

ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696

1 **ANDRADE GONZALEZ LLP**
SEAN A. ANDRADE [SBN 223591]
2 sandrade@andrdefirm.com
HENRY H. GONZALEZ [SBN 208419]
3 hgonzalez@andrdefirm.com
ARTURO PADILLA [SBN 188902]
4 apadilla@andrdefirm.com
634 South Spring Street, Top Floor
5 Los Angeles, California 90014
Telephone: (213) 986-3950
6 Facsimile: (213) 995-9696

7 Attorneys for Plaintiffs
TIMOTHY LACHENMEIER and KRISTEN LACHENMEIER
8

9 **IN THE UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11

12 TIMOTHY LACHENMEIER, an
13 individual, and KRISTEN
LACHENMEIER, an individual,

14 Plaintiffs,

15 vs.
16

17 THE BOEING COMPANY, a
Delaware Corporation, BOEING
18 DEFENSE, SPACE & SECURITY,
and DOES 1-10,

19 Defendants.
20
21

) Case No.:

) COMPLAINT FOR:

) 1. NEGLIGENCE

) 2. INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS

) 3. LOSS OF CONSORTIUM

) DEMAND FOR JURY TRIAL

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 Plaintiffs TIMOTHY LACHENMEIER (hereinafter, “TIM” or “TIM
3 LACHENMEIER”) and KRISTEN LACHENMEIER (hereinafter “KRISTEN” or
4 “KRISTEN LACHENMEIER”) (collectively, the “LACHENMEIERS” or
5 “Plaintiffs”), by and through their attorneys, for causes of action against Defendants
6 THE BOEING COMPANY (“BOEING”), BOEING DEFENSE, SPACE &
7 SECURITY (“BDSS”) and DOES 1-10 (collectively “Defendants”), hereby
8 complain and allege as follows:

9 **NATURE OF THE ACTION**

10 1. On March 27, 2017, TIM LACHENMEIER and Near Space
11 Corporation (“NSC”), a company that TIM founded, were working with BOEING
12 to conduct a high-altitude balloon drop for BOEING to test the parachute recovery
13 system on its new Starliner space capsule that would transport a crew to and from
14 the International Space Station. Both Boeing and SpaceX have won prized
15 commercial contracts with NASA to carry personnel and research to the
16 International Space Station. The March 27 test was one of a series of tests to
17 simulate space reentry by carrying BOEING’s capsule to 40,000 feet with a helium
18 balloon and releasing it to test its parachutes as part of the recovery system under
19 the actual conditions it would encounter.

20 2. For the March 27 test, BOEING and BDSS negligently failed to
21 implement proper safety measures, including, but not limited to, (a) failing to have
22 in place a capsule tie down system to prevent an inadvertent release of the capsule
23 prior to the time of launch which would expose anyone working near the vehicle to
24 substantial and potentially fatal harm, (b) providing to TIM and NSC an inadequate,
25 unsafe, and defective ladder that they knew could cause catastrophic injury,
26 including death or permanent total disability, if something went wrong while
27
28

ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696

1 someone was using it to access the capsule, and (c) failing to provide an adequate
2 grounding system which could have prevented the freak ESD event.

3 3. BOEING and BDSS knew or should have known that a capsule tie
4 down system would be required to prevent an inadvertent release of the capsule prior
5 to the time of launch which would expose anyone working near the vehicle to
6 substantial and potentially fatal harm. In addition, at least two years before the
7 March 27 test, BOEING and BDSS had banned the use of the type of ladder they
8 provided to TIM and NSC—which was very similar to the common ladders found
9 at a neighborhood hardware stores. BOEING’s own Ladder Standard and Fall
10 Protection Guidelines from 2015 mandated using specially designed step platforms
11 with guardrails to safely access its capsules during launch preparations. The ladders
12 also violate the American National Standards Institute’s Safety Code. In addition,
13 Boeing failed to provide an adequate grounding system which could have prevented
14 the freak ESD event.

15 4. BOEING’s and BDSS’s negligence in providing a suitable capsule
16 restraint system along with their decision to ignore their own ladder safety standards
17 would cause TIM to suffer a catastrophic injury. At approximately 7:00 a.m. on
18 March 27, 2017, TIM was leaning over the top of the BP-4 test capsule, standing on
19 the access ladder that BOEING and BDSS had provided to make the final electronics
20 connections for the launch, when a freak accident occurred: as TIM plugged in the
21 capsule release cable, an electrostatic discharge caused one of the pyro activated
22 cutters to misfire, severing the primary restraint lines holding the balloon to the
23 ground. This static discharge sent the capsule hurling upwards instantly and the force
24 pushed the ladder TIM was standing on backwards and away from the capsule. With
25 no other choice, TIM tried to jump away to safety, but there was nowhere to go. His
26 right foot landed hard on the lowboy trailer on which the capsule was mounted, also
27 provided by Boeing, shattering his ankle, before being hit by the ladder and tumbling
28

ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696

1 backwards head over heels the rest of the way to the ground. TIM fell approximately
2 20 feet, knocking off his hard hat when hit by the ladder, and ultimately landing hard
3 on his neck, back, and hips.

4 5. TIM would go on to suffer substantial physical and financial damages,
5 needlessly endure extreme pain and suffering from his resulting catastrophic injuries
6 and multiple surgeries, and, along with KRISTEN, enduring extreme emotional
7 distress from TIM being forced into a below-the-knee amputation of his right leg
8 that left him permanently disfigured or risk death. Defendants’ reckless conduct left
9 the LACHENMEIERS with permanent physical and emotional scars and the
10 LACHENMEIERS therefore seek monetary and punitive damages for their
11 emotional distress and loss of consortium.

12 **JURISDICTION AND VENUE**

13 6. Jurisdiction over this action is conferred on this Court pursuant to 28
14 U.S.C. § 1332. The parties are residents of different states and the amount in
15 controversy exceeds \$75,000.00.

16 7. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, because the
17 acts, events, or omissions giving rise to Plaintiff’s claims occurred in whole, or in
18 part, in the Central District of California.

19 **THE PARTIES**

20 8. During relevant times, Plaintiffs TIM LACHENMEIER and KRISTEN
21 LACHENMEIER were husband and wife and residents of the state of Oregon.

22 9. At all times mentioned herein, Plaintiff TIM LACHENMEIER was the
23 President of NSC, and was acting as the Launch Director of NSC.

24 10. At all times mentioned herein, Plaintiff KRISTEN LACHENMEIER
25 was the Chief Financial Officer of NSC.
26
27
28

ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696

1 11. Defendant BOEING is a corporation duly organized and existing under
2 the laws of the State of Delaware, with its headquarters and principal place of
3 business in Chicago, Illinois.

4 12. Defendant BDSS is a business entity of unknown form, with its
5 headquarters in Arlington, Virginia.

6 13. Plaintiffs are unaware of the true names and capacities, whether
7 individual, partnership, corporate, associate, or otherwise, of those Defendants sued
8 herein as DOES 1 through 10 (the “DOE Defendants”) and, therefore, sues these
9 Defendants by fictitious names. The DOE Defendants include employees,
10 representatives, affiliates, and agents of the Defendants, and each of them, and at all
11 times herein relevant were acting within the scope and course of their employment
12 or agency with Defendants, and each of them and the acts and omissions of the DOE
13 Defendants were the proximate cause of the injuries and losses suffered by Plaintiffs.
14 Plaintiffs will amend this Complaint to allege the true names and capacities of the
15 DOE Defendants when ascertained.

16 14. On or about March 22, 2019, Defendants entered into an agreement
17 with Plaintiffs, tolling the applicable Statute of Limitations until July 29, 2019 (the
18 “Tolling Agreement”). A true and correct copy of the March 22, 2019 Tolling
19 Agreement is attached hereto and incorporated herein by reference as Exhibit “A.”

20 15. The Tolling Agreement has been extended by written agreement of the
21 parties six separate times. The operative Sixth Amendment to the Tolling
22 Agreement, extending the tolling period to November 13, 2020, was executed by the
23 Defendants and Plaintiffs on July 2, 2020. A true and correct copy of the July 2,
24 2020, Sixth Amendment to the Tolling Agreement is attached hereto and
25 incorporated herein by reference as Exhibit “B.”

26 ///

27 ///

28

ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696

1 16. Defendants’ conduct, as alleged herein, was undertaken by its officers,
2 directors, project engineers, and managing agents, who were responsible for
3 corporate policies, underwriting, claims supervision and operational decisions, on
4 behalf of the corporate Defendants. The corporate Defendants had advance
5 knowledge of the actions and conduct of other employees, whose actions and
6 conduct were ratified, authorized, and approved by the corporate Defendants.

7 17. The LACHENMEIERS are informed and believe, and based thereon
8 allege that, at all times material hereto, each Defendant sued herein was the agent,
9 servant, employer, employee, joint venturer, contractor, partner, owner, subsidiary,
10 division, alias, and/or alter ego of each of the remaining Defendants and was, at all
11 times, acting within the purpose and scope of such agency, employment, contract,
12 ownership, subsidiary, alias, and/or alter ego and with the authority, consent,
13 approval, control, influence, and ratification of each of the remaining Defendants
14 sued herein.

15 **GENERAL ALLEGATIONS**

16 18. In or around April 6, 2015, Defendants BOEING and BDSS’
17 Commercial Crew Transportation System unit (“CCTS”) in Huntington Beach,
18 County of Orange, California, issued a purchase contract for services to NSC (the
19 “Purchase Contract”). Under the Purchase Contract, NSC was to provide Parachute
20 Development and Qualification Test Services as well as to conduct the Parachute
21 Drop Test. NSC’s invoices were to be submitted to Defendants’ CCTS unit in
22 Huntington Beach, California. The Purchase Contract was executed on April 8,
23 2015.

24 19. In the early morning of March 27, 2017, NSC conducted a Parachute
25 System Qualification Balloon Test (“PSQT”) at Spaceport America, New Mexico,
26 pursuant to the Purchase Contract with Defendants. During the PSQT, Plaintiff TIM
27 LACHENMEIER served as the Launch Director on behalf of NSC, and participated
28

ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696

1 during several stages of the PSQT as required by the Purchase Contract. This
2 included making final connections prior to the PSQT launch, with, among other
3 lacking safety measures from Defendants, an inadequate grounding system, lack of
4 a capsule tie down system, and requiring Plaintiff TIM LACHENMEIER to lean
5 over the top of the BOEING BP-4 drop test vehicle (the “BP-4”), while standing on
6 an unsafe and/or defective access ladder supplied by Defendants (the “Ladder”).

7 20. At all relevant times Defendants had a duty under the Purchase Contract
8 to provide and maintain the work area and equipment in a safe condition and free of
9 defects, for NSC’s use during the PSQT. In fact, Defendants’ Purchase Contract
10 provided that material substitutions made by NSC, would be unauthorized and
11 prohibited, and Defendants maintained control.

12 21. Pursuant to the Purchase Contract, Defendants provided the capsule,
13 the lowboy trailer on which the capsule was mounted, and the ladders required to
14 access the capsule from the ground. Boeing was also responsible for the all of the
15 ground support equipment for moving and securing the capsule prior to launch, but
16 failed to provide a sufficient capsule tie-down and grounding system. In addition,
17 the Defendants’ ladders were inadequate, unsafe, and *knowingly* defective. At least
18 two years before the March 27 test, BOEING and BDSS had banned the use of the
19 type of ladder they provided to TIM and NSC because they knew it could cause
20 catastrophic injury, including death or permanent total disability, if something went
21 wrong while someone was using it to access the capsule.

22 22. Further Defendants knew, or should have known, that implementing
23 other measures, including providing an adequate grounding system, a capsule tie
24 down system, and constraining the BP-4 capsule during pre-launch test activities,
25 would have prevented the accident.

26 ///

27 ///

28

ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696

1 23. BOEING and BDSS did not disclose to NSC, TIM, or KRISTEN that
2 (i) they had banned the use of the type of ladder they provided to TIM and NSC, (ii)
3 that BOEING’s own Ladder Standard and Fall Protection Guidelines from 2015
4 mandated using specially designed step platforms with guardrails to safely access its
5 capsules during launch preparations, or (iii) that the ladders they provided to TIM
6 and NSC also violated the American National Standards Institute’s Safety Code.

7 24. Plaintiffs are informed and believe, and on that basis allege, that at all
8 relevant times Defendants negligently failed to comply with standards and
9 guidelines for providing a safe working environment, tie-down system, grounding
10 system, fall restraint, fall protection, and safe ladders which were intended to protect
11 employees and contracted workers at test sites and other work areas against
12 foreseeable harm including foreseeable injuries caused by the use of unsecured
13 ladders which are prone to tipping over.

14 25. Plaintiffs are informed and believe, and on that basis allege, that while
15 TIM LACHENMEIER was on the ladder making final connections, an electrostatic
16 discharge caused one of the pyro activated cutters to misfire, severing the primary
17 restraint lines holding the balloon to the ground. This static discharge sent the
18 capsule hurling upwards instantly and the force pushed the ladder TIM was standing
19 on backwards and away from the capsule. As a result of the rapid and forceful
20 motion, the ladder pushed away from the BP-4, forcing TIM LACHENMEIER to
21 jump off the ladder but with nowhere to go, his right foot landed hard on the low-
22 boy trailer shattering his ankle, before being hit by the ladder and tumbling
23 backwards head over heels the rest of the way to the ground. TIM fell a total of
24 approximately 20 feet, knocking off his hard hat when hit by the ladder, and
25 ultimately landing hard on his neck, back, and hips.

26 26. TIM LACHENMEIER’s injuries as a result of Defendants’ failure to
27 implement proper safety measures, including failing to provide a capsule tie-down
28

ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696

1 system, an adequate grounding system, and his resulting fall from Defendants’
2 ladder were so catastrophic that among other things, he suffered a severe
3 comminuted closed tibia and fibula pilon fracture with multiple bone fragments.
4 Unfortunately, despite numerous excruciating surgical and other medical procedures
5 on his right leg, TIM LACHENMEIER ultimately needed and underwent a below-
6 the-knee amputation of his right leg on July 3, 2017.

7 27. During TIM LACHENMEIER’s numerous and painful medical
8 procedures, his wife KRISTEN LACHENMEIER was by his side, caring for TIM’s
9 severe wounds, and watching her husband suffer relentless and on-going
10 excruciating pain.

11 28. Plaintiffs’ lives have been forever altered as a result of Defendants’
12 negligence. TIM LACHENMEIER is no longer able to perform or fulfill his normal
13 work activities and responsibilities. Moreover, TIM LACHENMEIER will require
14 extensive and costly medical care for the remainder of his life as a result of
15 Defendants’ negligence and their reckless disregard for his health and safety, and
16 that of other employees and contractors.

17 29. Defendants’ conduct has further caused TIM LACHENMEIER to
18 suffer loss of companionship with his wife, KRISTEN LACHENMEIER, including
19 but not limited to companionship, comfort, care, assistance, society, and moral
20 support.

21 30. At all relevant times, KRISTEN was present during TIM’s medical
22 treatment, surgeries, doctors’ consultations, and when TIM was forced into a below-
23 the-knee amputation of his right leg, or risk death, and cared for TIM’s severe
24 wounds, all of which caused her to suffer significant emotional distress, pain and
25 suffering, which is continuous and ongoing. Defendants’ negligence caused
26 KRISTEN LACHENMEIER to suffer loss of companionship with her husband,
27
28

ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696

1 which is significant and ongoing, and includes, but is not limited to companionship,
2 comfort, care, assistance, society, and moral support.

3 **FIRST CAUSE OF ACTION**
4 **Negligence**
5 **(Tim Lachenmeier Against All Defendants)**

6 31. Plaintiffs reallege and incorporate each of the preceding and subsequent
7 paragraphs as though fully set forth herein.

8 32. Defendants owed TIM LACHENMEIER a duty to act reasonably and
9 use due care when he was providing testing and other services within the scope of
10 the NSC’s Purchase Contract with Defendants.

11 33. Defendants breached their duty to TIM LACHENMEIER by, among
12 other things, failing to provide TIM with a safe working environment including a
13 capsule tie-down system, proper grounding system, and a ladder which was free of
14 defects, failed to abide by Defendants’ ladder standards, failed to meet fall protection
15 guidelines, and/or failing to implement other safety measures, including a ladder tie
16 down system and constraining the BP-4 capsule during pre-launch test activities,
17 which resulted in TIM LACHENMEIER suffering catastrophic injuries.

18 34. Defendants’ negligent disregard for their own safety standards and
19 rules were the actual and proximate cause of TIM LACHENMEIER’s fall and
20 catastrophic injuries. Defendants’ conduct caused TIM LACHENMEIER to suffer
21 substantial damages and needlessly endure extreme pain and suffering, which is on-
22 going, from his resulting catastrophic injuries which necessitated the below-the-knee
23 amputation of his right leg and left him permanently disfigured, and requiring
24 continuing surgeries, leaving the LACHENMEIERS with permanent physical and
25 emotional scars.

26 ///

27 ///

28 ///

ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696

SECOND CAUSE OF ACTION
Intentional Infliction of Emotional Distress
(All Plaintiffs Against All Defendants)

35. Plaintiffs reallege and incorporate each of the preceding and subsequent paragraphs as though fully set forth herein.

36. Defendants engaged in extreme and outrageous conduct, as alleged herein, by:

(a) unreasonably, recklessly, and in bad faith failing to provide TIM LACHENMEIER and NSC with adequate and non-defective equipment to perform his duties under the Purchase Contract with NSC;

(b) unreasonably, recklessly, and in bad faith failing to disclose to NSC, TIM, or KRISTEN that (i) they neglected to provide a capsule tie down and grounding system and that they had banned the use of the type of ladder they provided to TIM and NSC, (ii) that BOEING’s own Ladder Standard and Fall Protection Guidelines from 2015 mandated using specially designed step platforms with guardrails to safely access its capsules during launch preparations, or (iii) that the ladders they provided to TIM and NSC also violated the American National Standards Institute’s Safety Code; and

(c) after the accident, pressuring TIM and KRISTEN to resume parachute recovery system testing, stating that TIM and KRISTEN were holding up their test, while TIM and KRISTEN were overwhelmed by the stress and worry caused by TIM’s rapidly deteriorating condition, causing them to suffer extreme physical and emotional pain.

37. Defendants intended to cause TIM emotional distress or acted with reckless disregard of the probability that TIM would suffer emotional distress, knowing that TIM was present when the conduct occurred.

///

///

ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696

1 38. Defendants conduct, as alleged herein, caused Plaintiff TIM
2 LACHENMEIER to suffer severe emotional distress, including but not limited to
3 suffering, anguish, fright, horror, nervousness, grief, anxiety, worry, shock,
4 humiliation, and shame.

5 39. Defendants' conduct, as alleged herein, was a substantial factor in
6 causing Plaintiff TIM LACHENMEIER's severe emotional distress, which would
7 not have occurred but for Defendants' conduct.

8 40. Defendants intended to cause KRISTEN emotional distress or acted
9 with reckless disregard of the probability that KRISTEN would suffer emotional
10 distress, knowing that KRISTEN was present when the conduct occurred.

11 41. At all relevant times, KRISTEN was aware of and present during
12 Plaintiff TIM LACHENMEIER's medical conditions and treatment. Plaintiff
13 KRISTEN LACHENMEIER witnessed Plaintiff TIM LACHENMEIER's injuries,
14 pain, and suffering caused by Defendants. Plaintiff KRISTEN LACHENMEIER
15 assisted and was present with Plaintiff TIM LACHENMEIER during his numerous
16 surgeries and treatment for his injuries. Furthermore, Plaintiffs were forced to
17 completely alter their way of living and conducting everyday activities because of
18 Plaintiff TIM LACHENMEIER's catastrophic injury which has permanently
19 disfigured him.

20 42. Defendants' conduct, as alleged herein, caused Plaintiff KRISTEN
21 LACHENMEIER to suffer emotional distress, including but not limited to suffering,
22 anguish, fright, horror, nervousness, grief, anxiety, worry, shock, and humiliation.

23 43. Defendants' conduct, as alleged herein, was a substantial factor in
24 causing Plaintiff KRISTEN LACHENMEIER's severe emotional distress, which
25 would not have occurred but for Defendants' conduct.
26
27
28

ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696

1 44. Plaintiffs TIM LACHENMEIER and KRISTEN LACHENMEIER are
2 entitled to recover damages for their emotional distress, in the amount to be proven
3 at trial.

4 45. Defendants’ conduct, as alleged herein, was committed maliciously and
5 oppressively with the wrongful intention of injuring Plaintiffs and with a willful and
6 conscious disregard of Plaintiffs’ health. Defendants knowingly and intentionally
7 caused Plaintiffs to needlessly endure horrific physical injuries, extreme emotional
8 distress, pain and suffering, loss of consortium, lost wages, and loss of earnings.
9 Accordingly, Plaintiffs are entitled to recover punitive damages in an amount
10 according to proof, in order to punish and to make an example of Defendants and to
11 deter such conduct in the future.

12 **THIRD CAUSE OF ACTION**

13 **Loss of Consortium**
14 **(All Plaintiffs Against All Defendants)**

15 46. Plaintiffs reallege and incorporate each of the preceding and subsequent
16 paragraphs as though fully set forth herein.

17 47. During relevant times alleged herein, Plaintiffs were a married couple,
18 living together in the State of Oregon.

19 48. Defendants’ conduct, as alleged herein, caused TIM LACHENMEIER
20 a loss of companionship with his wife, KRISTEN LACHENMEIER, including but
21 not limited to the loss of companionship, comfort, care, assistance, society, and
22 moral support.

23 49. Defendants’ conduct, as alleged herein, caused KRISTEN
24 LACHENMEIER a loss of companionship with her husband, TIM
25 LACHENMEIER, including but not limited to companionship, comfort, care,
26 assistance, society, and moral support.
27
28

ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696

1 50. Plaintiffs TIM LACHENMEIER and KRISTEN LACHENMEIER are
2 entitled to recover damages for their loss of consortium, in the amount to be proven
3 at trial.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiffs pray for relief as follows:

6 1. On the First Cause of Action for Negligence, that the Court enter
7 judgment against Defendants for general, special, and compensatory damages, in an
8 amount to be determined at trial.

9 2. On the Second Cause of Action for Intentional Infliction of Emotional
10 Distress, that the Court enter judgment against the Defendants for general, special,
11 and compensatory damages, in an amount to be determined at trial.

12 3. On the Third Cause of Action for Loss of Consortium, that the Court
13 enter judgment against the Defendants for general, special, and compensatory
14 damages, in an amount to be determined at trial.

15 4. On all Causes of Action:

16 a. For general and compensatory damages, in an amount to be
17 determined at trial;

18 b. For special and economic damages, in an amount to be
19 determined at trial;

20 c. For reasonable attorneys' fees incurred herein and as permitted
21 by law;

22 d. For pre-judgment and post-judgment interest;

23 e. For payment of the costs of this suit;

24
25 ///

26 ///

27 ///

28
ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696

- 1 f. For punitive and exemplary relief; and
- 2 g. For such other and further relief as this Court may deem proper
- 3 and just.

4
5 DATED: November 12, 2020

ANDRADE GONZALEZ LLP

6
7 */s/ Sean A. Andrade*

8 SEAN A. ANDRADE
 9 HENRY H. GONZALEZ
 10 ARTURO PADILLA
 Attorneys for Plaintiffs TIMOTHY
 LACHENMEIER and KRISTEN
 LACHENMEIER

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ANDRADE GONZALEZ LLP
 634 South Spring Street, Top Floor
 Los Angeles, California 90014
 Tel: (213) 986-3950 Fax: (213) 995-9696

JURY DEMAND

1
2 Plaintiffs respectfully request a jury on all issues triable by jury in the above
3 entitled action.

4
5 DATED: November 12, 2020

ANDRADE GONZALEZ LLP

6
7 */s/ Sean A. Andrade*

8
9

SEAN A. ANDRADE
HENRY H. GONZALEZ
ARTURO PADILLA
Attorneys for Plaintiffs
10 TIMOTHY LACHENMEIER and
KRISTEN LACHENMEIER

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
ANDRADE GONZALEZ LLP
634 South Spring Street, Top Floor
Los Angeles, California 90014
Tel: (213) 986-3950 Fax: (213) 995-9696