

SUMMONS - CIVIL

JD-CV-1 Rev. 4-16
C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a,
52-48, 52-259, P.B. §§ 3-1 through 3-21, 8-1, 10-13

STATE OF CONNECTICUT
SUPERIOR COURT



www.jud.ct.gov

See other side for instructions

- "X" if amount, legal interest or property in demand, not including interest and costs is less than \$2,500.
- "X" if amount, legal interest or property in demand, not including interest and costs is \$2,500 or more.
- "X" if claiming other relief in addition to or in lieu of money or damages.

TO: Any proper officer; BY AUTHORITY OF THE STATE OF CONNECTICUT, you are hereby commanded to make due and legal service of this Summons and attached Complaint.

Address of court clerk where writ and other papers shall be filed (Number, street, town and zip code) (C.G.S. §§ 51-346, 51-350)		Telephone number of clerk (with area code)	Return Date (Must be a Tuesday)
300 Grand Street, Waterbury CT 06702		(203) 591-3300	June _____ 20 , 2 017 Month Day Year
<input checked="" type="checkbox"/> Judicial District <input type="checkbox"/> Housing Session	<input type="checkbox"/> G.A. Number:	At (Town in which writ is returnable) (C.G.S. §§ 51-346, 51-349) Waterbury	Case type code (See list on page 2) Major: T Minor: 90

For the Plaintiff(s) please enter the appearance of:

Name and address of attorney, law firm or plaintiff if self-represented (Number, street, town and zip code) Faxon Law Group, LLC, 59 Elm Street, New Haven CT 06510		Juris number (to be entered by attorney only) 421593
Telephone number (with area code) (203) 624-9500	Signature of Plaintiff (If self-represented)	
The attorney or law firm appearing for the plaintiff, or the plaintiff if self-represented, agrees to accept papers (service) electronically in this case under Section 10-13 of the Connecticut Practice Book. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Email address for delivery of papers under Section 10-13 (if agreed to) jfaxon@faxonlawgroup.com

Number of Plaintiffs: **2** Number of Defendants: **6** Form JD-CV-2 attached for additional parties

Parties	Name (Last, First, Middle Initial) and Address of Each party (Number; Street; P.O. Box; Town; State; Zip; Country, if not USA)	ID
First Plaintiff	Name: Bond, Jacqueline D., Administratrix of the Estate of Travis Ward Address: 100 Mack Lane, Apartment C4, Waterbury CT 06704	P-01
Additional Plaintiff	Name: Mitchell, Nathan Address: 385 Woodland Street, Unit 2C, Hartford CT 06112	P-02
First Defendant	Name: Oakdale Musical Theatre Company Address: 224 Shore Drive, Branford CT 06405 Agent: Benjamin Segal 95 S. Turnpike Road, Wallingford CT 06492	D-01
Additional Defendant	Name: Live Nation Worldwide, Inc. Address: 9348 Civic Center Drive, Beverly Hills, CA 90210 Agent: Corporate Creations Network, Inc. 615 West Johnson Ave., #202, Cheshire CT 06410	D-02
Additional Defendant	Name: Willcox, Michael J. a/k/a Big Mike the Ruler Address: 225 East Pearl Street, 2nd Fl. Danbury CT 06810	D-03
Additional Defendant	Name: The Big Boy Game, LLC Address: 225 East Pearl Street, 2nd Fl. Danbury CT 06810 Agent: Michael J. Willcox 225 East Pearl Street, 2nd Fl. Danbury CT 06810	D-04

Notice to Each Defendant

- YOU ARE BEING SUED.** This paper is a Summons in a lawsuit. The complaint attached to these papers states the claims that each plaintiff is making against you in this lawsuit.
- To be notified of further proceedings, you or your attorney must file a form called an "Appearance" with the clerk of the above-named Court at the above Court address on or before the second day after the above Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to come to court.
- If you or your attorney do not file a written "Appearance" form on time, a judgment may be entered against you by default. The "Appearance" form may be obtained at the Court address above or at www.jud.ct.gov under "Court Forms."
- If you believe that you have insurance that may cover the claim that is being made against you in this lawsuit, you should immediately contact your insurance representative. Other action you may have to take is described in the Connecticut Practice Book which may be found in a superior court law library or on-line at www.jud.ct.gov under "Court Rules."
- If you have questions about the Summons and Complaint, you should talk to an attorney quickly. **The Clerk of Court is not allowed to give advice on legal questions.**

Signed (Sign and "X" proper box) 	<input checked="" type="checkbox"/> Commissioner of the Superior Court <input type="checkbox"/> Assistant Clerk	Name of Person Signing at Left Joel T. Faxon	Date signed 05/23/2017
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If this Summons is signed by a Clerk: a. The signing has been done so that the Plaintiff(s) will not be denied access to the courts. b. It is the responsibility of the Plaintiff(s) to see that service is made in the manner provided by law. c. The Clerk is not permitted to give any legal advice in connection with any lawsuit. d. The Clerk signing this Summons at the request of the Plaintiff(s) is not responsible in any way for any errors or omissions in the Summons, any allegations contained in the Complaint, or the service of the Summons or Complaint.	<i>For Court Use Only</i>
	File Date
I certify I have read and understand the above:	Signed (Self-Represented Plaintiff) Date 05/23/2017 Docket Number

**CIVIL SUMMONS
CONTINUATION OF PARTIES**
JD-CV-2 Rev. 9-12

STATE OF CONNECTICUT
SUPERIOR COURT

First named Plaintiff (Last, First, Middle Initial)

Bond, Jacqueline D.

First named Defendant (Last, First, Middle Initial)

Oakdale Musical Theatre Company

Additional Plaintiffs

Name (Last, First, Middle Initial, if individual)	Address (Number, Street, Town and Zip Code)	CODE
		03
		04
		05
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		07
		08
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		12
		13

Additional Defendants

Name (Last, First, Middle Initial, if individual)	Address (Number, Street, Town and Zip Code)	CODE
Roc Nation, LLC 9348 Civic Center Drive, Beverly Hills, CA 90210	Agent: Corporate Creations Network, Inc. 615 West Johnson Avenue #202, Cheshire CT 06410	05
Williams, Robert Rihmeek a/k/a Meek Mill 529 Fifth Avenue, Floor 10, New York, NY 10017	Statutory Agent: Connecticut Secretary of State, Denise W. Merrill 30 Trinity Street, Hartford CT 06106	06
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		09
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	12	FOR COURT USE ONLY - File Date
	13	
	14	
		Docket number

FAXON LAW GROUP, LLC
59 ELM STREET - NEW HAVEN, CT 06510
TEL. (203) 624-9500 - FACSIMILE (203) 624-9100 - JURIS NO. 421593

◇ RETURN DATE: JUNE 20, 2017 : SUPERIOR COURT

JACQUELINE D. BOND, ADMINISTRATRIX OF THE :
ESTATE OF TRAVIS WARD, AND :
NATHAN MITCHELL : J.D. OF WATERBURY

PLAINTIFFS :

VS. :

OAKDALE MUSICAL THEATRE COMPANY, :
LIVE NATION WORLDWIDE, INC., MICHAEL J. :
WILLCOX A/K/A BIG MIKE THE RULER, THE BIG :
BOY GAME, LLC, ROC NATION, LLC, AND :
ROBERT RIHMEEK WILLIAMS A/K/A MEEK MILL :

DEFENDANTS : MAY 23, 2017

COMPLAINT

FIRST COUNT: (JACQUELINE BOND, ADMINISTRATRIX OF THE ESTATE OF TRAVIS WARD V. OAKDALE MUSICAL THEATRE COMPANY - NEGLIGENCE)

1. TRAVIS WARD died on December 30, 2016, and his mother, JACQUELINE BOND, has been appointed Administratrix of his Estate by the New Haven Probate Court. See appointment attached as Exhibit A.

2. This action is brought pursuant to General Statutes § 52-555.

3. On December 30, 2016, plaintiff's decedent, TRAVIS WARD, a resident of New Haven, Connecticut, entered as a patron and business invitee upon the premises of the

◇ Oakdale Musical Theatre venue (THE OAKDALE), located at 95 S. Turnpike Road, Wallingford, Connecticut.

4. On that date, the plaintiff's decedent, TRAVIS WARD, attended a concert by rap artist, ROBERT RIHMEEK WILLIAMS, A/K/A MEEK MILL.

5. On December 30, 2016, and at all times mentioned herein, the Defendant, OAKDALE MUSICAL THEATRE COMPANY, was a domestic company organized and existing under the laws of the State of Connecticut with a principal place of business at 95 S. Turnpike Road, Wallingford, Connecticut.

6. On December 30, 2016, and at all times mentioned herein, the Defendant, LIVE NATION WORLDWIDE, INC., ("LIVE NATION"), was a foreign corporation organized and existing under the laws of the State of Delaware with a principal place of business at 9348 Civic Center Drive, Beverly Hills, CA 90210.

7. On December 30, 2016, and at all times mentioned herein, the Defendant, MICHAEL J. WILLCOX A/K/A BIG MIKE THE RULER, ("WILLCOX") operated as a concert promoter in the State of Connecticut, with a principal place of business at 25 East Pearl Street, Danbury, Connecticut.

8. On December 30, 2016, and at all times mentioned herein, the Defendant, ◇ WILLCOX was the managing member of Defendant, THE BIG BOY GAME, LLC, a domestic

◇ limited liability company organized and existing under the laws of the State of Connecticut, to promote local music performances, with a principal place of business at 25 East Pearl Street, Danbury, Connecticut.

9. On December 30, 2016, and at all times mentioned herein, the Defendant, ROC NATION, LLC ("ROC NATION") was a foreign limited liability company organized and existing under the laws of the State of Delaware with a principal place of business at 9348 Civic Center Drive, Beverly Hills, California.

10. On December 30, 2016, and at all times mentioned herein, the Defendant, ROBERT RIHMEEK WILLIAMS A/K/A MEEK MILL, ("MEEK MILL") operated as a musical performer and personality in the State of Connecticut, with a principal place of business in New York, New York.

11. On the above date, and at all times mentioned herein, the Defendants and/or their operatives, including their agents, apparent agents, servants, employees, contractors, partners, joint venturers and/or co-conspirators owned, operated, managed, conducted, performed at, maintained and/or controlled the premises known as THE OAKDALE, including its facilities and parking areas and lots.

12. Defendants promoted and/or solicited the sale of tickets to maximize patron
◇ attendance at the MEEK MILL music performance that occurred on December 30, 2016.

13. On December 30, 2016, a melee ensued shortly after the MEEK MILL performance in the parking area within the confines of THE OAKDALE facilities, when armed assailant(s) who had attended the MEEK MILL concert, discharged firearm(s) in the vicinity of the plaintiffs, and struck the plaintiffs with round(s) severely injuring or mortally wounding the plaintiffs. The plaintiffs were unarmed and did not contribute to, incite or in any fashion participate in the melee.

14. On the above date, the Plaintiff's decedent, TRAVIS WARD, was physically assaulted by a melee participant, who shot and killed TRAVIS WARD with a firearm on the premises of THE OAKDALE.

15. The Defendants invited and actively solicited members of the general public to enter and patronize their venue, performance and parking area in an effort to maximize cash receipts.

16. The Defendants had a duty to exercise reasonable care to protect concert goers, including TRAVIS WARD from dangers which might reasonably be anticipated to arise from conditions of the premises and activities taking place on the premises.

17. The Plaintiff's decedent's fatal injuries were proximately caused by the negligence and carelessness of the Defendant, OAKDALE MUSICAL THEATRE COMPANY,

in one or more of the following ways, in that it:

- a. allowed thugs to remain on the defendants premises, after exhibiting disorderly, disruptive, argumentative, angry and/or agitated behavior toward patrons;
- b. failed to take reasonable measures to protect patrons and invitees including plaintiff's decedent from violence;
- c. failed to hire and/or retain adequate security presence on the premises to protect patrons including the plaintiff's decedent;
- d. failed to take reasonable measures to protect patrons and invitees including plaintiff's decedent from violence after it became aware, or should have been aware, of prior disruptive, annoying, disorderly, criminal, violent and abusive behavior of patrons, including the discharge of firearms, in the environs of the concert venue, following previous concerts of artist/co-defendant, MEEK MILL;
- e. failed to take reasonable measures to protect patrons and invitees including plaintiff's decedent from violence after they became aware, or should have been aware, of prior disruptive, annoying, disorderly, and abusive behavior of patrons following previous performances at THE OAKDALE;
- f. ignored and tolerated disruptive, disorderly, argumentative and/or threatening behavior of patron(s) including the shooter or shooters;
- g. failed to institute proper procedures and guidelines for responding to persons who were disruptive, argumentative or behaving improperly toward other patrons;
- h. failed to train personnel in proper procedures for responding to disorderly and disruptive persons on the premises who behaved improperly toward other patrons;

- i. failed to take reasonable and necessary measures so as to avoid the risk of foreseeable harm posed by thugs toward invitees to the premises, including the Plaintiff's decedent;
- j. failed to discover, consider, appreciate or act on the fact, that MEEK MILL concerts historically have had violent outbursts in the parking lot or the environs of the show venue, before, during or after the event including, but not limited to, multiple shootings in the parking lot outside the Moodswing Niteclub Lounge gig on Kirkwood Highway, in Wilmington, Delaware in 2013, multiple melees and brawls in and outside of Club Lush at Tuxedo Junction, in Danbury, Connecticut in October, 2011; and/or,
- k. failed to discover, consider, appreciate or act on the fact that MEEK MILL's lyrics, songs and actions incite violence, and encourage the use of deadly weapons, including passages such as:

Ak-47 picture perfect like a camera
I point it at your homie leave 'em stinking like a pamper
Fuck what you drinkin, fuck what you thinkin
This 40 hit yo homie leave that nigga plankin

(passage in "*Tony Montana Freestyle*" from Dreamchasers (2011))

What's your body count nigga
I'm double digits
...
I got some bad hos in my crib
Coup' stones in my couch
Scarface in this bitch
It's like a gun store in my house
Hobart on my desk
Bag it up by ounce
The feds watchin this bitch
Oh lord it's three strikes and I'm out
I'm gone

(passage in "*Body Count*" from *Dreamchasers* (2011))

Oh, I grew up, I screw up a oz of crack
Then I blew up they knew us before all this rap
I maneuvered with shooters
You fuck around with me, get smoked like a hookah
My ruger go booyah, I do it for the streets

...

Hundred shots, aim straight at your snap cap
Everybody want the crown so I snatch that
Heard your gun go doo-doo-dooo-dooo
Well my gun go blap-blap-blap-blap-blap

...

And you feeling yourself so I'm killing these niggas like...

...

And a nigga fuck around get the RICO Act
Shoot shoot, and one, where my free throw at?
And my lil' nigga Bobby can't eat those flats
Like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em

[Verse 2 - Meek Mill:]

They know Meek Milly, I barely went gold
But Meek Milly look like he sold two million
All this new money I'm getting my nigga
I swear I don't know what to do with it
Yeah it's Meek Milly, I'm bombing on rappers
I really don't give a fuck who with 'em
Pair with a nigga like me one time, like me one time
And ya'll forgot about me
Acting like I don't really want mine
What the fuck wrong with em
Know how we feeling, let me get back to it
Terio like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em, ooh kill 'em, ooh

(passage from "Ooh kill 'em");

and MILL's penchant to resolve feuds with fellow rappers, like "THE GAME" through acts of violence, resulting in gunfire and the reckless discharge of weapons, including an incident at the Fontainebleau Hotel in Miami Beach, Florida, in September 2016, when MILL's personnel allegedly peppered THE GAME's Mercedes "G Wagon" SUV with gunfire after a beef escalated between MILL and THE GAME after THE GAME referred to MILL as "snitch" and expressed a desire to "beat" MILL.

18. As a proximate result of the negligence of the defendant, OAKDALE MUSICAL THEATRE COMPANY, the Plaintiff's decedent, TRAVIS WARD, sustained the following injuries:

- a. Multiple gunshot wounds;
- b. Uncontrolled hemorrhage;
- c. Perforation of the lung;
- d. Associated anxiety, fear of death and severe pain;
- e. Other traumatic injuries and shock and stress to his entire system; and,
- f. Death.

19. As a result of these injuries, the plaintiff's decedent, TRAVIS WARD, endured multiple emergent lifesaving procedures, mechanical intubation and related medical and support services. In addition, the plaintiff's decedent, TRAVIS WARD, suffered a complete

◇ destruction of the ability to participate in all activities of daily living in which he previously engaged and lost forever his ability to carry on and enjoy life's activities.

20. As a further direct and proximate result of the defendant's negligence, the Estate of TRAVIS WARD incurred expenses for medical care, treatment, and funeral and burial services, all to its loss and damage.

21. As a further direct and proximate result of the defendant's negligence, the Plaintiff's decedent suffered a complete destruction of his earning capacity.

SECOND COUNT: (JACQUELINE BOND, ADMINISTRATRIX OF THE ESTATE OF TRAVIS WARD V. LIVE NATION WORLDWIDE, INC. - NEGLIGENCE)

1- 16. Paragraphs 1 - 16 of COUNT ONE are incorporated herein as Paragraphs 1 - 16 of COUNT TWO.

17. The Plaintiff's decedent's fatal injuries were proximately caused by the negligence and carelessness of the Defendant, LIVE NATION, in one or more of the following ways, in that it:

- a. allowed thugs to remain on the defendants premises, after exhibiting disorderly, disruptive, argumentative, angry and/or agitated behavior toward patrons;
- b. failed to take reasonable measures to protect patrons and invitees including plaintiff's decedent from violence;
- c. failed to hire and/or retain adequate security presence on the premises to protect patrons including the plaintiff's decedent;

- d. failed to take reasonable measures to protect patrons and invitees including plaintiff's decedent from violence after it became aware or should have been aware of prior disruptive, annoying, disorderly, criminal, violent and abusive behavior of patrons, including the discharge of firearms, in the environs of the concert venue, following previous concerts of artist/co-defendant, MEEK MILL;
- e. failed to take reasonable measures to protect patrons and invitees including plaintiff's decedent from violence after they became aware or should have been aware of prior disruptive, annoying, disorderly, and abusive behavior of patrons following previous performances at THE OAKDALE;
- f. ignored and tolerated disruptive, disorderly, argumentative and/or threatening behavior of patron(s) including the shooter or shooters;
- g. failed to institute proper procedures and guidelines for responding to persons who were disruptive, argumentative or behaving improperly toward other patrons;
- h. failed to train personnel in proper procedures for responding to disorderly and disruptive persons on the premises who behaved improperly toward other patrons;
- i. failed to take reasonable and necessary measures so as to avoid the risk of foreseeable harm posed by thugs toward invitees to the premises, including the Plaintiff's decedent;
- j. failed to discover, consider, appreciate or act on the fact, that MEEK MILL concerts historically have had violent outbursts in the parking lot or the environs of the show venue, before, during or after the event including, but not limited to, multiple shootings in the parking lot outside the Moodswing Niteclub Lounge gig on Kirkwood Highway, in Wilmington, Delaware in 2013, multiple melees and brawls in and outside of Club Lush at Tuxedo Junction, in Danbury, Connecticut in October, 2011; and/or,

- k. failed to discover, consider, appreciate or act on the fact that MEEK MILL's lyrics, songs and actions incite violence, and encourage the use of deadly weapons including passages such as:

Ak-47 picture perfect like a camera
I point it at your homie leave 'em stinking like a pamper
Fuck what you drinkin, fuck what you thinkin
This 40 hit yo homie leave that nigga plankin

(passage in "*Tony Montana Freestyle*" from Dreamchasers (2011))

What's your body count nigga
I'm double digits
...
I got some bad hos in my crib
Coup' stones in my couch
Scarface in this bitch
It's like a gun store in my house
Hobart on my desk
Bag it up by ounce
The feds watchin this bitch
Oh lord it's three strikes and I'm out
I'm gone

(passage in "*Body Count*" from Dreamchasers (2011))

Oh, I grew up, I screw up a oz of crack
Then I blew up they knew us before all this rap
I maneuvered with shooters
You fuck around with me, get smoked like a hookah
My ruger go booyah, I do it for the streets
...
Hundred shots, aim straight at your snap cap
Everybody want the crown so I snatch that
Heard your gun go doo-doo-dooo-dooo

Well my gun go blap-blap-blap-blap-blap

...

And you feeling yourself so I'm killing these niggas like...

...

And a nigga fuck around get the RICO Act
Shoot shoot, and one, where my free throw at?
And my lil' nigga Bobby can't eat those flats
Like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em

[Verse 2 - Meek Mill:]

They know Meek Milly, I barely went gold
But Meek Milly look like he sold two million
All this new money I'm getting my nigga
I swear I don't know what to do with it
Yeah it's Meek Milly, I'm bombing on rappers
I really don't give a fuck who with 'em
Pair with a nigga like me one time, like me one time
And ya'll forgot about me
Acting like I don't really want mine
What the fuck wrong with em
Know how we feeling, let me get back to it
Terio like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em, ooh kill 'em, ooh

(passage from "Ooh kill 'em");

and MILL's penchant to resolve feuds with fellow rappers, like "THE GAME" through acts of violence, resulting in gunfire and the reckless discharge of weapons, including an incident at the Fontainebleau Hotel in Miami Beach, Florida, in September 2016, when MILL's personnel allegedly peppered THE GAME's Mercedes "G Wagon" SUV with gunfire after a beef escalated between MILL and THE GAME after THE GAME referred to MILL as "snitch" and expressed a desire to "beat" MILL.

18. As a proximate result of the negligence of the defendant, LIVE NATION, the Plaintiff's decedent, TRAVIS WARD, sustained the following injuries:

- a. Multiple gunshot wounds;
- b. Uncontrolled hemorrhage;
- c. Perforation of the lung;
- d. Associated anxiety, fear of death and severe pain;
- e. Other traumatic injuries and shock and stress to his entire system; and
- f. Death.

19. As a result of these injuries, the plaintiff's decedent, TRAVIS WARD, endured multiple emergent lifesaving procedures, mechanical intubation and related medical and support services. In addition, the plaintiff's decedent, TRAVIS WARD, suffered a complete destruction of the ability to participate in all activities of daily living in which he previously engaged and lost forever his ability to carry on and enjoy life's activities.

20. As a further direct and proximate result of the defendant's negligence, the Estate of TRAVIS WARD incurred expenses for medical care, treatment, and funeral and burial services, all to its loss and damage.

21. As a further direct and proximate result of the defendant's negligence, the Plaintiff's decedent suffered a complete destruction of his earning capacity.

◇ **THIRD COUNT:**

(JACQUELINE BOND, ADMINISTRATRIX OF THE ESTATE OF TRAVIS WARD V. MICHAEL J. WILLCOX A/K/A BIG MIKE THE RULER AND THE BIG BOY GAME, LLC - NEGLIGENCE)

1- 16. Paragraphs 1 - 16 of COUNT ONE are incorporated herein as Paragraphs 1 - 16 of COUNT THREE.

17. The Plaintiff's decedent's fatal injuries were proximately caused by the negligence and carelessness of the Defendants, WILLCOX and THE BIG BOY GAME, LLC, in one or more of the following ways, in that they:

- a. allowed thugs to remain on the defendants premises, after exhibiting disorderly, disruptive, argumentative, angry and/or agitated behavior toward patrons;
- b. failed to take reasonable measures to protect patrons and invitees including plaintiff's decedent from violence;
- c. failed to hire and/or retain adequate security presence on the premises to protect patrons including the plaintiff's decedent;
- d. failed to take reasonable measures to protect patrons and invitees including plaintiff's decedent from violence after it became aware or should have been aware of prior disruptive, annoying, disorderly, criminal, violent and abusive behavior of patrons, including the discharge of firearms, in the environs of the concert venue, following previous concerts of artist/co-defendant, MEEK MILL;
- e. failed to take reasonable measures to protect patrons and invitees including plaintiff's decedent from violence after they became aware or should have been aware of prior disruptive, annoying, disorderly, and abusive behavior of patrons following previous performances at THE OAKDALE;

- f. ignored and tolerated disruptive, disorderly, argumentative and/or threatening behavior of patron(s) including the shooter or shooters;
- g. failed to institute proper procedures and guidelines for responding to persons who were disruptive, argumentative or behaving improperly toward other patrons;
- h. failed to train personnel in proper procedures for responding to disorderly and disruptive persons on the premises who behaved improperly toward other patrons; and
- i. failed to take reasonable and necessary measures so as to avoid the risk of foreseeable harm posed by thugs toward invitees to the premises, including the Plaintiff's decedent;
- j. failed to discover, consider, appreciate or act on the fact, that MEEK MILL concerts historically have had violent outbursts in the parking lot or the environs of the show venue, before, during or after the event including, but not limited to, multiple shootings in the parking lot outside the Moodswing Niteclub Lounge gig on Kirkwood Highway, in Wilmington, Delaware in 2013, multiple melees and brawls in and outside of Club Lush at Tuxedo Junction, in Danbury, Connecticut in October, 2011; and/or,
- k. failed to discover, consider, appreciate or act on the fact that MEEK MILL's lyrics, songs and actions incite violence, and encourage the use of deadly weapons including passages such as:

Ak-47 picture perfect like a camera
I point it at your homie leave 'em stinking like a pamper
Fuck what you drinkin, fuck what you thinkin
This 40 hit yo homie leave that nigga plankin

(passage in "*Tony Montana Freestyle*" from *Dreamchasers* (2011))

What's your body count nigga
I'm double digits

...

I got some bad hos in my crib
Coup' stones in my couch
Scarface in this bitch
It's like a gun store in my house
Hobart on my desk
Bag it up by ounce
The feds watchin this bitch
Oh lord it's three strikes and I'm out
I'm gone

(passage in "*Body Count*" from Dreamchasers (2011))

Oh, I grew up, I screw up a oz of crack
Then I blew up they knew us before all this rap
I maneuvered with shooters
You fuck around with me, get smoked like a hookah
My ruger go booyah, I do it for the streets

...

Hundred shots, aim straight at your snap cap
Everybody want the crown so I snatch that
Heard your gun go doo-doo-dooo-dooo
Well my gun go blap-blap-blap-blap-blap

...

And you feeling yourself so I'm killing these niggas like...

...

And a nigga fuck around get the RICO Act
Shoot shoot, and one, where my free throw at?
And my lil' nigga Bobby can't eat those flats
Like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em

[Verse 2 - Meek Mill:]

They know Meek Milly, I barely went gold

But Meek Milly look like he sold two million
All this new money I'm getting my nigga
I swear I don't know what to do with it
Yeah it's Meek Milly, I'm bombing on rappers
I really don't give a fuck who with 'em
Pair with a nigga like me one time, like me one time
And ya'll forgot about me
Acting like I don't really want mine
What the fuck wrong with em
Know how we feeling, let me get back to it
Terio like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em, ooh kill 'em, ooh

(passage from "Ooh kill 'em");

and MILL's penchant to resolve feuds with fellow rappers, like "THE GAME" through acts of violence, resulting in gunfire and the reckless discharge of weapons, including an incident at the Fontainebleau Hotel in Miami Beach, Florida, in September 2016, when MILL's personnel allegedly peppered THE GAME's Mercedes "G Wagon" SUV with gunfire after a beef escalated between MILL and THE GAME after THE GAME referred to MILL as "snitch" and expressed a desire to "beat" MILL.

18. As a proximate result of the negligence of the defendants, WILLCOX and THE BIG BOY GAME, LLC, the Plaintiff's decedent, TRAVIS WARD, sustained the following injuries:

- a. Multiple gunshot wounds;
- b. Uncontrolled hemorrhage;
- c. Perforation of the lung;
- d. Associated anxiety, fear of death and severe pain;

- e. Other traumatic injuries and shock and stress to his entire system; and
- f. Death.

19. As a result of these injuries, the plaintiff's decedent, TRAVIS WARD, endured multiple emergent lifesaving procedures, mechanical intubation and related medical and support services. In addition, the plaintiff's decedent, TRAVIS WARD, suffered a complete destruction of the ability to participate in all activities of daily living in which he previously engaged and lost forever his ability to carry on and enjoy life's activities.

20. As a further direct and proximate result of the defendant's negligence, the Estate of TRAVIS WARD incurred expenses for medical care, treatment, and funeral and burial services, all to its loss and damage.

21. As a further direct and proximate result of the defendant's negligence, the Plaintiff's decedent suffered a complete destruction of his earning capacity.

FOURTH COUNT: (JACQUELINE BOND, ADMINISTRATRIX OF THE ESTATE OF TRAVIS WARD V. ROC NATION, LLC - NEGLIGENCE)

1- 16. Paragraphs 1 - 16 of COUNT ONE are incorporated herein as Paragraphs 1 - 16 of COUNT FOUR.

17. The Plaintiff's decedent's fatal injuries were proximately caused by the negligence and carelessness of the Defendant, ROC NATION, in one or more of the following ways, in that it:

- a. allowed thugs to remain on the defendants premises, after exhibiting disorderly, disruptive, argumentative, angry and/or agitated behavior toward patrons;
- b. failed to take reasonable measures to protect patrons and invitees including plaintiff's decedent from violence;
- c. failed to hire and/or retain adequate security presence on the premises to protect patrons including the plaintiff's decedent;
- d. failed to take reasonable measures to protect patrons and invitees including plaintiff's decedent from violence after it became aware or should have been aware of prior disruptive, annoying, disorderly, criminal, violent and abusive behavior of patrons, including the discharge of firearms, in the environs of the concert venue, following previous concerts of artist/co-defendant, MEEK MILL;
- e. failed to take reasonable measures to protect patrons and invitees including plaintiff's decedent from violence after they became aware or should have been aware of prior disruptive, annoying, disorderly, and abusive behavior of patrons following previous performances at THE OAKDALE;
- f. ignored and tolerated disruptive, disorderly, argumentative and/or threatening behavior of patron(s) including the shooter or shooters;
- g. failed to institute proper procedures and guidelines for responding to persons who were disruptive, argumentative or behaving improperly toward other patrons;
- h. failed to train personnel in proper procedures for responding to disorderly and disruptive persons on the premises who behaved improperly toward other patrons;

- i. failed to take reasonable and necessary measures so as to avoid the risk of foreseeable harm posed by thugs toward invitees to the premises, including the Plaintiff's decedent;
- j. failed to discover, consider, appreciate or act on the fact, that MEEK MILL concerts historically have had violent outbursts in the parking lot or the environs of the show venue, before, during or after the event including, but not limited to, multiple shootings in the parking lot outside the Moodswing Niteclub Lounge gig on Kirkwood Highway, in Wilmington, Delaware in 2013, multiple melees and brawls in and outside of Club Lush at Tuxedo Junction, in Danbury, Connecticut in October, 2011; and/or,
- k. failed to discover, consider, appreciate or act on the fact that MEEK MILL's lyrics, songs and actions incite violence, and encourage the use of deadly weapons including passages such as:

Ak-47 picture perfect like a camera
I point it at your homie leave 'em stinking like a pamper
Fuck what you drinkin, fuck what you thinkin
This 40 hit yo homie leave that nigga plankin

(passage in "*Tony Montana Freestyle*" from Dreamchasers (2011))

What's your body count nigga
I'm double digits
...
I got some bad hos in my crib
Coup' stones in my couch
Scarface in this bitch
It's like a gun store in my house
Hobart on my desk
Bag it up by ounce
The feds watchin this bitch
Oh lord it's three strikes and I'm out
I'm gone

(passage in "*Body Count*" from Dreamchasers (2011))

Oh, I grew up, I screw up a oz of crack
Then I blew up they knew us before all this rap
I maneuvered with shooters
You fuck around with me, get smoked like a hookah
My ruger go booyah, I do it for the streets

...
Hundred shots, aim straight at your snap cap
Everybody want the crown so I snatch that
Heard your gun go doo-doo-dooo-dooo
Well my gun go blap-blap-blap-blap-blap

...
And you feeling yourself so I'm killing these niggas like...

...
And a nigga fuck around get the RICO Act
Shoot shoot, and one, where my free throw at?
And my lil' nigga Bobby can't eat those flats
Like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em

[Verse 2 - Meek Mill:]

They know Meek Milly, I barely went gold
But Meek Milly look like he sold two million
All this new money I'm getting my nigga
I swear I don't know what to do with it
Yeah it's Meek Milly, I'm bombing on rappers
I really don't give a fuck who with 'em
Pair with a nigga like me one time, like me one time
And ya'll forgot about me
Acting like I don't really want mine
What the fuck wrong with em
Know how we feeling, let me get back to it
Terio like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em, ooh kill 'em, ooh

(passage from "Ooh kill 'em");

and MILL's penchant to resolve feuds with fellow rappers, like "THE GAME" through acts of violence, resulting in gunfire and the reckless discharge of weapons, including an incident at the Fontainebleau Hotel in Miami Beach, Florida, in September 2016, when MILL's personnel allegedly peppered THE GAME's Mercedes "G Wagon" SUV with gunfire after a beef escalated between MILL and THE GAME after THE GAME referred to MILL as "snitch" and expressed a desire to "beat" MILL.

18. As a proximate result of the negligence of the defendant, ROC NATION, the Plaintiff's decedent, TRAVIS WARD, sustained the following injuries:

- a. Multiple gunshot wounds;
- b. Uncontrolled hemorrhage;
- c. Perforation of the lung;
- d. Associated anxiety, fear of death and severe pain;
- e. Other traumatic injuries and shock and stress to his entire system; and
- f. Death.

19. As a result of these injuries, the plaintiff's decedent, TRAVIS WARD, endured multiple emergent lifesaving procedures, mechanical intubation and related medical and support services. In addition, the plaintiff's decedent, TRAVIS WARD, suffered a complete destruction of the ability to participate in all activities of daily living in which he previously engaged and lost forever his ability to carry on and enjoy life's activities.

20. As a further direct and proximate result of the defendant's negligence, the Estate of TRAVIS WARD incurred expenses for medical care, treatment, and funeral and burial services, all to its loss and damage.

21. As a further direct and proximate result of the defendant's negligence, the Plaintiff's decedent suffered a complete destruction of his earning capacity.

FIFTH COUNT: (JACQUELINE BOND, ADMINISTRATRIX OF THE ESTATE OF TRAVIS WARD V. ROBERT RIHMEEK WILLIAMS A/K/A MEEK MILL - NEGLIGENCE)

1- 16. Paragraphs 1 - 16 of COUNT ONE are incorporated herein as Paragraphs 1 - 16 of COUNT FIVE.

17. The Plaintiff's decedent's fatal injuries were proximately caused by the negligence and carelessness of the Defendant, MEEK MILL, in one or more of the following ways, in that he:

- a. failed to warn one or more of the co-defendants of the disorderly, disruptive, argumentative, angry, criminal, violent, abusive and/or agitated behavior and outburst(s) of thugs toward patrons following previous MILL events including melees in the parking lot or the environs of the show venue, before, during or after the event including, but not limited to, multiple shootings in the parking lot outside the Moodswing Niteclub Lounge gig on Kirkwood Highway, in Wilmington, Delaware in 2013, multiple melees and brawls in and outside of Club Lush at Tuxedo Junction, in Danbury, Connecticut in October, 2011; and/or,

- b. failed to warn one or more of the co-defendants that his lyrics, songs and actions incite violence, and encourage the use of deadly weapons including passages such as:

Ak-47 picture perfect like a camera
I point it at your homie leave 'em stinking like a pamper
Fuck what you drinkin, fuck what you thinkin
This 40 hit yo homie leave that nigga plankin

(passage in "*Tony Montana Freestyle*" from *Dreamchasers* (2011))

What's your body count nigga
I'm double digits
...
I got some bad hos in my crib
Coup' stones in my couch
Scarface in this bitch
It's like a gun store in my house
Hobart on my desk
Bag it up by ounce
The feds watchin this bitch
Oh lord it's three strikes and I'm out
I'm gone

(passage in "*Body Count*" from *Dreamchasers* (2011))

Oh, I grew up, I screw up a oz of crack
Then I blew up they knew us before all this rap
I maneuvered with shooters
You fuck around with me, get smoked like a hookah
My ruger go booyah, I do it for the streets
...
Hundred shots, aim straight at your snap cap
Everybody want the crown so I snatch that
Heard your gun go doo-doo-dooo-dooo

Well my gun go blap-blap-blap-blap-blap

...

And you feeling yourself so I'm killing these niggas like...

...

And a nigga fuck around get the RICO Act
Shoot shoot, and one, where my free throw at?
And my lil' nigga Bobby can't eat those flats
Like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em

[Verse 2 - Meek Mill:]

They know Meek Milly, I barely went gold
But Meek Milly look like he sold two million
All this new money I'm getting my nigga
I swear I don't know what to do with it
Yeah it's Meek Milly, I'm bombing on rappers
I really don't give a fuck who with 'em
Pair with a nigga like me one time, like me one time
And ya'll forgot about me
Acting like I don't really want mine
What the fuck wrong with em
Know how we feeling, let me get back to it
Terio like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em, ooh kill 'em, ooh

(passage from "Ooh kill 'em");

and MILL's penchant to resolve feuds with fellow rappers, like "THE GAME" through acts of violence, resulting in gunfire and the reckless discharge of weapons, including an incident at the Fontainebleau Hotel in Miami Beach, Florida, in September 2016, when MILL's personnel allegedly peppered THE GAME's Mercedes "G Wagon" SUV with gunfire after a beef escalated between MILL and THE GAME after THE GAME referred to MILL as "snitch" and expressed a desire to "beat" MILL.

18. As a proximate result of the negligence of the defendant, MEEK MILL, the Plaintiff's decedent, TRAVIS WARD, sustained the following injuries:

- a. Multiple gunshot wounds;
- b. Uncontrolled hemorrhage;
- c. Perforation of the lung;
- d. Associated anxiety, fear of death and severe pain;
- e. Other traumatic injuries and shock and stress to his entire system; and
- f. Death.

19. As a result of these injuries, the plaintiff's decedent, TRAVIS WARD, endured multiple emergent lifesaving procedures, mechanical intubation and related medical and support services. In addition, the plaintiff's decedent, TRAVIS WARD, suffered a complete destruction of the ability to participate in all activities of daily living in which he previously engaged and lost forever his ability to carry on and enjoy life's activities.

20. As a further direct and proximate result of the defendant's negligence, the Estate of TRAVIS WARD incurred expenses for medical care, treatment, and funeral and burial services, all to its loss and damage.

21. As a further direct and proximate result of the defendant's negligence, the Plaintiff's decedent suffered a complete destruction of his earning capacity.

◇ **SIXTH COUNT:** (NATHAN MITCHELL V. OAKDALE MUSICAL THEATRE COMPANY - NEGLIGENCE)

1. On December 30, 2016, the plaintiff, NATHAN MITCHELL, a resident of Hartford, Connecticut entered as a patron and business invitee upon the premises of the Oakdale Musical Theatre venue (THE OAKDALE), located at 95 S. Turnpike Road, Wallingford, Connecticut.

2. On that date, the plaintiff, NATHAN MITCHELL, attended a concert by rap artist, ROBERT RIHMEEK WILLIAMS A/K/A MEEK MILL.

3. On December 30, 2016, and at all times mentioned herein, the Defendant, OAKDALE MUSICAL THEATRE COMPANY, was a domestic company organized and existing under the laws of the State of Connecticut, with a principal place of business at 95 S. Turnpike Road, Wallingford, Connecticut.

4. On December 30, 2016, and at all times mentioned herein, the Defendant, LIVE NATION WORLDWIDE, INC., ("LIVE NATION"), was a foreign corporation organized and existing under the laws of the State of Delaware, with a principal place of business at 13155 Noel Road, Dallas, Texas.

5. On December 30, 2016, and at all times mentioned herein, the Defendant, ◇ MICHAEL J. WILLCOX A/K/A BIG MIKE THE RULER, ("WILLCOX") operated as a concert

◇ promoter in the State of Connecticut, with a principal place of business at 25 East Pearl Street, Danbury, Connecticut.

6. On December 30, 2016, and at all times mentioned herein, the Defendant, WILLCOX was the managing member of Defendant, THE BIG BOY GAME, LLC, a domestic limited liability company organized and existing under the laws of the State of Connecticut to promote local music performances, with a principal place of business at 25 East Pearl Street, Danbury, Connecticut.

7. On December 30, 2016, and at all times mentioned herein, the Defendant, ROC NATION, LLC ("ROC NATION") was a foreign limited liability company organized and existing under the laws of the State of Delaware with a principal place of business at 9348 Civic Center Drive, Beverly Hills, California.

8. On December 30, 2016, and at all times mentioned herein, the Defendant, ROBERT RIHMEEK WILLIAMS A/K/A MEEK MILL, ("MEEK MILL") operated as a musical performer and personality in the State of Connecticut, with a principal place of business in Philadelphia, Pennsylvania.

9. On the above date, and at all times mentioned herein, the Defendants and/or their operatives, including their agents, apparent agents, servants, employees, contractors, ◇ partners, joint venturers and/or co-conspirators owned, operated, managed, conducted,

◇ performed at, maintained and/or controlled the premises known as THE OAKDALE, including its facilities and parking areas and lots.

10. Defendants promoted and/or solicited the sale of tickets to maximize patron attendance at the MEEK MILL music performance that occurred on December 30, 2016.

11. On December 30, 2016, a melee ensued shortly after the MEEK MILL performance in the parking area within the confines of THE OAKDALE facilities, when armed assailant(s) who had attended the MEEK MILL concert, discharged firearm(s) in the vicinity of the plaintiffs, and struck the plaintiffs with round(s) severely injuring or mortally wounding the plaintiffs. The plaintiffs were unarmed and did not contribute to, incite or in any fashion participate in the melee.

12. On the above date, the Plaintiff, NATHAN MITCHELL, was physically assaulted by a melee participant, who shot and severely wounded NATHAN MITCHELL with a firearm on the premises of THE OAKDALE.

13. The Defendants invited and actively solicited members of the general public to enter and patronize their venue and performance and parking area in an effort to maximize cash receipts.

14. The Defendants had a duty to exercise reasonable care to protect concert goers, including the plaintiff, from dangers which might reasonably be anticipated to arise from conditions of the premises and activities taking place on the premises.

15. The Plaintiff's severe injuries were proximately caused by the negligence and carelessness of the Defendant, OAKDALE MUSICAL THEATRE COMPANY, in one or more of the following ways, in that it:

- a. allowed thugs to remain on the defendants premises, after exhibiting disorderly, disruptive, argumentative, angry and/or agitated behavior toward patrons;
- b. failed to take reasonable measures to protect patrons and invitees including the plaintiff from violence;
- c. failed to hire and/or retain adequate security presence on the premises to protect patrons including the plaintiff;
- d. failed to take reasonable measures to protect patrons and invitees including the plaintiff from violence after it became aware or should have been aware of prior disruptive, annoying, disorderly, criminal, violent and abusive behavior of patrons, including the discharge of firearms, in the environs of the concert venue, following previous concerts of artist/co-defendant, MEEK MILL;
- e. failed to take reasonable measures to protect patrons and invitees including the plaintiff from violence after they became aware or should have been aware of prior disruptive, annoying, disorderly, and abusive behavior of patrons following previous performances at THE OAKDALE;
- f. ignored and tolerated disruptive, disorderly, argumentative and/or threatening behavior of patron(s) including the shooter or shooters;

- g. failed to institute proper procedures and guidelines for responding to persons who were disruptive, argumentative or behaving improperly toward other patrons;
- h. failed to train personnel in proper procedures for responding to disorderly and disruptive persons on the premises who behaved improperly toward other patrons;
- i. failed to take reasonable and necessary measures so as to avoid the risk of foreseeable harm posed by thugs toward invitees to the premises, including the Plaintiff;
- j. failed to discover, consider, appreciate or act on the fact, that MEEK MILL concerts historically have had violent outbursts in the parking lot or the environs of the show venue, before, during or after the event including, but not limited to, multiple shootings in the parking lot outside the Moodswing Niteclub Lounge gig on Kirkwood Highway, in Wilmington, Delaware in 2013, multiple melees and brawls in and outside of Club Lush at Tuxedo Junction, in Danbury, Connecticut in October, 2011; and/or,
- k. failed to discover, consider, appreciate or act on the fact that MEEK MILL's lyrics, songs and actions incite violence, and encourage the use of deadly weapons including passages such as:

Ak-47 picture perfect like a camera
I point it at your homie leave 'em stinking like a pamper
Fuck what you drinkin, fuck what you thinkin
This 40 hit yo homie leave that nigga plankin

(passage in "*Tony Montana Freestyle*" from Dreamchasers (2011))

What's your body count nigga
I'm double digits

...

I got some bad hos in my crib
Coup' stones in my couch
Scarface in this bitch
It's like a gun store in my house
Hobart on my desk
Bag it up by ounce
The feds watchin this bitch
Oh lord it's three strikes and I'm out
I'm gone

(passage in "*Body Count*" from Dreamchasers (2011))

Oh, I grew up, I screw up a oz of crack
Then I blew up they knew us before all this rap
I maneuvered with shooters
You fuck around with me, get smoked like a hookah
My ruger go booyah, I do it for the streets
...
Hundred shots, aim straight at your snap cap
Everybody want the crown so I snatch that
Heard your gun go doo-doo-dooo-dooo
Well my gun go blap-blap-blap-blap-blap
...
And you feeling yourself so I'm killing these niggas like...
...
And a nigga fuck around get the RICO Act
Shoot shoot, and one, where my free throw at?
And my lil' nigga Bobby can't eat those flats
Like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em

[Verse 2 - Meek Mill:]

They know Meek Milly, I barely went gold
But Meek Milly look like he sold two million
All this new money I'm getting my nigga
I swear I don't know what to do with it

Yeah it's Meek Milly, I'm bombing on rappers
I really don't give a fuck who with 'em
Pair with a nigga like me one time, like me one time
And ya'll forgot about me
Acting like I don't really want mine
What the fuck wrong with em
Know how we feeling, let me get back to it
Terio like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em, ooh kill 'em, ooh

(passage from "Ooh kill 'em");

and MILL's penchant to resolve feuds with fellow rappers, like "THE GAME" through acts of violence, resulting in gunfire and the reckless discharge of weapons, including an incident at the Fontainebleau Hotel in Miami Beach, Florida, in September 2016, when MILL's personnel allegedly peppered THE GAME's Mercedes "G Wagon" SUV with gunfire after a beef escalated between MILL and THE GAME after THE GAME referred to MILL as "snitch" and expressed a desire to "beat" MILL.

16. As a proximate result of the negligence of the defendant, OAKDALE MUSICAL THEATRE COMPANY, through its agents servants and/or employees, the Plaintiff, NATHAN MITCHELL, sustained the following injuries:

- a. Gunshot wound of right upper extremity;
- b. Associated anxiety, fear and severe pain;
- c. Scarring;
- d. Fear of death; and,
- e. Other traumatic injuries and pain, shock and stress to his entire system.

17. As a result of these injuries, the plaintiff, NATHAN MITCHELL, was hospitalized and received medical support.

18. As a further direct and proximate result of the negligence as aforesaid, the plaintiff was required to spend various sums of money for medical care and treatment, all to his loss and damage.

19. As a further direct and proximate result of the defendant's negligence, the Plaintiff suffered lost wages.

SEVENTH COUNT: (NATHAN MITCHELL V. LIVE NATION WORLDWIDE, INC. - NEGLIGENCE)

1- 14. Paragraphs 1 - 14 of COUNT SIX are incorporated herein as Paragraphs 1 - 14 of COUNT SEVEN.

15. The Plaintiff's severe injuries were proximately caused by the negligence and carelessness of the Defendant, LIVE NATION, in one or more of the following ways, in that it:

- a. allowed thugs to remain on the defendants premises, after exhibiting disorderly, disruptive, argumentative, angry and/or agitated behavior toward patrons;
- b. failed to take reasonable measures to protect patrons and invitees including the plaintiff from violence;
- c. failed to hire and/or retain adequate security presence on the premises to protect patrons including the plaintiff;

- d. failed to take reasonable measures to protect patrons and invitees including the plaintiff from violence after it became aware or should have been aware of prior disruptive, annoying, disorderly, criminal, violent and abusive behavior of patrons, including the discharge of firearms, in the environs of the concert venue, following previous concerts of artist/co-defendant, MEEK MILL;
- e. failed to take reasonable measures to protect patrons and invitees including the plaintiff from violence after they became aware or should have been aware of prior disruptive, annoying, disorderly, and abusive behavior of patrons following previous performances at THE OAKDALE;
- f. ignored and tolerated disruptive, disorderly, argumentative and/or threatening behavior of patron(s) including the shooter or shooters;
- g. failed to institute proper procedures and guidelines for responding to persons who were disruptive, argumentative or behaving improperly toward other patrons;
- h. failed to train personnel in proper procedures for responding to disorderly and disruptive persons on the premises who behaved improperly toward other patrons;
- i. failed to take reasonable and necessary measures so as to avoid the risk of foreseeable harm posed by thugs toward invitees to the premises, including the Plaintiff;
- j. failed to discover, consider, appreciate or act on the fact, that MEEK MILL concerts historically have had violent outbursts in the parking lot or the environs of the show venue, before, during or after the event including, but not limited to, multiple shootings in the parking lot outside the Moodswing Niteclub Lounge gig on Kirkwood Highway, in Wilmington, Delaware in 2013, multiple melees and brawls in and outside of Club Lush at Tuxedo Junction, in Danbury, Connecticut in October, 2011; and/or,

- k. failed to discover, consider, appreciate or act on the fact that MEEK MILL's lyrics, songs and actions incite violence, and encourage the use of deadly weapons including passages such as:

Ak-47 picture perfect like a camera
I point it at your homie leave 'em stinking like a pamper
Fuck what you drinkin, fuck what you thinkin
This 40 hit yo homie leave that nigga plankin

(passage in "*Tony Montana Freestyle*" from *Dreamchasers* (2011))

What's your body count nigga
I'm double digits
...
I got some bad hos in my crib
Coup' stones in my couch
Scarface in this bitch
It's like a gun store in my house
Hobart on my desk
Bag it up by ounce
The feds watchin this bitch
Oh lord it's three strikes and I'm out
I'm gone

(passage in "*Body Count*" from *Dreamchasers* (2011))

Oh, I grew up, I screw up a oz of crack
Then I blew up they knew us before all this rap
I maneuvered with shooters
You fuck around with me, get smoked like a hookah
My ruger go booyah, I do it for the streets
...
Hundred shots, aim straight at your snap cap
Everybody want the crown so I snatch that
Heard your gun go doo-doo-dooo-dooo

Well my gun go blap-blap-blap-blap-blap

...

And you feeling yourself so I'm killing these niggas like...

...

And a nigga fuck around get the RICO Act
Shoot shoot, and one, where my free throw at?
And my lil' nigga Bobby can't eat those flats
Like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em

[Verse 2 - Meek Mill:]

They know Meek Milly, I barely went gold
But Meek Milly look like he sold two million
All this new money I'm getting my nigga
I swear I don't know what to do with it
Yeah it's Meek Milly, I'm bombing on rappers
I really don't give a fuck who with 'em
Pair with a nigga like me one time, like me one time
And ya'll forgot about me
Acting like I don't really want mine
What the fuck wrong with em
Know how we feeling, let me get back to it
Terio like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em, ooh kill 'em, ooh

(passage from "Ooh kill 'em");

and his penchant to resolve feuds with fellow rappers, like "THE GAME" through acts of violence, resulting in gunfire and the reckless discharge of weapons, including an incident at the Fontainebleau Hotel in Miami Beach, Florida, in September 2016, when MILL's personnel allegedly peppered THE GAME's Mercedes "G Wagon" SUV with gunfire after a beef escalated between MILL and THE GAME after THE GAME referred to MILL as "snitch" and expressed a desire to "beat" MILL.

16. As a proximate result of the negligence of the defendant, LIVE NATION, the Plaintiff, NATHAN MITCHELL, sustained the following injuries:

- a. Gunshot wound of right upper extremity;
- b. Associated anxiety, fear and severe pain;
- c. Scarring;
- d. Fear of death; and
- e. Other traumatic injuries and shock, pain and stress to his system.

17. As a result of these injuries, the plaintiff, NATHAN MITCHELL, was hospitalized and received medical support.

18. As a further direct and proximate result of the negligence as aforesaid, the plaintiff was required to spend various sums of money for medical care and treatment, all to his loss and damage.

19. As a further direct and proximate result of the defendant's negligence, the Plaintiff suffered lost wages.

EIGHTH COUNT: (NATHAN MITCHELL V. MICHAEL J. WILLCOX A/K/A BIG MIKE THE RULER AND THE BIG BOY GAME, LLC - NEGLIGENCE)

1- 14. Paragraphs 1 - 14 of COUNT SEVEN are incorporated herein as Paragraphs 1 - 14 of COUNT EIGHT.

15. The Plaintiff's severe injuries were proximately caused by the negligence and carelessness of the Defendants, WILLCOX and THE BIG BOY GAME, LLC, in one or more of the following ways, in that they:

- a. allowed thugs to remain on the defendants premises, after exhibiting disorderly, disruptive, argumentative, angry and/or agitated behavior toward patrons;
- b. failed to take reasonable measures to protect patrons and invitees including the plaintiff from violence;
- c. failed to hire and/or retain adequate security presence on the premises to protect patrons including the plaintiff;
- d. failed to take reasonable measures to protect patrons and invitees including the plaintiff from violence after it became aware or should have been aware of prior disruptive, annoying, disorderly, criminal, violent and abusive behavior of patrons, including the discharge of firearms, in the environs of the concert venue, following previous concerts of artist/co-defendant, MEEK MILL;
- e. failed to take reasonable measures to protect patrons and invitees including the plaintiff from violence after they became aware or should have been aware of prior disruptive, annoying, disorderly, and abusive behavior of patrons following previous performances at THE OAKDALE;
- f. ignored and tolerated disruptive, disorderly, argumentative and/or threatening behavior of patron(s) including the shooter or shooters;
- g. failed to institute proper procedures and guidelines for responding to persons who were disruptive, argumentative or behaving improperly toward other patrons;

- h. failed to train personnel in proper procedures for responding to disorderly and disruptive persons on the premises who behaved improperly toward other patrons;
- i. failed to take reasonable and necessary measures so as to avoid the risk of foreseeable harm posed by thugs toward invitees to the premises, including the Plaintiff;
- j. failed to discover, consider, appreciate or act on the fact, that MEEK MILL concerts historically have had violent outbursts in the parking lot or the environs of the show venue, before, during or after the event including, but not limited to, multiple shootings in the parking lot outside the Moodswing Niteclub Lounge gig on Kirkwood Highway, in Wilmington, Delaware in 2013, multiple melees and brawls in and outside of Club Lush at Tuxedo Junction, in Danbury, Connecticut in October, 2011; and/or,
- k. failed to discover, consider, appreciate or act on the fact that MEEK MILL's lyrics, songs and actions incite violence, and encourage the use of deadly weapons including passages such as:

Ak-47 picture perfect like a camera
I point it at your homie leave 'em stinking like a pamper
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(passage in "*Tony Montana Freestyle*" from Dreamchasers (2011))

What's your body count nigga
I'm double digits
...
I got some bad hos in my crib
Coup' stones in my couch
Scarface in this bitch
It's like a gun store in my house
Hobart on my desk
Bag it up by ounce

The feds watchin this bitch
Oh lord it's three strikes and I'm out
I'm gone

(passage in "*Body Count*" from Dreamchasers (2011))

Oh, I grew up, I screw up a oz of crack
Then I blew up they knew us before all this rap
I maneuvered with shooters
You fuck around with me, get smoked like a hookah
My ruger go booyah, I do it for the streets

...

Hundred shots, aim straight at your snap cap
Everybody want the crown so I snatch that
Heard your gun go doo-doo-dooo-dooo
Well my gun go blap-blap-blap-blap-blap

...

And you feeling yourself so I'm killing these niggas like...

...

And a nigga fuck around get the RICO Act
Shoot shoot, and one, where my free throw at?
And my lil' nigga Bobby can't eat those flats
Like ooh kill 'em, ooh kill 'em
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[Verse 2 - Meek Mill:]

They know Meek Milly, I barely went gold
But Meek Milly look like he sold two million
All this new money I'm getting my nigga
I swear I don't know what to do with it
Yeah it's Meek Milly, I'm bombing on rappers
I really don't give a fuck who with 'em
Pair with a nigga like me one time, like me one time
And ya'll forgot about me
Acting like I don't really want mine
What the fuck wrong with em

Know how we feeling, let me get back to it
Terio like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em, ooh kill 'em, ooh

(passage from "Ooh kill 'em");

and MILL's penchant to resolve feuds with fellow rappers, like "THE GAME" through acts of violence, resulting in gunfire and the reckless discharge of weapons, including an incident at the Fontainebleau Hotel in Miami Beach, Florida, in September 2016, when MILL's personnel allegedly peppered THE GAME's Mercedes "G Wagon" SUV with gunfire after a beef escalated between MILL and THE GAME after THE GAME referred to MILL as "snitch" and expressed a desire to "beat" MILL.

16. As a proximate result of the negligence of the defendants, WILLCOX and THE BIG BOY GAME, LLC, the Plaintiff, NATHAN MITCHELL, sustained the following injuries:

- a. Gunshot wound of right upper extremity;
- b. Associated anxiety, fear and severe pain;
- c. Scarring;
- d. Fear of death; and,
- e. Other traumatic injuries and shock, pain and stress to his system.

17. As a result of these injuries, the plaintiff, NATHAN MITCHELL, was hospitalized and received medical support.

18. As a further direct and proximate result of the negligence as aforesaid, the plaintiff was required to spend various sums of money for medical care and treatment, all to his loss and damage.

19. As a further direct and proximate result of the defendant's negligence, the Plaintiff suffered lost wages.

NINTH COUNT: (NATHAN MITCHELL V. ROC NATION, LLC - NEGLIGENCE)

1- 14. Paragraphs 1 - 14 of COUNT SEVEN are incorporated herein as Paragraphs 1 - 14 of COUNT NINE.

15. The Plaintiff's severe injuries were proximately caused by the negligence and carelessness of the Defendant, ROC NATION, in one or more of the following ways, in that it:

- a. allowed thugs to remain on the defendants premises, after exhibiting disorderly, disruptive, argumentative, angry and/or agitated behavior toward patrons;
- b. failed to take reasonable measures to protect patrons and invitees including the plaintiff from violence;
- c. failed to hire and/or retain adequate security presence on the premises to protect patrons including the plaintiff;
- d. failed to take reasonable measures to protect patrons and invitees including the plaintiff from violence after it became aware or should have been aware of prior disruptive, annoying, disorderly, criminal, violent and abusive behavior of patrons, including the discharge of firearms, in the environs of the concert venue, following previous concerts of artist/co-defendant, MEEK MILL;

- e. failed to take reasonable measures to protect patrons and invitees including the plaintiff from violence after they became aware or should have been aware of prior disruptive, annoying, disorderly, and abusive behavior of patrons following previous performances at THE OAKDALE;
- f. ignored and tolerated disruptive, disorderly, argumentative and/or threatening behavior of patron(s) including the shooter or shooters;
- g. failed to institute proper procedures and guidelines for responding to persons who were disruptive, argumentative or behaving improperly toward other patrons;
- h. failed to train personnel in proper procedures for responding to disorderly and disruptive persons on the premises who behaved improperly toward other patrons;
- i. failed to take reasonable and necessary measures so as to avoid the risk of foreseeable harm posed by thugs toward invitees to the premises, including the Plaintiff;
- j. failed to discover, consider, appreciate or act on the fact, that MEEK MILL concerts historically have had violent outbursts in the parking lot or the environs of the show venue, before, during or after the event including, but not limited to, multiple shootings in the parking lot outside the Moodswing Niteclub Lounge gig on Kirkwood Highway, in Wilmington, Delaware in 2013, multiple melees and brawls in and outside of Club Lush at Tuxedo Junction, in Danbury, Connecticut in October, 2011; and/or,
- k. failed to discover, consider, appreciate or act on the fact that MEEK MILL's lyrics, songs and actions incite violence, and encourage the use of deadly weapons including passages such as:

Ak-47 picture perfect like a camera
I point it at your homie leave 'em stinking like a pamper

Fuck what you drinkin, fuck what you thinkin
This 40 hit yo homie leave that nigga plankin

(passage in "*Tony Montana Freestyle*" from *Dreamchasers* (2011))

What's your body count nigga
I'm double digits

...

I got some bad hos in my crib
Coup' stones in my couch
Scarface in this bitch
It's like a gun store in my house
Hobart on my desk
Bag it up by ounce
The feds watchin this bitch
Oh lord it's three strikes and I'm out
I'm gone

(passage in "*Body Count*" from *Dreamchasers* (2011))

Oh, I grew up, I screw up a oz of crack
Then I blew up they knew us before all this rap
I maneuvered with shooters
You fuck around with me, get smoked like a hookah
My ruger go booyah, I do it for the streets

...

Hundred shots, aim straight at your snap cap
Everybody want the crown so I snatch that
Heard your gun go doo-doo-dooo-dooo
Well my gun go blap-blap-blap-blap-blap

...

And you feeling yourself so I'm killing these niggas like...

...

And a nigga fuck around get the RICO Act
Shoot shoot, and one, where my free throw at?
And my lil' nigga Bobby can't eat those flats

Like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em

[Verse 2 - Meek Mill:]

They know Meek Milly, I barely went gold
But Meek Milly look like he sold two million
All this new money I'm getting my nigga
I swear I don't know what to do with it
Yeah it's Meek Milly, I'm bombing on rappers
I really don't give a fuck who with 'em
Pair with a nigga like me one time, like me one time
And ya'll forgot about me
Acting like I don't really want mine
What the fuck wrong with em
Know how we feeling, let me get back to it
Terio like ooh kill 'em, ooh kill 'em
Ooh kill 'em, ooh kill 'em, ooh kill 'em, ooh

(passage from "Ooh kill 'em");

and MILL's penchant to resolve feuds with fellow rappers, like "THE GAME" through acts of violence, resulting in gunfire and the reckless discharge of weapons, including an incident at the Fontainebleau Hotel in Miami Beach, Florida, in September 2016, when MILL's personnel allegedly peppered THE GAME's Mercedes "G Wagon" SUV with gunfire after a beef escalated between MILL and THE GAME after THE GAME referred to MILL as "snitch" and expressed a desire to "beat" MILL.

16. As a proximate result of the negligence of the defendant, ROC NATION, the Plaintiff, NATHAN MITCHELL, sustained the following injuries:

- a. Gunshot wound of right upper extremity;
- b. Associated anxiety, fear and severe pain;

- c. Scarring;
- d. Fear of death; and,
- e. Other traumatic injuries and shock, pain and stress to his system.

17. As a result of these injuries, the plaintiff, NATHAN MITCHELL, was hospitalized and received medical support.

18. As a further direct and proximate result of the negligence as aforesaid, the plaintiff was required to spend various sums of money for medical care and treatment, all to his loss and damage.

19. As a further direct and proximate result of the defendant's negligence, the Plaintiff suffered lost wages.

TENTH COUNT: (NATHAN MITCHELL V. ROBERT RIHMEEK WILLIAMS A/K/A MEEK MILL - NEGLIGENCE)

1- 14. Paragraphs 1 - 14 of COUNT SEVEN are incorporated herein as Paragraphs 1 - 14 of COUNT TEN.

15. The Plaintiff's severe injuries were proximately caused by the negligence and carelessness of the Defendant, MEEK MILL, in one or more of the following ways, in that he:

- a. failed to warn the co-defendants of the disorderly, disruptive, argumentative, angry, criminal, violent, abusive and/or agitated behavior and outburst of thugs toward patrons following previous events including melees in the parking lot or the environs of the show venue, before, during or after the event including, but not limited to, multiple shootings in the

parking lot outside the Moodswing Niteclub Lounge gig on Kirkwood Highway, in Wilmington, Delaware in 2013, multiple melees and brawls in and outside of Club Lush at Tuxedo Junction, in Danbury, Connecticut in October, 2011; and/or,

- b. failed to warn the co-defendants that his lyrics, songs and actions incite violence, and encourage the use of deadly weapons including passages such as:

Ak-47 picture perfect like a camera
I point it at your homie leave 'em stinking like a pamper
Fuck what you drinkin, fuck what you thinkin
This 40 hit yo homie leave that nigga plankin

(passage in "*Tony Montana Freestyle*" from Dreamchasers (2011))

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allegedly peppered THE GAME's Mercedes "G Wagon" SUV with gunfire after a beef escalated between MILL and THE GAME after THE GAME referred to MILL as "snitch" and expressed a desire to "beat" MILL.

16. As a proximate result of the negligence of the defendant, MEEK MILL, the Plaintiff, NATHAN MITCHELL, sustained the following injuries:

- a. Gunshot wound of right upper extremity;
- b. Associated anxiety, fear and severe pain;
- c. Scarring;
- d. Fear of death; and,
- e. Other traumatic injuries and shock, pain and stress to his system.

17. As a result of these injuries, the plaintiff, NATHAN MITCHELL, was hospitalized and received medical support.

18. As a further direct and proximate result of the negligence as aforesaid, the plaintiff was required to spend various sums of money for medical care and treatment, all to his loss and damage.

19. As a further direct and proximate result of the defendant's negligence, the Plaintiff suffered lost wages.

◇ WHEREFORE, THE PLAINTIFFS HEREBY CLAIM MONETARY DAMAGES, IN EXCESS OF FIFTEEN THOUSAND & 00/100 DOLLARS (\$15,000.00) AND THIS MATTER IS WITHIN THE JURISDICTION OF THIS COURT.

THE PLAINTIFFS,

JACQUELINE BOND, ADMINISTRATRIX OF THE
ESTATE OF TRAVIS WARD, AND NATHAN
MITCHELL

By: 

JOEL T. FAXON, ESQ.
FAXON LAW GROUP, LLC
59 Elm Street
New Haven, CT 06510
T: 203.624.9500
F: 203.624.9100
THEIR ATTORNEY
jfaxon@faxonlawgroup.com
Juris Number 421593

PLEASE ENTER THE APPEARANCE OF:

FAXON LAW GROUP, LLC
59 Elm Street
New Haven, CT 06510
T: 203.624.9500
F: 203.624.9100
Juris Number 421593

FOR THE PLAINTIFFS

◇ RETURN DATE: JUNE 20, 2017 : SUPERIOR COURT

JACQUELINE D. BOND, ADMINISTRATRIX OF THE :
ESTATE OF TRAVIS WARD, AND :
NATHAN MITCHELL : J.D. OF WATERBURY

PLAINTIFFS :

VS. :

OAKDALE MUSICAL THEATRE COMPANY, :
LIVE NATION WORLDWIDE, INC., MICHAEL J. :
WILLCOX A/K/A BIG MIKE THE RULER, THE BIG :
BOY GAME, LLC, ROC NATION, LLC, AND :
ROBERT RIHMEEK WILLIAMS A/K/A MEEK MILL :

DEFENDANTS : MAY 23, 2017

STATEMENT OF AMOUNT IN DEMAND

The amount, legal interest or property in demand is \$15,000.00 or more exclusive of interest and costs.

THE PLAINTIFFS,

JACQUELINE BOND, ADMINISTRATRIX OF THE
ESTATE OF TRAVIS WARD, AND NATHAN
MITCHELL

By: 

JOEL T. FAXON, ESQ.
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COURT OF PROBATE

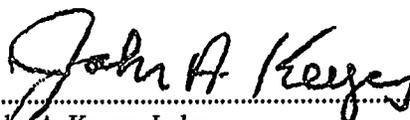
COURT OF PROBATE, New Haven Probate Court		DISTRICT NO. PD38
ESTATE OF/IN THE MATTER OF Travis Earl Ward, AKA Travis Ward (17-0365)		DATE OF CERTIFICATE April 25, 2017
FIDUCIARY'S NAME AND ADDRESS Jacqueline Darlene Bond, 100 Mack Lane, Apartment C4, Waterbury, CT 06704	FIDUCIARY'S POSITION OF TRUST Administratrix/Limited	DATE OF APPOINTMENT April 25, 2017

The undersigned hereby certifies that the fiduciary in the above-named matter has accepted appointment, is legally authorized and qualified to act as such fiduciary because the appointment is unrevoked and in full force as of the above date of certificate.

This certificate is valid for one year from the date of the certificate.

Other limitation, if any, on the above certificate: Limited authority is given to litigate, access, investigate and receive all information regarding the decedent's financial assets and real property but with no authority to handle any of the decedent's assets.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of this Court on the above date of certificate.


.....
John A. Keyes, Judge

Court
Seal

NOT VALID WITHOUT COURT OF PROBATE SEAL IMPRESSED