

CASE NO: A-25-916430-C
Department 16

1 **COMJD**
2 RICHARD D. YOUNG
3 Nevada Bar No. 11331
4 JONATHAN B. LEE
5 Nevada Bar No. 13524
6 **RICHARD HARRIS LAW FIRM**
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DISTRICT COURT
CLARK COUNTY, NEVADA

10 MELLISA READY as heir to JONATHAN
11 LEWIS,
12
13 Plaintiff,
14
15 vs.
16 CLARK COUNTY SCHOOL DISTRICT, a
17 political subdivision of the State of Nevada;
18 SANDRA CORONA, an individual; and
19 DOES 1 through 20; inclusive,
20
21 Defendants.

CASE NO.:
DEPT. NO.:

**COMPLAINT AND DEMAND FOR
JURY TRIAL**



17 Plaintiff MELLISA READY as heir to JONATHAN LEWIS, by and through her
18 counsel, RICHARD D. YOUNG of the RICHARD HARRIS LAW FIRM, files this
19 Complaint against Defendants and alleges as follows:

PARTIES AND JURISDICTION

- 21 1. Mellisa Ready is a resident of Clark County, Nevada, and the natural mother
22 and legal heir of Jonathan Lewis, deceased. She brings this action in her personal capacity.
- 23 2. Defendant Clark County School District (“CCSD”) is a political subdivision
24 of the State of Nevada and, at all relevant times, operated Rancho High School, located in
25 Las Vegas, Nevada.
- 26 3. Defendant Sandra Corona is a resident of Clark County, Nevada, and at all
27 times relevant was the title owner of real property located at 1308 N. 21st Street, Las Vegas,
28 NV 89101.

1 entering or traversing the property, particularly in light of repeated loitering and known
2 criminal or violent activity in the area.

3 23. Defendant Corona breached these duties by failing to restrict access,
4 implement security measures, or otherwise act to prevent the known danger posed by her
5 property's use as a gathering location for students, resulting in the fatal injuries sustained
6 by Jonathan Lewis.

7 24. The breach of these duties by Defendant Corona was the direct and
8 proximate cause of Jonathan's death and Plaintiff's damages.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiffs pray for judgment against Defendant as follows:


- 11 1. General and special damages in an amount in excess of \$15,000, to be determined
12 at trial;
- 13 2. Wrongful death damages, including compensation for grief, loss of companionship,
14 emotional distress, and other damages recoverable under Nevada law;
- 15 3. Funeral and burial expenses;
- 16 4. Costs of suit incurred herein;
- 17 5. Pre- and post-judgment interest as allowed by law;
- 18 6. Such other and further relief as the Court deems just and proper

19 **DEMAND FOR JURY TRIAL**

20 Plaintiff hereby demands a trial by jury of all issues in the pending lawsuit.

21 DATE: April 9, 2025.

22 **RICHARD HARRIS LAW FIRM**

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Attorneys for Plaintiff