

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

DAVID A. D. DAO,

Petitioner,

v.

CITY OF CHICAGO, a municipal
corporation, and
UNITED AIRLINES, INC., a corporation,

Respondents.

No.

2017CH05227
CALENDAR/ROOM 09
TIME 00:00
General Chancery

PETITIONER'S EMERGENCY BILL OF DISCOVERY

Petitioner, DAVID A. D. DAO, by his attorneys, CORBOY & DEMETRIO, P.C., and
GOLAN CHRISTIE TAGLIA LLP, petitions this Court for an Emergency Bill of Discovery, and
in support thereof, states as follows:

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DOROTHY BROWN
CLERK

1. On April 9, 2017, DAVID A. D. DAO was a passenger on United Express Flight No. 3411, scheduled to fly from Chicago, O'Hare International Airport to Louisville, Kentucky.
2. After being duly processed by the ticket agent, checked in by the attendant, and seated in his assigned passenger seat, Petitioner was forcibly dragged and removed from the said aircraft by City employees, sustaining personal injury.
3. The Respondents include the City of Chicago, a municipal corporation, which operated Chicago O'Hare International Airport, and United Airlines, a corporation, who owned and operated Flight No. 3411.
4. Petitioner believes it is crucial and essential that the following be preserved and protected pursuant to court order:

- (a) all April 9, 2017, surveillance video recordings depicting the boarding of all passengers on United Express Flight No. 3411;
- (b) the cockpit voice recording (CVR) for United Express Flight No. 3411 on April 9, 2017;
- (c) complete April 9, 2017, passenger list for United Express Flight No. 3411;
- (d) complete April 9, 2017, employee and crew list for United Express Flight No. 3411;
- (e) all incident reports prepared by Respondents herein;
- (f) the protocol of United Airlines in force and effect for the removal of passengers from commercial aircraft as of April 9, 2017; and
- (g) the personnel files of the Aviation Department police who removed Petitioner from the plane.

5. The requested preservation and protection for items (a) through (g) is necessary, since each of those items are in the possession of one or both of the Respondents, and Petitioner currently has no access to them and believes that serious prejudice will inure to the Petitioner if said relief is not granted.

WHEREFORE, Petitioner, DAVID A. D. DAO, prays for the entry of an Order granting the aforesaid relief.

Respectfully submitted,



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