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10  
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**FILED**  
San Francisco County Superior Court

AUG 31 2018

CLERK OF THE COURT  
BY:   
Deputy Clerk

CGC-18-569372

13 THE SUPERIOR COURT OF CALIFORNIA

14 COUNTY OF SAN FRANCISCO – UNLIMITED CIVIL JURISDICTION

15 MARION JAMES MARCIN, BRIAN  
16 MARCIN, and SHARRI MARCIN,

17 Plaintiffs,

18 v.

19 CCMH FISHERMAN'S WHARF LLC, a  
20 limited liability company, doing business  
as SAN FRANCISCO MARRIOTT  
21 FISHERMAN'S WHARF; HOST  
HOTEL & RESORTS INC., a  
22 corporation; HOST HOTEL & RESORTS  
L.P., a limited partnership; CRESTLINE  
23 HOTELS & RESORTS, INC., a  
corporation; BARCELO CRESTLINE  
24 CORPORATION, a corporation; BRUCE  
WILLIAM MILLER, an individual; and  
DOES 1-100, inclusive,

25 Defendants

CASE NO.

COMPLAINT FOR DAMAGES

1. Negligence and Respondeat Superior
2. Negligent Hiring, Training, Supervision and Retention
3. Battery
4. Intentional Infliction of Emotional Distress
5. Assault
6. Negligence

DEMAND FOR JURY TRIAL

26  
27 Plaintiffs Marion James Marcin, Brian Marcin, and Sharri Marcin (hereinafter  
28

1 collectively "plaintiffs" or "the Marcins") complain of defendants, and each of them, and allege  
2 as follows:

3 1. Defendant CCMH Fisherman's Wharf LLC, doing business as San Francisco  
4 Marriott Fisherman's Wharf ("CCMH Fisherman's Wharf"), is a Delaware company. At all  
5 relevant times, defendant CCMH Fisherman's Wharf owned the San Francisco Marriott  
6 Fisherman's Wharf hotel located at 1250 Columbus Ave, San Francisco (the "Marriott Hotel").

7 2. Defendant Host Hotel & Resorts Inc., a Maryland corporation ("HHR Inc."), and  
8 Host Hotels & Resorts, L.P., a Delaware limited partnership ("HHR LP") (collectively, "Host  
9 Hotels"), own and lease various hotel properties across the United States and were and are  
10 continually and systematically doing business in the State of California. HHR Inc. is the sole  
11 general partner of HHR LP and holds approximately 99% of the outstanding partnership units.  
12 HHR Inc. conducts all of its operations through HHR LP. Defendant CCMH Fisherman's Wharf  
13 LLC is a wholly-owned subsidiary of Host Hotels. At all times relevant to this Complaint, Host  
14 Hotels owned the Marriott Hotel through its ownership of the CCMH Fisherman's Wharf.

15 3. Defendant Crestline Hotels & Resorts LLC, a Delaware corporation ("Crestline  
16 Hotels"), manages, operates, and leases various hotel properties across the United States and was  
17 and is continually and systematically doing business in the State of California. At all times  
18 relevant to this Complaint, Crestline Hotels leased, managed, and operated the Marriott Hotel  
19 under contract with Host Hotels & Resorts, LP. That contract, among other things, allows Host  
20 Hotels to terminate the Crestline Hotel management agreement based on Crestline's  
21 performance.

22 4. Defendant Barcelo Crestline Corporation, a Maryland corporation ("Barcelo")  
23 owns Crestline Hotels and through Crestline Hotels was and is continually and systematically  
24 doing business in the State of California.

25 5. Defendant Bruce Miller was, and at all times relevant is, a resident of the State of  
26 California.

27 6. At all relevant times, Doe 16 through Doe 20, and each of them, were employees  
28 of Host Hotels, CCMH Fisherman's Wharf, Crestline Hotels, Barcelo, and Doe 1 through Doe

1 10 and committed the acts complained of herein while within the course and scope of their  
2 employment, and whose alleged wrongful actions have been ratified by the defendants, and each  
3 of them, who had advance knowledge of the unfitness of Doe 16 through Doe 20, and each of  
4 them, and employed them nevertheless, in conscious disregard of the rights and/or safety of  
5 plaintiffs.

6 7. Plaintiffs are ignorant of the true names and capacities of defendants Doe 1  
7 through Doe 100, inclusive, and therefore sues these defendants by such fictitious names.  
8 Plaintiffs are informed and believe and thereon alleges that each defendant so named is  
9 responsible in some manner for the injuries and damages suffered by plaintiffs, as set forth  
10 herein. Plaintiffs will amend this Complaint to state the true names and capacities of defendant  
11 Doe 1 through Doe 100, inclusive, when they have been ascertained.

12 8. At all times, defendants, and each of them, including both named and Doe  
13 defendants, were the agents, servants, employees and joint venturers of all other defendants in  
14 the course and scope of such agency, employment and/or joint venture; and were and are  
15 responsible for legally causing damage to plaintiffs.

#### 16 GENERAL ALLEGATIONS

17 9. This lawsuit arises out of the negligent failure of defendants, and each of them, to  
18 protect guests of the San Francisco Marriott Fisherman's Wharf Hotel from harmful misconduct,  
19 brutal and violent assault and battery inflicted by former San Francisco 49ers fullback Bruce  
20 Miller on hotel guests Marion James Marcin ("James Marcin"), a 70-year-old father, Sharri  
21 Marcin, his wife, and their developmentally disabled son, Brian Marcin.

22 10. At all relevant times, defendant Bruce Miller was a professional football player  
23 employed by the San Francisco 49ers, was age 29, was approximately 6'2" tall, and weighed  
24 approximately 255 lbs.

25 11. The Marcins arrived in San Francisco on August 29, 2016, proceeded to Lake  
26 Tahoe, where they stayed until September 2, 2016, and then returned to San Francisco on  
27 September 2, 2016. Upon their return to San Francisco, the Marcins checked into the San  
28

1 Francisco Marriott Fisherman's Wharf Hotel and were assigned side-by-side, connecting rooms  
2 on the hotel's second floor.

3 12. On or about September 4, 2016, defendant Bruce Miller arrived at the San  
4 Francisco Marriott Fisherman's Wharf Hotel, approached the guest reception desk and requested  
5 a room. Hotel employees informed Miller that the hotel was sold-out and that no rooms were  
6 available.

7 13. On September 5, 2016, at approximately 2 a.m., defendant Miller again entered  
8 the Marriott Hotel and went up to the second floor. Hotel employees made no attempt to stop  
9 defendant Miller from entering the hotel and ascending to the second floor. As Miller made his  
10 way up to the second floor, the Marcins slept inside the presumed safety of their second-floor  
11 hotel rooms.

12 14. Arriving on the second floor, defendant Miller approached James and Sharri  
13 Marcin's room and began to bang loudly on the door. Startled by defendant Miller's banging,  
14 Sharri Marcin woke up, approached the locked door, and told defendant Miller, from behind the  
15 door, that he had the wrong room number. Defendant Miller turned violent, angry and yelling,  
16 calling Sharri Marcin numerous vulgar epithets and demanded that she open the door. Next,  
17 defendant Miller attempted to break the door down by charging, shouldering, and kicking it.

18 15. James Marcin told defendant Miller that he had the wrong room. Defendant  
19 Miller responded by continuing to pound the door with his fists, but now calling James Marcin  
20 many sexually derogatory and vile epithets.

21 16. Sharri Marcin called the hotel operator, explaining that someone was trying to  
22 break into their room. She demanded immediate hotel security and was assured a security guard  
23 would be there shortly.

24 17. After approximately 10 minutes from calling the hotel operator, no security guard  
25 had arrived. A second call to the hotel operator was made, pleading for the hotel to send a  
26 security guard and insisting that defendant Miller was trying to break the door down. Once  
27 more, the hotel operator assured Sharri Marcin that the security guard was "on his way."  
28

1           18.     Eventually, a security guard appeared outside of the Marcins' room. The security  
2 guard was wearing dark pants and a white shirt, was approximately 6'4 tall, and had a handheld  
3 radio attached at his waist. James cracked the door open, keeping the latch-lock engaged, and  
4 told the security guard that defendant Miller was attempting to break into their room and that the  
5 security guard should remove defendant Miller. A brief exchange ensued between the security  
6 guard and defendant Miller. At one point, the security guard put his hand on defendant Miller's  
7 shoulder, and defendant Miller shoved away the security guard's hand. The security guard began  
8 to walk away. Plaintiffs James and Sharri Marcin called out to the security guard, loudly asking,  
9 "where are you going?;" plaintiffs repeatedly begged him not to leave them alone. The security  
10 guard offered no explanation; he simply walked away toward the second-floor elevator.

11           19.     As soon as the security guard had abandoned the Marcins, defendant Miller  
12 returned to charging, shouldering, and kicking the door multiple times, trying to break the door  
13 down.

14           20.     The epithets ranted by defendant Miller threatened plaintiffs, and each of them,  
15 with physical and sexual abuse, coupled with the ability to carry out his threats, including the  
16 threat of death.

17           21.     Plaintiff Sharri Marcin called 911 to report that defendant Miller was trying to  
18 break into their hotel room and that the hotel's security guard had abandoned the scene.

19           22.     Defendant Miller next turned his attention towards the adjacent room of plaintiff  
20 Brian Marcin; plaintiff James Marcin entered the connecting room as plaintiff Brian Marcin  
21 partially opened the door. Defendant Miller shoved the door wide open and punched plaintiff  
22 James Marcin in the face knocking him unconscious.

23           23.     Defendant Miller dragged Brian Marcin into the hallway. Brian Marcin's knees  
24 buckled, and he fell to the floor. Defendant Miller then kicked Brian in the chest. Defendant  
25 Miller repeatedly stomped on plaintiff Brian Marcin's chest and right hand.

26           24.     While defendant Miller attacked Brian Marcin, plaintiff James Marcin regained  
27 consciousness and came to his son's rescue. Defendant Miller smashed plaintiff Brian Marcin's  
28

1 metal cane into the head of James Marcin, cracking his skull and causing him to lose  
2 consciousness.

3 25. As a direct, proximate and substantial cause of the acts and omissions of  
4 defendant, and each of them, plaintiff James Marcin suffered severe physical injuries including,  
5 but not limited to, complex skull fractures, eye socket fractures, multiple facial fractures, cuts  
6 and contusions, and emotional distress, and neurological and cognitive injuries, permanently  
7 disabling plaintiff, all to plaintiff's general damage in a sum in excess of the jurisdictional  
8 minimum of this Court.

9 26. As a further proximate result of the acts, conduct and omissions of defendants,  
10 and each of them, plaintiff James Marcin incurred medical expenses and will incur medical and  
11 incidental expenses for physicians and surgeons to examine, treat and care for plaintiff, the exact  
12 amount of which is presently unknown.

13 27. As a further proximate result of the acts, conduct and omissions of defendants,  
14 and each of them, plaintiff James Marcin was prevented from attending to his usual and daily  
15 activities, and sustained a loss of earnings and loss of future earning capacity, all to plaintiff's  
16 special and general damage in an amount presently unascertained, as said loss has not yet been  
17 finally determined.

18 28. Plaintiff James Marcin is the husband of Sharri Marcin and the father of Brian  
19 Marcin. James Marcin was present throughout defendant Miller's rampage and witnessed the  
20 injury to Sharri Marcin and Brian Marcin as a result of the acts and omissions of defendants, and  
21 each of them; as a direct and proximate result, James Marcin suffered severe emotional shock  
22 and physical injuries, all of which has caused, continues to cause and will cause him great  
23 physical and mental pain and suffering.

24 29. As a direct, proximate and substantial cause of the acts and omissions of  
25 defendant, and each of them, plaintiff Brian Marcin suffered severe physical injuries including,  
26 but not limited to, a sternal fracture, cuts on his abdomen, abrasions on both his right and left  
27 knee caps, bruising and swelling in his chest, torn ligaments, deep lacerations on this right foot,  
28 severe pain in his right hand, mental and emotional distress, and neurological and cognitive

1 injuries, permanently disabling plaintiff, all to plaintiff's general damage in a sum in excess of  
2 the jurisdictional minimum of this Court.

3 30. As a further proximate result of the acts, conduct and omissions of defendants,  
4 and each of them, plaintiff Brian Marcin incurred medical expenses and will incur medical and  
5 incidental expenses for physicians and surgeons to examine, treat and care for plaintiff, the exact  
6 amount of which is presently unknown.

7 31. As a further proximate result of the acts, conduct and omissions of defendants,  
8 and each of them, plaintiff Brian Marcin was prevented from attending to his usual and daily  
9 activities, and sustained a loss of earnings and loss of future earning capacity, all to plaintiff's  
10 special and general damage in an amount presently unascertained, as said loss has not yet been  
11 finally determined.

12 32. Plaintiff Brian Marcin is the son of plaintiffs James Marcin and Sharri Marcin.  
13 Brian Marcin was present throughout defendant Miller's rampage and witnessed the injury to  
14 James Marcin and Sharri Marcin as a result of the acts and omissions of defendants, and each of  
15 them; as a direct and proximate result, Brian Marcin suffered severe emotional shock and  
16 physical injuries, all of which has caused, continues to cause and will cause her great physical  
17 and mental pain and suffering.

18 33. Plaintiff Sharri Marcin is the wife of James Marcin and the mother of Brian  
19 Marcin. Sharri Marcin was present throughout defendant Miller's rampage and witnessed the  
20 injury to James Marcin and Brian Marcin as a result of the acts and omissions of defendants, and  
21 each of them; as a direct and proximate result, Sharri Marcin suffered severe emotional shock  
22 and physical injuries, all of which has caused, continues to cause and will cause her great  
23 physical and mental pain and suffering.

24 **FIRST CAUSE OF ACTION - NEGLIGENCE - RESPONDEAT SUPERIOR**  
25 **All Plaintiffs Against CCMH Fisherman's Wharf, Host Hotels, Crestline Hotels, Barcelo,**  
26 **and Doe 1 through Doe 10**

26 Plaintiffs adopt and re-allege each prior paragraph, where relevant, as if set forth fully  
27 herein.  
28

1           34. As guests and customers at the San Francisco Marriott Fisherman's Wharf Hotel,  
2 the Marcins were "invitees."

3           35. As the owners and managers of the Marriott Hotel, Defendants Host Hotels,  
4 CCMHFW LLC, Barcelo, Crestline Hotels, and Doe 1 through Doe 10 were "innkeepers."

5           36. A special relationship existed between the Marcins, as invitees, and Defendants  
6 Host Hotels, CCMHFW LLC, Barcelo, Crestline Hotels, and Doe 1 through Doe 10, as  
7 innkeepers.

8           37. In accordance with this special relationship, Defendants Host Hotels, CCMHFW  
9 LLC, Barcelo, Crestline Hotels, and Doe 1 through Doe 10 owed the Marcins a legal duty to take  
10 proactive measures to protect them against harms that may occur while they were staying at the  
11 Marriott Hotel and to properly respond to any event posing an immediate danger or threat to  
12 them.

13           38. Defendants Host Hotels, CCMHFW LLC, Barcelo, Crestline Hotels, and Doe 1  
14 through Doe 10 further owed the Marcins a legal duty to protect them from reasonably  
15 foreseeable criminal or tortious conduct committed by third persons at the Marriott Hotel.

16           39. Defendants Host Hotels, CCMHFW LLC, Barcelo, Crestline Hotels, and Doe 1  
17 through Doe 10, by and through their employees and agents, who were acting within the scope  
18 and course of their employment or agency, breached the duties owed to the Marcins by:

- 19           A. Failing to make any attempt whatsoever to stop Miller from entering the  
20 Marriott Hotel and ascending to the guest rooms located on the second  
21 floor;  
22           B. Failing to send a sufficient number of properly trained and able security  
23 personnel to the Marcin's rooms within a reasonable time;  
24           C. Failing to keep any properly trained and able security personnel at the  
25 Marcins' rooms after the sole security guard was unsuccessful in getting  
26 Miller to leave;  
27           D. Failing to keep a sufficient number of properly trained and able security  
28 personnel at the Marcins' rooms after the sole security guard to address



1 Marcin on the second floor was unsuccessful in getting Miller to leave;  
2 and

3 E. Abandoning the Marcins on the second floor after identifying that an  
4 intruder into the Marriott Hotel, Miller, was assaulting the Marcins  
5 through the Marcins' locked doors and presented a clear and present  
6 danger to the Marcins, as well as other hotel guests present on the second  
7 floor.

8 40. The acts and omissions of the defendants, and each of them, proximately resulted  
9 in plaintiffs' injuries and damages as set forth herein.

10 **SECOND CAUSE OF ACTION -Negligent Hiring, Training, Supervision and Retention**  
11 **All Plaintiffs Against CCMH Fisherman's Wharf, Host Hotels, Crestline Hotels, Barcelo,**  
12 **and Doe 1 through Doe 15**

13 Plaintiffs adopt and re-allege each prior paragraph, where relevant, as if set forth fully  
14 herein.

15 41. At all relevant times, defendants CCMH Fisherman's Wharf, Host Hotels,  
16 Crestline Hotels, Barcelo, and Doe 1 through Doe 15, and each of them, had a duty of care to  
17 properly hire, train, retain, and supervise defendants Doe 16 through Doe 20 so as to avoid  
18 unreasonable risk of harm to guests and customers of the Marriott Hotel.

19 42. Plaintiffs are informed and believe and thereon allege defendants CCMH  
20 Fisherman's Wharf, Host Hotels, Crestline Hotels, Barcelo, and Doe 1 through Doe 15, and each  
21 of them, knew or should have known that defendants Doe 16 through Doe 20 were incompetent  
22 and unfit to perform security services at a hotel establishment in that, among other things, for a  
23 substantial time prior to September 5, 2016, defendants, and each of them, knew, or in the  
24 exercise of ordinary care should have known that defendants Doe 16 through Doe 20 did not  
25 properly trained and licensed security guards authorized by the State of California; that  
26 defendants, and each of them, were further negligent in that they failed to adequately supervise  
27 or control the activities of defendants Doe 16 through Doe 20 while they were in contact with the  
28 general public in the course and scope of their employment and negligently failed to protect

1 plaintiffs from risk and danger of harm; and that defendants Doe 16 through Doe 20 negligently  
2 and carelessly abandoned Marcins on the second floor after identifying that an intruder into the  
3 Marriott Hotel, Miller, was assaulting the Marcins and presented a clear and present danger to  
4 the Marcins, as well as other hotel guests present on the second floor.

5 43. Defendants CCMH Fisherman's Wharf, Host Hotels, Crestline Hotels, Barcelo,  
6 and Doe 1 through Doe 10, and each of them, breached their duty of care to plaintiffs and others  
7 in that they failed to adequately train Doe 16 through Doe 20; this lack of adequate supervisory  
8 behavior by said defendants, the lack of adequate on the job training, and the lack of retaining  
9 control, proximately caused injury to plaintiffs as set forth herein.

10 44. As a result of the acts and/or omissions of defendants, and each of them, plaintiffs  
11 suffered injuries and damages as set forth in this complaint.

12 **THIRD CAUSE OF ACTION – BATTERY**  
13 **All Plaintiffs Against Defendant Miller**

14 Plaintiffs adopt and re-allege each prior paragraph, where relevant, as if set forth fully  
15 herein.

16 45. By attacking the Marcins and committing the actions set forth in paragraphs 9-24,  
17 defendant Bruce Miller committed each of the elements of Battery:

- 18 A. Miller touched plaintiffs Marion James and Brian Marcin with the intent  
19 to harm or offend them;  
20 B. Plaintiffs James Marcin and Brian Marcin did not consent to Miller's  
21 touching;  
22 C. Plaintiffs James Marcin and Brian Marcin were harmed and offended by  
23 Miller's touching;  
24 D. A reasonable person in plaintiffs James Marcin and Brian Marcin's  
25 position would have been offended by Miller's touching.

26 46. The conduct of the defendant proximately resulted in plaintiffs' injuries and  
27 damages as set forth herein.  
28

1        47. Defendant's acts were done knowingly, wantonly, willfully, oppressively and in  
2 conscious disregard of the safety of plaintiffs and plaintiffs' rights and with malicious intent,  
3 entitling plaintiffs to punitive damages in an amount to be determined at trial.

4        WHEREFORE, plaintiffs pray for relief as hereinafter set forth.

5        **FOURTH CAUSE OF ACTION – Intentional Infliction of Emotional Distress**  
6        **All Plaintiffs against Defendant Miller**

7        Plaintiffs adopt and re-allege each prior paragraph, where relevant, as if set forth fully  
8 herein.

9        48. By attacking the Marcins and committing the actions set forth in paragraphs 9-24,  
10 Defendant Bruce Miller committed each of the elements of Intentional Infliction of Emotional:  
11 Distress:

- 12            A. Miller's assault on the Marcins was extreme and outrageous;  
13            B. Miller acted with the intent to cause, or with reckless disregard of the  
14            probability of causing, emotional distress to the Marcins;  
15            C. The Marcins suffered severe and extreme emotional distress; and  
16            D. Miller's extreme and outrageous conduct was the direct and proximate  
17            cause of the emotional distress suffered by the Marcins.

18        49. The conduct of the defendant proximately resulted in plaintiffs' injuries and  
19 damages as set forth herein.

20        50. Defendant's acts were done knowingly, wantonly, willfully, oppressively and in  
21 conscious disregard of the safety of plaintiffs and plaintiffs' rights and with malicious intent,  
22 entitling plaintiffs to punitive damages in an amount to be determined at trial.

23        **FIFTH CAUSE OF ACTION - Assault**  
24        **Plaintiffs James Marcin, Brian Marcin, and Sharri Marcin Against Defendant Miller**

25        Plaintiffs adopt and re-allege each prior paragraph, where relevant, as if set forth fully  
26 herein.

27        51. By attacking the Marcins and committing the actions set forth in paragraphs 9-24  
28 above, Defendant Bruce Miller committed each of the elements of an Assault:

- 1 A. Miller acted with the intent to cause harmful or offensive contact to the  
2 Marcins and threatened to touch them in a harmful or offensive manner;  
3 B. The Marcins reasonably believed that Miller was about to touch them in a  
4 harmful or offensive manner and it reasonably appeared to them that  
5 Miller was about to carry out the threats he directed at them;  
6 C. The Marcins did not consent to Miller's conduct;  
7 D. The Marcins were harmed by Miller's conduct, suffering numerous  
8 physical, emotional, mental, cognitive, neurological, and psychological  
9 injuries; and  
10 E. Miller's conduct was a substantial factor in causing the Marcins' injuries.

11 52. The conduct of the defendant proximately resulted in plaintiffs' injuries and  
12 damages as set forth herein.

13 53. Defendant's acts were done knowingly, wantonly, willfully, oppressively and in  
14 conscious disregard of the safety of plaintiffs and plaintiffs' rights and with malicious intent,  
15 entitling plaintiffs to punitive damages in an amount to be determined at trial.

16 **SIXTH CAUSE OF ACTION – Negligence**  
17 **All Plaintiffs Against Defendant Miller**

18 Plaintiffs adopt and re-allege each prior paragraph, where relevant, as if set forth fully  
19 herein.

20 54. In all that he did, defendant Miller lacked the mental capacity to govern himself in  
21 accordance with reason and therefore was negligent and careless.

22 55. The conduct of the defendant proximately resulted in plaintiffs' injuries and  
23 damages as set forth herein.

24 **PRAYER FOR RELIEF**

25 WHEREFORE, plaintiffs pray judgment against defendants, and each of them, as  
26 follows:  
27


- 28 1. General damages according to proof;

2. Special damages according to proof;
3. Punitive damages according to proof;
4. Prejudgment interest according to law;
5. Costs of this action; and
6. Any other and further relief that the Court considers proper.

DATED: August 30, 2018

ALEXANDER LAW GROUP, LLP  
VALOREM LAW GROUP

By:

  
RICHARD ALEXANDER  
Attorneys for Plaintiffs

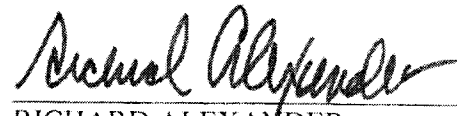
**PLAINTIFFS' DEMAND FOR JURY TRIAL**

Plaintiffs hereby demand a trial by jury in the above-entitled action.

DATED: August 30, 2018

ALEXANDER LAW GROUP, LLP  
VALOREM LAW GROUP

By:

  
RICHARD ALEXANDER  
Attorneys for Plaintiff