

34th Judicial District of St. Bernard Parish

State of Louisiana

Case No: 19 - 1955

Division:



FILED

DEC 27 2019

BRADFORD ROUBLOW

VERSUS

Randy S. Nunez
CLERK OF COURT
ST. BERNARD PARISH

CBS BROADCASTING AND DANNI PRODUCTIONS, LLC

@ 3:19 pm

PETITION FOR DAMAGES

NOW INTO THE COURT COMES BRADFORD ROUBLOW, a person of full age and majority who is domiciled in Orleans Parish and respectfully submits that his Petition for Damages in the following manner:

1.

The petitioner contends that intentional damage was caused to the Petitioner by the Defendants from your petitioner was limited to negligence of Defendants CBS BROADCASTING, INC and DANNI PRODUCTIONS LLC.

2.

YOUR petitioner contends that the damages were caused by fraudulent inducement of defendants.

3.

YOUR Petitioner contends that the damages were caused by the negligent misrepresentation of the defendants.

4.

YOUR petitioner contends that damages were caused by fraudulent concealment by defendants.

5.

On or about October 18, 2017, your petitioner was working as a paid actor for the above named defendants on the set of the television show "NCIS: New Orleans" at 78700 W. Judge Perez Dr. Chalmette, Louisiana 70043.

6.

Your petitioner's role on the show was that of a fictitious "Armed Jewelry Store Robber."

7.

As the petitioner acted out his role of "robbing" the jewelry store, a squad of local police officers arrived on the scene with guns pointed at your petitioner as they believed that an actual armed robbery was taking place.

8.

According to the police, the defendants failed to warn local authorities that a "staged" armed robbery would be taking place at the location.

9.

Plaintiff was in no way negligent. Rather, the incident and his injuries were caused exclusively by the fault of the defendants for the following non-exclusive particular a, to wit:

- A. Failing to warn of and remedy a dangerous condition which was created by the defendant as well as known or should have known to the defendants in exercise of reasonable care;
- B. Failing to warn local authorities of the production;
- C. Failing to take adequate steps to discover and or/ remedy a known danger;
- D. Failing to exercise reasonable care under the circumstances;
- E. Failing to do what should have been done under the circumstances;
- F. Other acts of negligence that will be developed during discovery and/ or proven at a trial on the merits of this matter

9.

In addition to general negligence by defendants, your petitioner contends the additional claim of negligent misrepresentation.

10.

Defendants instructed your petitioner to exit the building for additional pictures from the outside. However, defendants did not inform your petitioner that no one was notified of the filming outside was not within the scope of the original agreement.

11.

Your petitioner would show that his suffered injuries were directly caused by the fraudulent inducement by the defendants in the following, non-exclusive particulars:

- A. Supplied false information by omission of a material fact;

- B. Had a legal duty to supply the correct information to your petitioner;
- C. Breached this duty by omitting the lack of a permit to your petitioner;
- D. The breach of duty caused your petitioner to suffer damages because of his reliance upon their omission;
- E. Other elements of fraudulent inducement, the form and substance of which will be more fully shown at trial on the merits of these proceedings and discovery herein;

12.

In addition to the negligence of defendants, CBS Broadcasting Inc. and Danni Productions LLC, your petitioner wishes to assert claim of fraudulent inducement by defendants.

13.

Defendants informed the hiring agency that they required an actor for modeling their studio located at 800 Distributors Road, the NCIS center. However, when the petitioner agreed and arrived at the studio, defendants then informed him that the plans changed and moved all the actors to jewelry store for live action filming, which was not in the scope of the original agreement.

14.

Your petitioner would show that he suffered injuries were directly caused by the fraudulent inducement by the defendants in the following, non-exclusive particulars;

- 1. Misrepresenting the truth regarding the role your petitioner would play;
- 2. Intentionally misrepresenting the role to unjustly enrich themselves;
- 3. Causing justifiable reliance by your petitioner with a resulting injury; and
- 4. Other elements of fraudulent inducement, the form and substance of which will be more fully shown at trial on the merits of these proceedings and revealed during discovery herein.

15.

Additionally, your petitioner wishes to assert a claim of fraudulent concealment by the defendants.

16.

While in the course of filming inside the jewelry store, the actors while in full "robber" attire armend with realistic but fake firearms, were instructed to go outside to film their entrance. The

defendants had no permits to film outside; did not inform the sheriff's department of the filming; did not inform the general public of the filming; and did not inform the actors that there was no permit to film outside.

17.

Your petitioner would show that he has suffered injuries were directly caused by the fraudulent concealment by the defendants in the following, non exclusive particulars;

1. Knowing that defendants did not have a permit to film or shoot outside the store;
2. Intentionally not informing your petitioner of this lack of a permit to enrich themselves;
3. Causing your petitioner to rely upon this information to go outside of the store;
4. Which directly caused the injuries suffered by your petitioner;
5. Other elements of fraudulent concealment, the form and substance of which will be more fully shown at trial on their merits of these proceedings and revealed during discovery herein.

18.

The aforesaid negligence of the defendants and other acts of the defendants has resulted in the petitioner suffering injuries, which have caused him damages said damages petitioner itemizes as follow to wit:

- A. Medical expenses, past, present, and future.
- B. Physical pain and suffering past, present, and future including headaches, insomnia, and anxiety;
- C. Mental pain and anguish past, present, future including post traumatic stress disorder
- D. Inconvenience, concern of blackball from industry, loss of gratification of and/ or intellectual and/or physical enjoyment of life and/or loss of lifestyle as well as lost wages
- E. Such other damages, the form and substance which will be more fully shown at trial on the merits of these proceedings and revealed during discovery herein

WHEREFORE, petitioner prays that the plaintiff to submit this petition for damages to and that the defendants be served with this petition and that after all legal delays and due proceedings are had there be judgement, casting the defendants liable unto petitioner for compensatory damages as might be determined by this this Honorable Court, together with legal interest thereon from

the date of judicial demand until paid, all costs and disbursements herein including but not limited to any expert witnesses fees, penalties, and attorney fees, as provided by law, all court costs and for all other general and equitable relief as determined by the Court.

Respectfully Submitted,



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And

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