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7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
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10 MATT DIES, RAEONA DIES; THE
ESTATE OF MALLORY DIES,

11 Plaintiffs,

12 v.

13 LOIS CAPPS, UNITED STATES OF
14 AMERICA, RAYMOND MORUA and
DOES 1 through 100, inclusive,

15 Defendants.
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Case No.

**COMPLAINT FOR WRONGFUL DEATH
AND SURVIVAL ACTION DAMAGES
SOUNDING IN THE FOLLOWING
CAUSE OF ACTION:**

- 1. **NEGLIGENCE**
- 2. **PUNITIVE DAMAGES**

DEMAND FOR JURY TRIAL

20
21 **COME NOW** Plaintiffs, for Causes of Action against Defendants, and DOES 1 through
22 100, inclusive, and each of them, complain and allege as follows:

23 **GENERAL ALLEGATIONS**

24 1. This wrongful death and survival action arises from an auto vs. pedestrian accident
25 which occurred on December 6, 2013, that caused the death of Mallory Dies.

26 2. The true names and capacities, whether individual, plural, corporate, partnership,
27 associate, or otherwise, of DOES 1 through 100, inclusive, are unknown to Plaintiffs who

1 therefore sue said Defendants by such fictitious names. The full extent of the facts linking such
2 fictitiously sued Defendants is unknown to Plaintiffs. Plaintiffs are informed and believe, and
3 thereon allege, that each of the Defendants designated herein as a DOE was, and is, negligent, or
4 in some other actionable manner, responsible for the events and happenings hereinafter referred to,
5 and thereby negligently, or in some other actionable manner, legally and proximately caused the
6 hereinafter described injuries and damages to Plaintiffs. Plaintiffs will hereafter seek leave of the
7 Court to amend this Complaint to show the Defendants' true names and capacities after the same
8 have been ascertained.

9 3. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned
10 herein, Defendants, and each of them, including DOES 1 through 100, inclusive, and each of
11 them, were agents, servants, employees, successors in interest, and/or joint venturers of their co-
12 Defendants, and were, as such, acting within the course, scope, and authority of said agency,
13 employment, and/or venture, and that each and every Defendant, as aforesaid, when acting as a
14 principal, was negligent in the selection and hiring of each and every other defendant as an agent,
15 servant, employee, successor in interest, and/or joint venturer.

16 4. Plaintiff MATT DIES, natural father of decedent Mallory Dies, is, and at all times
17 herein relevant was, a resident of the County of Riverside, State of California.

18 5. Plaintiff RAEONA DIES, natural mother of decedent Mallory Dies, is, and at all
19 times herein relevant was, a resident of the County of Riverside, State of California.

20 6. Plaintiff THE ESTATE OF MALLORY DIES is represented by and through its
21 Successor-In-Interest, MATT DIES, the natural father of decedent Mallory Dies, and as such,
22 MATT DIES is decedent's Successor-in-Interest pursuant to California Code of Civil Procedure §
23 377.11. Plaintiff MATT DIES has executed and filed with this Complaint a declaration under
24 penalty of perjury pursuant to California Code of Civil Procedure §377.32.

25 7. Plaintiffs are informed and believe, and thereon allege, that Defendant UNITED
26 STATES OF AMERICA, (hereafter "U.S.A.") is, and at all times herein relevant was, a
27 governmental entity authorized to do, and that has regularly done, and is doing, government

1 business within the County of Santa Barbara, in the State of California, and has systematically
2 conducted government business on a regular basis in the State of California, under and by virtue of
3 the laws of the State of California.

4 8. Plaintiffs are informed and believe, and thereon allege, that Defendant LOIS
5 CAPPS is, and at all times herein relevant was, a representative in the United States House of
6 Representatives authorized to do, and that has regularly done, and is doing, government business
7 within the County of Santa Barbara, in the State of California, and has systematically conducted
8 business on a regular basis in the State of California, under and by virtue of the laws of the State
9 of California.

10 9. Plaintiffs are informed and believe, and thereon allege, that at all times herein
11 relevant, Defendants, LOIS CAPPS, RAYMOND MORUA , and U.S.A. and each of them, and
12 Does 1-100, owned, leased, managed, maintained, repaired, entrusted, controlled, required, used
13 for government business, and operated a certain red Dodge Caliber (hereafter collectively referred
14 to as “SUBJECT AUTO”).

15 10. Plaintiffs are informed and believe, and thereon allege, that at all times herein
16 relevant, Defendant RAYMOND MORUA, who operated the required SUBJECT AUTO, was a
17 resident of Santa Barbara County, State of California.

18 11. Plaintiffs are informed and believe, and thereon allege, that all Defendants and
19 Does 1-100, hired and retained Defendant RAYMOND MORUA as an employee to drive required
20 vehicles with the knowledge that Defendant RAYMOND MORUA is, and all times relevant was,
21 an individual with a long and publicly known history of alcohol and drug abuse, and a well-
22 documented public history of operating automobiles while under the influence of drugs and
23 alcohol (hereafter “SUBJECT DANGEROUS TENDENCIES”). Plaintiffs are further informed
24 and believe, and thereon allege, that all Defendants, and Does 1-100, hired and retained Defendant
25 RAYMOND MORUA with the knowledge that in addition to his SUBJECT DANGEROUS
26 TENDENCIES, all Defendants, and Does 1-100, also had knowledge that: (1) Defendant
27 RAYMOND MORUA was not qualified, trained or experienced to safely drive a vehicle such as

1 the required SUBJECT AUTO as part of his work duties; (2) Defendant RAYMOND MORUA
2 had a common practice of driving without due care, and specifically, that he had a past driving
3 history that included numerous prior Vehicle Code violations and convictions as well as having
4 caused multiple prior vehicle collisions, some of which were caused by Defendant RAYMOND
5 MORUA'S SUBJECT DANGEROUS TENDENCIES. Plaintiffs are further informed and
6 believe, and thereon allege, that all Defendants, and Does 1-100, knew that because of Defendant
7 RAYMOND MORUA'S SUBJECT DANGEROUS TENDENCIES, he could not safely drive any
8 motor vehicle. Plaintiffs are further informed and believe, that despite such knowledge, all
9 Defendants, and Does 1-100, still hired and retained Defendant RAYMOND MORUA to perform
10 job duties that included driving the required SUBJECT AUTO.

11 12. Plaintiffs are further informed and believe, and thereon allege, that: (1) all
12 Defendants, and Does 1-100, took no action to ensure that Defendant RAYMOND MORUA was
13 properly monitored or supervised while performing his job duties driving the required SUBJECT
14 AUTO on public highways; (2) all Defendants, and Does 1-100, took no action to provide any
15 form of supervision over Defendant RAYMOND MORUA to ensure he was abstaining from drug
16 and alcohol use or to ensure he was continually fit to drive the required SUBJECT AUTO on
17 public highways; (3) all Defendants, and Does 1-100, took no action to provide any form of
18 supervision over Defendant RAYMOND MORUA in the event of his SUBJECT DANGEROUS
19 TENDENCIES occurring while he was driving the required SUBJECT AUTO. Said acts or
20 omissions by all Defendants, and Does 1-100, were performed negligently, recklessly and with
21 conscious disregard for human safety in the pursuit of profit and political advantage.

22 13. Plaintiffs are informed and believe, and thereon allege, that all Defendants, and
23 Does 1-100, had full knowledge of the dangers associated with employing a person with
24 Defendant RAYMOND MORUA'S SUBJECT DANGEROUS TENDENCIES as well as said
25 past driving history and then allowing him to drive government required vehicles on public
26 highways, so to cause severe injury or death to members of the public. Despite such knowledge,
27 all Defendants, and Does 1-100, knowingly and recklessly permitted Defendant RAYMOND

1 MORUA to continue driving the required SUBJECT AUTO during his employment, and
2 continued engaging in such misconduct in a willful and conscious disregard for the rights and
3 safety of the public in the interest of gaining financial profit for a substantial period of time.

4 14. Plaintiffs are informed and believe, and thereon allege, that when considering
5 Defendant RAYMOND MORUA’S SUBJECT DANGEROUS TENDENCIES, said past driving
6 history and said use of drugs and/or alcohol, it was highly foreseeable to any reasonable person or
7 entity that Defendant RAYMOND MORUA would cause a serious vehicle collision with the
8 required SUBJECT AUTO resulting in serious injury or death to members of the public. Despite
9 the foregoing, the Defendants, and each of them, allowed, supported and ratified RAYMOND
10 MORUA’S misconduct.

11 15. On or about December 6, 2013, Defendant RAYMOND MORUA was operating
12 the required SUBJECT AUTO in the course and scope of his employment for all Defendants, and
13 Does 1-100. Defendant RAYMOND MORUA drove the required SUBJECT AUTO on Anacapa
14 Street in Santa Barbara, California. Defendant RAYMOND MORUA negligently, recklessly, and
15 in conscious disregard for human safety, drove the required SUBJECT AUTO into the decedent
16 Mallory Dies causing catastrophic injuries that ultimately led to her death (hereafter “SUBJECT
17 INCIDENT”).

18 **FIRST CAUSE OF ACTION**

19 **(Negligence by All Plaintiffs, and Survival Action by THE ESTATE**
20 **OF MALLORY DIES, by and through its personal representative and**
21 **successor-in-interest MATT DIES, As against All Defendants)**

22 16. Plaintiffs re-allege and incorporate herein by reference each and every allegation
23 and statement contained in the prior paragraphs.

24 17. Plaintiffs are informed and believe, and thereon allege, that all times relevant
25 herein, all Defendants, and DOES 1 through 100, inclusive, and each of them, owed a duty of care
26 to all reasonably foreseeable people, including decedent Mallory Dies and Plaintiffs, to own, lease,
27 manage, maintain, control, entrust, and operate the required SUBJECT AUTO in a reasonable

1 manner.

2 18. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned
3 herein, Defendants, and each of them, negligently, recklessly and with conscious disregard for
4 human safety, owned, leased, managed, maintained, entrusted, controlled and operated the
5 required SUBJECT AUTO so as to legally and proximately cause the same to collide with the
6 decedent Mallory Dies, resulting in fatal injuries.

7 19. Plaintiffs are informed and believe, and thereon allege, Defendants, and each of
8 them, inclusive, said careless, negligent, reckless, willful, and unlawful conduct in regards to the
9 ownership, control, entrustment, management, maintenance and operation of the required
10 SUBJECT AUTO was the direct, legal and proximate cause of the fatal injuries to decedent
11 Mallory Dies and damages to Plaintiffs as herein alleged.

12 20. Plaintiffs are informed and believe, and thereon allege, Defendant RAYMOND
13 MORUA, was also per se negligent for operating the required SUBJECT AUTO in violation of,
14 including, but not limited to, Vehicle Code § 23152. Plaintiffs are further informed and believe,
15 and thereon allege, that at all times herein mentioned, decedent Mallory Dies was in the class of
16 people the aforementioned Vehicle Code section and other statutes were meant to protect and
17 decedent Mallory Dies suffered the type of injuries the aforementioned vehicle code section and
18 other statutes were meant to prevent. Plaintiffs are further informed and believe, and thereon
19 allege, that said violation of Vehicle Code § 23152 and other statutes were the legal and proximate
20 cause of the injuries and damages complained of herein. On April 15, 2014, defendant MORUA
21 pleaded guilty to multiple criminal offenses that caused the death of Mallory Dies.

22 21. The aforementioned subject incident that gave rise to this lawsuit which occurred at
23 approximately 12:05 a.m. on December 6, 2013, caused decedent Mallory Dies to suffer traumatic
24 injuries. As a legal, direct and proximate result of the conduct of all Defendants, and DOES 1
25 through 100, and each of them, decedent Mallory Dies suffered pre-death physical injuries, mental
26 anguish, terror, anxiety, unconsciousness, and ultimately death.

27 22. As a legal, direct and proximate result of said wrongful conduct by all Defendants,

1 and DOES 1 through 100, and each of them, Plaintiffs, MATT DIES, RAEONA DIES and THE
2 ESTATE OF MALLORY DIES, by and through its personal representative and successor-in-
3 interest, MATT DIES, will all be deprived of the love, comfort, support, society, financial support,
4 and assistance of decedent Mallory Dies, the exact amount of such losses to be stated according to
5 proof, pursuant to Section 425.10 of the California Code of Civil Procedure.

6 23. As a legal, direct and proximate result of said wrongful conduct by All Defendants,
7 and DOES 1 through 100, and each of them, as aforesaid, Plaintiffs, MATT DIES, THE ESTATE
8 OF MALLORY DIES, by and through its personal representative and successor-in-interest MATT
9 DIES, have incurred property, medical, funeral and burial expenses in an amount to be stated
10 according to proof, pursuant to Section 425.10 of the California Code of Civil Procedure.

11 24. As a legal, direct and proximate result of said wrongful conduct by all Defendants,
12 and DOES 1 through 100, and each of them, decedent Mallory Dies was compelled to, and did,
13 employ the services of hospitals, physicians, surgeons, nurses, and the like, to care for and treat
14 her, the exact amount of such losses to be stated according to proof, pursuant to Section 425.10 of
15 the California Code of Civil Procedure.

16 25. As a legal, direct and proximate result of said wrongful conduct by all Defendants,
17 and DOES 1 through 100, and each of them, decedent Mallory Dies suffered lost earning and
18 property damages, the exact amount of such losses to be stated according to proof, pursuant to
19 Section 425.10 of the California Code of Civil Procedure.

20 26. Plaintiffs are informed and believe, and thereon allege, that Defendants LOIS
21 CAPPS and DOES 1 through 100, and each of them, engaged in said wrongful conduct with a
22 conscious disregard of the dangers such misconduct would and did create for the rights and safety
23 of the public, including decedent Mallory Dies. Plaintiffs are further informed and believe, and
24 thereon allege, that long before the date of the SUBJECT INCIDENT on December 6, 2013, said
25 Defendants acted with malice in that they engaged in despicable conduct in conscious disregard of
26 the rights, safety, and welfare of decedent Mallory Dies and Plaintiffs by reason of, including but
27 not limited to, knowingly and recklessly:

- 1 (a) hiring Defendant RAYMOND MORUA to drive the required SUBJECT AUTO as
2 an employee despite lacking the proper training or experience necessary to safely
3 drive such a vehicle;
- 4 (b) entrusting the required SUBJECT AUTO to Defendant RAYMOND MORUA
5 despite knowing he was not qualified, trained or experienced to safely drive such a
6 vehicle;
- 7 (c) allowing Defendant RAYMOND MORUA, despite knowing he had a common
8 practice of driving the required SUBJECT AUTO without due care, and
9 specifically, to drive the required SUBJECT AUTO beyond the legal speed limit
10 and in excess of speeds reasonable for the circumstances thereby endangering the
11 safety of the public;
- 12 (d) allowing Defendant RAYMOND MORUA to continue driving the required
13 SUBJECT AUTO despite knowing he had numerous prior Vehicle Code violations
14 and/or convictions as well as having caused recent prior traffic collisions in the
15 required SUBJECT AUTO or other similar vehicles;
- 16 (e) hiring Defendant RAYMOND MORUA to drive the required SUBJECT AUTO
17 knowing he is an alcoholic and drug abuser with SUBJECT DANGEROUS
18 TENDENCIES and said driving history;
- 19 (f) failing to act despite being informed for a substantial period of time prior to the
20 date of the SUBJECT INCIDENT that Defendant RAYMOND MORUA was
21 consuming drugs and alcohol while in the course and scope of his employment;
- 22 (g) authorizing Defendant RAYMOND MORUA to continue driving the required
23 SUBJECT AUTO on the public highways despite having knowledge of Defendant
24 RAYMOND MORUA'S SUBJECT DANGEROUS TENDENCIES and said
25 driving history;
- 26 (h) taking no action to ensure that Defendant RAYMOND MORUA was properly
27 monitored or supervised while performing his job duties driving the required
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1 SUBJECT AUTO on public highways;

2 (i) taking no action to provide any form of supervision over Defendant RAYMOND

3 MORUA in the event of his SUBJECT DANGEROUS TENDENCIES occurring

4 while he was driving the required SUBJECT AUTO;

5 (j) following the INCIDENT, all Defendants, and DOES 1 through 100, and each of

6 them, conspired to conceal defendant RAYMOND MORUA’S condition of

7 intoxication at the time of the INCIDENT. Defendants intentionally violated

8 government policies and procedures in furtherance of the conspiracy to cover up

9 RAYMOND MORUA’S condition of intoxication with drugs, alcohol, and sleep

10 deprivation.

11 27. Defendants, and each of them, had prior knowledge of the dangers and risks that

12 such misconduct would and did create, including causing serious injury or death to members of

13 the public. Defendants LOIS CAPPs and DOES 1 through 100 further had full knowledge of the

14 dangers associated with employing a person with Defendant RAYMOND MORUA’S SUBJECT

15 DANGEROUS TENDENCIES as well as RAYMOND MORUA’S past driving history and then

16 allowing him to drive company vehicles on public highways, such as causing severe injury or

17 death to members of the public. Despite such knowledge, Defendants LOIS CAPPs and DOES 1

18 through 100 knowingly and recklessly permitted Defendant RAYMOND MORUA to continue

19 driving the required SUBJECT AUTO during his employment, and continued engaging in such

20 misconduct in a willful and conscious disregard for the rights and safety of the public in the

21 interests of gaining financial profit and political power votes. Considering Defendant

22 RAYMOND MORUA’S SUBJECT DANGEROUS TENDENCIES, his driving history, it was

23 highly foreseeable to any reasonable person or entity that Defendant RAYMOND MORUA would

24 cause a serious vehicle collision with the required SUBJECT AUTO resulting in serious injury or

25 death to members of the public. Despite such knowledge and such understanding, said Defendants

26 knowingly and recklessly authorized and required Defendant RAYMOND MORUA to continue

27 driving the required SUBJECT AUTO during his employment, and to continue engaging in such

1 misconduct in a willful and conscious disregard for the rights and safety of others, including
2 decedent Mallory Dies and Plaintiffs. Said Defendants knowingly and recklessly engaged in these
3 actions and omissions in the pursuit of financial and political profit while using public highways in
4 conscious disregard for public safety. Said Defendants were on actual and constructive notice of
5 the dangers said acts created to the public, and Defendants had the power to make changes that
6 would eliminate such dangers to the public, but said Defendants, and each of them, failed to take
7 any corrective measures in conscious disregard for public safety. Said misconduct by Defendants,
8 and each of them, by knowingly or recklessly creating said substantial risk and high probability of
9 injury or death was oppressive, despicable, highly reprehensible and done in the conscious
10 disregard for the rights and safety of the public, including decedent Mallory Dies and the
11 Plaintiffs. Said acts and omissions were ratified by managerial and elected employees of
12 Defendants, and DOES 1 through 100, inclusive, and were carried out with the consent of the
13 officers, directors, and/or managing agents and elected officials of Defendants, and DOES 1
14 through 100, inclusive. As such, the imposition of punitive damages against that Defendants LOIS
15 CAPPS, RAYMOND MORUA, and DOES 1 through 100, inclusive, and each of them, is
16 appropriate.

17 28. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned
18 herein, Defendant RAYMOND MORUA was acting within the course and scope of his duties for
19 his employer, all Defendants, and DOES 1 through 100, inclusive.

20 29. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned
21 herein, all Defendants, and DOES 1 through 100, inclusive, and each of them, were negligent in
22 the hiring and retention of Defendant RAYMOND MORUA in that all Defendants, and DOES 1
23 through 100, inclusive, and each of them, knew or should have known that Defendant
24 RAYMOND MORUA was unfit for the specific tasks to be performed during the course of his
25 employment, namely the general safe operation of the required SUBJECT AUTO during his work
26 for Defendants, and DOES 1 through 100, inclusive, and each of them.

27 30. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned

1 herein, all Defendants, and DOES 1 through 100, inclusive, and each of them, were negligent or
2 reckless by failing to provide any or sufficient training or supervision to Defendant RAYMOND
3 MORUA after hiring him, and retained Defendant RAYMOND MORUA as an employee for job
4 performance which included driving motor vehicles such as the required SUBJECT AUTO for
5 Defendants, and DOES 1 through 100, inclusive

6 31. Plaintiffs are informed and believe, and thereon allege that at all times herein
7 relevant, All Defendants, and DOES 1 through 100, inclusive, and each of them, owed a duty of
8 care to the public, including decedent Mallory Dies and Plaintiffs, in the hiring, retention, training
9 and supervision of their agents, employees, servants, and/or independent contractors, which they
10 assigned to operate motor vehicles such as the required SUBJECT AUTO.

11 32. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned
12 herein, Defendants, and DOES 1 through 100, inclusive, and each of them, failed to act reasonably
13 in the hiring, retention, training, and supervision of their agents, employees, servants and/or
14 independent contractors which they assigned to operator motor vehicles such as the required
15 SUBJECT AUTO, including Defendant RAYMOND MORUA.

16 33. Plaintiffs are informed and believe, and thereon allege, that the aforementioned
17 negligent hiring, retention, training, and supervision of Defendant RAYMOND MORUA by
18 Defendants, and DOES 1 through 100, inclusive, and each of them, directly, legally and
19 proximately caused or contributed to causing the SUBJECT INCIDENT involving the required
20 SUBJECT AUTO violently colliding with decedent Mallory Dies, thereby causing the injuries and
21 damages complained of herein.

22 34. As a legal, direct and proximate result of said wrongful conduct by Defendants, and
23 DOES 1 through 100, inclusive, and each of them, Plaintiffs MATT DIES, RAEONA DIES; THE
24 ESTATE OF MALLORY DIES, by and through its personal representative and successor-in-
25 interest MATT DIES, will all be deprived of the financial support and assistance of decedent
26 Mallory Dies, the exact amount of such losses to be stated according to proof, pursuant to Section
27 425.10 of the California Code of Civil Procedure.

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PRAYER FOR DAMAGES

WHEREFORE, Plaintiffs, MATT DIES, RAEONA DIES; THE ESTATE OF MALLORY DIES , by and through its personal representative and successor-in-interest MATT DIES, pray judgment against Defendants, and DOES 1 through 100, inclusive, and each of them, as follows:

1. For general damages and the loss of the love, comfort, society, and support suffered by Plaintiffs, MATT DIES and RAEONA DIES, according to proof;
2. For economic damages suffered by Plaintiffs, MATT DIES and RAEONA DIES, according to proof;
3. For funeral and burial expenses suffered by Plaintiffs, MATT DIES and RAEONA DIES, according to proof;
4. For hospital, medical, professional and incidental expenses suffered by Plaintiffs, MATT DIES, RAEONA DIES, THE ESTATE OF MALLORY DIES, by and through its personal representative and successor-in-interest MATT DIES, according to proof.
5. For loss of personal property and income suffered by Plaintiffs, MATT DIES, RAEONA DIES, THE ESTATE OF MALLORY DIES, by and through its personal representative and successor-in-interest MATT DIES, according to proof;
6. For loss of inheritance suffered by Plaintiffs MATT DIES, RAEONA DIES, according to proof;
7. For damages for other economic losses suffered by Plaintiffs, MATT DIES, RAEONA DIES, THE ESTATE OF MALLORY DIES, by and through its personal representative and successor-in-interest MATT DIES, according to proof;
9. For prejudgment interest, pre-trial interest, according to proof;
10. For punitive damages against Defendants LOIS CAPPs and RAYMOND MORUA,
11. For such other and further relief as this Court may deem just and proper.

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DEMAND FOR TRIAL BY JURY

Plaintiffs, MATT DIES, RAEONA DIES, THE ESTATE OF MALLORY DIES, by and through its personal representative and successor-in-interest MATT DIES, hereby demand a trial by jury as to all Causes of Action

Dated: April 15, 2014

STOLL, NUSSBAUM & POLAKOV
A Professional Corporation

By: _____
ROBERT J. STOLL, JR.
Attorneys for Plaintiffs