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ATTORNEY FOR (Name): Plaintiffs MICHAEL MEDLIN; CARLOS BONILLA, et. al.

FOR COURT USE ONLY

90028

FILED

LOS ANGELES SUPERIOR COURT

MAR 21 2008

JOHN M. CLARKE, CLERK  
BY MARY GARCIA, DEPUTY

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS: 111 North Hill Street

CITY AND ZIP CODE: Los Angeles, California 90012

BRANCH NAME: CENTRAL DISTRICT

PLAINTIFF: MICHAEL MEDLIN; CARLOS BONILLA; and JOSE PEREZ

DEFENDANT: ROBERT RITCHIE aka "KID ROCK", An Individual and dba LOST HIGHWAY TOURING; TWISTED BROWN TRUCKER BAND; HOLLYWOOD ROOSEVELT HOTEL; TEDDY'S NIGHTCLUB; JULIAN JONES; JEREMIAH HAREL; PAUL DEVOUX; TED DEVOUX; DONALD DEVOUX

DOES 1 TO 50, Inclusive *see attachments*

COMPLAINT—Personal Injury, Property Damage, Wrongful Death

AMENDED (Number):

Type (check all that apply):

MOTOR VEHICLE

OTHER (specify): General Negligence

Property Damage

Wrongful Death

Personal Injury

Other Damages (specify): EXEMPLARY

Case assigned to D-54 Judge

DAMAGES:

*Ernest Hiroshige*

Jurisdiction (check all that apply):

ACTION IS A LIMITED CIVIL CASE

Amount demanded

does not exceed \$10,000

exceeds \$10,000, but does not exceed \$25,000

ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)

ACTION IS RECLASSIFIED by this amended complaint

from limited to unlimited

from unlimited to limited

CASE NUMBER

BC387789

1. Plaintiff (name or names): MICHAEL MEDLIN; CARLOS BONILLA; and JOSE PEREZ

alleges causes of action against defendant (name or names): ROBERT RITCHIE aka "KID ROCK", et. al.

2. This pleading, including attachments and exhibits, consists of the following number of pages:

3. Each plaintiff named above is a competent adult

a.  except plaintiff (name):

(1)  a corporation qualified to do business in California

(2)  an unincorporated entity (describe):

(3)  a public entity (describe):

(4)  a minor  an adult

(a)  for whom a guardian or conservator of the estate or a guardian ad litem has been appointed

(b)  other (specify):

(5)  other (specify):

b.  except plaintiff (name):

(1)  a corporation qualified to do business in California

(2)  an unincorporated entity (describe):

(3)  a public entity (describe):

(4)  a minor  an adult

(a)  for whom a guardian or conservator of the estate or a guardian ad litem has been appointed

(b)  other (specify):

(5)  other (specify):

Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

CLERK: BC387789 LEV/MPH  
RECEIPT #: CM978057083  
DATE PAID: 03/21/08 03:37:28 PM  
PAYMENT: \$320.00  
RECEIVED:  
CHECK: 320.00  
CASH:  
CHARGE:  
CARD:

SHORT TITLE: MEDLIN V. RICHIE	CASE NUMBER:
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4.  Plaintiff (name):  
is doing business under the fictitious name (specify):  
  
and has complied with the fictitious business name laws.
5. Each defendant named above is a natural person
- a.  except defendant (name): HOLLYWOOD ROOSEVELT HOTEL

(1)  a business organization, form unknown  
 (2)  a corporation  
 (3)  an unincorporated entity (describe):  
  
 (4)  a public entity (describe):  
 (5)  other (specify): AN UNKNOWN ENTITY

c.  except defendant (name): BOO YAA TRIBE

(1)  a business organization, form unknown  
 (2)  a corporation  
 (3)  an unincorporated entity (describe):  
  
 (4)  a public entity (describe):  
 (5)  other (specify): AN UNKNOWN ENTITY
- b.  except defendant (name): TEDDY'S NIGHTCLUB

(1)  a business organization, form unknown  
 (2)  a corporation  
 (3)  an unincorporated entity (describe):  
  
 (4)  a public entity (describe):  
 (5)  other (specify): AN UNKNOWN ENTITY

d.  except defendant (name): LOST HIGHWAY TOURING

(1)  a business organization, form unknown  
 (2)  a corporation  
 (3)  an unincorporated entity (describe):  
  
 (4)  a public entity (describe):  
 (5)  other (specify): AN UNKNOWN ENTITY
- Information about additional defendants who are not natural persons is contained in Attachment 5.
6. The true names of defendants sued as Does are unknown to plaintiff.
- a.  Doe defendants (specify Doe numbers): 1-25 were the agents or employees of other named defendants and acted within the scope of that agency or employment.

b.  Doe defendants (specify Doe numbers): 26-50 are persons whose capacities are unknown to plaintiff.
7.  Defendants who are joined under Code of Civil Procedure section 382 are (names):
8. This court is the proper court because
- a.  at least one defendant now resides in its jurisdictional area.  
 b.  the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.  
 c.  injury to person or damage to personal property occurred in its jurisdictional area.  
 d.  other (specify):

MEDLIN V. RICHIE
9.  Plaintiff is required to comply with a claims statute, and
- a.  has complied with applicable claims statutes, or  
 b.  is excused from complying because (specify):

SHORT-TITLE: MICHAEL MEDLIN, et al. v. ROBERT RITCHIE aka "KID ROCK"	CASE NUMBER:
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10. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):

- a.  Motor Vehicle
- b.  General Negligence
- c.  Intentional Tort
- d.  Products Liability
- e.  Premises Liability
- f.  Other (specify): EXEMPLARY DAMAGES

11. Plaintiff has suffered

- a.  wage loss
- b.  loss of use of property
- c.  hospital and medical expenses
- d.  general damage
- e.  property damage
- f.  loss of earning capacity
- g.  other damage (specify):

12.  The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a.  listed in Attachment 12.
- b.  as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1)  compensatory damages
  - (2)  punitive damages
- The amount of damages is (in cases for personal injury or wrongful death, you must check (1)):
- (1)  according to proof
  - (2)  in the amount of: \$ 15,000,000

15.  The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers):

Date: 3/20/2008

HOWARD R. LEVINE  
(TYPE OR PRINT NAME)

  
(SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE:

MICHAEL MEDLIN, et al. v. ROBERT RITCHIE aka "KID ROCK"

CASE NUMBER:

FIRST CAUSE OF ACTION—General Negligence  
(number)

Page 4

ATTACHMENT TO  Complaint  Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): MICHAEL MEDLIN; CARLOS BONILLA; and JOSE PEREZ

alleges that defendant (name): ROBERT RITCHIE aka "KID ROCK", An Individual and aka LOST HIGHWAY TOURING; TWISTED BROWN TRUCKER BAND; HOLLYWOOD ROOSEVELT HOTEL; TEDDY'S NIGHTCLUB; JULIAN JONES; JEREMIAH HAREL; PAUL DEVOUX; TED DEVOUX; DONALD DEVOUX; ROSCOE DEVOUX; DAVID DEVOUX; DANNY DEVOUX, Individuals and aka BOO YAA TRIBE, and

 Does 1 to 50, inclusive

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): March 22, 2008

at (place): located at 7000 HOLLYWOOD BLVD. LOS ANGELES, CALIFORNIA 90028

(description of reasons for liability):

Plaintiffs stood outside of Teddy's Night Club at the Hollywood Roosevelt Hotel, waiting to see "Kid Rock" as he left the club on the night or early morning of March 22, 2006. Plaintiffs who collect celebrity autographs also wanted to ask for Defendants autograph and picture. They stood outside the club holding autograph books as well as a pocket camera.

Robert Ritchie aka "Kid Rock"; Julian Jones; Jeremiah Harel; Paul Devoux; Ted Devoux; Donald Decoux; Roscoe Decoux; David Devoux; Danny Devoux; aka Boo Yaa Tribe; and others whose names are unknown at the present time assaulted and battered plaintiffs, who were waiting to see "Kid Rock" outside Teddy's Night Club in the Hollywood Roosevelt Hotel on the night and or early morning of March 22, 2006.

"Kid Rock" and members of the Boo Yaa tribe assaulted and battered all three plaintiffs. Julian Jones and Jeremiah Harel joined in and beat and kicked plaintiff Michael Medlin.

**PLAINTIFF MICHAEL MEDLIN WAS LEFT ON THE GROUND SERIOUSLY INJURED AS "KID ROCK" AND HIS ENTOURAGE DROVE OFF.**

At said time and place, Defendants, and each of them, so negligently and carelessly owned, maintained, controlled, managed, supervised and operated their premises so as to allow plaintiffs to be attacked and severely beaten on the premises of the Hollywood Roosevelt Hotel. Defendants, each of them, allowed this dangerous and hazardous condition and circumstances to occur because they did not supervise, patrol, or monitor the area outside Teddy's Night Club at the Hollywood Roosevelt Hotel. Plaintiff's each of them were assaulted and battered at the hands of defendants. In addition, they had their personal property stolen from them and placed in the back of defendant's limosine. In doing so all defendants failed to act in a reasonable manner and violated the plaintiffs civil rights in violation of Civil Code Section 43.

In addition Robert Ritchie aka "Kid Rock"; Julian Jones; Jeremiah Harel; Paul Devoux; Ted Devoux; Donald Devoux; Roscoe Devoux; David Devoux; Danny Devoux; aka Boo Yaa tribe; and others whose names are unknown at the present time; stole plaintiffs cameras, bags, and other personal items in their hands. Defendants took Plaintiff's property and threw the items in the back of "Kid Rocks" limosine and drove off.

SHORT TITLE: MICHAEL MEDLIN, et al. v. ROBERT RITCHIE aka "KID ROCK"	CASE NUMBER:
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SECOND CAUSE OF ACTION—Premises Liability  
(number)

ATTACHMENT TO  Complaint  Cross-Complaint  
(Use a separate cause of action form for each cause of action.)

Prem.L-1. Plaintiff (name): MICHAEL MEDLIN; CARLOS BONILLA; and JOSE PEREZ alleges the acts of defendants were the legal (proximate) cause of damages to plaintiff.  
On (date): MARCH 22, 2006 plaintiff was injured on the following premises in the following

*fashion (description of premises and circumstances of injury):*  
ROBERT RITCHIE aka "KID ROCK"; JULIAN JONES; JEREMIAH HAREL; PAUL DEVOUX; TED DEVOUX; DONALD DEVOUX; ROSCOE DEVOUX; DAVID DEVOUX; DANNY DEVOUX; aka BOO YAA TRIBE; and OTHERS WHO ARE NOT KNOWN TO US AT THIS TIME, ASSAULTED AND BATTERED PLAINTIFFS WHO WERE WAITING TO SEE "KID ROCK" AND GET HIS AUTOGRAPH, AT THE HOLLYWOOD ROOSEVELT HOTEL, OUTSIDE OF TEDDY'S NIGHTCLUB; LOCATED AT 7000 HOLLYWOOD BLVD, LOS ANGELES, CA 90028  
IN ADDITION, DEFENDANTS TOOK PLAINTIFFS PERSONAL ITEMS AND THREW THE ITEMS INTO THE BACK OF "KID ROCK'S" LIMOUSINE.  
PLAINTIFFS WERE LEFT SEVERELY BEATEN ON THE GROUND AT SAID LOCATION ON NIGHT AND OR EARLY MORNING OF MARCH 22, 2006.

Prem.L-2.  Count One—Negligence The defendants who negligently owned, maintained, managed and operated the described premises were (names): HOLLYWOOD ROOSEVELT HOTEL, an Unknown Entity; and TEDDY'S NIGHT CLUB, an Unknown Entity.

Does 1 to 50

Prem.L-3.  Count Two—Willful Failure to Warn [Civil Code section 846] The defendant owners who willfully or maliciously failed to guard or warn against a dangerous condition, use, structure, or activity were (names): HOLLYWOOD ROOSEVELT HOTEL, an Unknown Entity; and TEDDY'S NIGHT CLUB, an Unknown Entity

Does 1 to 50

Plaintiff, a recreational user, was  an invited guest  a paying guest.

Prem.L-4.  Count Three—Dangerous Condition of Public Property The defendants who owned public property on which a dangerous condition existed were (names):

Does 1 to \_\_\_\_\_

a.  The defendant public entity had  actual  constructive notice of the existence of the dangerous condition in sufficient time prior to the injury to have corrected it.

b.  The condition was created by employees of the defendant public entity.

Prem.L-5. a.  Allegations about Other Defendants The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names):

3/22/06

Does 1 to 50

b.  The defendants who are liable to plaintiffs for other reasons and the reasons for their liability are  described in attachment Prem.L-5.b  as follows (names):

SHORT TITLE: **MICHAEL MEDLIN, et al. v. ROBERT RITCHIE aka "KID ROCK"**

CASE NUMBER

**THIRD** CAUSE OF ACTION—Intentional Tort  
(number)Page 6ATTACHMENT TO  Complaint  Cross-Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): **MICHAEL MEDLIN; CARLOS BONILLA; and JOSE PEREZ**alleges that defendant (name): **ROBERT RITCHIE aka "KID ROCK", An Individual and dba LOST HIGHWAY TOURING; TWISTED BROWN TRUCKER BAND; HOLLYWOOD ROOSEVELT HOTEL; TEDDY'S NIGHTCLUB; JULIAN JONES; JEREMIAH HAREL; PAUL DEVOUX; TED DEVOUX; DONALD DEVOUX; ROSCOE DEVOUX; DAVID DEVOUX; DANNY DEVOUX, Individuals and dba BOO YAA TRIBE; and** Does 1 to 50

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff

on (date): **Wednesday March 22, 2006**at (place): **7000 Hollywood Blvd. Los Angeles, CA 90028**

(description of reasons for liability):

Plaintiff's each of them were assaulted and battered by the defendants, as alleged in the First Cause of Action. In addition, they had their personal property stolen from them and placed in the back of defendant's limousine. Plaintiffs were left on the floor seriously injured as "Kid Rock" and his entourage drove off.

"Kid Rock" and members of the Boo Yaa Tribe assaulted and battered all three Plaintiffs in this action.

Julian Jones and Jeremiah Harel, joined in and beat and kick Plaintiff Michael Medlin, severely.

In addition, Robert Ritchie aka "KID ROCK"; Julian Jones; Jeremiah Harel; Paul Devoux; Ted Devoux; Donald Devoux; Roscoe Devoux; David Devoux; Danny Devoux; aka Boo Yaa Tribe; and others whose names are unknown at the present time, stole Plaintiffs cameras, bags, and other small items in their hands. Defendants took the property of Plaintiffs and threw these items in the back of "Kid Rock's" Limousine and drove off.

Plaintiffs were severely injured by Defendants when they came over to Plaintiffs and started assaulting and battering them, they did so intentionally, Plaintiff's experienced the immediate apprehension of a harmful touching. The experience of immediate apprehension and harmful touching continued as other members of the Defendants entourage came to them and repeatedly assaulted and battered them by hitting, and kicking them to the ground. This extreme and outrageous conduct caused the plaintiffs severe mental distress. Defendant's behavior was beyond the bounds of decency and was atrocious and utterly intolerable in a civilized society. This behavior was so despicable as to justify punitive damages to make an example of Defendants so that others will not repeat their actions.

As a direct and legal cause of this apprehension of the Touching and the harmful touching, plaintiffs were substantially injured.

1 INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

2 Plaintiffs refers to and incorporates the facts in the other Causes of Action in this Complaint as if fully  
3 set forth herein.

4 Plaintiffs are informed and believe and therupon allege that Defendants' Intentionally Assaulted and  
5 Battered Plaintiffs who were waiting to see "Kid Rock" outside Teddy's Night Club in the Hollywood  
6 Roosevelt Hotel on the morning of March 22, 2006. Plaintiffs were severely injured and left on the  
7 ground as the Defendant's drove off, taking with them Plaintiff's personal property. Defendants  
8 intentionally hit, kicked, battered, and assaulted Plaintiffs deliberately, willfully, wantonly and with a  
9 conscious disregard for the Plaintiffs wellbeing, and intended to embarrass, humiliate, cause mental  
10 anguish, and all of this done with the knowledge that Plaintiffs would undoubtedly experience an  
11 increased level of emotional distress.

12 As a result of Defendant's acts, Plaintiffs did, and do to this day, suffer extreme emotional distress,  
13 humiliation, and mental anguish, in an amount to be determined at trial.

14 As Defendant's intentional actions were outrageous, extreme and motivated to cause them injury, such  
15 conduct was oppressive, malicious and despicable, in conscious disregard for Plaintiff's rights; and was  
16 intended to harm and humiliate them, plaintiffs are entitled to punitive damages in an amount to be  
17 proven at the time of trial.

24  
25  
26  
27  
ECONOMY

(Required for verified pleading) The items on this page stated on information and belief (specify item numbers, not line numbers):

This page may be used with any Judicial Council form or any other paper filed with this court.

SHORT TITLE: MICHAEL MEDLIN, et al. v. ROBERT RITCHIE aka "KID ROCK"

CASE NUMBER

## Exemplary Damages Attachment

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ATTACHMENT TO  Complaint  Cross-Complaint

EX-1. As additional damages against defendant (name): ROBERT RITCHIE aka "KID ROCK", As Individual and dba LOST HIGHWAY TOURING; TWISTED BROWN TRUCKER BAND; HOLLYWOOD ROOSEVELT HOTEL; TEDDY'S NIGHTCLUB; JULIAN JONES; JEREMIAH HAREL; PAUL DEVOUX; TED DEVOUX; DONALD DEVOUX; ROSCOE DEVOUX; DAVID DEVOUX;

Plaintiff alleges defendant was guilty of

- malice  
 fraud  
 oppression

as defined in Civil Code section 3294, and plaintiff should recover, in addition to actual damages, damages to make an example of and to punish defendant.

EX-2. The facts supporting plaintiff's claim are as follows:

Plaintiffs stood outside of Teddy's Night Club at the Hollywood Roosevelt Hotel, waiting to see "Kid Rock" as he left the club on the night or early morning of March 22, 2006. Plaintiffs who collect celebrity autographs also wanted to ask for Defendants autograph and picture. They stood outside the club holding autograph books as well as a pocket camera.

Robert Ritchie aka "Kid Rock"; Julian Jones; Jeremiah Harel; Paul Devoux; Ted Devoux; Donald Decoux; Roscoe Decoux; David Devoux; Danny Devoux; aka Boo Yaa Tribe; and others whose names are unknown at the present time assaulted and battered plaintiffs, who were waiting to see "Kid Rock" outside Teddy's Night Club in the Hollywood Roosevelt Hotel on the night and or early morning of March 22, 2006.

"Kid Rock" and members of the Boo Yaa tribe assaulted and battered all three plaintiffs. Julian Jones and Jeremiah Harel joined in and beat and kicked plaintiff Michael Medlin. Plaintiff Michael Medlin was left on the ground seriously injured and "Kid Rock" and his entourage drove off.

Plaintiffs were severely injured by Defendants when they came over to Plaintiffs and started assaulting and battering them, they did so intentionally, Plaintiff's experienced the immediate apprehension of a harmful touching. The experience of immediate apprehension and harmful touching continued as other members of the Defendants entourage came to them and repeatedly assaulted and battered them by hitting, and kicking them to the ground. This extreme and outrageous conduct caused the plaintiffs severe mental distress. Defendant's behavior was beyond the bounds of decency and was atrocious and utterly intolerable in a civilized society.

This behavior was so despicable as to justify punitive damages to make an example of Defendants so that others will not repeat their actions.

As Defendant's intentional actions were outrageous, extreme and motivated to cause them injury, such conduct was oppressive, malicious and despicable, in conscious disregard for Plaintiff's rights; and was intended to harm and humiliate them, plaintiffs are entitled to punitive damages in an amount to be proven at the time of trial.

EX-3. The amount of exemplary damages sought is

- a.  not shown, pursuant to Code of Civil Procedure section 425.10.  
b.  \$

PETITIONER/PLAINTIFF: MICHAEL MEDLIN; CARLOS BONILLA; and RESPONDENT/DEFENDANT: ROBERT RITCHIE aka "KID ROCK"	CASE NUMBER:
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COMPLAINT PAGE ATTACHMENT 5

THE TWISTED BROWN TRUCKER BAND, An Unknown Entity

TMZ

10/24/15

PETITIONER/PLAINTIFF: MICHAEL MEDLIN; CARLOS BONILLA; and RESPONDENT/DEFENDANT: ROBERT RITCHIE AKA "KID ROCK"	CASE NUMBER
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COMPLAINT PAGE ATTACHMENT

[REDACTED]

Roscoe Devoux; David Devoux; Danny Devoux,  
Individuals and aba BOO YAA Tribe; and  
Does 1 to 50, Inclusive

CFR

TMZ

3/1/08