



20235351

By Fax

1 Sandra Ribera Speed (SBN 236769)  
2 RIBERA LAW FIRM  
3 A Professional Corporation  
4 157 West Portal Avenue, Suite 2  
5 San Francisco, CA 94127  
6 Phone: (415) 576-1600  
7 Fax: (415) 842-0321

**FILED**  
**ALAMEDA COUNTY**

AUG 31 2017

CLERK OF THE SUPERIOR COURT

By

8 Attorneys for Plaintiff  
9 Christopher Askew, individually and as heir of  
10 Cash Askew, deceased

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 COUNTY OF ALAMEDA (UNLIMITED JURISDICTION)

RG17873709

13 CHRISTOPHER ASKEW,  
14 individually and as heir of CASH ASKEW,  
15 deceased

16 Plaintiff,

17 vs.

18 CHOR NAR SIU NG, individually and as  
19 Trustee of the CHOR NAR SIU NG  
20 REVOCABLE TRUST DATED SEPTEMBER )  
21 28, 2007; )  
22 EVA NG; )  
23 KAI NG; )  
24 DERICK ION ALMENA; )  
25 MICAH ALLISON; )  
26 NICHOLAS ALEXANDER BOUCHARD; )  
27 DANIEL LOPEZ; )  
28 510 CUSTOM AUDIO; )  
OMAR VEGA, individually and dba CUSTOM )  
O'S; )  
JOHN HRABKO aka RADAR; )  
AMANDA BETH BROWN, individually and )  
dba 100% SILK; )  
BRITT BROWN, individually and dba 100% )  
SILK; )  
100% SILK; )  
NOT NOT FUN RECORDS; )  
JOEL SHANAHAN aka GOLDEN DONNA; )

) Case No.  
)  
) **SHORT FORM COMPLAINT AND**  
) **NOTICE OF ADOPTION OF FIRST**  
) **AMENDED MASTER COMPLAINT IN**  
) **THE IN RE GHOST SHIP LITIGATION**  
) **(CASE NO. RG16843631 AND RELATED**  
) **CASES)**  
)  
) **DEMAND FOR JURY TRIAL**

1 RUSSELL E.L. BUTLER aka BLACK JEANS; )  
 2 OPAL RECORDS; )  
 3 BENJAMIN CANNON; )  
 4 MAX HARRIS aka MAX OHR; )  
 5 PACIFIC GAS & ELECTRIC COMPANY; )  
 6 PG&E CORPORATION; )  
 7 CITY OF OAKLAND; )  
 8 COUNTY OF ALAMEDA; )  
 9 STATE OF CALIFORNIA (OFFICE OF THE )  
 STATE FIRE MARSHAL and DEPARTMENT )  
 OF FORESTRY AND FIRE PROTECTION); )  
 and DOES 1 through 750, inclusive, )  
 Defendants. )

10 PLAINTIFF, CHRISTOPHER ASKEW, COMPLAINS OF THE DEFENDANTS AND  
 11 EACH OF THEM AS FOLLOWS:

12 1. Plaintiff refers to and incorporates herein by reference that certain First Amended  
 13 Master Complaint filed in IN RE THE GHOST SHIP INCIDENT, as though fully set forth  
 14 herein. Plaintiff hereby adopts the First Amended Master Complaint and agrees to be bound by  
 15 any rulings with respect to the pleadings of the First Amended Master Complaint and the Master  
 16 Complaint.

17 2. Plaintiff incorporates by reference each of the causes of action in the First  
 18 Amended Master Complaint checked below:

- 19  Negligence
- 20  Negligence Against PG&E Defendants
- 21  Premises Liability
- 22  Negligent Failure to Evict
- 23  Negligent Hiring, Supervision, Training and/or Retention
- 24  Public Nuisance
- 25  Strict Liability
- 26  Survival Action
- 27  Negligent Infliction of Emotional Distress
- 28  Intentional Infliction of Emotional Distress

- 1         Government Tort Liability
- 2         Dangerous Condition of Public Property
- 3         Negligence Against DOES 501 Through 750
- 4         Survival Action – Gov’t Entities and DOES 501 Through 750

5        3. Plaintiff brings those causes of action, as applicable, against each of the  
 6 Defendants in the First Amended Master Complaint checked below:

7         CHOR NAR SIU NG, individually and as Trustee of the CHOR NAR SIU NG  
 8 REVOCABLE TRUST DATED SEPTEMBER 28, 2007

- 9         EVA NG
- 10        KAI NG
- 11        DOES 1 THROUGH 50
- 12        DERICK ION ALMENA
- 13        MICAH ALLISON
- 14        NICHOLAS ALEXANDER BOUCHARD
- 15        DOES 51 THROUGH 100
- 16        DANIEL LOPEZ
- 17        510 CUSTOM AUDIO
- 18        OMAR VEGA, individually and dba CUSTOM O’S
- 19        DOES 101 THROUGH 150
- 20        JOHN HRABKO aka RADAR
- 21        AMANDA BETH BROWN, individually and dba 100% SILK
- 22        BRITT BROWN, individually and dba 100% SILK
- 23        100% SILK
- 24        NOT NOT FUN RECORDS
- 25        JOEL SHANAHAN aka GOLDEN DONNA
- 26        RUSSELL E.L. BUTLER aka BLACK JEANS
- 27        OPAL RECORDS
- 28        DOES 151 through 200

- 1         BENJAMIN CANNON
- 2         DOES 201 THROUGH 250
- 3         MAX HARRIS aka MAX OHR
- 4         PACIFIC GAS & ELECTRIC COMPANY
- 5         PG&E CORPORATION
- 6         DOES 251 through 300
- 7         DOES 301 through 500
- 8         CITY OF OAKLAND
- 9         COUNTY OF ALAMEDA
- 10        STATE OF CALIFORNIA
- 11        DOES 501 through 750

12       4.       Plaintiff is a resident of Aachen, Germany. Plaintiff's injuries as alleged in this  
 13 litigation occurred in the County of Alameda, in the State of California.

14       5.       Plaintiff(s) brings this action and seeks damages as follows:

15        Plaintiff \_\_\_\_\_ is an individual who sustained injuries and/or  
 16 damages as a result of the Ghost Ship fire.

17        Plaintiff is the spouse of \_\_\_\_\_, an individual  
 18 who died as a result of injuries sustained in the Ghost Ship fire.

19        Plaintiff's decedent, Cash Askew, is an individual who sustained fatal injuries in  
 20 the Ghost Ship fire. The following Plaintiffs are heirs of Plaintiff's decedent, or  
 21 other persons entitled to bring an action for the wrongful death of Plaintiff's  
 22 decedent, and bring the causes of action alleged herein pursuant to Code of Civil  
 23 Procedure § 377.60: Christopher Askew and Leisa Askew.

24       The date of death is: December 2, 2016.

25        Plaintiff is a personal representative or successor in interest to decedent, Cash  
 26 Askew, who sustained fatal injuries in the Ghost Ship fire, and is authorized to  
 27 bring a survivor action on behalf of the decedent pursuant to Code of Civil  
 28 Procedure § 377.31, et seq. Plaintiff is a successor in interest as set forth in Code

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

of Civil Procedure § 377.32 or has been appointed as the decedent's personal representative by the following court, on the following date:

\_\_\_\_\_

Other (please describe): \_\_\_\_\_  
\_\_\_\_\_

6. Plaintiff requests the relief checked below:

Economic damages according to proof, including, but not limited to, past and future, medical and incidental expenses, loss of earnings and/or diminution in earning capacity, loss of household services, the financial support Decedent would have contributed to the family, funeral and burial expenses, and/or property damage.

Noneconomic damages according to proof associated with wrongful death, including, but not limited to, past and future, loss of consortium, love, companionship, comfort, care, assistance, protection, affection, social, moral support, training and guidance.

Noneconomic damages according to proof associated with personal injuries, including, but not limited to, past and future physical pain, mental suffering, loss of enjoyment of life, disfigurement, physical impairment, inconvenience, grief, anxiety, humiliation and/or emotional distress.

Pre- and post-judgment interest on all damages as allowed by the law.

Attorneys' fees, costs and other damages as permitted under applicable laws.

Punitive damages in an amount according to proof.

Costs of suit incurred herein.

Other (specify): \_\_\_\_\_  
\_\_\_\_\_

///

///

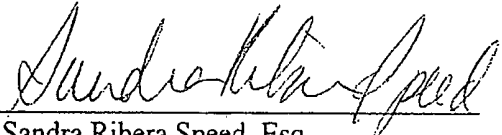
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DEMAND FOR JURY TRIAL**

Plaintiff(s) hereby demands a trial by jury.

Dated: August 31, 2017

RIBERA LAW FIRM, APC

By:   
Sandra Ribera Speed, Esq.  
*Attorneys for Plaintiff*