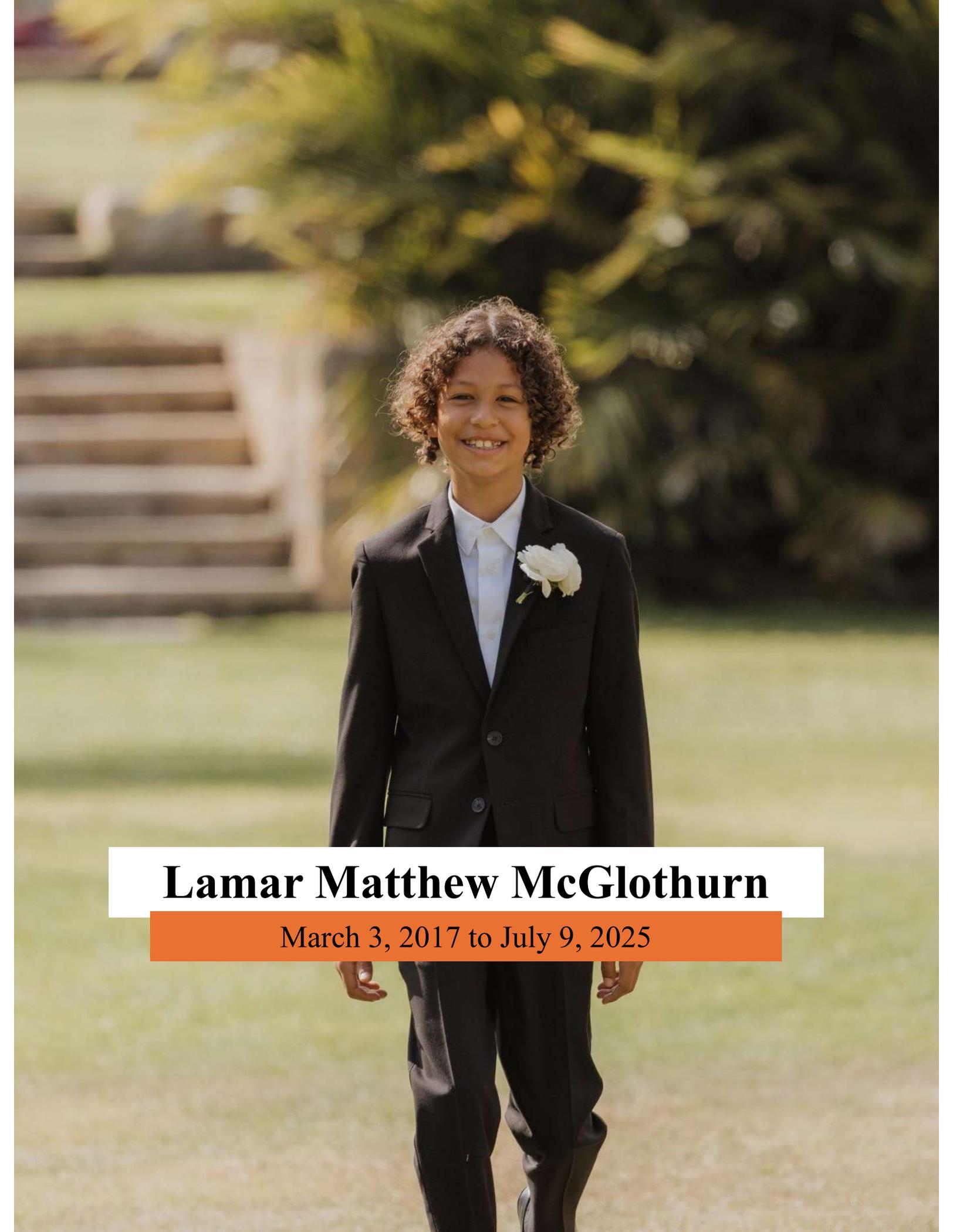
20 7. **Reservation of right to amend and/or supplement claim:** Claimants reserve the
21 right to amend and/or supplement this Claim for Damages, including asserting new theories of
22 liability or causes of action, upon discovery of new or additional information or facts. Claimants
23 reserves the right to supplement or amend these claims as discovery proceeds in this matter.

24 DATED: November 13, 2025

PANISH | SHEA | RAVIPUDI LLP

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By: 
Robert S. Glassman
Attorneys for Claimants



Lamar Matthew McGlothurn

March 3, 2017 to July 9, 2025













