

CASE NO: A-20-808100-C  
Department 32

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12 **EIGHTH JUDICIAL DISTRICT COURT**  
13 **CLARK COUNTY, NEVADA**

14 DEBORAH CIHAL CRAWFORD, individually and as  
15 heir to the ESTATE OF TRACY ANN CIHAL; JOHN  
DOE ADMINISTRATOR, as Special Administrator of  
16 the ESTATE OF TRACY ANN CIHAL,

17 Plaintiffs,

18 v.

19 LAS VEGAS DRAGON HOTEL, LLC, a Nevada  
20 limited-liability company doing business as the  
ALPINE MOTEL APARTMENTS; ADOLFO  
21 OROZCO, an individual; DOES 1 through 10; ROE  
ENTITIES 1 through 10,

22 Defendants.

Case No.  
Dept. No.

**COMPLAINT AND DEMAND FOR  
JURY TRIAL**

**(Exempt from Arbitration: Amount in  
Controversy Greater Than \$50,000)**

23 COME NOW Plaintiffs DEBORAH CIHAL CRAWFORD, individually and as heir to the  
24 ESTATE OF TRACY ANN CIHAL and JOHN DOE ADMINISTRATOR, as Special  
25 Administrator of the ESTATE OF TRACY ANN CIHAL (collectively "Plaintiffs"), by and  
26 through their attorneys of record, the law firm of PANISH SHEA & BOYLE LLP, and MORGAN  
27 & MORGAN, P.A., and hereby demand a trial by jury and complain and allege against  
28 Defendants as follows:

PANISH SHEA & BOYLE LLP  
8816 Spanish Ridge Ave.  
Las Vegas, NV 89148  
702.560.5520 phone • 702.975.2515 fax

1 **INTRODUCTORY ALLEGATIONS**

2 1. This action arises from a senseless, avoidable tragedy. In the early morning hours  
3 of December 21, 2019, a fire broke out at the Alpine Motel Apartments in Downtown Las Vegas,  
4 Nevada, a three-story apartment complex owned and operated by Defendant LAS VEGAS  
5 DRAGON HOTEL, LLC and its managing member Defendant ADOLFO OROZCO. A stove  
6 used as a makeshift heater in lieu of a proper heating system reportedly sparked the fire. It spread  
7 throughout the building, but there was neither a sprinkler system to contain it nor a fire alarm to  
8 warn residents of the impending danger. Even when residents attempted to evacuate, many found  
9 that the rear exit door had been barricaded. Several were found trapped in the building, unable to  
10 escape, while others resorted to jumping from second and third story windows to escape the  
11 flames. In total, six people lost their lives, and thirteen were seriously injured, making it the  
12 deadliest fire in the City's history.

13 2. One of those killed was Tracy Ann Cihal, a 57-year-old woman affectionately  
14 known as "Mama Bear" to other Alpine residents for the caring attention she paid to others. Ms.  
15 Cihal lived on the first floor and used a walker for mobility. She was unable to evacuate the  
16 building in time and lost her life in the fire. Her body was found in the main hallway near the  
17 barricaded back exit door.

18 3. As alleged in greater detail below, Plaintiffs seek all available relief against  
19 Defendants for the negligence and wrongful conduct that led to the wrongful death of decedent  
20 Tracy Ann Cihal.

21 **PARTIES AND JURISDICTION**

22 4. Plaintiff DEBORAH CIHAL CRAWFORD ("Ms. Cihal Crawford") is an adult  
23 citizen and resident of Hillsborough County, Florida. Ms. Crawford is the next of kin to decedent  
24 Tracy Ann Cihal. Ms. Cihal Crawford brings this action individually as heir to the ESTATE OF  
25 TRACY ANN CIHAL. At all relevant times, Tracy Ann Cihal was a resident of Alpine Motel  
26 Apartments located at 213 N. Ninth Street, Las Vegas, Nevada 89101 and died in a fire that occurred  
27 on December 21, 2019.

28 ///

PANISH SHEA & BOYLE LLP  
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1           5.       Plaintiff JOHN DOE ADMINISTRATOR is the Special Administrator of the  
2 ESTATE OF TRACY ANN CIHAL.

3           6.       Defendant LAS VEGAS DRAGON HOTEL, LLC ("DRAGON HOTEL") is, and  
4 at all times relevant hereto was, a Nevada limited liability company authorized to and doing  
5 business in Clark County, Nevada.

6           7.       Defendant ADOLFO OROZCO ("OROZCO") is, and at all times relevant hereto  
7 was, a resident of Clark County, Nevada, and managing member of DRAGON HOTEL.

8           8.       Upon information and belief, each of the Defendants sued herein as Defendants  
9 DOES 1 through 10, inclusive, and ROE ENTITIES 1 through 10, inclusive, are responsible in  
10 some manner for the events and happenings herein referred to, including without limitation the  
11 ownership, control, security, operations, supervision, inspection, management, maintenance,  
12 design, repair, construction, and/or renovation of the real property located at 213 N 9th St, Las  
13 Vegas, NV 89101, including without limitation the property's fire prevention, suppression, and/or  
14 safety systems, heating, ventilation, and cooling systems, emergency exits, and utility services,  
15 any or all of which thereby proximately caused the injuries and damages to Plaintiffs as alleged  
16 herein as a result of the fire that erupted at the property on December 21, 2019; that when the true  
17 names and capacities of such Defendants become known, Plaintiff will ask leave of this Court to  
18 amend this complaint to insert the true names, identities and capacities together with proper  
19 charges and allegations.

20           9.       At all relevant times, Defendants, and each of them, were the agents, ostensible  
21 agents, servants, employees, employers, partners, co-owners and/or joint venturers of each other  
22 and of their co-Defendants, and were acting within the color, purpose and scope of their  
23 employment, agency, ownership and/or joint ventures and by reason of such relationships with  
24 Defendants, and each of them, are vicariously and jointly and severally responsible and liable for  
25 the acts and/or omissions of their co-Defendants.

26           10.      At all relevant times the Alpine Motel Apartments were owned, maintained,  
27 operated, leased, rented, run and supervised by Defendants DRAGON HOTEL, OROZCO, and  
28 DOES 1 through 10 and ROE ENTITIES 1 through 10 inclusive, and each of them.

1           11.    Upon information and belief, Defendant DRAGON HOTEL owned, possessed,  
2 secured, controlled, operated, managed, leased, inspected, maintained, repaired, and/or supervised  
3 Alpine Motel Apartments located at 213 N Ninth Street, Las Vegas, Nevada 89101, and/or had the  
4 right(s) to own, possess, secure, control, operate, manage, lease, inspect, maintain, repair, and/or  
5 supervise Alpine Motel Apartments. DRAGON HOTEL also had the duty and had the authority,  
6 discretion, and responsibility for the day to day operation and management of the business, including  
7 but not limited to the supervision, hiring, and firing of employees and/or agents in furtherance of the  
8 business of Alpine Motel Apartments and ensuring that the property and its tenants were reasonably  
9 safe from foreseeable harm.

10           12.    Upon information and belief, Defendant OROZCO had and exercised the duty and  
11 authority, discretion, and responsibility for the day to day operation and management of the  
12 Alpine Motel Apartments, including the supervision, hiring, and firing of employees and/or agents  
13 in furtherance of the business of Alpine Motel Apartments and ensuring that the Property and its  
14 tenants were reasonably safe from foreseeable harm.

15           13.    Further, upon information and belief, OROZCO had a duty to make Alpine Motel  
16 Apartments and its tenants safe from all known fire hazards and to inspect, install, maintain,  
17 and/or provide fire safety products and/or equipment, including but not limited to smoke detectors,  
18 fire extinguishers, and a fire alarm system.

19           14.    Upon information and belief, OROZCO had the authority, discretion, and  
20 responsibility to purchase, install, inspect, test and/or provide Alpine Motel Apartments and its  
21 tenants with properly functioning and properly mounted fire safety products and/or equipment,  
22 including but not limited to smoke detectors, fire extinguishers, and a fire alarm system.

23           15.    Upon information and belief, OROZCO was under a duty to advise, discuss,  
24 inform, counsel, repair, and/or replace any missing or faulty smoke detectors, fire extinguishers,  
25 electrical power sources, appliances, heaters, furnaces, and/or any other defective or dangerous  
26 product or condition installed or existing at Alpine Motel Apartments, including safe entrance and  
27 egress to and from the building and its units.

28    ///



1 hallway lighting (means of egress illumination) as required by the applicable fire code, which  
2 prevented residents from quickly and safely exiting the burning building.

3       27.     Upon information and belief, the egress doors located within the Alpine Motel  
4 Apartments were bolted closed, in violation of the applicable fire code, NRS 41.800, and trapping  
5 residents from safely exiting the burning building.

6       28.     Upon information and belief, the Alpine Motel Apartments did not have working  
7 fire alarms or smoke detectors, in violation of the applicable fire code, and causing numerous  
8 residents to fail to perceive the threat of the spreading fire.

9       29.     Upon information and belief, the Alpine Motel Apartments did not have working  
10 fire extinguishers or a fire suppression system, in violation of the applicable fire code.

11       30.     Upon information and belief, the Alpine Motel Apartments, including without  
12 limitation Tracy Ann Cihal's unit, were uninhabitable and/or failed to provide basic essential  
13 services and/or utilities, including heating and air systems, as required by NRS 118A.290 and  
14 other applicable law.

15       31.     Prior to the subject fire, Defendants failed to inspect, install, replace, test, and/or  
16 maintain the appliances, fire safety equipment and devices, entry and exit doors and/or pathways,  
17 electrical power sources, and/or the utilities at the Alpine Motel Apartments and inside Tracy Ann  
18 Cihal's apartment.

19       32.     Defendants knew or should have known that the equipment, devices, products, and/or  
20 conditions that caused or contributed to the fire and damages described herein were faulty and that the  
21 Alpine Motel Apartments, including Tracy Ann Cihal's apartment, was unreasonably dangerous  
22 and/or failed to meet or comply with applicable laws, codes, and/or ordinances.

23       33.     Tracy Ann Cihal's death and the damages complained of herein were the direct and  
24 proximate result of the failure of the Defendants to provide its tenants and/or invitees, including  
25 Tracy Ann Cihal, with safe and/or habitable living conditions.

26       34.     Upon information and belief, the named Defendants took the actions as described  
27 herein with knowledge of the probable harmful consequences of a wrongful act and a willful and  
28 deliberate failure to act to avoid those consequences, and said actions were the product of

1 negligence, malice, and/or oppression.

2 35. The injuries and ultimate death of Tracy Ann Cihal was the result of the negligent,  
3 knowing, oppressive, malicious, and/or reckless conduct of the Defendants and/or their failure to  
4 properly distribute, select, install, inspect, repair, maintain, test, or purchase smoke alarms, fire  
5 extinguishers, fire alarm system, essential utilities, entrance and exit doors, appliances, and/or  
6 electrical power sources at Alpine Motel Apartments.

7 36. At all relevant times Defendants DRAGON HOTEL, OROZCO, and DOES 1  
8 through 10 and ROE ENTITIES 1 through 10, and each of them, had a duty to act reasonably to  
9 provide Plaintiffs, and each of them, with safe and habitable apartments and to comply with all  
10 statutory requirements and codes governing the maintenance of rental apartment units, among  
11 other responsibilities and duties imposed at law.

12 37. Defendants DRAGON HOTEL, OROZCO, DOES 1 through 10 and ROE  
13 ENTITIES 1 through 10, inclusive, and each of them did not equip the Alpine Motel Apartments  
14 with an adequate fire suppression system, an alarm system, smoke detectors, or safe means of  
15 egress, all in violation of applicable fire codes.

16 38. Defendants DRAGON HOTEL, OROZCO, DOES 1 through 10 and ROE  
17 ENTITIES 1 through 10, inclusive, and each of them, were the agent, representative, servant,  
18 independent contractor, subcontractor, partner, joint venture, alter ego, successor in interest,  
19 affiliate, parent and/or subsidiary, employee and franchise of each of the remaining Defendants,  
20 and each of them herein, and were at all times acting within the purpose and scope of said agency,  
21 service, employment, partnership, joint venture, parent/subsidiary and franchise as such and with  
22 the express and/or implied permission, knowledge, consent, and ratification of all said other  
23 Defendants.

24 39. Plaintiffs further allege upon information and belief that the OROZCO and DOES  
25 1 through 10, inclusive, and each of them, were the alter egos of DRAGON HOTEL and ROE  
26 ENTITIES 1 through 10, inclusive, and each of them named herein, having influenced and  
27 governed the entities, there is such unity of interest and ownership that the limited-liability  
28 company and the person are inseparable from each other; and adherence to the notion of the

1 limited-liability company being an entity separate from the person would sanction fraud or  
2 manifest injustice. Further, OROZCO is liable for the damages caused to Plaintiffs as a result of  
3 the duties he owed to them as an individual, separate and apart from his role as a member of  
4 DRAGON HOTEL, including without limitation his individual negligence concerning his direct  
5 knowledge of actions that threatened physical injuries to Plaintiffs.

6 **FIRST CAUSE OF ACTION**

7 **WRONGFUL DEATH**

8 **(against all Defendants)**

9 40. Plaintiffs re-allege each and every allegation contained in the preceding and  
10 subsequent paragraphs, and by this reference incorporates said paragraphs as though fully set forth  
11 herein.

12 41. On or about December 21, 2019, Tracy Ann Cihal was a tenant of the Alpine Motel  
13 Apartments and legally on the premises described herein above.

14 42. Defendants owed Tracy Ann Cihal the duty to act as a reasonable landlord, obey by  
15 applicable laws, codes, and ordinances, and provide Tracy Ann Cihal a habitable dwelling and a  
16 premises safe from unreasonable danger.

17 43. Additionally, Defendants owed Tracy Ann Cihal the non-delegable duty to  
18 maintain the Alpine Motel Apartments and its common areas and means of egress in a reasonably  
19 safe condition, owed a duty to use reasonable care when inspecting, servicing and maintaining the  
20 Alpine Motel Apartments and its common areas and means of egress, and had a duty to comply  
21 with all applicable building, housing and fire codes.

22 44. Upon information and belief, Defendants had actual and constructive notice of code  
23 violations, dangerous conditions, and/or deficiencies that rendered the Alpine Motel Apartments  
24 and its and common areas uninhabitable, prior the fire described herein, and was given notice by  
25 the decedent, Tracy Ann Cihal, other residents, and/or local health and/or fire inspectors. The  
26 Defendants conduct created a foreseeable zone of risk that a fire and smoke resulting therefrom  
27 would occur.

28 45. Defendants breached their duties in that they failed to use reasonable care in the



1 manner by which they owned, operated, managed, maintained, supervised, inspected, failed to  
2 inspect, controlled, and/or renovated the Alpine Motel Apartments, including the property's fire  
3 prevention, suppression, and/or safety systems, heating, ventilation, and cooling systems,  
4 emergency egress routes, and utility services. At the time Tracy Ann Cihal occupied the Alpine  
5 Motel Apartments, Defendants:

- 6 a. Failed to maintain, or adequately maintain the smoke alarms, fire  
7 extinguishers, and fire alarm system at the subject property;
- 8 b. Failed to inspect, or adequately inspect the smoke alarms, fire extinguishers,  
9 and fire alarm system at the subject property;
- 10 c. Failed to maintain or adequately maintain the entrance and exit doors of the  
11 subject property;
- 12 d. Failed to inspect, or adequately inspect the entrance and exit doors of the  
13 subject property;
- 14 e. Failed to maintain or adequately maintain the utilities, specifically the  
15 heating systems, of the subject property;
- 16 f. Failed to warn or adequately warn the Tracy Ann Cihal of the dangerous  
17 conditions relating to the fire protection devices and systems, the entrance and exit doors  
18 (sealed shut), and lack of essential utilities, including heat, when Defendants knew or  
19 should have known of their existence and when Plaintiff's decedent was unaware of the  
20 dangerous conditions;
- 21 g. Failed to correct or adequately correct the fire protection devices and  
22 systems and dangerous conditions relating to the habitability and fire safety at the subject  
23 property when Defendants knew or should have known of their existence;
- 24 h. Failed to provide a safe and secure means of moving about the subject  
25 property for Plaintiff's decedent;
- 26 i. Failed to install fire prevention devices, specifically smoke alarms, fire  
27 extinguishers, and fire alarm systems;
- 28 j. Negligently hired, trained, and supervised the managers, maintenance

1 personnel, and employees working at Alpine Motel Apartments regarding fire safety and how  
2 to properly install, inspect, test, maintain, and/or repair the smoke alarms, fire extinguishers,  
3 fire alarm system, entrance and exit doors, and/or essential utilities, specifically the heating  
4 systems at Alpine Motel Apartments;

5 k. Failed to comply with the applicable building, housing and fire codes; and

6 l. Failed to act reasonably under the circumstances.

7 46. Plaintiffs are informed and believe and allege thereon that these dangerous  
8 conditions were known to Defendants DRAGON HOTEL, OROZCO, DOES 1 through 10, and  
9 ROE ENTITIES 1 through 10, inclusive and each of them, and/or was discoverable through  
10 reasonable inspection of the property.

11 47. As a result of Defendants' negligence, the building was in an unsafe and dangerous  
12 condition so that instead of protecting the tenants, it actually exposed the tenants to an  
13 unreasonable risk of harm and exacerbated, instead of mitigated, the damages caused by the fire.

14 48. Tracy Ann Cihal was part of the class of people intended to be protected by the fire  
15 code of the City of Las Vegas and other applicable codes, regulations, laws, and ordinances of  
16 which Defendants violated, including NRS 41.800 and/or NRS 118A.290.

17 49. Defendants' actions and omissions as alleged herein directly and proximately  
18 caused the wrongful death of Tracy Ann Cihal.

19 50. As a result of the wrongful deaths of Tracy Ann Cihal, Deborah Cihal Crawford  
20 has sustained the loss of love, affection, society, service, comfort, support, right of support,  
21 expectations of future support, and counseling, companionship, solace and mental support, as well  
22 as other benefits and assistance, all to her general damages in a sum in excess of Fifteen Thousand  
23 Dollars (\$15,000.00).

24 51. Plaintiffs further seek exemplary and punitive damages in excess of Fifteen  
25 Thousand Dollars (\$15,000.00).

26 52. Plaintiffs have been required to engage the services of an attorney, incurring  
27 attorneys' fees and costs to bring this action.

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**SECOND CAUSE OF ACTION**

**NEGLIGENCE**

**(against all Defendants)**

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2  
3  
4 53. Plaintiffs re-allege each and every allegation contained in the preceding and  
5 subsequent paragraphs, and by this reference incorporates said paragraphs as though fully set forth  
6 herein.

7 54. On or about December 21, 2019, Tracy Ann Cihal was a tenant of the Alpine Motel  
8 Apartments and legally on the premises described herein above.

9 55. Defendants owed Tracy Ann Cihal the duty to act as a reasonable landlord, obey by  
10 applicable laws, codes, and ordinances, and provide Tracy Ann Cihal a habitable dwelling and a  
11 premises safe from unreasonable danger.

12 56. Additionally, Defendants owed Tracy Ann Cihal the non-delegable duty to  
13 maintain the Alpine Motel Apartments and its common areas and means of egress in a reasonably  
14 safe condition, owed a duty to use reasonable care when inspecting, servicing and maintaining the  
15 Alpine Motel Apartments and its common areas and means of egress, and had a duty to comply  
16 with all applicable building, housing and fire codes.

17 57. Upon information and belief, Defendants had actual and constructive notice of code  
18 violations, dangerous conditions, and/or deficiencies that rendered the Alpine Motel Apartments  
19 and its and common areas uninhabitable, prior the fire described herein, and was given notice by  
20 the decedent, Tracy Ann Cihal, other residents, and/or local health and/or fire inspectors. The  
21 Defendants conduct created a foreseeable zone of risk that a fire and smoke resulting therefrom  
22 would occur.

23 58. Defendants breached their duties in that they failed to use reasonable care in the  
24 manner by which they owned, operated, managed, maintained, supervised, inspected, failed to  
25 inspect, controlled, and/or renovated the Alpine Motel Apartments, including the property's fire  
26 prevention, suppression, and/or safety systems, heating, ventilation, and cooling systems,  
27 emergency egress routes, and utility services. At the time Tracy Ann Cihal occupied the Alpine  
28 Motel Apartments, Defendants:

- 1 a. Failed to maintain, or adequately maintain the smoke alarms, fire  
2 extinguishers, and fire alarm system at the subject property;
- 3 b. Failed to inspect, or adequately inspect the smoke alarms, fire extinguishers,  
4 and fire alarm system at the subject property;
- 5 c. Failed to maintain or adequately maintain the entrance and exit doors of the  
6 subject property;
- 7 d. Failed to inspect, or adequately inspect the entrance and exit doors of the  
8 subject property;
- 9 e. Failed to maintain or adequately maintain the utilities, specifically the  
10 heating systems, of the subject property;
- 11 f. Failed to warn or adequately warn the Tracy Ann Cihal of the dangerous  
12 conditions relating to the fire protection devices and systems, the entrance and exit doors  
13 (sealed shut), and lack of essential utilities, including heat, when Defendants knew or  
14 should have known of their existence and when Plaintiff's decedent was unaware of the  
15 dangerous conditions;
- 16 g. Failed to correct or adequately correct the fire protection devices and  
17 systems and dangerous conditions relating to the habitability and fire safety at the subject  
18 property when Defendants knew or should have known of their existence;
- 19 h. Failed to provide a safe and secure means of moving about the subject  
20 property for Plaintiff's decedent;
- 21 i. Failed to install fire prevention devices, specifically smoke alarms, fire  
22 extinguishers, and fire alarm systems;
- 23 j. Negligently hired, trained, and supervised the managers, maintenance  
24 personnel, and employees working at Alpine Motel Apartments regarding fire safety and how  
25 to properly install, inspect, test, maintain, and/or repair the smoke alarms, fire extinguishers,  
26 fire alarm system, entrance and exit doors, and/or essential utilities, specifically the heating  
27 systems at Alpine Motel Apartments;
- 28 k. Failed to comply with the applicable building, housing and fire codes; and

1           I.       Failed to act reasonably under the circumstances.

2           59.     Plaintiffs are informed and believe and allege thereon that these dangerous  
3 conditions were known to Defendants DRAGON HOTEL, OROZCO, DOES 1 through 10, and  
4 ROE ENTITIES 1 through 10, inclusive and each of them, and/or was discoverable through  
5 reasonable inspection of the property.

6           60.     As a result of Defendants' negligence, the building was in an unsafe and dangerous  
7 condition so that instead of protecting the tenants, it actually exposed the tenants to an  
8 unreasonable risk of harm and exacerbated, instead of mitigated, the damages caused by the fire.

9           61.     Tracy Ann Cihal was part of the class of people intended to be protected by the fire  
10 code of the City of Las Vegas and other applicable codes, regulations, laws, and ordinances of  
11 which Defendants violated, including NRS 41.800 and/or NRS 118A.290.

12           62.     As a direct and proximate result of Defendants' negligence, a fire ignited at the  
13 Alpine Motel Apartments on December 21, 2019, causing Tracy Ann Cihal to experience pain and  
14 suffering, and ultimately death, leaving behind grieving family members, including Plaintiff  
15 Deborah Cihal Crawford.

16           63.     Plaintiffs further seek exemplary and punitive damages in excess of Fifteen  
17 Thousand Dollars (\$15,000.00).

18           64.     Plaintiffs have been required to engage the services of an attorney, incurring  
19 attorneys' fees and costs to bring this action.

20                                   **THIRD CAUSE OF ACTION**

21                                   **VIOLATION OF NRS 41.800**

22                                   **(against all Defendants)**

23           65.     Plaintiffs re-allege each and every allegation contained in the preceding and  
24 subsequent paragraphs, and by this reference incorporates said paragraphs as though fully set forth  
25 herein.

26           66.     NRS 41.800(1) makes it unlawful for a person to obstruct "the ingress or egress to  
27 any public or private property from any other public or private place in such a manner as not to  
28 leave a free passageway for persons and vehicles lawfully seeking to enter or leave the property

1 via the public or private place."

2 67. A person aggrieved by a violation of NRS 41.800(1) may bring a civil action  
3 against those who committed the violation, and seek actual damages, reasonable attorney's fees  
4 and costs, and any other legal or equitable relief the Court deems appropriate.

5 68. Defendants intentionally obstructed the ingress and egress of the Alpine Motel  
6 Apartments in such a manner to prevent the free passageway for Tracy Ann Cihal, who was  
7 lawfully seeking to leave the property.

8 69. As a direct and proximate result of Defendants' violation of NRS 41.800, Tracy  
9 Ann Cihal suffered damages in excess of Fifteen Thousand Dollars (\$15,000.00).

10 70. Plaintiffs further seek exemplary and punitive damages in excess of Fifteen  
11 Thousand Dollars (\$15,000.00).

12 71. Plaintiffs have been required to engage the services of an attorney, incurring  
13 attorneys' fees and costs to bring this action.

14 **PRAYER FOR RELIEF**


15 **WHEREFORE**, Plaintiffs pray for relief as follows:

- 16 1. For general damages sustained by Plaintiffs in an amount in excess of \$15,000;
- 17 2. For special damages sustained by Plaintiffs in an amount in excess of \$15,000;
- 18 3. For punitive damages against Defendants in an amount in excess of \$15,000;
- 19 4. For attorneys' fees and costs;
- 20 5. For interest at the statutory rate; and
- 21 6. For such other relief as the Court deems just and proper.

22  
23 **DATED:** January 8, 2020

**PANISH SHEA & BOYLE LLP**

24  
25 By:


  
26 RAHUL RAVIPUDI (NV Bar No. 14750)  
27 IAN SAMSON (NV Bar No. 15089)  
28 ADAM ELLIS (NV Bar No. 14514)  
Attorneys for PLAINTIFFS

**DEMAND FOR TRIAL BY JURY**

Plaintiffs hereby demand a trial by jury as to all causes of action.

**DATED:** January 8, 2020

**PANISH SHEA & BOYLE LLP**

By:   
\_\_\_\_\_  
RAHUL RAVIPUDI (NV Bar No. 14750)  
IAN SAMSON (NV Bar No. 15089)  
ADAM ELLIS (NV Bar No. 14514)  
Attorneys for PLAINTIFFS

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