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14 DISTRICT COURT

15 WASHOE COUNTY, NEVADA

16 MEGAN SMITH, as Co-Special
Administrator of the Estate of JACOB JAY
17 SHEPHERD, deceased, and SADIE BROOK
SLADE SHEPHERD, Individually, and as
18 the Co-Special Administrator of the Estate of
JACOB JAY SHEPHERD, Deceased, and as
19 parent and natural guardian of Jack Jay
Shepherd, Ruby Mae Shepherd and Dean
20 Calvin Shepherd, their minor children; and
DEBORAH URRESTI and JAMES
21 URRESTI, Individually and as the Co-
22 Administrators of the Estate of TIFFANY
MARIE URRESTI,
23

24 Plaintiffs,

25 -vs.-

26 RENO FLYING SERVICE, INC., a Nevada
27 Corporation; AIR MEDICAL RESOURCE
GROUP, INC., a Utah Corporation; THE
28 JOSEPH HUNT FAMILY TRUST; DOE

Case No.: CV18-02271
Dept. No.: 10

FIRST AMENDED COMPLAINT

1 TRUSTEES 1-10; JOSEPH HUNT;
2 JONATHAN HUNT; SARA HUNT;
3 JAMES HUNT; GUARDIAN FLIGHT
4 LLC, d/b/a GUARDIAN FLIGHT, INC., a
5 Delaware Limited Liability Company;
6 GLOBAL MEDICAL RESPONSE, INC.,
7 f/k/a and/or d/b/a AIR MEDICAL GROUP
8 HOLDINGS, INC., and/or AMGH, INC., a
9 Delaware Corporation; AIR MEDICAL
10 GROUP HOLDINGS LLC, a Delaware
11 Limited Liability Company; AMGH
12 HOLDING CORP., a Delaware Corporation;
13 AMGH MERGER SUB, INC., a Delaware
14 Corporation; JOHN DOES 1-40; and ROE
15 CORPORATIONS 1-40,

Defendants.

11
12 **FIRST AMENDED COMPLAINT**

13 Plaintiffs MEGAN SMITH, SADIE BROOK SHEPHERD, DEBORAH URRESTI and
14 JAMES URRESTI respectfully allege as follows:

15 **PARTIES**

16 1. Plaintiff SADIE BROOK SLADE SHEPHERD is a citizen and resident of Cache
17 County in the State of Utah and the spouse of JACOB JAY SHEPHERD, deceased.

18 2. Plaintiff SADIE BROOK SLADE SHEPHERD brings this lawsuit individually on
19 her own behalf and as the Co-Special Administrator the Estate of JACOB JAY SHEPHERD, and
20 as parent and natural guardian of JACK JAY SHEPHERD, RUBY MAE SHEPHERD and
21 DEAN CALVIN SHEPHERD, their minor children.

22 3. On and prior to November 18, 2016, JACOB JAY SHEPHERD and SADIE
23 BROOK SLADE SHEPHERD were lawfully married and were the natural parents of their three
24 minor children JACK JAY SHEPHERD, RUBY MAE SHEPHERD and DEAN CALVIN
25 SHEPHERD.

26 4. MEGAN SMITH is a citizen and resident of Elko County, state of Nevada, and
27 was appointed as the resident, Co-Special Administrator of the Estate of JACOB JAY
28

1 SHEPHERD, along with SADIE BROOK SLADE SHEPHERD, for the purpose of prosecuting
2 wrongful death and survival claims on behalf of the Estate.

3 5. Plaintiffs DEBORAH URRESTI and JAMES URRESTI are citizens and residents
4 of Elko County, Nevada, and the parents of TIFFANY MARIE URRESTI, deceased.

5 6. Plaintiffs DEBORAH URRESTI and JAMES URRESTI bring this lawsuit
6 individually on their own behalves and as the Administrators the Estate of TIFFANY MARIE
7 URRESTI.

8 7. Based upon information and belief, Defendant RENO FLYING SERVICE, INC.
9 (“RFS”), is a Nevada Corporation that maintains its principal place of business at 485 South
10 Rock Boulevard, Hangar B, Reno, NV 89502.

11 8. Based upon information and belief, Defendant AIR MEDICAL RESOURCE
12 GROUP, INC. (“AMRG”), is a Utah Corporation that maintains its principal place of business
13 at 10888 South 300 West, South Jordan, Utah, 84095. At all relevant times, AMRG was and is
14 doing substantial business in and had contacts with the State of Nevada sufficient for this Court
15 to exercise jurisdiction over these defendants.

16 9. Based upon information and belief, Defendant THE JOSEPH HUNT FAMILY
17 TRUST is a Utah trust administered in Utah. DOE TRUSTEES 1-10 are the presently unknown
18 persons and entities appointed and/or empowered to serve as Trustees of Defendant THE
19 JOSEPH HUNT FAMILY TRUST now and/or at the time of the subject crash. The true
20 identities of these persons and entities will be supplied by way of substitution and/or amendment
21 to this complaint when their true identities are ascertained. Based upon information and belief,
22 Defendants THE JOSEPH HUNT FAMILY TRUST and DOE TRUSTEES 1-10 (collectively
23 “the TRUST”), by and through their subsidiaries, RFS and/or AMRG, at all times relevant to this
24 complaint, were and are doing substantial business in and had contacts with the State of Nevada
25 sufficient for this Court to exercise jurisdiction over these defendants.

26 10. Based upon information and belief, JOSEPH HUNT is a resident of Utah, and is
27 or was at all times relevant herein the president, chief executive officer and/or a director of
28 AMRG and a Trustee of THE JOSEPH HUNT FAMILY TRUST.

1 11. Based upon information and belief, JONATHAN HUNT is a resident of Utah, and
2 is or was at all relevant times herein the registered agent and/or a director of AMRG.

3 12. Based upon information and belief, SARA HUNT is a resident of Utah, and is or
4 was at all relevant times herein the secretary and/or a director of AMRG and a Trustee of THE
5 JOSEPH HUNT FAMILY TRUST.

6 13. Based upon information and belief, JAMES HUNT is a resident of Utah, and is or
7 was at all times relevant herein a Trustee of THE JOSEPH HUNT FAMILY TRUST.
8 Hereinafter, JOSEPH HUNT, JONATHAN HUNT, SARA HUNT and JAMES HUNT may be
9 referred to collectively as “the HUNTS.” At all times relevant hereto, the HUNTS were doing
10 substantial business in and had contacts with the State of Nevada, including through their work
11 as officers and/or directors of RFS and AMRG, and as Trustees of THE JOSEPH HUNT
12 FAMILY TRUST, sufficient for this Court to exercise jurisdiction over these defendants.

13 14. Based upon information and belief, Defendant GUARDIAN FLIGHT LLC, doing
14 business as GUARDIAN FLIGHT, INC., is a Delaware Limited Liability Company that
15 maintains its principal place of business at 10888 South 300 West, South Jordan, Utah, 84095.

16 15. Based upon information and belief, Defendant GLOBAL MEDICAL
17 RESPONSE, INC. (“GMR”), formerly known as and/or doing business as AIR MEDICAL
18 GROUP HOLDINGS, INC., and/or AMGH, INC. is a Delaware Corporation that maintains its
19 principal place of business at 209 Texas 121 Frontage Road, Suite 21, Lewisville, Texas 75067
20 and/or 209 State Highway 121 Bypass, Lewisville, Texas 75067.

21 16. Based upon information and belief, Defendant AIR MEDICAL GROUP
22 HOLDINGS, LLC (“AMGH LLC”), is a Delaware Limited Liability Company that maintains
23 its principal place of business at 209 Texas 121 Frontage Road, Suite 21, Lewisville, Texas,
24 75067, 209 State Highway 121 Bypass, Lewisville, Texas 75067.

25 17. Based upon information and belief, Defendant AMGH HOLDING CORP.
26 (“AMGHHC”), is a Delaware Limited Liability Company that maintains its principal place of
27 business at 209 Texas 121 Frontage Road, Suite 21, Lewisville, Texas, 75067 and/or 209 State
28 Highway 121 Bypass, Lewisville, Texas 75067.

1 18. Based upon information and belief, Defendant AMGH MERGER SUB, INC.
2 (“AMGHMS”), is a Delaware Limited Liability Company that maintains its principal place of
3 business at 209 Texas 121 Frontage Road, Suite 21, Lewisville, Texas, 75067 and/or 209 State
4 Highway 121 Bypass, Lewisville, Texas 75067. Hereinafter, GUARDIAN FLIGHT LLC,
5 GMR, AMGH LLC, AMGHHC and AMGHMS may be referred to collectively as “the AMGH
6 Defendants.” Based upon information and belief, in or about April, 2017, the AMGH Defendants
7 purchased RFS and AMRG. At all relevant times, the AMGH Defendants were and are doing
8 substantial business in and had contacts with the State of Nevada, including as the successor in
9 interest to RFS and AMRG, sufficient for this Court to exercise jurisdiction over these
10 defendants.

11 19. Defendants JOHN DOES 1-40 and ROE CORPORATIONS 1-40 are persons and
12 entities whose true identities are presently unknown and whose acts and omissions caused and/or
13 contributed to the cause of the deaths JACOB JAY SHEPHERD, deceased, and TIFFANY
14 MARIE URRESTI, deceased, and the damages sustained by the plaintiffs in this action. The
15 true identities of these persons and entities will be supplied by way of substitutions and/or
16 amendment to this complaint when their true identities are ascertained. By way of description,
17 so as to provide notice to Defendants JOHN DOES 1-40 and ROE CORPORATIONS 1-40 of
18 the pendency and nature of this action, these defendants include without limitation:

- 19 a. all persons and entities who repaired, maintained, rebuilt, overhauled, tested,
20 inspected, and/or certified the Piper model PA-31T aircraft, registration number
21 N779MF (“the subject aircraft”), including but not limited to its engines and
22 component parts, that crashed and caused the deaths of JACOB JAY SHEPHERD
23 and TIFFANY MARIE URRESTI (the “subject crash”);
- 24 b. all persons and entities who performed installation of engine parts that were
25 installed in the subject aircraft at and before the time of the subject crash;
- 26 c. all persons and entities who hired and/or employed the persons who installed the
27 engine parts that were installed in the subject aircraft at the time of the subject
28 crash;

- 1 d. all persons and entities who maintained and provided maintenance services on the
2 engines of the subject aircraft at and before the time of the subject crash;
- 3 e. all persons and entities who hired and/or employed the persons who performed
4 maintenance services on the engines of the subject aircraft at and before the time
5 of the subject crash;
- 6 f. all persons and entities who inspected and provided inspection services on the
7 engines of the subject aircraft at and before the time of the subject crash;
- 8 g. all persons and entities who hired and/or employed the persons who inspected the
9 engine of the subject aircraft at and before the time of the subject crash;
- 10 h. all persons and entities who owned any interest in Defendants RFS and/or AMRG
11 at the time of subject crash; and
- 12 i. all persons and entities who succeeded to any ownership interest in RFS and/or
13 AMRG since the time the subject crash.

14 20. Each and all of Defendants AMRG, the TRUST, the HUNTS, the AMGH
15 Defendants, JOHN DOES 1-40 and ROE CORPORATIONS 1-40 were the employees, agents,
16 parent corporations or entities, subsidiary corporations or entities, predecessor corporations or
17 entities, successor corporations or entities, joint venturers, partners, affiliates, and/or alter egos
18 of RFS and the others, and/or were acting on behalf of or for the economic benefit of the others,
19 such that their legal and corporate identities should be disregarded and the acts and omissions of
20 one should be imputed to the others.

21 21. The amount in controversy vastly exceeds the minimal jurisdictional amount.

22 **FACTS**

23 22. On November 18, 2016, JACOB JAY SHEPHERD and TIFFANY MARIE
24 URRESTI were passengers on the subject aircraft, operated by American Medflight, Inc., that
25 was engaged in an air-ambulance flight from Elko, Nevada with the intended destination of Salt
26 Lake City, Utah (“the subject flight”). The subject aircraft was equipped with two Pratt &
27 Whitney PT6A-28 engines, with the left engine bearing serial no. PCE 52075 (“the subject
28 engine”).

1 23. On November 18, 2016, shortly after the subject flight took off from Elko Regional
2 Airport, the subject aircraft experienced a loss of power in the subject engine, resulting in a loss
3 of control that caused the subject aircraft to crash into a parking lot within a half mile of the
4 departure end of the runway and to burst into flames.

5 24. The subject crash resulted in severe personal injuries to JACOB JAY SHEPHERD
6 and TIFFANY MARIE URRESTI, including mental and physical pain and suffering and pre-
7 impact fear and terror prior to the time of their deaths, and caused the deaths of JACOB JAY
8 SHEPHERD and TIFFANY MARIE URRESTI.

9 25. On and prior to November 18, 2016, and at all relevant times herein, the subject
10 aircraft was maintained, repaired, inspected and certified as airworthy by RFS, JOHN DOES 1-
11 40 and ROE CORPORATIONS 1-40, and each of them (hereinafter collectively “the
12 Maintenance Defendants”), by and through their parent companies, officers, agents, employees,
13 servants, and/or representatives.

14 26. The subject aircraft’s loss of power and control, and the resulting crash were
15 caused by the Maintenance Defendants’ negligent and improper maintenance, inspection, repair
16 and/or testing of the subject aircraft and subject engine, including but not limited to its fuel
17 delivery system.

18 27. As a result of the foregoing negligent actions and omissions, all personal and estate
19 plaintiffs are entitled to recover full special, general, and compensatory damages, including
20 without limitation damages for loss of the earnings of the decedents, loss of support, loss of
21 services, loss of prospective inheritance and future accumulations, loss of protection, care,
22 counsel, society and companionship, loss of parental training, education, care and guidance, loss
23 of consortium, grief, sorrow, the decedent’s mental and physical pain and suffering and fear of
24 impending death, burial and funeral expenses, and other damages for economic and intangible
25 losses as determined by a jury.

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FIRST CLAIM FOR RELIEF

WRONGFUL DEATH AND SURVIVAL DAMAGES AGAINST RENO FLYING SERVICE, INC., JOHN DOES 1-40, AND ROE CORPORATIONS 1-40 BASED UPON NEGLIGENCE

28. Plaintiffs hereby incorporate by reference as though set forth fully herein Paragraphs 1 through 27 above.

29. On and prior to November 18, 2016, and at all relevant times herein, the Maintenance Defendants owed a duty to the Plaintiffs' decedents, JACOB JAY SHEPHERD and TIFFANY URRESTI, and all others who would fly in the subject air ambulance aircraft to exercise reasonable care in properly maintaining the subject aircraft, including the subject engine, and ensuring that the subject aircraft and subject engine were airworthy and safe for flight.

30. On or prior to November 18, 2016, and all relevant times herein, the Maintenance Defendants, by and through their subsidiaries, agents, employees, servants, and/or representatives, were negligent in carrying out the above described business responsibilities and duties, and were in violation of applicable standards of care in that they negligently and improperly maintained, repaired, inspected and certified the subject aircraft and subject engine. Such negligent and improper maintenance, inspection and/or certification includes, but is not limited to:

- a. negligently failing to maintain, repair, test, inspect, and troubleshoot the subject aircraft and engines;
- b. negligently failing to discover, diagnose and correct the underlying defective and dangerous conditions that resulted in a loss of power in the subject engine;
- c. negligently failing to remove and replace component parts in the subject aircraft's left engine to prevent a loss of power in the subject engine;
- d. negligently failing to make and keep sufficient maintenance records for the subject aircraft such that underlying defects and dangerous conditions could be properly detected, diagnosed, and corrected;

- e. negligently failing to repair and test the subject aircraft and engines and signing off on components as airworthy when they were not;
- f. negligently failing to inspect, test and otherwise exercise adequate quality control to discover, diagnose and correct the defective and dangerous conditions in the subject aircraft and engines;
- g. negligently failing to properly and safely install new parts in the subject aircraft and engines that were airworthy or installing such parts in a manner that made the engines not airworthy;
- h. negligently failing to comply with the manufacturer's instructions, guidelines or manuals and other service letters, bulletins and literature regarding maintenance, inspection, installation, testing and certification of the subject aircraft and engines;
- i. negligently supervising, directing and controlling the maintenance, repair, inspection and certification of the subject aircraft and engines;
- j. negligently failing to ensure the continuing airworthiness of the subject aircraft and engines;
- k. negligently failing to comply with all applicable standards of care regarding the maintenance, repair, inspection, testing and certification of the subject aircraft and subject engine and negligently repairing the subject aircraft and engines, so as to make the subject aircraft unsafe and unairworthy under all applicable standards of care; and
- l. otherwise negligently maintaining, troubleshooting, repairing, inspecting, testing and certifying the subject aircraft and engines.

31. The aforementioned negligence of the Maintenance Defendants, by and through their subsidiaries, agents, employees, servants, and/or representatives, breached their duty and caused the subject crash, injuries and resultant wrongful deaths of Plaintiffs' decedents, JACOB JAY SHEPHERD and TIFFANY MARIE URRESTI, and the damages sustained by Plaintiffs herein.

1 **THIRD CLAIM FOR RELIEF**

2 **WRONGFUL DEATH AND SURVIVAL DAMAGES AGAINST AIR MEDICAL**
3 **RESOURCE GROUP, INC., THE JOSEPH HUNT TRUST, DOE TRUSTEES 1-10,**
4 **JOSEPH HUNT, JONATHAN HUNT, SARA HUNT, JAMES HUNT AND GUARDIAN**
5 **FLIGHT LLC BASED UPON NEGLIGENCE**

6 38. Plaintiffs hereby incorporate by reference as though set forth fully herein
7 Paragraphs 1 through 37 above.

8 39. Based upon information and belief, on and prior to November 18, 2016, and at all
9 relevant times herein, AMRG, the TRUST, the HUNTS, and GUARDIAN FLIGHT LLC
10 (hereinafter “the AMRG Defendants”) were the owners, stockholders, parent corporations or
11 entities, successor corporations or entities, joint venturers, partners, affiliates, and/or alter egos
12 of the Maintenance Defendants, and/or the Maintenance Defendants were acting on behalf of or
13 for the economic benefit of the AMRG Defendants.

14 40. Based upon information and belief, on and prior to November 18, 2016, and at all
15 relevant times herein, the AMRG Defendants and the Maintenance Defendants shared many of
16 the same owners, stockholders, directors, and/or officers such that there is and was a unity of
17 interest and ownership that make them inseparable from each other, and such that the acts and
18 omissions of the Maintenance Defendants are imputed to the AMRG Defendants.

19 41. Adherence to the corporate fiction that the Maintenance Defendants are separate
20 from the AMRG Defendants would sanction fraud and promote a manifest injustice.

21 42. Therefore, the aforementioned negligence by the Maintenance Defendants, which
22 breached their duty, caused the subject crash, injuries and resultant wrongful deaths of Plaintiffs’
23 decedents, JACOB JAY SHEPHERD and TIFFANY MARIE URRESTI, and the damages
24 sustained by Plaintiffs herein, can and must be imputed to the AMRG Defendants.

25 43. By reason of the foregoing, Plaintiffs suffered damages and are entitled to recover
26 the aforesaid damages and any and all other available damages under applicable law from the
27 AMRG Defendants in amounts as herein alleged and according to proof at trial.

28 **FOURTH CLAIM FOR RELIEF**

WRONGFUL DEATH AND SURVIVAL DAMAGES AGAINST AIR MEDICAL
RESOURCE GROUP, INC., THE JOSEPH HUNT TRUST, DOE TRUSTEES 1-10,

1 **JOSEPH HUNT, JONATHAN HUNT, SARA HUNT, JAMES HUNT, AND GUARDIAN**
2 **FLIGHT LLC BASED UPON BREACH OF WARRANTY**

3 44. Plaintiffs hereby incorporate by reference as though set forth fully herein
4 Paragraphs 1 through 43 above.

5 45. Based upon information and belief, on and prior to November 18, 2016, and at all
6 relevant times herein, the AMRG Defendants were the owners, stockholders, parent corporations
7 or entities, successor corporations or entities, joint venturers, partners, affiliates, and/or alter egos
8 of the Maintenance Defendants, and/or the Maintenance Defendants were acting on behalf of or
9 for the economic benefit of the AMRG Defendants.

10 46. Based upon information and belief, on and prior to November 18, 2016, and at all
11 relevant times herein, the AMRG Defendants and the Maintenance Defendants shared many of
12 the same owners, stockholders, directors, and/or officers such that there is and was a unity of
13 interest and ownership that make them inseparable from each other, and such that the acts and
14 omissions of the Maintenance Defendants are imputed to the AMRG Defendants.

15 47. Adherence to the corporate fiction that the Maintenance Defendants are separate
16 from the AMRG Defendants would sanction fraud and promote a manifest injustice.

17 48. Therefore, the aforementioned breach of implied warranties by the Maintenance
18 Defendants, which were a direct and proximate cause of the wrongful deaths of JACOB JAY
19 SHEPHERD and TIFFANY MARIE URRESTI and of Plaintiffs' damages as more fully
20 described above, can and must be imputed to the AMRG Defendants.

21 49. By reason of the foregoing, Plaintiffs suffered damages and are entitled to recover
22 the aforesaid damages and any and all other available damages under applicable law from the
23 AMRG Defendants in amounts as herein alleged and according to proof at trial.

FIFTH CLAIM FOR RELIEF

WRONGFUL DEATH AND SURVIVAL DAMAGES AGAINST GLOBAL MEDICAL RESPONSE, INC., AIR MEDICAL GROUP HOLDINGS LLC, AMGH HOLDING CORP., AMGH MERGER SUB, INC., AND GUARDIAN FLIGHT LLC, BASED UPON NEGLIGENCE

50. Plaintiffs hereby incorporate by reference as though set forth fully herein Paragraphs 1 through 49 above.

51. Based upon information and belief, since November 18, 2016, the AMGH Defendants have become and are the owners, stockholders, parent corporations or entities, successor corporations or entities, joint venturers, partners, affiliates, and/or alter egos of the Maintenance Defendants, and/or the Maintenance Defendants were acting on behalf of or for the economic benefit of the AMGH Defendants.

52. Based upon information and belief, the AMGH Defendants purchased AMRG and the Maintenance Defendants in and about April 2017.

53. Based upon information and belief, the AMGH Defendants are continuing the AMRG's and Maintenance Defendants' enterprises, and possesses a continuity of shareholders with AMRG and the Maintenance Defendants.

54. Based upon information and belief, AMRG and the Maintenance Defendants have ceased their ordinary operations and the AMGH Defendants have assumed AMRG's and the Maintenance Defendants' obligations and liabilities.

55. Based upon information and belief, to the extent that the AMGH Defendants' purchase of AMRG and/or the Maintenance Defendants was accomplished by the purchase or transfer of AMRG's and the Maintenance Defendants' assets to the AMGH Defendants, such transfer was fraudulent and meant to escape creditors, including the Plaintiffs.

56. Therefore, the AMGH Defendants are liable as the successor corporations or entities of AMRG and the Maintenance Defendants for the aforementioned negligence by the Maintenance Defendants, which breached their duty, caused the subject crash, injuries and resultant wrongful deaths of Plaintiffs' decedents, JACOB JAY SHEPHERD and TIFFANY MARIE URRESTI, and the damages sustained by Plaintiffs herein.

1 and proximate cause of the wrongful deaths of JACOB JAY SHEPHERD and TIFFANY MARIE
2 URRESTI and of Plaintiffs' damages as more fully described above.

3 65. By reason of the foregoing, Plaintiffs suffered damages and are entitled to recover
4 the aforesaid damages and any and all other available damages under applicable law from the
5 AMGH Defendants in amounts as herein alleged and according to proof at trial.

6 **PRAYER FOR RELIEF**

7 **WHEREFORE**, Plaintiffs SADIE BROOKE SHEPHERD, individually, as the Co-
8 Special Administrator of the Estate of JACOB JAY SHEPHERD, and as natural guardian of
9 JACK JAY SHEPHERD, RUBY MAE SHEPHERD and DEAN CALVIN SHEPHERD,
10 MEGAN SMITH, as the Co-Special Administrator of the Estate of JACOB JAY SHEPHERD,
11 and DEBORAH URRESTI and JAMES URRESTI, individually and as Co-Administrators of the
12 Estate of TIFFANY MARIE URRESTI, respectfully pray that judgment be entered against
13 defendants RENO FLYING SERVICE, INC., AIR MEDICAL RESOURCE GROUP, INC., THE
14 JOSEPH HUNT FAMILY TRUST, DOE TRUSTEES 1-10, JOSEPH HUNT, JONATHAN
15 HUNT, SARA HUNT, JAMES HUNT, GUARDIAN FLIGHT LLC, d/b/a GUARDIAN
16 FLIGHT, INC., GLOBAL MEDICAL RESPONSE, INC., f/k/a and/or d/b/a AIR MEDICAL
17 GROUP HOLDINGS, INC., AIR MEDICAL GROUP HOLDINGS, LLC, AMGH HOLDINGS
18 CORP., AMGH MERGER SUB, INC., JOHN DOES 1-40, and ROE CORPORATIONS 1-40,
19 on the First, Second, Third, Fourth, Fifth and Sixth Claims in such amounts as they shall prove at
20 the trial of this case; for their reasonable attorneys' fees, interest and taxable costs; and for such
21 other further relief that this Court deems just, proper and equitable.

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AFFIRMATION Pursuant to NRS 239B.030 and 603A.040

The undersigned does hereby affirm that the preceding document, FIRST AMENDED COMPLAINT, filed in this case number does not contain the personal information of any person.

DATED this ____ day of December, 2018.

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