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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KIM ARLENE HACHEL, individually and)
as the surviving mother of the decedent and)
as special administratrix of the Estate of)
MICHELLE HACHEL, deceased; HELEN)
BARKER, individually and as the surviving)
grandmother of the decedent, TYLER)
HACHEL, individually and as the surviving)
brother of the decedent; CARRIE BARKER,)
individually and as the surviving aunt of the)
decedent;)

Plaintiffs,

vs.

WALTER EDWARD SHEETZ aka ED)
SCHEETZ; ANNIE DARROHN;)
MORGANS HOTEL GROUP CO.;)
MORGANS HOTEL GROUP, LLC;)
MORGANS HOTEL MANAGEMENT,)
LLC; MORGANS HOTEL GROUP)
MANAGEMENT; DOES I through XXX,)
ROE corporations I through XXX, inclusive,)

Defendants.

Case No. _____

COMPLAINT

ON BEHALF OF THE ESTATE OF
MICHELLE HACHEL:

- 1. Assault and Battery
- 2. Wrongful Death by Wrongful Acts
- 3. Wrongful Death by Negligence
- 4. Wrongful Death by Negligence Per Se
- 5. Intentional Infliction of Emotional Distress

ON BEHALF OF THE HEIRS OF
MICHELLE HACHEL:

- 6. Wrongful Death by Wrongful Acts
- 7. Wrongful Death by Negligence
- 8. Wrongful Death by Negligence Per Se
- 9. Intentional Infliction of Emotional Distress
- 10. Negligent Infliction of Emotional Distress
- 11. Concert of Action
- 12. Civil Conspiracy

Plaintiff's are all named by and through their attorneys, MICHAEL J. AMADOR, ESQ.

1 AND C. CONRAD CLAUS, ESQ., and for their claims of relief against Defendants, and each of
2 them, are alleged as follows:

3 **GENERAL ALLEGATIONS**

4 **Jurisdiction**

5
6 1. The Court has jurisdiction over Plaintiffs' causes of action as alleged herein pursuant to 28
7 USC §1332 based upon the grounds of diversity of citizenship of the parties and that the amount in
8 controversy exceeds the sum or value of seventy-five thousand dollars (\$75,000.00) exclusive of
9 interest and costs. There is complete diversity of citizenship between all plaintiffs and defendants.
10

11 **PERSONAL JURISDICTION**

12
13 2. This Court has personal jurisdiction over Defendant SCHEETZ, Defendant MORGANS
14 HOTEL GROUP CO., MORGANS HOTEL GROUP, LLC, and MORGANS HOTEL GROUP
15 MANAGEMENT, MORGANS HOTEL MANAGEMENT, LLC and ROE Corporations I through
16 V, inclusive, because each of said Defendants conducted and conducts substantial business in the
17 State of Nevada and maintains an office at 4455 Paradise Road, Las Vegas, Nevada.
18

19 **VENUE**

20
21 3. This action is brought in Federal District Court in the District of Nevada pursuant to 28
22 USC § 1391 (b) (1) because the decedent, 23 year old MICHELLE HATCHEL died and/or was
23 killed as a proximate result of the Defendants, and each of them, wrongful and/or negligent acts or
24 omissions in the three bedroom penthouse suite, Tower 3, # 3004 of Turnberry Place, 2777 Paradise
25 Road, Las Vegas, Clark County, Nevada and as this is an action by her estate and her heirs for her
26 wrongful death, amongst other causes of action related thereto and set forth herein below, a
27

substantial part of the events or omissions giving rise to the claims alleged herein occurred within
1 Las Vegas, Nevada which is in the District of Nevada of the United States District Court.

2
3
4 **PARTIES**

5 4. At all times herein mentioned the Plaintiff KIM HATCHEL was and is the natural mother
6 of the decedent MICHELLE HATCHEL and is the duly appointed Special Administratrix of the
7 ESTATE OF MICHELLE HATCHEL, deceased, a special Estate filed in the State of Colorado for
8 the purpose of bringing and maintaining this action in the United States District Court in the District
9 of Nevada as the decedent MICHELLE HATCHEL was a resident of the State of Colorado at the
10 time of her death, her death having occurred on August 29, 2007 in Las Vegas. Nevada.

11
12 5. At all times mentioned herein plaintiff KIM HATCHEL was a citizen of the United States
13 and a resident of the State of Colorado and is the natural mother and surviving parent and an heir of
14 the decedent MICHELLE HATCHEL. Under the laws of the State of Colorado plaintiff KIM
15 HATCHEL is the person authorized to bring a wrongful death claim individually and as an heir of
16 the decedent and on behalf of the ESTATE OF MICHELLE HATCHEL and the other named
17 plaintiffs herein are all entitled as heirs of the decedent to each individually to assert a claims for the
18 wrongful death of MICHELLE HATCHEL and related claims on behalf of the Estate.

19
20 6. At all times mentioned herein the decedent MICHELLE HATCHEL was a citizen of the
21 United States and was a resident of the state of Colorado.

22 7. Plaintiffs are informed and believe that the natural father of MICHELLE HATCHEL,
23 Walter Hatchel, divorced from KIM HATCHEL years ago and was at the time of her death a
24 resident of the state of Texas, but is not named here as a plaintiff because Defendant ED SCHEETZ,
25 and/or other named Defendants settled his claims for the wrongful death of his natural daughter
26 MICHELLE HATCHEL for a substantial sum of money and he has no right of recovery herein.
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1 8. At all times mentioned herein Plaintiff TYLER HATCHEL is the natural brother and a
2 surviving heir of the decedent MICHELLE HATCHEL and was and is a resident of the State of
3 Colorado.

4 9. At all times mentioned herein Plaintiff CARRIE BARKER was the natural sister of
5 Plaintiff KIM HATCHEL and the maternal aunt and surviving heir of the decedent MICHELLE
6 HATCHEL and was and is a resident of the State of Colorado.

7 10. Plaintiffs are informed and believe that at all times mentioned herein the Defendant
8 WALTER EDWARD SCHEETZ aka ED SCHEETZ (hereinafter referred to as Defendant
9 SCHEETZ) was a resident of the State of Connecticut and was the Chief Executive Officer of
10 Defendant MORGANS HOTEL GROUP CO. (MHGC) from February 14, 2006 until his separation
11 from Defendant MORGANS HOTEL GROUP CO. Defendant SCHEETZ' separation from
12 Defendant MORGAN's HOTEL GROUP CO. was pursuant to a "Separation Agreement and
13 Release" entered into on September 19, 2007 ("THE TERMINATION DATE"), twenty one days
14 after the untimely, tragic, and wrongful death of the decedent MICHELLE HATCHEL which
15 occurred in the leased condominium penthouse at 2777 Paradise Road, Tower 3 #3004 of Turnberry
16 Place in Las Vegas, Clark County, Nevada. Said premises at all times mentioned herein were leased
17 by Defendant SCHEETZ and Defendant MORGANS HOTEL GROUP CO. and both Defendants
18 had actual and/or constructive control of said leased premises and its contents.

19 11. Plaintiffs are informed and believe that at all times mentioned herein Defendant ANNIE
20 DARROHN was an individual who was and is a resident of the State of California.

21 12. At all times mentioned herein Plaintiffs are informed and believe that Defendant
22 MORGANS HOTEL GROUP, LLC. was and is a Corporation in good standing duly organized
23 under the laws of the State of Delaware with its principle place of business in the State of New York.

24 13. At all times mentioned herein Plaintiffs are informed and believe that Defendant
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MORGANS HOTEL GROUP, LLC., Defendant MORGANS HOTEL MANAGEMENT, LLC., and
1 Defendant MORGANS HOTEL GROUP MANAGEMENT are and were subsidiaries and/or
2 affiliates of Defendant MORGANS HOTEL GROUP CO. and were Corporations duly organized
3 under the laws of the a State of Delaware each with their principle place of business in New York
4 City, New York and Las Vegas, Nevada, hereinafter referred to as “MORGANS HOTEL GROUP
5 COMPANIES.”
6

7 14. The true names and capacities, whether individuals, corporate, co-partnership, corporate
8 subsidiaries or affiliates, agents, representatives, employees, employers, co-conspirators, associate or
9 otherwise, of DOES I through XXX and ROE Corporations I through XXX, are unknown to the
10 Plaintiffs, who therefore sue said Defendants by said fictitious names. Plaintiff is informed and
11 believes and thereon alleges that each of the fictitiously named Defendants designated as a DOE or
12 ROE Corporation are legally responsible and/or liable in the manner set forth below for the acts,
13 conduct, and/or omissions concerning the events and happenings herein referred to which
14 proximately caused the injuries and damages suffered by the Plaintiff’s herein, and each of them,
15 and also proximately caused the wrongful death of MICHELLE HATCHEL, deceased, and Plaintiffs
16 as alleged below. Plaintiffs request leave of Court to amend the Complaint to insert the true names
17 and capacities of said Defendants, when the same has been ascertained, to join such Defendants, in
18 this action and assert the appropriate charging allegations.
19
20

21 15. At all times mentioned herein, the Defendants, and each of them, were the agents,
22 employees, partners, joint ventures, and/or co-conspirators of the other Defendants, and each of them
23 and were acting within the course and scope of their agency, employment, partnerships, joint
24 ventures, and/or civil conspiracy or concert of action and are vicariously liable, joint and severally
25 liable, liable under the Doctrine of Respondent Superior and/or as co-conspirators and legally
26 responsible for the actions or inactions, and/or omissions of each of the other Defendants which
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1 proximately resulted in the death of the decedent MICHELLE HATCHEL and the injuries and
2 damages to each of the other plaintiffs as alleged herein and proximately resulted in the injuries and
3 damages as alleged herein.
4

5 GENERAL ALLEGATIONS

6 16. Plaintiffs are informed and believe that on or before August 29, 2007, the decedent
7 MICHELLE HATCHEL was a girlfriend and paramour of Defendant SCHEETZ and had intimate
8 sexual relations, including having had sexual relations on August 29, 2007 in the aforementioned
9 Turnberry Place Tower 3, # 3004 penthouse condominium, prior to her untimely and tragic death.
10

11 17. Plaintiffs are informed and believe that prior to her death on August 29, 2007 that the
12 decedent was in good physical health and condition, had no known illnesses or infirmities and had
13 never been prescribed the controlled substance and opiate pain killer "Oxycodone" and was not an
14 abuser of the illegal controlled substance Cocaine.

15 18. Plaintiffs are informed and believe that on or before August 29, 2007 the decedent
16 MICHELLE HATCHEL did travel from Colorado to New York City, New York on a flight booked
17 by the employee of defendant's, and each of them, a certain Jennifer Obolewicz, who was acting in
18 the capacity as a secretary for Defendant SCHEETZ, both of whom were acting in the course and
19 scope of the employment for Defendants MORGANS HOTEL GROUP CO. and/ or MORGANS
20 HOTEL GROUP LLC and/or MORGANS HOTEL MANAGEMENT, LLC., and/or MORGANS
21 HOTEL GROUP MANAGEMENT.
22

23 19. Following a brief stay in New York with defendant EDWARD SCHEETZ, the
24 decedent MICHELLE HATCHEL was flown on a private jet owned and/or leased by Defendants,
25 and each of them, for use by Defendant SCHEETZ in the course and scope of his employment for
26 defendants MORGANS HOTEL GROUP CO. and/ or MORGANS HOTEL GROUP, LLC and/or
27

MORGANS HOTEL MANAGEMENT, LLC and/or MORGANS HOTEL GROUP
MANAGEMENT.

20. Plaintiffs are informed and believe thereon that a lawsuit was filed in the Supreme Court of the State of New York, County of New York on January 16, 2007 by a certain Amber Gerard, Plaintiff therein, against MORGANS HOTEL GROUP CO., MORGANS HOTEL GROUP MANAGEMENT, MORGANS HOTEL GROUP, LLC., MORGANS HOTEL MANAGEMENT, LLC., and WALTER EDWARD SCHEETZ, Defendants therein, alleging therein, among other things, causes of action against said Defendants, jointly and severally, for discrimination and sexual harassment, hostile work environment sexual harassment, quid pro quo sexual harassment and retaliation in violation of City, County and State Law and further alleging causes of action against said Defendants for defamation, Intentional infliction of emotional distress, said action arising out of said Plaintiff's employment at the Hudson Hotel located in New York, New York during which time the corporate and limited liability company defendants and their employees, managers, agents and servants (including, but not limited to, the individual defendants) acting on behalf of, in concert with, under the control and direction of, and with the knowledge of the corporate and limited liability defendants, harassed and retaliated against plaintiff and otherwise discriminated against and damaged plaintiff based on plaintiff's sex by, among other things, (a) simulating forced sex with plaintiff; (b) threatening to engage in forced sex with plaintiff; (c) touching plaintiff's breasts; (d) touching plaintiff's buttocks; (e) creating and tolerating a hostile work environment including, but not limited to, an environment polluted with nudity, sexual contact and sexual conduct; (f) illegally retaliating against plaintiff including, but not limited to, suspending plaintiff, wrongfully disciplining plaintiff, attempting to terminate plaintiff's employment, humiliating plaintiff, harassing plaintiff, and assigning to plaintiff undesirable work; (g) humiliating, disparaging and harassing plaintiff; and (h) failing to implement and enforce an effective anti-discrimination and anti-sexual harassment

1 | policy. This action also arises out of Defendant's improper and wrongful hiring and retention of
2 | inappropriate individuals unsuitable to work with plaintiff and other women.

3 | 21. At all times mentioned herein Defendant Scheetz was an individual who lived a
4 | hedonistic lifestyle involving himself, with his employer's full knowledge and consent, with
5 | multiple sexual partners, often at the same time, and the consistent and voluminous use and abuse of
6 | the controlled substance cocaine and the giving, providing, transporting, supplying and
7 | administering of cocaine and other controlled substances including oxycodone to others including to
8 | the decedent MICHELLE HATCHEL, which wrongful act and/or acts proximately caused the death
9 | of the decedent MICHELLE HATCHEL.

10 | 22. At all times mentioned herein Defendant Scheetz was the CEO of MORGANS HOTEL
11 | GROUP CO. which corporation and other corporate Defendants named herein became the majority
12 | owners of the Hardrock Hotel and Casino in Las Vegas Nevada on or about February 2007 and the
13 | Plaintiffs are informed and believe that a part of the "Hardrock" marketing's strategy its target
14 | demographic patrons included hedonistic sexually permissive and promiscuous lifestyle which also
15 | included use of illegal and/or illegally obtained, provided, given, and/or supplied controlled
16 | substances including but not limited to cocaine and oxycodone and as CEO of said named corporate
17 | Defendants, Defendant SCHEETZ's own lifestyle as above described was a living example of said
18 | "Hardrock" image and all of his actions, inactions, and/or omissions herein were within the course
19 | and scope of his employment and Plaintiffs are informed and believe that said named corporate
20 | Defendants paid for and/or reimbursed Defendant SCHEETZ for his illicit activities including those
21 | activities that occurred in the private jet or in the leased premises at Turnberry Place in Las Vegas
22 | Nevada and as such they are jointly and severally liable for the damages proximately caused by the
23 | Defendants, and each of them, as alleged herein.

24 | 23. At all times mentioned herein, Plaintiffs are informed and believe that Defendant
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1 MORGANS HOTEL GROUP CO. and all other named corporate Defendants knew or in the
2 exercise of reasonable and ordinary care should have known of the Defendant SCHEETZ's
3 hedonistic proclivities based upon common knowledge within said corporate network of his
4 employers and also as a result of the lawsuit for sexual harassment filed against them as alleged
5 herein and as a result of said continued employment of Defendant SCHEETZ said named corporate
6 Defendants are jointly and severally liable for all his actions, inactions, and omissions alleged
7 herein.

8 24. At all times mentioned herein Plaintiffs are informed and believe that prior to the
9 untimely, tragic and wrongful death of the decedent MICHELLE HATCHEL that the Defendant
10 SCHEETZ's wife had filed for divorce and was proceeding forward with said divorce until learning
11 of her husband's involvement in the death of the decedent MICHELLE HATCHEL and that on or
12 about September 28, 2007 Mrs. Scheetz filed a motion to dismiss the divorce, subsequently granted,
13 and among other things Defendant SCHEETZ transferred to his wife all rights, title and interest in
14 their eight million dollar (8,000,000.00) Connecticut Estate and that the purposes of said actions
15 were both to protect his assets from a wrongful death lawsuit and by staying married he could
16 attempt to preclude his wife from testifying against him in Court.
17

18 25. Plaintiffs are informed and believe thereon, and following the untimely, tragic, and
19 wrongful death of the decedent MICHELLE HATCHEL the Defendant SCHEETZ began
20 transferring his personal assets, both real and personal, in an effort to hide his real net worth in
21 anticipation of a wrongful death action against him as a result of his complicity in the wrongful acts
22 and/or negligence that proximately caused the death of the decedent MICHELLE HATCHEL.
23

24 26. Plaintiffs are informed and believe that an autopsy was performed on the decedent
25 MICHELLE HATCHEL and that said report by the Medical Examiner in Clark County Nevada
26 dated August 30, 2007 states that the death of the 23-year old Caucasian female, MICHELLE LYNN
27

HATCHEL, was due to “acute, multiple drug intoxication (oxycodone, cocaine).”

1 27. Plaintiffs are informed and believe that the Toxicology Report results from said autopsy
2 report from a comprehensive blood screen of the decedent MICHELLE HATCHEL set forth results
3 which included 631 NG/ML of oxycodone, 474 NG/ML cocaine, and 1765 NG/ML of
4 benzoylecgonine (cocaine metabolite).
5

6 28. Plaintiffs are informed and believe that the decedent, MICHELLE HATCHEL met
7 Defendant SCHEETZ at a nightclub in Denver, Colorado in the year 2005 and had a brief
8 intimate relationship but kept in contact with each other, mostly through text messages.
9 MICHELLE HATCHEL was then twenty one (21) years old. In her early high school life she
10 had been a freshman at Columbine High School in Colorado. She had moved briefly to Texas
11 with her father two (2) months before her boyfriend’s sister, and her friend, and several other of
12 her friends were killed in the Columbine massacre. These losses affected her for years as the
13 Defendant Scheetz well knew when he lured her into his wild, hedonistic mixture of cocaine and
14 sex on his MORGANS HOTEL GROUP CO. corporate private jet for a weekend filled with such
15 actions and behaviors in Las Vegas, Nevada.
16

17 29. Plaintiffs are informed and believe that the decedent MICHELLE HATCHEL along
18 with her friend Gina Russ flew with Defendant SCHEETZ on a private jet to Las Vegas shortly
19 after the decedent MICHELLE HATCHEL met Defendant SCHEETZ as described above.
20

21 30. Plaintiffs are informed and believe that a photograph of decedent MICHELLE
22 HATCHEL and Defendant SCHEETZ, together on the New York, New York hotel roller coaster
23 was taken in Las Vegas on September 28, 2005 during the trip described above.
24

25 31. Plaintiffs are informed and believe that the decedent MICHELLE HATCHEL along
26 with her friend Gina Russ stayed with Defendant SCHEETZ at the Hard Rock Hotel in Las
27 Vegas in the year 2005.
28

1 were random emails between Defendant SCHEETZ and the decedent MICHELLE HATCHEL
2 regarding plans to see each other again one day.

3
4 33. Plaintiffs are informed and believe that between August 17, 2007 to August 21, 2007,
5 emails were sent regarding travel plans for the decedent MICHELLE HATCHEL and a friend
6 Miko Sonntag to meet with Defendant SCHEETZ in New York and accompany him to his Las
7 Vegas business trip.

8
9 34. Plaintiffs are informed and believe that the decedent MICHELLE HATCHEL was
10 planning to depart from Denver Colorado on Monday, August 20, 2007, for New York but
11 decided to leave August 24, 2007 instead. Miko Sonntag was to arrive in New York the
12 following day; all expenses for said trip were paid by Defendants, and each of them.

13
14 35. Plaintiffs are informed and believe that while decedent MICHELLE HATCHEL was
15 staying in New York with Defendant SCHEETZ, she unexpectedly located clothes belonging to
16 Defendant "ANNIE DARROHN," a former girlfriend of Defendant SCHEETZ, and the decedent
17 MICHELLE HATCHEL and Defendant SCHEETZ argued about the same.

18
19 36. Plaintiffs are informed and believe that on or between August 24, 2007 and August
20 27, 2007 the decedent MICHELLE HATCHEL and Defendant SCHEETZ had several text
21 messages and verbal disagreements regarding MICHELLE HATCHEL accompanying Defendant
22 SCHEETZ to Las Vegas and that much of the disagreement involved Defendant SCHEETZ
23 seeing other women in Las Vegas upon his arrival on August 28, 2007, but despite Defendant
24 SCHEETZ objections to the contrary he acquiesced in the decedent MICHELLE HATCHEL's
25 desire to spend time with him in Las Vegas.

26
27 37. Plaintiffs are informed and believe that the decedent MICHELLE HATCHEL arrived
28 in Las Vegas on August 28, 2007 by Defendant SCHEETZ's/Defendant MORGANS HOTEL

GROUP CO's private jet, to stay at their leased penthouse condominium at Turnberry Place as
1 herein alleged.

2 38. Plaintiffs are informed and believe that Defendant ANNIE DARROHN was at
3 sometime present at the said Turnberry condominium with the decedent MICHELLE HATCHEL
4 and Defendant SCHEETZ on or between August 28, 2007 through August 29, 2007, but was
5 present with Defendant SCHEETZ when the decedent MICHELLE HATCHEL died at said
6 location on August 29, 2007.

7 8 39. Plaintiffs are informed and believe that decedent MICHELLE HATCHEL sent a text
9 message to Miko Sonntag on August 28, 2007 at 10:50 p.m. stating, "This girl just told Ed that
10 she loved him," a copy of which is attached hereto as Exhibit #1 and incorporated herein as
11 though set forth in full.

12 13 39. Plaintiffs are informed and believe that the decedent MICHELLE HATCHEL sent a
14 text message to her friend Gina Russ in Colorado on August 28, 2007 at 11:56 p.m. stating, "I
15 am not having fun! I can't believe how much coke he does all the time all day long he keeps
16 leaving me to talk to a girl he dated," a copy of which is attached hereto as Exhibit #2 and
17 incorporated herein as though set forth in full.

18 19 40. Plaintiffs are informed and believe that on or about August 28, 2007, at 11:58 p.m.
20 Gina Russ responded to a text message from decedent MICHELLE HATCHEL and stated, "That
21 sucks try to come back," a copy of which is attached hereto as Exhibit #3 and incorporated
22 herein as though set forth in full.

23 24 41. Plaintiffs are informed and believe that on or about August 29, 2007, at 12:43 am
25 Gina Russ sent a text message to the decedent MICHELLE HATCHEL stating, "Is that girl still
26 mad with you?," a copy of which is attached hereto as Exhibit #4 and incorporated herein as
27 though set forth in full.

42. Plaintiffs are informed and believe that on August 27, 2009 at 12:53 am decedent

1 MICHELLE HATCHEL started a draft text message to her friend Gina Russ stating, "I think
2 they are trying to". The text was never finished or sent, a copy of which is attached hereto as
3 Exhibit #5 and incorporated herein as though set forth in full.
4

5 43. Plaintiffs are informed and believe that text messages continued constantly between
6 the decedent MICHELLE HATCHEL and Defendant SCHEETZ from August 24, 2007 to
7 August 29, 2007, except that the decedent MICHELLE HATCHEL's last text message she
8 attempted to draft is set forth in the above paragraph, but the defendant SCHEETZ texted the
9 decedent MICHELLE HATCHEL on August 29, 2007 at 9:10 a.m., at 7:53 p.m., and 7:58 p.m.
10 and there is no record of any telephone calls to the decedent MICHELLE HATCHEL between
11 those times on August 29, 2007, despite defendant Scheetz' statements to the Las Vegas
12 Metropolitan Police Department to the contrary.
13

14 44.. Plaintiffs are informed and believe that the Defendant SCHEETZ lied to the Las
15 Vegas Metropolitan Police Department when he stated that the decedent MICHELLE
16 HATCHEL was at the "Pure" night club until 3:00 a.m., and lied about other facts to the police.
17

18 45. Plaintiffs are informed and believe that on August 29, 2007, the Defendant
19 SCHEETZ stated that he had sex with the decedent MICHELLE HATCHEL around 3:00 a.m.
20 and that he last spoke to her at 9:00 am before he had left for work.

21 46. Plaintiffs are informed and believe that the Defendant SCHEETZ lied to the Las
22 Vegas Metropolitan Police Department when he stated that the decedent MICHELLE
23 HATCHEL was alive when he left the Turnberry penthouse condominium at 9:00 a.m. on
24 August 29, 2007.
25

26 47. Plaintiffs are informed and believe that the decedent MICHELLE HATCHEL called
27 her brother TYLER HATCHEL on August 29, 2009 in the early morning hours before 3:00 a.m.
28

1 stating that she was hiding in the closet in the said Turnberry penthouse condominium stating
2 that she was shocked by the Defendant SCHEETZ's excessive drug use and she was scared.

3 48. Plaintiffs are informed and believe that in the early morning hours of August 29,
4 2007, TYLER HATCHEL spoke with the decedent MICHELL HATCHEL again where she had
5 expressed fear at the Turnberry condominium, and TYLER HATCHEL believes that their
6 conversation was unusual and he was concerned about her safety.

7 49. Plaintiffs are informed and believe that on August 24, 2007, Miko Sonntag met up
8 with the decedent MICHELLE HATCHEL in New York and stayed with her at the Defendant
9 SCHEETZ's New York apartment.

10 50. Plaintiffs are informed and believe that on August 25, 2007, Miko Sonntag and the
11 decedent MICHELLE HATCHEL were moved to the Hudson Hotel in NYC and were expected
12 to check out the next day.

13 51. Plaintiffs are informed and believe that Miko Sonntag made plans to travel back to
14 Denver the night of Monday, August 27, 2007, and ended up arriving back in Denver the early
15 morning of August 28, 2007.

16 52. Plaintiffs are informed and believe that the last text from Miko Sonntag to the
17 decedent MICHELLE HATCHEL was on August 28, 2007, at 10:26pm stating, "Left ya a
18 message. Today was rough. Happy you are there :) Let me know if you want company. I'm off
19 this weekend for my reunion but I'll miss it..." A copy of which is attached hereto as Exhibit #6
20 and incorporated herein as though set forth in full.

21 53. Plaintiffs are informed and believe that the decedent MICHELLE HATCHEL texted
22 Miko from the Turnberry penthouse condominium closet on August 28, 2009, at 10:36 pm
23 stating, "Things are really bad. Ed has been so mean to me," a copy of which is attached hereto
24 as Exhibit #7 and incorporated herein as though set forth in full.
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1 54. Plaintiffs are informed and believe that the decedent MICHELLE HATCHEL was
2 given, provided, given access to, and/or supplied the cocaine and oxycodone by Defendant
3 SCHEETZ, and DOES I through X, inclusive, in violation of Nevada Revised Statute 453.316
4 and 453.321 and that the ingestion of said controlled substances proximately caused her death in
5 violation of Nevada Revised Statute 200.010 (2) and Nevada Revised Statute 453.333 and that
6 he and Defendant ANNIE DARROHN failed to timely aid her in recovery or seek necessary
7 medical assist for the decedent MICHELLE HATCHEL in violation of Nevada Revised Statute
8 453.333 and 453.3335 (c).

9 55. Plaintiffs are informed and believe that on or about August 25, 2007 Defendant
10 SCHEETZ sent via cellular telephone media mail the decedent MICHELLE HATCHEL a
11 photograph of himself bound and tied at his ankles, legs and wrists. A copy of which is attached
12 hereto as Exhibit #8 and incorporated herein as though set forth in full.

13 56. Plaintiffs are informed and believe that at 1:00 a.m. on August 25, 2007 the
14 Defendant SCHEETZ sent a text message to the decedent MICHELLE HATCHEL stating that "I
15 don't know what to do with myself. I'm bot tied up and bloody," a copy of said text message is
16 attached hereto as Exhibit #9 and incorporated herein as though set forth in full.

17 57. Plaintiffs are informed and believe that at approximately 2:04 a.m. the Defendant
18 SCHEETZ twice sent via cellular telephone media mail to decedent MICHELLE HATCHEL a
19 photograph of himself having sexual intercourse with a female in a pink bathing suit with his
20 hand around her neck strangling/choking her and she doesn't look like she likes it. A copy of
21 said photograph edited for discretion purpose to exclude graphic detail of genitalia is attached
22 hereto as Exhibit #10 and by this reference incorporated herein as though set forth in full.

23 58. Plaintiffs are informed and believe that on August 25, 2007 at 2:04 a.m. Defendant
24 SCHEETZ sent via cellular telephone media mail to decedent MICHELLE HATCHEL a
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1 photograph of a female with brown hair giving him oral sex, a copy of said photograph, edited to
2 leave out graphic genitalia, is attached hereto as Exhibit #11 and incorporated herein as though
3 set forth in full.

4 59. Plaintiffs are informed and believe that on August 29, 2007 at 1:30 p.m. Defendant
5 SCHEETZ sent via cellular telephone media mail to decedent MICHELLE HATCHEL a nude
6 photograph that he had taken of the decedent MICHELLE HATCHEL taken from his cellular
7 telephone the evening of August 28, 2007.

8 60. Plaintiffs are informed and believe that the last photographs taken by the decedent
9 MICHELLE HATCHEL on her cellular telephone from inside the Defendant SCHEETZ' and
10 Defendant MORGANS HOTEL GROUP CO.'s said Turnberry Place penthouse condominium
11 facing toward a window on August 29, 2007 at 4:51 a.m. and 4:52 a.m.

12 61. Plaintiffs are informed and believe that at all times mentioned herein the premises located
13 at Turnberry Place, 2777 Paradise Road, Tower 3, # 3004, Las Vegas, Nevada was leased by
14 Defendant SCHEETZ and corporate Defendants MORGANS HOTEL GROUP CO., MORGANS
15 HOTEL GROUP, LLC, MORGANS HOTEL MANAGEMENT, LLC, and MORGANS HOTEL
16 GROUP MANAGEMENT and that said premises were used and maintained for the purpose of
17 entertaining guests of said named Defendants, and each of them, and for the use of said premises for
18 the hedonistic lifestyle of Defendant SCHEETZ which said lifestyle was in the course and scope of
19 his employment as Chief Executive Officer (CEO) of Defendant MORGANS HOTEL GROUP CO.
20 and that a part of said premises included importing, transporting, selling, exchanging, bartering,
21 supplying, prescribing, dispensing, giving away or administering controlled or counterfeit
22 substances, including cocaine, in violation of Nevada Revised Statute 453.316 and 453.321 (1).
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26 62. Plaintiffs are informed and believe that the decedent MICHELLE HATCHEL was
27 assaulted and battered between August 18, 2007 and August 29, 2007 and as a result of said
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1 assault and battery that she suffered injuries which resulted in bruises and abrasions to her body
2 including a “black eye”/contusion to the right upper eyelid, abrasions on the back of the fingers
3 of the right hand, a contusion on the lateral aspect of the left arm, a contusion is on the back of
4 the forearm, an abrasion on the back of the left hand, an abrasion on the right knee, and various
5 contusions on the legs bilaterally.

6 63. Plaintiffs are informed and believe that when the 911 tape of August 29, 2007 called
7 in by Defendant SCHEETZ to the Las Vegas Metropolitan Police Department is listened to
8 under enhancement that there are two individuals speaking from inside the afore-described
9 Turnberry Place penthouse condominium leased by Defendant SCHEETZ and corporate
10 Defendants MORGANS HOTEL GROUP CO., and/or MORGANS HOTEL GROUP, LLC.,
11 and/or MORGANS HOTEL MANAGEMENT, LLC, and/or MORGANS HOTEL GROUP
12 MANAGEMENT which is contrary to the statements of Defendant Scheetz to the Las Vegas
13 Metropolitan Police Department. The investigation of the premises where over 7 grams of
14 cocaine and a prescription bottle in the name of Defendant Scheetz for oxycodone were located
15 in said premises and of the death of MICHELLE HATCHEL was turned over to the Clark
16 County Coroners Office and the Las Vegas Metropolitan Police Department “Homicide”
17 detectives were never given the case to investigate.
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20 DEFINITIONS

21 64. **NRS 41.085** Heirs and personal representatives may maintain action.

22 1. As used in this section, “heir” means a person who, under the laws of this
23 state, would be entitled to succeed to the separate property of the decedent if he died
24 intestate.
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26 2. When the death of any person, whether or not a minor, is caused by the
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1 wrongful act of another, the heirs of the decedent and the personal representatives of
2 the decedent may each maintain an action for damages against the person who
3 caused the death, or if the wrongdoer is dead, against his personal representatives,
4 whether the wrongdoer died before or after the person he injured. If any other person
5 is responsible for the wrongful act or neglect, or if the wrongdoer is employed by
6 another person who is responsible for his conduct the action may be maintained
7 against that other person, or if he is dead against his personal representatives.

8 3. An action brought by the heirs of a decedent pursuant to subsection 2 and the
9 cause of action of that decedent brought or maintained by his personal
10 representatives which arose of the same wrongful act or neglect may be joined.

11 4. The heirs may prove their respective damages in the action brought pursuant
12 to subsection 2, and the court or jury may award each person pecuniary damages for
13 his grief or sorrow, loss of probable support, companionship, society, comfort and
14 consortium, and damages for pain, suffering or disfigurement of the decedent.

15 5. The damages recoverable by the personal representatives of a decedent on
16 behalf of his estate include:
17

18 (a) Any special damages, such as medical expenses, which the decedent
19 incurred or sustained before his death, and funeral expenses; and
20

21 (b) Any penalties, including, but not limited to, exemplary or punitive
22 damages, that the decedent would have recovered if he had lived,
23

24 But do not include damages for pain, suffering or disfigurement of the decedent. The
25 proceeds of any judgment for damages awarded under this subsection are liable for
26 the debts of the decedent unless exempted by law. Plaintiffs are informed and believe
27 that the Estate of MICHELLE HATCHEL has no debts nor creditors.
28

65. **NRS 193.0175** states as follows:

1 “Malice” and ‘maliciously’ import evil intent, wish or design to vex, annoy or injure
2 another person. Malice may be inferred from an act done in willful disregard of the rights of
3 another, or an act wrongfully done without just cause or excuse, or an act or omission of duty
4 betraying a willful disregard of social duty.
5

66. **NRS 193.018** states as follows:

7 “Neglect”, “negligence,” “negligent” and “negligently” import a want of such
8 attention to the nature or probable consequences of an act or omission as an ordinarily
9 prudent person usually exercises in his own business.
10

67. **NRS 193.0195** states as follows:

11 “Owner” of any property includes any person who has a general or special property
12 in the whole or any part thereof, or lawful possession thereof, either actual or constructive.
13

68. **NRS 193.090** states as follows:

14 The omission to specify or affirm in this Title any liability to any damages, penalty,
15 forfeiture or other remedy imposed by law, and allowed to be recovered or enforced in any
16 civil action or proceeding, for any act or omission declared punishable in this Title shall not
17 affect any right to recover or enforce the same.
18

69. **NRS 195.020** states as follows:

19 Every person concerned in the commission of a felony, gross misdemeanor or
20 misdemeanor, whether he directly commits the act constituting the offense, or aids or abets
21 in its commission, and whether present or absent; and every person who, directly or
22 indirectly, counsels, encourages, hires, commands, induces or otherwise procures another to
23 commit a felony, gross misdemeanor or misdemeanor is a principle, and shall be proceeded
24 against and punished as such. The fact that the person aided, abetted, counseled, encouraged,
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1 hired, commanded, induced or procured, could not or did not entertain a criminal intent shall
2 not be a defense to any person aiding, abetting, counseling, encouraging, hiring,
3 commanding, inducing or procuring him.

4 70. **NRS 199.230** states as follows:

5 A person who, by persuasion, force, threat, intimidation, deception or otherwise, and
6 with the intent to obstruct the course of justice, prevents or attempts to prevent another
7 person from appearing before any court, or person authorized to subpoena witnesses, as a
8 witness in any action, investigation or other official proceeding, or causes or induces another
9 person to absent himself from such a proceeding or evade the process which requires him to
10 appear as a witness to testify or produce a record, document or other object, shall be
11 punished:

- 12 1. Where physical force or the immediate threat of physical force is used, for a
13 category D felony as provided in NRS 193.130.
- 14 2. Where no physical force or immediate threat of physical force is used, for a
15 gross misdemeanor.
16

17 71. **NRS 199.240** states as follows:

18 A person who:

- 19 1. Gives, offers or promises directly or indirectly any compensation, gratuity or
20 reward to any witness or person who may be called as a witness in an official
21 proceeding, upon an agreement or understanding that his testimony will be
22 thereby influenced; or
23
- 24 2. Uses any force, threat, intimidation or deception with the intent to:
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26 (a) Influence the testimony of any witness or person who may be called
27 as a witness in an official proceeding;
28

1 (b) Cause or induce him to give false testimony or to withhold true
2 testimony; or

3 (c) Cause or induce him to withhold a record, document or other object
4 from the proceeding,

5 is guilty of a category C felony and shall be punished as provided in NRS
6 193.130, and may be further punished by a fine of not more than \$50,000.00

7 72. **NRS 199.480** states as follows:

8 1. Except as otherwise provided in subsection 2, whether two or more persons
9 conspire to commit murder, robbery, sexual assault, kidnaping in the first or
10 second degree, arson in the first or second degree, or a violation of NRS 205.463,
11 each person is guilty of a category B felony and shall be punished;

12 (a) If the conspiracy was to commit robbery, sexual assault, kidnaping in
13 the first or second degree, arson in the first or second degree, or a
14 violation or NRS 205.463, by imprisonment in the state prison for a
15 minimum term of not less than 1 year and a maximum term of not more
16 than 6 years; or

17 (b) If the conspiracy was to commit murder, by imprisonment in the state
18 prison for a minimum term of not less than 2 years and a maximum term
19 of not more than 10 years,

20 And may be further punished by a fine of not more than \$5,000.00

21 2. If the conspiracy subjects the conspirators to criminal liability under NRS
22 207.400, they shall be punished in the manner provided in NRS 207.400.

23 3. Whenever two or more persons conspire;

24 (a) To commit any crime other than those set forth in subsections 1 and
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2, and no punishment is otherwise prescribed by law;

- 1 (b) Falsely and maliciously to procure another to be arrested or
2 proceeded against for a crime;
- 3 (c) Falsely to institute or maintain any action or proceeding;
- 4 (d) To cheat or defraud another out of property by unlawful or fraudulent
5 means;
- 6 (e) To prevent another from exercising any lawful trade or calling, or
7 from doing any other lawful act, by force, threats or intimidation, or by
8 interfering or threatening to interfere with any tools, implements or
9 property belonging to or used by another, or with the use or employment
10 thereof;
- 11 (f) To commit any act injurious to the public health, public morals, trade
12 or commerce, or for the perversion or corruption of public justice or the
13 due administration of the law; or
- 14 (g) To accomplish any criminal or unlawful purpose, or to accomplish a
15 purpose, not in itself criminal or unlawful, by criminal or unlawful
16 means, each person is guilty of a gross misdemeanor.

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20 73. **NRS 200.010** states in pertinent part that murder is the unlawful killing of a human being
21 as follows:

- 22 1. With malice aforethought, either express or implied;
- 23 2. Caused by a controlled substance which was sold, given, traded, or otherwise made
24 available to a person in violation of chapter 453 of NRS: The Nevada Revised Statutes.
- 25 3. Caused by a violation of NRS 453.3325.

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27 The unlawful killing may be effected by any of the various means by which death may be
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occasioned.

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74. **NRS 200.020** states as follows:

1. Express malice is that deliberate intention unlawfully to take away the life of a fellow creature, which is manifested by external circumstances capable of proof.
2. Malice shall be implied when no considerable provocation appears, or when all circumstances of the killing show an abandoned and malignant heart.

Implied malice signifies general malignant disregard and recklessness of others' lives and safety or disregard of social duty. Malice is the malignant disregard and recklessness concerning life and safety of another.

75. **NRS 453.101** states as follows:

“Narcotic drug” means any of the following, however manufactured:

1. Opium, opium derivative, and any derivative of either, including their salts, isomers and salts of isomers but not including isoquinoline alkaloids of opium;
2. Synthetic opiate and any derivatives of synthetic opiate, including their isomers, esters, esthers, salts, and salts of isomers, esters and esthers;
3. Poppy straw and concentrate of poppy straw;
4. Coca leaves, except coca leaves and extracts of coca leaves from which cocaine, ecgonine, and derivatives of ecgonine or their salts have been removed;
5. Cocaine, or any salt, isomer or salt of isomer of cocaine;
6. Cocaine base;
7. Ecgonine, or any derivative, salt, isomer or salt of isomer of ecgonine; and
8. A compound, mixture or preparation containing any quantity of a substance listed in this section.

76. **NRS 453.106 (1)** states as follows:

- 1 “Opiate” means any substance having an addiction-forming or addiction-
2 sustaining liability similar to morphine or being capable of conversion into a
3 drug having addiction-forming or addiction sustaining liability, including opium,
4 opium derivatives and synthetic opiates.

5 77. **NRS 453.316** states in pertinent part:

- 6 1. A person who opens or maintains any place for the purpose of unlawfully selling,
7 giving away or using controlled substance is guilty of a category B felony and shall
8 be punished by imprisonment in the state prison for a minimum term of not less than
9 1 year and a maximum term of not more than 6 years, and may be further punished
10 by a fine of not more than \$10,000.00, except as otherwise provided in subsection 2.
11
12 2. If a person convicted of violating this section has previously been convicted of
13 violating this section, or if, in the case of a first conviction of violating this section,
14 he has been convicted of an offense under the laws of the United States or any state,
15 territory or district which, if committed in this state, would amount to a felony under
16 this section, he is guilty of a category B felony and shall be punished by
17 imprisonment of not less than 2 years and a maximum of not more than 10 years, and
18 may be further punished by a fine of not more than \$20,000.00. The court shall not
19 grant probation to or suspend the sentence of a person convicted or violating this
20 section if he has been previously convicted under this section or of any other offense
21 described in this section.
22
23 3. This section does not apply to any rehabilitation clinic established or licensed by the
24 health division of the department of human resources.

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26 78. **NRS 453.321** states in pertinent part:

- 27 1. Except as authorized by the provisions of NRS 453.011 to 453-552, inclusive, it is
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unlawful for a person to:

- 1 (a) Import, transport, sell, exchange, barter, supply, prescribe, dispense, give
2 away or administer a controlled or counterfeit substance;...
3
4 (b) Offer or attempt to do any act set forth in paragraph (a)...

5 79. **NRS 453.333** states in pertinent part:

6 If the death of a person is proximately caused by a controlled substance which was sold,
7 given, traded or otherwise made available to him by another person in violation of this chapter, the
8 person who sold, gave or traded or otherwise made the substance available to him is guilty of
9 murder.

10 80. **NRS 453.3335** states in pertinent part that a person is guilty of violating NRS 453.321 or
11 NRS 453.333 where:

- 12
13 (a) The use of the controlled substance by a person resulted in death or
14 substantial bodily harm to the person;
15 (b) The defendant was in the presence of the injured person when he manifested
16 an adverse physical reaction to the controlled substance; and
17 (c) The defendant failed to render or seek necessary medical assistance for the
18 injured person in a timely manner,

19 shall be punished by imprisonment in the state prison for a term equal to and in
20 addition to the term of imprisonment prescribed by statute for the crime. The
21 sentence prescribed by this section runs consecutively with the sentence prescribed
22 by statute for the crime.
23

- 24 1. This section does not create a separate offense but provides an additional penalty for
25 the primary offense, whose imposition is contingent upon the finding of the
26 prescribed fact and as such said statute codifies a duty upon persons who violate
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NRS 453.321 and/or 453.316 and that any breach of that duty causes additional harm

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which is compensable to Plaintiffs, and each of them.

81. NRS 453.3628 (1) states as follows:

“Prescription drug” means:

- 1. A controlled substance or dangerous drug that may be dispensed to an ultimate user only pursuant to a lawful prescription: and
- 2. Any other substance or drug substituted for such a controlled substance or dangerous drug.

82. Cocaine is a controlled substance within the purview of chapter 453 of the NRS and the Uniform Controlled Substances Act NRS 453.011 Oxycodone.....

83. Benzoylcegonine is a metabolite of cocaine which becomes present in the blood and/or urine of a person after cocaine is ingested or otherwise introduced into a person’s body and.....

84. At all times mentioned herein the Defendants, and each of them, were not pharmacists, lawful prescribers, law enforcement officers, physicians nor medical practitioners with legal authority to give,.....Cocaine or oxycodone to any person in violation of any of the provisions of Chapter 453 of Nevada Revised Statutes.

FIRST CAUSE OF ACTION
(Assault and Battery)

Plaintiff KIM HATCHEL as special administratrix of the ESTATE OF MICHELLE HATCHEL alleges as follows:

85. Plaintiff repeats and re-alleges each and every allegation contained in Paragraph 1 through 84 inclusive, as though fully set forth herein.

1 agents or employees, in concert with others, as part of a civil conspiracy or otherwise as
2 alleged herein to establish liability in Defendants, and each of them, on or about August
3 28, 2009 and August 29, 2009 did cause the person of the decedent MICHELLE
4 HATCHEL to feel fear and apprehension of harmful or offensive conduct and did
5 thereafter cause the uncomfortable, harmful, and without consent touching of the
6 decedent MICHELLE HATCHEL all of which did proximately cause the injuries and
7 damages as alleged herein.
8

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10 87. As a direct and proximate result of the assault and battery of the decedent MICHELLE
11 HATCHEL she suffered physical harm and injuries including bruises and abrasions about
12 her face, arms and legs as alleged hereinabove, as well as mental distress, emotional
13 harm, emotional distress, fear, apprehension of harm, mental anguish, fear, stress, and/or
14 mental and emotional suffering and physical pain and is entitled to an award in excess of
15 seventy five thousand dollars (\$75,000) but Plaintiff's Estate is demanding general
16 damages in the amount of ten million dollars (\$10,000,000)
17

18 88. That as a result of the conduct, actions, inactions, and/or omissions of the Defendants, and
19 each of them, all of which were malicious, oppressive, and/or committed with the conscious
20 and reckless disregard for the rights, safety, health, and/or life of the decedent MICHELLE
21 HATCHEL and the ESTATE OF MICHELLE HATCHEL is entitled to an award of
22 exemplary and punitive damages in an amount in excess of seventy-five thousand dollars
23 (\$75,000.00) but at this time Plaintiff KIM HATCHEL on behalf of the ESTATE OF
24 MICHELLE HATCHEL is demanding an award for punitive damages from Defendants in a
25 minimum amount of twenty five million dollars (\$25,000,000.)
26

27 89. That it has been necessary for Plaintiff, KIM HATCHEL on behalf of the ESTATE OF
28

MICHELLE HATCHEL, to retain the services of an attorney to prosecute this action and said Plaintiff is therefore entitled to reasonable attorney's fees herein.

SECOND CAUSE OF ACTION
(Wrongful Death by Wrongful Acts)

90. Plaintiff repeats and re-alleges each and every allegation contained in Paragraphs 1 through 89 inclusive, as though fully set forth herein.

91. As a result of the wrongful acts of the Defendants, and each of them, as alleged hereinabove, and individually, as agents or employees, in concert with others, as part of a civil conspiracy or otherwise as alleged herein to establish liability in Defendants, and each of them, by importing, transporting, selling, exchanging, bartering, supplying, prescribing, dispensing, giving away or administering controlled substances including cocaine and oxycodone to the decedent MICHELLE HATCHEL Defendants, and each of them, did proximately cause the wrongful death of the decedent MICHELLE HATCHEL in violation of NRS 453.316, NRS 453.321, NRS 453.333, NRS 453.3335, NRS 200.010 (2), and as a proximate result of said wrongful acts, proximately caused the death of MICHELLE HATCHEL and the injuries and damages set forth herein.

92. That by reason of the premises and as a direct result of the actions of Defendants, and each of them, the ESTATE OF MICHELLE HATCHEL is therefore entitled to funeral expenses, loss of probable support and any other special damages, an amount at this time unascertained and plaintiff will ask leave of court to amend this amount when the same has been fully ascertained at trial.

93. That by reason of premises and as a direct and proximate result of the conduct, actions, inactions, and/or omissions of the Defendants, and each of them, each were malicious,

1 | oppressive, and/or committed with the conscious and reckless disregard for the rights, safety,
2 | health, and/or life of the Plaintiffs, and each of them, and/or the decedent MICHELLE
3 | HATCHEL, the ESTATE OF MICHELLE HATCHEL is entitled to an award of exemplary
4 | and punitive damages in an amount in excess of seventy five thousand dollars (\$75,000) but
5 | at this time Plaintiffs are demanding an award for punitive damages in the amount of one
6 | hundred million dollars (\$100,000,000.)

7 | 94. That it has been necessary for Plaintiff, KIM HATCHEL on behalf of the ESTATE OF
8 | MICHELLE HATCHEL, to retain the services of an attorney to prosecute this action and
9 | said Plaintiff is therefore entitled to reasonable attorney's fees herein.

10 |
11 | **THIRD CAUSE OF ACTION**
12 | (Wrongful Death by Negligence)

13 | 95. Plaintiff repeats and re-alleges each and every allegation contained in Paragraphs 1 through
14 | 94 inclusive, as though fully set forth herein.

15 | 96. That as a result of the negligent acts of the Defendants, and each of them, by violating their
16 | duty to act in a reasonable and prudent fashion and individually, as agents or employees, in
17 | concert with others, as part of a civil conspiracy or otherwise as alleged herein to establish
18 | liability in Defendants, and each of them, by importing, transporting, selling, exchanging,
19 | bartering, supplying, prescribing, dispensing, giving away or administering controlled
20 | substances including cocaine and oxycodone to the decedent MICHELLE HATCHEL which
21 | did proximately cause the death of the decedent MICHELLE HATCHEL in violation of
22 | NRS 453.316, NRS 453.321, NRS 453.333, NRS 453.3335, and NRS 200.010 (2).

23 |
24 | 97. That by reason of the premises and as a direct result of the actions of Defendants, and each
25 | of them, the ESTATE OF MICHELLE HATCHEL is therefore entitled to funeral expenses,
26 | loss of probable support and any other special damages, an amount at this time unascertained
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and plaintiff will ask leave of court to amend this amount when the same has been fully
ascertained at trial.

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98. That it has been necessary for Plaintiff, KIM HACHEL on behalf of the ESTATE OF
MICHELLE HACHEL, to retain the services of an attorney to prosecute this action and
said Plaintiff is therefore entitled to reasonable attorney's fees herein.

FOURTH CAUSE OF ACTION
(Wrongful Death by Negligence Per Se)

99. Plaintiffs repeat and re-allege each and every allegation contained in Paragraph 1 through 98
inclusive, as though fully set forth herein.

100. Defendants, and each of them, individually, as agents or employees, in concert with
others, as part of a civil conspiracy or otherwise as alleged herein to establish liability in
Defendants, and each of them, did violate Nevada Revised Statutes 453.316, 453.321,
453.333, 453.3335, and 200.010, said statutes being enacted for the safety of persons in the
State of Nevada of which the decedent MICHELLE HACHEL was such a person and
Defendants, and each of them, were negligent per se and are responsible for all injuries and
damages proximately caused thereby.

101. That by reason of the premises and as a direct result of the actions of Defendants, and
each of them, the ESTATE OF MICHELLE HACHEL is therefore entitled to funeral
expenses, loss of probable support and any other special damages, an amount at this time
unascertained and plaintiff will ask leave of court to amend this amount when the same has
been fully ascertained at trial.

102. That it has been necessary for Plaintiff, KIM HACHEL on behalf of the ESTATE
OF MICHELLE HACHEL, to retain the services of an attorney to prosecute this action and
said Plaintiff is therefore entitled to reasonable attorney's fees herein.

FIFTH CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

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103. Plaintiffs repeat and re-allege each and every allegation contained in Paragraph 1 through 102 inclusive, as though fully set forth herein.

104. The acts of Defendants, and each of them, individually, as agents or employees, in concert with others, as part of a civil conspiracy or otherwise as alleged herein to establish liability in Defendants, and each of them, constituted extreme and outrageous conduct, were not privileged, and recklessly caused the decedent MICHELLE HATCHEL injury, damages and subsequently her death, and caused the Plaintiff to suffer severe emotional distress and suffering, damages and/or destruction of their mental and emotional health until her death August 29, 2009.

105. The Defendants', and each of them, actions, inactions, omissions and any conduct as herein alleged did intentionally inflict emotional distress upon person of decedent MICHELLE HATCHEL and did proximately cause her emotional harm prior to her death and proximately caused the damages in an amount in excess of seventy thousand dollars (\$75,000) but at this time Plaintiff is demanding an award of ten million dollars (\$10,000,000).

106. That as a result of the conduct, actions, inactions, and/or omissions of the Defendants, and each of them, of which were malicious, apprehensive, and/or committed with the conscious and reckless disregard for the rights, safety, health, and/or life of the Plaintiffs, and each of them, and/or the decedent MICHELLE HATCHEL, the ESTATE OF MICHELLE HATCHEL is entitled to an award of exemplary and punitive damages in an amount in excess of seventy-five thousand dollars (\$75,000.00.) but at this time Plaintiff is demanding an award for punitive damages in the amount of twenty five million dollars

(\$25,000,000.)

1 107. That it has been necessary for Plaintiff, KIM HATCHEL on behalf of the ESTATE
2 OF MICHELLE HATCHEL, to retain the services of an attorney to prosecute this action and
3 said Plaintiff is therefore entitled to reasonable attorney's fees herein.
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5 **SIXTH CAUSE OF ACTION**
6 (Wrongful Death by Wrongful Acts)

7 Plaintiffs KIM HATCHEL, individually and as the surviving natural mother of the decedent
8 MICHELLE HATCHEL, HELEN BARKER, individually, and as the surviving maternal
9 grandmother of the decedent MICHELLE HATCHEL, TYLER HATCHEL, individually and as
10 the surviving brother of the decedent MICHELLE HATCHEL, and CARRIE BARKER,
11 individually and as the surviving aunt of the decedent MICHELLE HATCHEL allege as follows:
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13 108. Plaintiff repeats and re-alleges each and every allegation contained in Paragraphs 1
14 through 107 inclusive, as though fully set forth herein.
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16 109. As a result of the wrongful acts of the Defendants, and each of them, as alleged
17 hereinabove, and individually, in concert with others, or as part of a civil conspiracy as
18 otherwise alleged to create liability in each Defendant by importing, transporting, selling,
19 exchanging, bartering, supplying, prescribing, dispensing, giving away or administering
20 controlled substances including cocaine and oxycodone to the decedent MICHELLE
21 HATCHEL Defendants, and each of them, did proximately cause the wrongful death of the
22 decedent MICHELLE HATCHEL in violation of NRS 453.316, NRS 453.321, NRS
23 453.333, NRS 453.3335, NRS 200.010 (2), and as a proximate result of said wrongful acts,
24 proximately caused the death of MICHELLE HATCHEL and the injuries and damages set
25 forth herein.
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27 110. That by reason of the premises and as a direct and proximate result of the actions of
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1 the Defendants, and each of them, Plaintiffs KIM HATCHEL, HELEN BARKER, TYLER
2 HATCHEL, and CARRIE BARKER as heirs of the decedent MICHELLE HATCHEL, were
3 each hurt and injured in health, strength, and activity, sustaining injury to their bodies and
4 shock and injury to their nervous systems and persons, all of which said injuries have caused,
5 and continue to cause Plaintiffs loss of probable support, great mental anguish and physical
6 pain and suffering, resulting in some permanent disability to the said Plaintiffs general
7 damages in a minimum amount in excess of seventy five thousand dollars (\$75,000) but at
8 this time said Plaintiffs are demanding twenty five million dollars (\$25,000,000.)

9 111. That by reason of premises and as a direct and proximate result of the conduct,
10 actions, inactions, and/or omissions of the Defendants, and each of them, as alleged herein ,
11 each were malicious, oppressive, and/or committed with the conscious and reckless disregard
12 for the rights, safety, health, and/or life of the Plaintiffs, and each of them, and/or the
13 decedent MICHELLE HATCHEL, Plaintiffs KIM HATCHEL, HELEN BARKER, TYLER
14 HATCHEL, and CARRIE BARKER as heirs of the decedent MICHELLE HATCHEL are
15 entitled to an award each of exemplary and punitive damages in a minimum amount in
16 excess of seventy-five thousand dollars (\$75,000.00) but at this time said Plaintiffs are
17 demanding an award for punitive damages in the amount of seventy five million dollars
18 (\$75,000,000.)
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21 112. That it has been necessary for Plaintiffs, KIM HATCHEL, HELEN BARKER,
22 TYLER HATCHEL, and CARRIE BARKER as heirs of the decedent MICHELLE
23 HATCHEL, to retain the services of an attorney to prosecute this action and said Plaintiffs
24 are therefore entitled to reasonable attorney's fees herein.
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27 **SEVENTH CAUSE OF ACTION**
28 (Wrongful Death by Negligence)

1 113. Plaintiffs repeat and re-allege each and every allegation contained in Paragraphs 1
2 through 112 inclusive, as though fully set forth herein.

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4 114. That as a result of the negligent acts of the Defendants, and each of them, by
5 violating their duty to act in a reasonable and prudent fashion and , individually, as agents or
6 employees, in concert with others, as part of a civil conspiracy or otherwise as alleged herein
7 to establish liability in Defendants, and each of them, by importing, transporting, selling,
8 exchanging, bartering, supplying, prescribing, dispensing, giving away or administering
9 controlled substances including cocaine and oxycodone to the decedent MICHELLE
10 HATCHEL which did proximately cause the death of the decedent MICHELLE HATCHEL
11 in violation of NRS 453.316, NRS 453.321, NRS 453.333, NRS 453.3335, and
12 NRS 200.010 (2).
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14 115. That by reason of the premises and as a direct and proximate result of the actions of
15 the Defendants, and each of them, Plaintiffs KIM HATCHEL, HELEN BARKER, TYLER
16 HATCHEL, and CARRIE BARKER as heirs of the decedent MICHELLE HATCHEL, were
17 each hurt and injured in health, strength, and activity, sustaining injury to their bodies and
18 shock and injury to their nervous systems and persons, all of which said injuries have caused,
19 and continue to cause Plaintiffs loss of probable support, great mental anguish and physical
20 pain and suffering, resulting in some permanent disability to the said Plaintiffs general
21 damages in a minimum amount in excess of seventy five thousand dollars (\$75,000) but at
22 this time said Plaintiffs are demanding twenty five million dollars (\$25,000,000.)
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24 116. That it has been necessary for Plaintiffs, KIM HATCHEL, HELEN BARKER,
25 TYLER HATCHEL, and CARRIE BARKER as heirs of the decedent MICHELLE
26 HATCHEL, to retain the services of an attorney to prosecute this action and said Plaintiffs
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are therefore entitled to reasonable attorney's fees herein.

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EIGHTH CAUSE OF ACTION
(Wrongful Death by Negligence Per Se)

117. Plaintiffs repeat and re-allege each and every allegation contained in Paragraph 1 through 116 inclusive, as though fully set forth herein.

118. Defendants, and each of them, did violate NRS 453.321, NRS 453.333, NRS 453.3335, and NRS 200.010, said statutes being enacted for the safety of persons in the State of Nevada of which the decedent MICHELLE HATCHEL was such a person and Defendants, and each of them, were negligent per se and are responsible for all injuries and damages proximately caused thereby.

119. That by reason of the premises and as a direct and proximate result of the actions of the Defendants, and each of them, Plaintiffs KIM HATCHEL, HELEN BARKER, TYLER HATCHEL, and CARRIE BARKER as heirs of the decedent MICHELLE HATCHEL, were each hurt and injured in health, strength, and activity, sustaining injury to their bodies and shock and injury to their nervous systems and persons, all of which said injuries have caused, and continue to cause Plaintiffs, loss of probable support, great mental anguish and physical pain and suffering, resulting in some permanent disability to the said Plaintiffs general damages in a minimum amount in excess of seventy five thousand dollars (\$75,000) but at this time said Plaintiffs are demanding twenty five million dollars (\$25,000,000.)

120. That it has been necessary for Plaintiffs, KIM HATCHEL, HELEN BARKER, TYLER HATCHEL, and CARRIE BARKER as heirs of the decedent MICHELLE HATCHEL, to retain the services of an attorney to prosecute this action and said Plaintiffs are therefore entitled to reasonable attorney's fees herein.

NINTH CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

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121. Plaintiffs repeat and re-allege each and every allegation contained in Paragraph 1 through 120 inclusive, as though fully set forth herein.

122. The acts of Defendants, and each of them, individually, as agents or employees, in concert with others, as part of a civil conspiracy or otherwise as alleged herein to establish liability in Defendants, and each of them, constituted extreme and outrageous conduct, were not privileged, and recklessly caused the decedent MICHELLE HATCHEL injury, damages and subsequent death, and caused the Plaintiffs to suffer severe emotional distress and suffering, damages and/or destruction of their mental and emotional health and continues to cause the same to Plaintiffs.

123. The Defendants', and each of them, actions, inactions, omissions and any conduct as herein alleged did intentionally inflict emotional distress upon persons of said heirs, KIM HATCHEL, HELEN BARKER, TYLER HATCHEL, and CARRIE BARKER and did proximately cause them emotional harm as a result of wrongful acts perpetrated by Defendants, and each of them, and the wrongful acts that caused her death and did proximately cause each of said Plaintiff heirs the injuries and damages as herein alleged.

124. That by reason of the premises and as a direct and proximate result of the actions of the Defendants, and each of them, Plaintiffs KIM HATCHEL, HELEN BARKER, TYLER HATCHEL, and CARRIE BARKER as heirs of the decedent MICHELLE HATCHEL, were each hurt and injured in health, strength, and activity, sustaining injury to their bodies and shock and injury to their nervous systems and persons, all of which said injuries have caused, including the fact that KIM HATCHEL suffered a heart attack during the funeral services for her daughter MICHELLE HATCHEL, and continue to cause Plaintiffs great mental anguish and physical pain and suffering, resulting in some permanent disability to the said

1 Plaintiffs general damages in a minimum amount in excess of seventy five thousand dollars
2 (\$75,000) but at this time said Plaintiff heirs are demanding twenty five million dollars
3 (\$25,000,000.)

4 125. That as a result of the conduct, actions, inactions, and/or omissions of the
5 Defendants, and each of them, of which were malicious, apprehensive, and/or committed
6 with the conscious and reckless disregard for the rights, safety, health, and/or life of the said
7 Plaintiffs heirs, and each of them, and they are each entitled to an award of exemplary and
8 punitive damages in an amount in excess of seventy-five thousand dollars (\$75,000.00.) but
9 at this time said Plaintiff heirs are demanding an award for punitive damages in the amount
10 of seventy five million dollars (\$75,000,000.)

11 126. That it has been necessary for Plaintiffs, KIM HATCHEL, HELEN BARKER,
12 TYLER HATCHEL, and CARRIE BARKER as heirs of the decedent MICHELLE
13 HATCHEL, to retain the services of an attorney to prosecute this action and said Plaintiffs
14 are therefore entitled to reasonable attorney's fees herein.
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17 **TENTH CAUSE OF ACTION**
18 (Negligent Infliction of Emotional Distress)

19 127. Plaintiffs repeat and re-allege each and every allegation contained in Paragraph 1
20 through 126 inclusive, as though fully set forth herein.

21 128. That Defendants, and each of them, individually, as agents or employees, in
22 concert with others, as part of a civil conspiracy or otherwise as alleged herein to
23 establish liability in Defendants, and each of them, did commit the aforementioned
24 actions in breach of their duties, as herein described, and their conduct was careless,
25 negligent and committed with reckless disregard for the consequences of their actions
26 and the Defendants, and each of them, did carelessly, negligently and recklessly cause the
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said Plaintiff heirs to suffer the injuries and damages as alleged herein.

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129. That by reason of the premises and as a direct and proximate result of the actions of the Defendants, and each of them, Plaintiffs KIM HATCHEL, HELEN BARKER, TYLER HATCHEL, and CARRIE BARKER as heirs of the decedent MICHELLE HATCHEL, were each hurt and injured in health, strength, and activity, sustaining injury to their bodies and shock and injury to their nervous systems and persons, all of which said injuries have caused, and continue to cause Plaintiffs great mental anguish and physical pain and suffering, resulting in some permanent disability to the said Plaintiffs general damages in a minimum amount in excess of seventy five thousand dollars (\$75,000) but at this time said Plaintiff heirs are demanding twenty five million dollars (\$25,000,000.)

130. That it has been necessary for Plaintiffs, KIM HATCHEL, HELEN BARKER, TYLER HATCHEL, and CARRIE BARKER as heirs of the decedent MICHELLE HATCHEL, to retain the services of an attorney to prosecute this action and said Plaintiffs are therefore entitled to reasonable attorney's fees herein.

ELEVENTH CAUSE OF ACTION

(Concert of Action)

131. Plaintiff heirs repeat and re-allege each and every allegation contained in Paragraph 1 through 130 inclusive, as though fully set forth herein.

132. Defendants, and each of them, acted individually, as agents or employees, in concert with others, as part of a civil conspiracy or otherwise as alleged herein to establish liability in Defendants, and each of them, with another or Defendants, and each of them, acted together to commit the wrongful tortuous acts alleged herein pursuant to a common design and or purpose and did cause the hereinafter described injuries and damages as alleged herein

133. That by reason of the premises and as a direct and proximate result of the actions of the Defendants, and each of them, Plaintiffs, and each of them, were hurt and injured in health, strength, and activity, sustaining injury to their bodies and shock and injury to their nervous systems and persons, all of which said injuries have caused, and continue to cause Plaintiffs great mental anguish and physical pain and suffering, resulting in some permanent disability to the said Plaintiffs general damages in a minimum amount in excess of seventy five thousand dollars (\$75,000) but at this time said Plaintiff heirs are demanding twenty five million dollars (\$25,000,000.)

134. That as a result of the conduct, actions, inactions, and/or omissions of the Defendants, and each of them, all of which were malicious, oppressive, and/or committed with the conscious and reckless disregard for the rights, safety, health, and/or life of the decedent MICHELLE HATCHEL and the Plaintiffs, and each of them are entitled to an award of exemplary and punitive damages in an amount in excess of seventy-five thousand dollars (\$75,000.00) but at this time said Plaintiffs are demanding an award for punitive damages from Defendants in a minimum amount of twenty five million dollars (\$25,000,000.)

135. That it has been necessary for Plaintiffs, and each of them, to retain the services of an attorney to prosecute this action and said Plaintiffs are therefore entitled to reasonable attorney's fees herein.

TWELFTH CAUSE OF ACTION
(Civil Conspiracy)

136. Plaintiffs, and each of them, repeat and re-allege each and every allegation contained in Paragraph 1 through 135 inclusive, as though fully set forth herein.

137. Defendants, by acting in concert, and with agreement between tortfeasors express

1 or implied, intended to accomplish an unlawful objective for the purpose of harming
2 Plaintiffs and each of them, and each of said Defendants knew or in the exercise of
3 ordinary care should have known the facts constituting the civil conspiracy to violate
4 NRS 453.316, NRS 453.321, NRS 453.333, NRS 453.3335, and NRS 200.010 (2) and
5 did individually, as agents or employees, in concert with others, as part of a civil
6 conspiracy or otherwise as alleged herein to establish liability in Defendants, and each of
7 them and/or pursuant to the definition of an aider and abetter set forth in NRS 195.020
8 and did proximately cause the injuries and damages set forth herein.

9 138. That by reason of the premises and as a direct and proximate result of the actions of
10 the Defendants, and each of them, Plaintiffs, and each of them, were hurt and injured in
11 health, strength, and activity, sustaining injury to their bodies and shock and injury to their
12 nervous systems and persons, all of which said injuries have caused, and continue to cause
13 Plaintiffs great mental anguish and physical pain and suffering, resulting in some permanent
14 disability to the said Plaintiffs general damages in a minimum amount in excess of seventy
15 five thousand dollars (\$75,000) but at this time said Plaintiff heirs are demanding ten million
16 dollars (\$10,000,000.)
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18 139. That by reason of premises and as a direct and proximate result of the conduct,
19 actions, inactions, and/or omissions of the Defendants, and each of them, each were
20 malicious, oppressive, and/or committed with the conscious and reckless disregard for the
21 rights, safety, health, and/or life of the Plaintiffs, and each of them, and/or the decedent
22 MICHELLE HATCHEL, the ESTATE OF MICHELLE HATCHEL is entitled to an award
23 of exemplary and punitive damages in an amount in excess of seventy-five thousand dollars
24 (\$75,000.00.) but at this time Plaintiffs are demanding an award for punitive damages in the
25 amount of seventy five million dollars (\$75,000,000.)
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140. That by reason of the premises and as a direct and proximate result of the actions of the Defendants, and each of them, Plaintiff heirs, and each of them, were hurt and injured in health, strength, and activity, sustaining injury to their bodies and shock and injury to their nervous systems and persons, all of which said injuries have caused, and continue to cause Plaintiffs great mental anguish and physical pain and suffering, resulting in some permanent disability to the said Plaintiffs general damages in a minimum amount in excess of seventy five thousand dollars (\$75,000) but at this time said Plaintiff heirs are demanding twenty five million dollars (\$25,000,000.)

141. That it has been necessary for Plaintiffs, and each of them, to retain the services of an attorney to prosecute this action and said Plaintiffs are therefore entitled to reasonable attorney's fees herein.

Wherefore, Plaintiffs, and each of them, pray for judgment against the Defendants, and each of them, as follows:

A. As for the First Cause of Action, Plaintiff KIM HATCHEL on behalf of the ESTATE OF MICHELLE HATCHEL complains that:

1. General damages in the amount of \$10,000,000
2. Punitive damages in the amount of \$25,000,000.00;
3. Reasonable attorneys fees;
4. Costs of suit incurred herein.

B. As for the Second Cause of Action, Plaintiff KIM HATCHEL on behalf of the ESTATE OF MICHELLE HATCHEL complains that:

1. Funeral expenses, loss of probable support and other special damages;

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2. Punitive damages in the amount of \$25,000,000.00;
3. Reasonable attorney's fees;
4. Costs of suit incurred herein.

C. As for the Third Cause of Action, Plaintiff KIM HATCHEL on behalf of the ESTATE OF MICHELLE HATCHEL complains that:

1. Funeral expenses, loss of probable support and other special damages;
2. Reasonable attorney's fees;
3. Costs of suit incurred herein.

D. As for the Fourth Cause of Action, Plaintiff KIM HATCHEL on behalf of the ESTATE OF MICHELLE HATCHEL complains that:

1. Funeral expenses, loss of probable support and other special damages;
2. Reasonable attorney's fees;
3. Costs of suit incurred herein.

E. As for the Fifth Cause of Action, Plaintiff KIM HATCHEL on behalf of the ESTATE OF MICHELLE HATCHEL complains that:

1. General damages in the amount of \$10,000,000;
2. Punitive damages in the amount of \$25,000,000.00;
3. Reasonable attorney's fees;
4. Costs of suit incurred herein.

F. As for the Sixth Cause of Action, Plaintiffs KIM HATCHEL, HELEN BARKER,

TYLER HATCHEL, and CARRIE BARKER as heirs of MICHELLE HATCHEL

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complain of:

1. Loss of probable support;
2. General damages in the amount of \$25,000,000.00;
3. Punitive damages in the amount of \$75,000,000;
4. Reasonable attorney's fees;
5. Costs of suit incurred herein.

G. As for the Seventh Cause of Action, Plaintiffs KIM HATCHEL, HELEN BARKER, TYLER HATCHEL, and CARRIE BARKER as heirs of MICHELLE HATCHEL

complain of:

1. Loss of probable support;
2. General damages in the amount of \$25,000,000.00;
3. Reasonable attorney's fees;
4. Costs of suit incurred herein.

H. As for the Eighth Cause of Action, Plaintiffs KIM HATCHEL, HELEN BARKER, TYLER HATCHEL, and CARRIE BARKER as heirs of MICHELLE HATCHEL

complain of:

1. Loss of probable support;
2. General damages in the amount of \$25,000,000.00;
3. Reasonable attorney's fees;
4. Costs of suit incurred herein.

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I. As for the Ninth Cause of Action, Plaintiffs KIM HATCHEL, HELEN BARKER, TYLER HATCHEL, and CARRIE BARKER as heirs of MICHELLE HATCHEL

complain of:

1. General damages in the amount of \$25,000,000.00;
2. Punitive damages in the amount of \$75,000,000.00;
3. Reasonable attorney’s fees;
4. Costs of suit incurred herein.

J. As for the Tenth Cause of Action, Plaintiffs KIM HATCHEL, HELEN BARKER, TYLER HATCHEL, and CARRIE BARKER as heirs of MICHELLE HATCHEL

complain of:

1. General damages in the amount of \$25,000,000.00;
2. Punitive damages in the amount of \$75,000,000.00;
3. Reasonable attorney’s fees;
4. Costs of suit incurred herein.

K. As for the Eleventh Cause of Action, Plaintiffs KIM HATCHEL, HELEN BARKER, TYLER HATCHEL, and CARRIE BARKER as heirs of MICHELLE HATCHEL

complain of:

1. General damages in the amount of \$25,000,000.00;
2. Punitive damages on behalf of the ESTATE OF MICHELLE HATCHEL in the amount of \$75
3. Punitive damages in the amount of \$75,000,000.00;
4. Reasonable attorney’s fees;

5. Costs of suit incurred herein.

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L. As for the Twelfth Cause of Action, Plaintiffs KIM HATCHEL individually and on behalf of the ESTATE OF MICHELLE HATCHEL, HELEN BARKER, TYLER HATCHEL, and CARRIE BARKER as heirs of MICHELLE HATCHEL complain of:

- 1. General damages in the amount of \$25,000,000.00;
- 2. Punitive damages in the amount of \$75,000,000.00;
- 3. Reasonable attorney’s fees;
- 4. Costs of suit incurred herein.

DATED this _____ day of August, 2009.

LAW OFFICE OF
MICHAEL J. AMADOR, CHTD.

 /S/ Michael J. Amador, Esq.
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