

No. 2019DCV3471

JESSICA GARCIA, Individually, and As §
Next Friend of GUILLERMO GARCIA, and §
As Next Friend of K.G. and G.G., Minors; §
JANE DOE 1, Individually and on Behalf of the §
Estate of JOHN DOE 1, Deceased, and As Next §
Friend of MINOR DOE 1 and MINOR DOE 2; §
ARNULFO RASCON; and ILDA CAMPOS, §
Individually and on Behalf of the Estate of §
LEONARDO CAMPOS, Deceased §

Plaintiffs

AURORA BONILLA HERNANDEZ, §
Individually, and As Representative of the §
Estate of MARIBEL HERNANDEZ LOYA, §
Deceased, ANDRES LOYA, RAUL §
ROBERTO LOYA, YVETTE SHIBLEY, §
YVONNE LOYA, DONNA RAE SIFFORD, §
ERNEST CHRISTOPHER GRANT, and §
ROSA BARRON §

Intervenors

v. §

WALMART, INC.; WAL-MART STORES §
TEXAS, LLC; and PATRICK WOOD §
CRUSIUS §

Defendants

IN THE DISTRICT COURT OF

EL PASO COUNTY, TEXAS

448TH JUDICIAL DISTRICT

PLAINTIFFS’ SECOND AMENDED PETITION

TO THE HONORABLE JUDGE OF THIS COURT:

JESSICA GARCIA, Individually and as Next Friend of GUILLERMO GARCIA, and As Next Friend of K.G. and G.G., Minors; JANE DOE 1, Individually and on Behalf of the Estate of JOHN DOE 1, Deceased, and As Next Friend of MINOR DOE 1 and MINOR DOE 2; ARNULFO RASSON; and ILDA CAMPOS, Individually and on Behalf of the Estate of LEONARDO CAMPOS, Deceased, (“Plaintiffs”), complaining of WALMART, INC.; WAL-MART STORES TEXAS, LLC; and PATRICK WOOD CRUSIUS (“Defendants”), and setting forth grounds for

their Second Amended Petition, would show as follows:

DISCOVERY CONTROL PLAN

1. Pursuant to Rule 190.4 of the Texas Rules of Civil Procedure, Plaintiffs will proceed with discovery under a Level 3 Discovery Control Plan.

PARTIES

2. Plaintiff Jessica Garcia and Minors K.G. and G.G. are resident citizens of Texas.

3. Guillermo Garcia is an individual and resident of Texas who brings suit through his next friend and wife, Jessica Garcia.

4. Plaintiff Jane Doe 1, Minor Doe 1, and Minor Doe 2 are resident citizens of Chihuahua, Mexico. Jane Doe 1 is the surviving spouse of John Doe 1. Minor Doe 1 and Minor Doe 2 are the surviving minor children of John Doe 1. There is no formal legal representative of the Estate of John Doe 1, and no formal administration of the estate is necessary.

5. Plaintiff Arnulfo Rascon is a resident citizen of Texas.

6. Plaintiff Ilda Campos, Individually and on Behalf of the Estate of Leonardo Campos, Deceased, is a resident citizen of Texas. Ilda Campos is the surviving mother of Leonardo Campos. There is no formal legal representative of the Estate of Leonardo Campos, and no formal administration of the estate is necessary.

7. Defendant Walmart, Inc. is a foreign-for-profit corporation authorized to and doing business in the State of Texas and can be served with process through its registered agent, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136.

8. Defendant Walmart Stores Texas, LLC is a foreign limited liability company doing business in the State of Texas and can be served with process through its registered agent, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136.

9. Defendants Walmart, Inc. and Wal-Mart Stores Texas, LLC may be referred to collectively in this Petition as “Wal-Mart” and/or “the Wal-Mart Defendants.”

10. Defendant Patrick Wood Crusius is an individual residing in Collin County, Texas and may be served with process at his place of residence located at 900 Kingsbury Court, Allen, Texas 75013-5357, or wherever he may be found.

JURISDICTION AND VENUE

11. Venue is proper and maintainable in El Paso County, Texas since a substantial part of the events or omissions giving rise to Plaintiffs’ claims occurred in El Paso County, Texas.

12. This Court has jurisdiction over Defendants because they conduct business in Texas and have committed a tort in Texas.

13. Jurisdiction is proper because the amount in controversy exceeds the minimal jurisdiction limits of this Court.

FACTUAL BACKGROUND

14. The Wal-Mart Supercenter, Store #2201 located at 7101 Gateway Boulevard W, El Paso, Texas 79925 (“the Premises”), is an especially busy retail location.

15. On Saturday, August 3, 2019, Plaintiffs Jessica Garcia, Guillermo Garcia, and twenty-two other people were wounded, Plaintiff Arnulfo Rascon was injured, and John Doe 1, Leonardo Campos, and twenty others were killed by Defendant Patrick Wood Crusius (hereinafter referred to as “the shooter” and/or “Crusius”) in a mass shooting while customers of that Wal-Mart Supercenter. Minor Plaintiffs K.G. and G.G., the children of Plaintiff Jessica Garcia and Guillermo Garcia, were present and witnessed their parents and others being shot by Defendant Crusius.

16. Plaintiff Jessica Garcia and Guillermo Garcia were on the Premises fundraising for K.G.’s soccer team, which Guillermo coached. They had set up a stand on the Premises between the two

entrances and were selling drinks and snacks that they had purchased on the Premises from the Wal-Mart Defendants earlier that day. The Wal-Mart Defendants permitted this fundraising to promote their corporate image that they support the community.

17. John Doe 1 was on the Premises shopping.

18. Arnulfo Rascon was on the Premises shopping.

19. Leonardo Campos was on the Premises shopping.

20. While the Garcias were out front at their stand, the shooter walked by them and went inside to case the inside of the Premises. If there had been any discernible security presence at the Premises, the shooter would have been deterred when he took this survey.

21. The shooter then walked back to his vehicle, which was parked in the Premises parking lot, grabbed an assault rifle, approached the Garcias, and began shooting. Plaintiff Jessica Garcia was shot in both legs. Guillermo Garcia was shot several times as he attempted to shield his wife and another woman from the shooter.

22. Defendant Crusius continued shooting customers on the Premises, eventually going inside the store and shooting more customers there. John Doe 1 and Leonardo Campos were among the many shot and killed by Defendant Crusius at the Wal-Mart Supercenter that day. Leonardo Campos was shot in the head and killed.

23. Plaintiff Arnulfo Rascon was also injured as a result of the shooting.

24. Defendant Crusius would later tell police he was surprised nobody challenged him as he roamed the Premises.

25. While K.G. hid and the shooter roamed the aisles, she could hear him shouting taunts at the terrified customers. As K.G. hid from the shooter, a woman hiding next to her was shot in the head and killed.

26. Defendant Crusius then went back outside to finish off several victims he had already shot and wounded. Jessica Garcia played dead as the shooter went from one wounded person to the next and shot them in the head.

27. The shooter then left the Premises and surrendered to the police.

28. A few days after the shooting, a Wal-Mart corporate employee sent an email to 20,000 of his coworkers calling for a strike in response to Wal-Mart's inaction on gun violence.

29. Wal-Mart announced in response that it would not change its policies on selling guns or allowing customers to carry guns in its stores.

30. Two weeks later, in the face of Wal-Mart's inaction, this same employee delivered a petition with over 128,000 signatures to Doug McMillon, Wal-Mart's chief executive officer. In the petition, the employee explained:

We value Walmart and our fellow associates, but we are no longer willing to contribute our labor to a company that profits from the sale of deadly weapons.

We would like to see Walmart take a unified and public stance against guns and gun violence. We urge our leadership to cease the sale of all firearms and ammunition, ban the public open and concealed carry of weapons on company property and in all stores, and cease WALPAC donations to NRA backed -A/A+ politicians.

31. On September 3, 2019, one month after the massacre, Mr. McMillon announced that the Wal-Mart Defendants would stop selling handguns, handgun ammunition, and assault-rifle ammunition at its stores.

32. The Wal-Mart Defendants have a long history of problems with crime at their stores.

33. In 2015, an Indiana town declared their local Wal-Mart a public nuisance because of how bad the crime at the store was.

34. In June 2016, an armed man took two employees hostage and was later shot by police at a Wal-Mart in Amarillo, Texas.

35. Shortly thereafter, Bloomberg Businessweek reported in August 2016 that “Walmart’s out-of-control crime problem is driving police crazy.” That report concluded that the level of crime at Wal-Mart was the direct result of a cost-cutting corporate policy dating back to 2000.

36. In November 2017, an armed man shot and killed three shoppers at a Wal-Mart in Thornton, Colorado.

37. Just a few days before the shooting in El Paso, an armed man shot and killed two people and injured a third at a Wal-Mart in Southaven, Mississippi.

38. Rather than providing security at its stores to prevent these sorts of incidents, the Wal-Mart Defendants have relied on taxpayer-funded local law enforcement to respond to violent crimes at its stores after the fact. This is the result of a conscious decision by the Wal-Mart Defendants to increase profits by passing the cost of store security on to the communities where their stores are located.

39. The Wal-Mart Defendants previously had an armed, off-duty police officer protecting the Premises and their patrons at all times, but the Wal-Mart Defendants stopped providing this security measure in order to save money and improve their bottom line.

40. Despite years of rampant crime at its stores, the Wal-Mart Defendants did not take necessary and reasonable steps to protect their customers on August 3, 2019, at the Wal-Mart Supercenter in El Paso, Texas because they cared more about profits than safety.

41. This problem is particularly acute in low-income communities and communities of color.

42. The Wal-Mart Defendants assign each store location a risk score based on community demographics, local housing values, crime statistics, and internal company records, including their own internal crime databases.

43. An individual store’s risk score scores range from 0 to 2,000. A score of 0 indicates that

crime is 10 times less likely to occur at a particular store would be expected in that area; a score of 500 indicates that crime is 5 times more likely to occur at a particular store.

44. An individual store’s risk scores provides an objective confirmation of the risk of in-store violence endangering Wal-Mart customers.

45. The Wal-Mart Defendants’ gathering, ranking, and consideration of their risk and crime data confirms their subjective awareness of the risk of in-store violence, and the Wal-Mart Defendants’ conscious failure to allocate additional security based on their subjective awareness of this objectively confirmed risk constitutes a course of action that is consciously indifferent to the safety of Wal-Mart customers such those others killed and injured at the Wal-Mart Supercenter in El Paso on August 3, 2019.

46. The Wal-Mart Defendants do not spend the most on security at stores with the highest risk scores, just as they do not prioritize employee staffing at those stores. Instead, the Wal-Mart Defendants provide more security and staffing at their stores in higher-income, majority-white neighborhoods at the expense of low-income communities and communities of color, regardless of the stores’ relative risk scores.

47. As a result of the Wal-Mart Defendants’ conscious policy to provide more security and staffing at their stores in higher-income, majority-white neighborhoods at the expense of low-income communities and communities of color, the Wal-Mart Supercenter in El Paso had inadequate security on August 3, 2019.

FIRST CAUSE OF ACTION
(VICARIOUS LIABILITY – CORPORATE VEIL –
WAL-MART DEFENDANTS)

48. All preceding paragraphs are incorporated herein by reference.

49. The Wal-Mart Defendants own and operate the Premises where Plaintiff Jessica Garcia and

Guillermo Garcia were shot and gravely injured, John Doe 1 and Leonardo Campos were shot and killed, and Plaintiff Arnulfo Rascon was injured. Further, the Wal-Mart Defendants were responsible for providing security for the Premises. Specifically, the Wal-Mart Defendants had an obligation to provide security to patrol and monitor the entrances and common areas of the Premises, including the areas where Plaintiffs Jessica Garcia, Guillermo Garcia, John Doe 1, Arnulfo Rascon, Leonardo Campos, and the other victims were shot, killed, and/or injured.

50. It was the responsibility of the Wal-Mart Defendants to provide security to the Premises due to the capacity of patrons at the Premises. Despite the crowd at the Premises on the day of the shooting, no security guards were provided to protect the patrons at the Premises.

51. Plaintiffs Jessica Garcia, Guillermo Garcia, and Arnulfo Rascon's injuries and John Doe 1 and Leonardo Campos's death would not have occurred but for the negligence, gross negligence, and premises liability of the Wal-Mart Defendants. The occurrence made the basis of this lawsuit and the resulting injuries and damages were proximately caused by the non-exclusive acts and omissions of the Wal-Mart Defendants, including:

- a. failing to keep a proper lookout;
- b. failing to maintain proper security equipment;
- c. failing to properly secure the premises;
- d. failing to properly patrol the premises in question;
- e. being inattentive; and
- f. failing to observe ordinary care and prudence given the circumstances.

52. The Wal-Mart Defendants owed a duty to Plaintiffs Jessica Garcia, Guillermo Garcia, John Doe 1, Arnulfo Rascon, and Leonardo Campos, as invitees, to take reasonable care to discover dangers and to reduce or eliminate such dangers on the Premises. The Wal-Mart Defendants each

had a non-delegable duty of ordinary care to secure the Premises and to keep patrons of the Premises safe. The Wal-Mart Defendants failed to comply with this duty by failing to provide proper security at the Premises to timely stop and/or prevent the shooting from occurring. Despite the shooter arming himself with a powerful rifle and dressing in armored gear, the Wal-Mart Defendants' failure to provide a guard on the Premises to prevent the shooter from entering the Premises and protect patrons on the Premises created a hazardous condition to patrons of the Premises.

53. The Wal-Mart Defendants consciously chose not to pay for necessary security on the Premises. The Wal-Mart Defendants were personally responsible for many of the decisions that placed profits over the safety of invitees and caused the Premises to be an easy, inviting target for criminals to commit their acts of violence.

54. Each of the above acts and omissions, singularly or in combination with others, constituted negligence, which proximately caused the occurrence made the basis of this action and caused the injuries to Plaintiffs Jessica Garcia, Guillermo Garcia, and Arnulfo Rascon and the deaths of John Doe 1 and Leonardo Campos. Each of these acts and omissions, singularly or in combination with others, constituted gross negligence in that it indicated an extreme degree of risk, considering the probability and magnitude of the potential harm to the invitees of the Premises, including Plaintiffs Jessica Garcia, Guillermo Garcia, John Doe 1, Arnulfo Rascon, and Leonardo Campos. Defendants had actual, subjective awareness of the other risks but proceeded anyway with conscious indifference to the rights, safety, or welfare of others, and in particular, the invitees of the Premises.

55. Plaintiffs hereby further assert any and all alternative theories of piercing the corporate veil available under Texas law, and specifically, under *Castleberry v. Branscum*, 721 S.W.2d 270 (Tex. 1986).

SECOND CAUSE OF ACTION
(ASSAULT – CRUSIUS)

56. All preceding paragraphs are incorporated herein by reference.

57. While the negligence of the Wal-Mart Defendants was the producing and proximate cause of the injuries to Plaintiffs Jessica Garcia, Guillermo Garcia, John Doe 1, Arnulfo Rascon, and Leonardo Campos, Plaintiffs allege that Defendant Patrick Wood Crusius entered the Premises with the intent to fatally injure invitees of the Premises and succeeded in that intent.

58. Specifically, Plaintiffs allege that Defendant Patrick Wood Crusius intentionally, knowingly, and/or recklessly caused bodily injury to Plaintiffs Jessica Garcia, Guillermo Garcia, John Doe 1, Arnulfo Rascon, and Leonardo Campos.

59. The conduct of Defendant Crusius was a proximate cause of the incident that occurred on the Premises.

DAMAGES

60. All preceding paragraphs are incorporated herein by reference.

61. As a direct and proximate result of the acts and omissions alleged above, Plaintiff Jessica Garcia and Guillermo Garcia were shot and gravely wounded, Arnulfo Rascon was injured, and John Doe 1 and Leonardo Campos were shot and killed.

62. As a direct and proximate result of the acts and omissions alleged above, Plaintiffs seek all damages allowed under law for all elements of damages recognized under existing law.

63. Plaintiff Jane Doe 1, Individually and on Behalf of the Estate of John Doe 1, Deceased, and As Next Friend of Minor Doe 1 and Minor Doe 2, further seeks damages under the Texas Wrongful Death and Survival Statutes.

64. Plaintiff Ilda Campos, Individually and on Behalf of the Estate of Leonardo Campos, Deceased, further seeks damages under the Texas Wrongful Death and Survival Statutes.

65. Because of the nature and severity of the injuries sustained, Jessica Garcia, Guillermo Garcia, and Arnulfo Rascon have suffered physical pain and mental anguish and, in reasonable probability, will continue to suffer physical pain and mental anguish in the future and for the rest of their lives.

66. Because of the nature and severity of the injuries sustained, Jessica Garcia, Guillermo Garcia, and Arnulfo Rascon have suffered physical impairment and, in reasonable probability, will continue to suffer physical impairment in the future and for the rest of their lives.

67. Because of the nature and severity of the injuries sustained, Jessica Garcia, Guillermo Garcia, and Arnulfo Rascon have suffered disfigurement and, in reasonable probability, will continue to suffer disfigurement in the future and for the rest of their lives.

68. Because of the nature and severity of the injuries sustained, Jessica Garcia, Guillermo Garcia, and Arnulfo Rascon have required medical treatment in the past and, in reasonable probability, will require other and additional treatment and life care in the future. Charges for such medical treatment and life care that have been made in the past and those which will, in reasonable probability, be made in the future and for the rest of their lives have been and will be reasonable charges made necessary by the shooting in question.

69. As a direct and proximate result of the injuries suffered by Jessica Garcia, Guillermo Garcia, and Arnulfo Rascon, they have diminished earning capacity and loss of earnings in the past and, in reasonable probability, will continue to experience a loss of earning capacity and loss of earnings in the future. To compensate for this loss, Jessica Garcia, Guillermo Garcia, and Arnulfo Rascon seek recovery of loss of past and future earnings and earning capacity.

70. As a direct and proximate result of the injuries suffered by Jessica Garcia and Guillermo Garcia, Minor Plaintiffs K.G. and G.G. have also suffered injuries and damages. Specifically,

because of the catastrophic injuries sustained by their parents, Jessica Garcia and Guillermo Garcia, Minor Plaintiffs K.G. and G.G. have suffered loss of consortium and all factors considered therein by law as a result of those injuries as proximately caused by Defendants, and have personally suffered a loss of the services that would have been performed by Jessica Garcia and Guillermo Garcia, for which they seek and are entitled to recover compensation.

71. As a direct and proximate result of witnessing the injuries suffered by Jessica Garcia and Guillermo Garcia, Minor Plaintiffs K.G. and G.G. have also suffered direct emotional injuries as a result of seeing their parents shot.

72. Plaintiff Jane Doe 1, Individually and on Behalf of the Estate of John Doe 1, Deceased, and As Next Friend of Minor Doe 1 and Minor Doe 2, respectfully requests the Court and jury to determine the amount of loss she has incurred and is entitled to recover, including the expenses of John Doe 1's funeral and medical expenses, and compensation for the suffering John Doe 1 was caused to endure from the injuries received in the shooting made the basis of this lawsuit until the time of death.

73. By reason of the occurrence made the basis of this lawsuit, the support, inheritance, and contributions that John Doe 1 made and would have made to Plaintiff Jane Doe 1, Minor Doe 1, and Minor Doe 2, his wife and children, have been forever swept away. Accordingly, Jane Doe 1, Minor Doe 1, and Minor Doe 2 seek to recover a sum of money that would fairly and reasonably compensate them for their pecuniary losses, such as the loss, care, maintenance, support, services, advice, counsel, and all other reasonable contributions having a pecuniary value. Plaintiff Jane Doe 1, Minor Doe 1, and Minor Doe 2 also seek compensation for the loss of inheritance and for all other damages resulting from the termination of their spousal and parent-child relationships, including loss of the love, comfort, companionship, and society that they would, in reasonable

probability, have received from John Doe 1 had he lived.

74. Plaintiff Jane Doe 1, Minor Doe 1, and Minor Doe 2 also seek compensation for the emotional pain, torment, mental anguish, and suffering they have suffered and, in reasonable probability, will continue to suffer in connection with the untimely death of John Doe 1, their beloved husband and father.

75. Plaintiff Ilda Campos, Individually and on Behalf of the Estate of Leonardo Campos, Deceased, respectfully requests the Court and jury to determine the amount of loss she has incurred and is entitled to recover, including the expenses of Leonardo Campos's funeral and medical expenses, and compensation for the suffering Leonardo Campos was caused to endure from the injuries received in the shooting made the basis of this lawsuit until the time of death.

76. By reason of the occurrence made the basis of this lawsuit, the support, inheritance, and contributions that Leonardo Campos made and would have made to Plaintiff Ilda Campos, his mother, have been forever swept away. Accordingly, Ilda Campos seeks to recover a sum of money that would fairly and reasonably compensate her for her pecuniary losses, such as the loss, care, maintenance, support, services, advice, counsel, and all other reasonable contributions having a pecuniary value. Plaintiff Ilda Campos also seeks compensation for the loss of inheritance and for all other damages resulting from the termination of the parent-child relationship, including loss of the love, comfort, companionship, and society that she would, in reasonable probability, have received from Leonardo Campos had he lived.

77. Plaintiff Ilda Campos also seeks compensation for the emotional pain, torment, mental anguish, and suffering she has suffered and, in reasonable probability, will continue to suffer in connection with the untimely death of Leonardo Campos, her beloved son.

78. Plaintiffs would additionally say and show that they are entitled to recovery of pre-

judgment interest in accordance with law and equity as part of their damages herein, and Plaintiffs here and now sue for recovery of pre-judgment interest as provided by law and equity, under the applicable provisions of the laws of the State of Texas.

79. Plaintiffs would further show that the conduct of Defendants constitutes gross negligence and malice as these terms are defined and understood under Texas law because Defendants' conduct showed such an entire want of care as to establish that the acts or omissions complained of resulted from actual conscious indifference to the rights, welfare, or safety of others. Accordingly, Plaintiffs seek exemplary damages from Defendants in addition to compensatory damages.

RESERVATION OF RIGHTS

80. These allegations against Defendants are made acknowledging that this lawsuit is still in its early stages, and investigation and discovery, although undertaken, are continuing.

81. As further investigation and discovery are conducted, additional facts will surely be uncovered that may and probably will necessitate further, additional, and/or different allegations, including the potential of adding parties to the case or dismissing parties from the case. The right to do so is, under Texas law, expressly reserved.

REQUEST FOR DISCLOSURE

82. Pursuant to Texas Rule of Civil Procedure 194, each Defendant herein is requested to disclose within the time period set forth in Rule 194.3 the information or material described in Rule 194.2(a) – Rule 194.2(l).

JURY DEMAND

83. Pursuant to Rule 216 of the Texas Rule of Civil Procedure, Plaintiffs respectfully request and demand a trial by jury. The appropriate jury fee has previously been tendered.

PRAYER

WHEREFORE, Plaintiffs respectfully request:

- a. That Defendants be cited to appear and answer herein;
- b. Judgment against Defendants for actual and compensatory damages (including mental anguish) within the jurisdictional limits of this Court;
- c. Judgment against Defendants for exemplary damages in a sum to be determined by the trier of fact;
- d. Pre- and post-judgment interest at the rate allowed by law until paid;
- e. Costs of court; and
- f. Such other and further relief, at law or in equity, to which Plaintiffs may by this pleading or proper amendment thereto show themselves justly entitled.

Respectfully submitted,

THE AMMONS LAW FIRM, LLP

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document has been forwarded to all counsel of record in accordance with TEX. R. CIV. P. 21a by electronic service and all unrepresented parties by U.S. mail on October 7, 2019.

/s/ Patrick A. Luff
PATRICK A. LUFF