

been caused to undergo and will undergo in the future extensive physical and mental pain and suffering.

117. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Gerald Ford was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his ears, head, neck, and knees, hearing loss, post-traumatic stress, and depression. Because of his injuries, plaintiff Gerald Ford has been caused to undergo and will undergo in the future extensive medical treatment, including surgery, and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Gerald Ford has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo and will undergo in the future extensive physical and mental pain and suffering.

118. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Richard L. George was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his ears, perforated ear drums, hearing loss, burns on his face and arms, and post-traumatic stress. Because of his injuries, plaintiff Richard L. George has been caused to undergo and will undergo in the future extensive medical treatment, including surgery, and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Richard L. George has been and will continue to be prevented

from engaging in his normal activities. He has been caused to undergo and will undergo in the future extensive physical and mental pain and suffering.

119. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Alfred Jackson was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his head, eye, ear, legs and knee, extensive burns to his face, neck, arm and hand, hearing loss, and post-traumatic stress. Because of his injuries, plaintiff Alfred Jackson has been caused to undergo and will undergo in the future extensive medical treatment, including surgery, and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Alfred Jackson has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo and will undergo in the future extensive physical and mental pain and suffering.

120. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff David Jackson was caused to sustain severe and permanent injuries to mind and body, including but not limited to, a broken arm, burns to his body, and post-traumatic stress. Because of his injuries, plaintiff David Jackson has been caused to undergo and will undergo in the future extensive medical treatment, including surgery, and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff David Jackson has been and will continue to be prevented from engaging in his normal activities. He has been

caused to undergo and will undergo in the future extensive physical and mental pain and suffering.

121. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Larry Jefferson was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his neck, leg and knee, and post-traumatic stress. Because of his injuries, plaintiff Larry Jefferson has been caused to undergo and will undergo in the future extensive medical treatment, including surgery, and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Larry Jefferson has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo and will undergo in the future extensive physical and mental pain and suffering.

122. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Dalton E. Porteous was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his ears, eardrums, arm, abdomen and leg, and post-traumatic stress. Because of his injuries, plaintiff Dalton E. Porteous has been caused to undergo and will undergo in the future extensive medical treatment, including surgery, and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Dalton E. Porteous has been and will continue to be prevented from engaging in his normal

activities. He has been caused to undergo and will undergo in the future extensive physical and mental pain and suffering.

123. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Anthony Sailor was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his head and teeth, and post-traumatic stress. Because of his injuries, plaintiff Anthony Sailor has been caused to undergo and will undergo in the future extensive medical treatment, and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Anthony Sailor has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo and will undergo in the future extensive physical and mental pain and suffering.

124. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Robert Lee Sims was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his ears, ear drums and leg, and post-traumatic stress. Because of his injuries, plaintiff Robert Lee Sims has been caused to undergo and will undergo in the future extensive medical treatment, and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Robert Lee Sims has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo and will undergo in the future extensive physical and mental pain and suffering.

125. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Henry Carl Smith was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his head, ear, ear drum, arm and leg, hearing loss, burns on his arms and legs, and post-traumatic stress. Because of his injuries, plaintiff Henry Carl Smith has been caused to undergo and will undergo in the future extensive medical treatment, including surgery, and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Henry Carl Smith has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo and will undergo in the future extensive physical and mental pain and suffering.

126. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Melvin Spencer was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his ear, ear drum, face, eyes, elbow, back and knees, and post-traumatic stress. Because of his injuries, plaintiff Melvin Spencer has been caused to undergo and will undergo in the future extensive medical treatment, including surgery, and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Melvin Spencer has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo and will undergo in the future extensive physical and mental pain and suffering.

127. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Romana Wells was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to her ear and eardrum, hearing loss, and post-traumatic stress. Because of her injuries, plaintiff Romana Wells has been caused to undergo and will undergo in the future extensive medical treatment, including surgery, and has been caused to incur and will incur in the future medical and related expenses. She has suffered a loss of earnings and an impairment of her earning capacity. Plaintiff Romana Wells has been and will continue to be prevented from engaging in her normal activities. She has been caused to undergo and will undergo in the future extensive physical and mental pain and suffering.

128. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Tyrell White was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his ears, eardrums, face and back, hearing loss, and post-traumatic stress. Because of his injuries, plaintiff Tyrell White has been caused to undergo and will undergo in the future extensive medical treatment, including surgery, and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Tyrell White has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo and will undergo in the future extensive physical and mental pain and suffering.

129. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Anthony Bernard Ballard was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his ears, chest and leg, tinnitus and post-traumatic stress. Because of his injuries, plaintiff Anthony Bernard Ballard has been caused to undergo and will undergo in the future extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Anthony Bernard Ballard has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

130. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Donna Marie DaGraca was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to her ears and ankle, hearing loss and post-traumatic stress. Because of her injuries, plaintiff Donna Marie DaGraca has been caused to undergo and will undergo in the future extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. She has suffered a loss of earnings and an impairment of her earning capacity. Plaintiff Donna Marie DaGraca has been and will continue to be prevented from engaging in her normal activities. She has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

131. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Christopher A. Gordon-Somers was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his ears, ear drum, neck and wrist, and post-traumatic stress. Because of his injuries, plaintiff Christopher A. Gordon-Somers has been caused to undergo and will undergo in the future extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Christopher A. Gordon-Somers has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

132. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Wade McArthur Harris, Jr. was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his ears, ear drums, leg and thigh, hearing loss, burns on his face and post-traumatic stress. Because of his injuries, plaintiff Wade McArthur Harris, Jr. has been caused to undergo and will undergo in the future extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Wade McArthur Harris, Jr. has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.



133. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Ralph Hunter was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Ralph Hunter has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Ralph Hunter has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

134. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Alex L. Jackson was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his ears, ear drum and foot, impaired hearing, and post-traumatic stress. Because of his injuries, plaintiff Alex L. Jackson has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Alex L. Jackson has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

135. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Earl Thomas Marshall, Sr. was caused to sustain severe and permanent

injuries to mind and body, including but not limited to, injuries to his ears, ear drums, back and hands, hearing loss, tinnitus, burns on his head and face, and post-traumatic stress. Because of his injuries, plaintiff Earl Thomas Marshall, Sr. has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Earl Thomas Marshall, Sr. has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

136. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Frank Wesley McGee, Jr. was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his ears and ear drum, hearing loss and post-traumatic stress. Because of his injuries, plaintiff Frank Wesley McGee, Jr. has been caused to undergo and will undergo in the future extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Frank Wesley McGee, Jr. has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

137. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Clarence Rambo was caused to sustain severe and permanent injuries to

mind and body, including post-traumatic stress. Because of his injuries, plaintiff Clarence Rambo has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Clarence Rambo has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

138. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Forrest Ward was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Forrest Ward has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Forrest Ward has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

139. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Thomas Leon Woodland was caused to sustain severe and permanent injuries to mind and body, including but not limited to, injuries to his ears and ear drums, and post-traumatic stress. Because of his injuries, plaintiff Thomas Leon Woodland has been caused to undergo and will undergo in the future extensive

medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Thomas Leon Woodland has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

140. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Jeffrey Wynes was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Jeffrey Wynes has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Jeffrey Wynes has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

141. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Carlos Marquez was caused to sustain severe and permanent injuries to mind and body, including, but not limited to, ruptured eardrums, tinnitus and post-traumatic stress. Because of his injuries, plaintiff Carlos Marquez has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning

capacity. Plaintiff Carlos Marquez has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

142. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Andre W. Woodson was caused to sustain severe and permanent injuries to mind and body, including, but not limited to, ruptured eardrums, hearing loss and post-traumatic stress. Because of his injuries, plaintiff Andre W. Woodson has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Andre W. Woodson has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

143. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Ruthlyn Resha Baxter was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of her injuries, plaintiff Ruthlyn Resha Baxter has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. She has suffered a loss of earnings and an impairment of her earning capacity. Plaintiff Ruthlyn Resha Baxter has been and will continue to be prevented from engaging in her

normal activities. She has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

144. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Brandon Borders was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Brandon Borders has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Brandon Borders has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

145. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Rickey Eugene Borders was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Rickey Eugene Borders has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Rickey Eugene Borders has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

146. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Lee Robert Brown, III was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Lee Robert Brown, III has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Lee Robert Brown, III has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

147. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Shawn Butler was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Shawn Butler has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Shawn Butler has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

148. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Darryl Allen Byers was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries,

plaintiff Darryl Allen Byers has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Darryl Allen Byers has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

149. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Jordan Edwards was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Jordan Edwards has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Jordan Edwards has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

150. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff James Earl Frazier was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff James Earl Frazier has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings



and an impairment of his earning capacity. Plaintiff James Earl Frazier has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

151. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Michaela Haugabook was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of her injuries, plaintiff Michaela Haugabook has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. She has suffered a loss of earnings and an impairment of her earning capacity. Plaintiff Michaela Haugabook has been and will continue to be prevented from engaging in her normal activities. She has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

152. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Timothy Glen Henderson was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Timothy Glen Henderson has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Timothy Glen Henderson has been and will continue to be prevented from engaging in his

normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

153. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Charlie Chris Hill was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Charlie Chris Hill has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Charlie Chris Hill has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

154. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Roosevelt Johnson was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Roosevelt Johnson has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Roosevelt Johnson has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

155. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Robert Eugene Jones was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Robert Eugene Jones has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Robert Eugene Jones has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

156. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Ronald Jones was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Ronald Jones has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Ronald Jones has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

157. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Gary Lungrin was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff

Gary Lungrin has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Gary Lungrin has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

158. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Charles J. Maxwell was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Charles J. Maxwell has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Charles J. Maxwell has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

159. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff James Winfield May was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff James Winfield May has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss

of earnings and an impairment of his earning capacity. Plaintiff James Winfield May has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

160. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Paul Andrew McCathron was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Paul Andrew McCathron has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Paul Andrew McCathron has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

161. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Andre McGhee was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Andre McGhee has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Andre McGhee has been and will continue to be prevented from engaging in his normal activities. He has been

caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

162. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Delionel B. Meadows was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Delionel B. Meadows has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Delionel B. Meadows has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

163. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Manuel Anthony Medina was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Manuel Anthony Medina has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Manuel Anthony Medina has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

164. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Bryan Mills was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Bryan Mills has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Bryan Mills has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

165. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Lynn Arnett Morgan was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Lynn Arnett Morgan has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Lynn Arnett Morgan has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

166. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Wayne P. Neeley was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries,

plaintiff Wayne P. Neeley has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Wayne P. Neeley has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

167. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Miguel H. Spruill was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Miguel H. Spruill has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Miguel H. Spruill has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

168. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Ronald Tate was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Ronald Tate has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an



impairment of his earning capacity. Plaintiff Ronald Tate has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

169. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Alvin Levert Wallace was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Alvin Levert Wallace has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Alvin Levert Wallace has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

170. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Robert Weldon was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Robert Weldon has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Robert Weldon has been and will continue to be prevented from engaging in his normal activities. He has been

caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

171. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Lloyd Elliot Wells was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Lloyd Elliot Wells has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Lloyd Elliot Wells has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

172. As a direct and proximate result of the "La Belle" bomb explosion, plaintiff Earnest Eugene Wilson was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Earnest Eugene Wilson has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Earnest Eugene Wilson has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

173. As a direct and proximate result of the "La Belle" bomb explosion, Plaintiff Marshaun A. R. Winston was caused to sustain severe and permanent injuries to mind and body, including post-traumatic stress. Because of his injuries, plaintiff Marshaun A. R. Winston has been caused to undergo, and will undergo in the future, extensive medical treatment and has been caused to incur and will incur in the future medical and related expenses. He has suffered a loss of earnings and an impairment of his earning capacity. Plaintiff Marshaun A. R. Winston has been and will continue to be prevented from engaging in his normal activities. He has been caused to undergo, and will undergo in the future, extensive physical and mental pain and suffering.

**COUNT I**

**WRONGFUL DEATH**

**(D.C. Code §16-2701, et seq.)**

174. Paragraphs 1 through 173 are incorporated herein as if fully set forth.

175. As a direct and proximate result of the willful, wrongful, intentional and reckless acts of defendants constituting the "La Belle" terrorist bomb attack, Kenneth Terence Ford and James E. Goins were killed.

176. As a direct and proximate result of defendants' acts, as set forth above, Robert Lee Beecham, Alice Faye Ford, Revell Scott, and the Estate of Robin L. Beecham, who are the beneficiaries of Kenneth Terence Ford under the Wrongful Death Act of the District of Columbia, and Patrocinia Goins and Carlos Goins, who are the beneficiaries of James E. Goins under the Wrongful Death

Act of the District of Columbia, have suffered the loss of future financial support by their respective decedents, as well as services, gifts and other contributions they might reasonably have expected to receive during their respective decedents' lifetimes, and the estates of the decedents have thereby been diminished. Carlos Goins has also suffered the loss of care, education, training, guidance and parental advice that James E. Goins would have been expected to give to him. The beneficiaries are also entitled to expenses for the care, treatment and hospitalization of their respective decedents incident to the injury resulting in their deaths, and reasonable funeral expenses.

177. As a direct and proximate result of defendants' acts, as set forth above, the aforesaid beneficiaries are entitled to the full range of damages as set forth in the Wrongful Death Act of the District of Columbia, D.C. Code §16-2701, et seq.

**COUNT II**

**SURVIVAL**

**(D.C. Code § 12-101)**

178. Paragraphs 1 through 177 are incorporated herein as if fully set forth.

179. As a direct and proximate result of defendants' acts, Kenneth Terence Ford and James E. Goins suffered severe and permanent injuries to mind and body and experienced severe physical and mental pain and suffering before their injuries resulted in their deaths; and their estates have sustained losses of reasonably expected income of the decedents and other economic

losses and losses of accretions, as well as losses of services, protection, care and assistance provided by the respective decedents. Their estates are also entitled to compensation for the expenses incurred for the care, treatment and hospitalization their respective decedents received incident to the injuries they sustained resulting in their deaths.

180. Had Kenneth Terence Ford and James E. Goins survived, each would have had a cause of action against defendants for the injuries he suffered during his lifetime. Their respective estates are entitled to recover the full range of damages for their survival action claims, as provided for in the Survival Act of the District of Columbia, D.C. Code §12-101.

### **COUNT III**

#### **WRONGFUL DEATH**

(State common and statutory law)

181. Paragraphs 1 through 180 are incorporated herein as if fully set forth.

182. As a direct and proximate result of the willful, wrongful, intentional and reckless acts of defendants constituting the "La Belle" terrorist bomb attack, Kenneth Terence Ford and James E. Goins were killed.

183. As a direct and proximate result of defendants' acts, as set forth above, Robert Lee Beecham, Alice Faye Ford, Revell Scott, and the Estate of Robin L. Beecham, the survivors and next of kin of Kenneth Terence Ford, and Patrocinia Goins and Carlos Goins, the survivors and next of kin of James E. Goins, have suffered compensable damages and losses for which the

representatives of their estates make claim, including: sorrow, mental anguish, bereavement, grief and solace including loss of society, companionship, comfort, guidance, kindly offices and advice of the decedent; compensation for reasonably expected loss of income of the decedent, financial support, economic losses, loss of accretions to decedent's estate, and services, protection, care and assistance provided by the decedent; expenses for the care, treatment and hospitalization of the decedent incident to the injury resulting in his death; and reasonable funeral expenses.

184. As a direct and proximate result of defendants' acts, Kenneth Terence Ford and James E. Goins suffered severe and permanent injuries to mind and body and experienced severe physical and mental pain and suffering before their injuries resulted in their deaths; and their estates have sustained loss of reasonably expected income of the decedent and other economic losses and losses of accretions, as well as loss of services, protection, care and assistance provided by the respective decedents. Their estates are also entitled to compensation for the expenses incurred for the care, treatment and hospitalization their respective decedents received incident to the injuries they sustained resulting in their deaths.

185. Had Kenneth Terence Ford and James E. Goins survived, each would have had a cause of action against defendants for the injuries he suffered during his lifetime. Their respective estates are entitled to recover the full range of money damages, including economic damages and damages for pain and suffering.

186. Each plaintiff listed in this count asserts that he or she is entitled to judgment on this count pursuant to the applicable common and statutory laws of the District of Columbia, Michigan, North Carolina, and/or the state where each plaintiff and/or decedent was domiciled at the time of the incident at issue in this case.

**COUNT IV**

**WRONGFUL DEATH, LOSS OF CONSORTIUM, SOLATIUM**

(State common and statutory law)

187. Paragraphs 1 through 186 are incorporated herein as if fully set forth.

188. Plaintiffs Robert Lee Beecham, Alice Fay Ford, Revell Scott, and the Estate of Robin L. Beecham, the surviving next of kin of decedent Kenneth Terence Ford, and plaintiffs Patrocina Goins and Carlos Goins, the surviving next of kin of decedent James E. Goins, have suffered sorrow, mental anguish, bereavement, grief, and solace including loss of society, companionship, comfort, guidance, kindly offices and advice of their decedents. Plaintiffs Robert Lee Beecham, Alice Faye Ford, Revell Scott, the Estate of Robin L. Beecham, Patrocina Goins and Carlos Goins are entitled to the full range of loss of consortium and solatium damages resulting from the wrongful deaths of their respective decedents.

189. As a direct and proximate result of defendants' acts, Kenneth Terence Ford and James E. Goins suffered severe and permanent injuries to mind and body and experienced severe physical and mental pain and suffering

before their injuries resulted in their deaths; and their estates have sustained loss of reasonably expected income of the decedent and other economic losses and losses of accretions, as well as loss of services, protection, care and assistance provided by the respective decedents. Their estates are also entitled to compensation for the expenses incurred for the care, treatment and hospitalization their respective decedents received incident to the injuries they sustained resulting in their deaths.

190. Had Kenneth Terence Ford and James E. Goins survived, each would have had a cause of action against defendants for the injuries he suffered during his lifetime. Their respective estates are entitled to recover the full range of money damages, including economic damages and damages for pain and suffering.

191. Each plaintiff listed in this count asserts that he or she is entitled to judgment on this count pursuant to the applicable common and statutory laws of the District of Columbia, Michigan, North Carolina, and/or the state where each plaintiff and/or decedent was domiciled at the time of the incident at issue in this case.

**COUNT V**

**WRONGFUL DEATH, LOSS OF CONSORTIUM, SOLATIUM  
AND INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

(State common and statutory law)

192. Paragraphs 1 through 191 are incorporated herein as if fully set forth.



193. Defendants' actions of exploding a bomb in the "La Belle" discotheque were extreme and outrageous conduct which intentionally and recklessly caused each of the persons listed in the next paragraph to suffer severe emotional distress.

194. Plaintiffs Robert Lee Beecham, Alice Fay Ford, Revell Scott, and the Estate of Robin L. Beecham, the surviving next of kin of decedent Kenneth Terence Ford, and plaintiffs Patrocinia Goins and Carlos Goins, the surviving next of kin of decedent James E. Goins, have suffered severe emotional distress, sorrow, mental anguish, bereavement, grief, and solace including loss of society, companionship, comfort, guidance, kindly offices and advice of their respective decedents. Plaintiffs Robert Lee Beecham, Alice Faye Ford, Revell Scott, the Estate of Robin L. Beecham, Patrocinia Goins, and Carlos Goins are entitled to the full range of loss of consortium, solatium and emotional distress damages resulting from the wrongful deaths of their respective decedents.

195. As a direct and proximate result of defendants' acts, Kenneth Terence Ford and James E. Goins suffered severe and permanent injuries to mind and body and experienced severe physical and mental pain and suffering before their injuries resulted in their deaths; and their estates have sustained loss of reasonably expected income of the decedent and other economic losses and losses of accretions, as well as loss of services, protection, care and assistance provided by the respective decedents. Their estates are also entitled to compensation for the expenses incurred for the care, treatment and

hospitalization their respective decedents received incident to the injuries they sustained resulting in their deaths.

196. Had Kenneth Terence Ford and James E. Goins survived, each would have had a cause of action against defendants for the injuries he suffered during his lifetime. Their respective estates are entitled to recover the full range of money damages, including economic damages and damages for pain and suffering.

197. Each plaintiff listed in this count asserts that he or she is entitled to judgment on this count pursuant to the applicable common and statutory laws of the District of Columbia, Michigan, North Carolina, and/or the state where each plaintiff and/or decedent was domiciled at the time of the incident at issue in this case.

**COUNT VI**

**SURVIVAL**

(State common and statutory law)

198. Paragraphs 1 through 197 are incorporated herein as if fully set forth.

199. As a direct and proximate result of defendants' acts, Kenneth Terence Ford and James E. Goins suffered severe and permanent injuries to mind and body and experienced severe physical and mental pain and suffering before their injuries resulted in their deaths; and their estates have sustained loss of reasonably expected income of the decedent and other economic losses and losses of accretions, as well as loss of services, protection, care and assistance

provided by the respective decedents. Their estates are also entitled to compensation for the expenses incurred for the care, treatment and hospitalization their respective decedents received incident to the injuries they sustained resulting in their deaths.

200. Had Kenneth Terence Ford and James E. Goins survived, each would have had a cause of action against defendants for the injuries he suffered during his lifetime. Their respective estates are entitled to recover the full range of money damages, including economic damages and damages for pain and suffering, for their survival action claims.

201. Each plaintiff listed in this count asserts that he or she is entitled to judgment on this count pursuant to the applicable common and statutory laws of the District of Columbia, Michigan, North Carolina, and/or the state where each plaintiff and/or decedent was domiciled at the time of the incident at issue in this case.

**COUNT VII**

**WRONGFUL DEATH**

(State common and statutory law)

202. Paragraphs 1 through 201 are incorporated herein as if fully set forth.

203. As a direct and proximate result of the willful, wrongful, intentional and reckless acts of defendants constituting the "La Belle" terrorist bomb attack, Kenneth Terence Ford and James E. Goins were killed.

204. As a direct and proximate result of defendants' acts, as set forth above, Robert Lee Beecham, Alice Faye Ford, Revell Scott, and the Estate of Robin L. Beecham, the survivors and next of kin of Kenneth Terence Ford, and Patrocinia Goins and Carlos Goins, the survivors and next of kin of James E. Goins, have suffered compensable damages and losses for which the representatives of their estates make claim, including: sorrow, mental anguish, bereavement, grief and solace including loss of society, companionship, comfort, guidance, kindly offices and advice of the decedent; compensation for reasonably expected loss of income of the decedent, financial support, economic losses, loss of accretions to decedent's estate, and services, protection, care and assistance provided by the decedent; expenses for the care, treatment and hospitalization of the decedent incident to the injury resulting in his death; and reasonable funeral expenses.

205. As a direct and proximate result of defendants' acts, Kenneth Terence Ford and James E. Goins suffered severe and permanent injuries to mind and body and experienced severe physical and mental pain and suffering before their injuries resulted in their deaths; and their estates have sustained loss of reasonably expected income of the decedent and other economic losses and losses of accretions, as well as loss of services, protection, care and assistance provided by the respective decedents. Their estates are also entitled to compensation for the expenses incurred for the care, treatment and hospitalization their respective decedents received incident to the injuries they sustained resulting in their deaths.

206. Had Kenneth Terence Ford and James E. Goins survived, each would have had a cause of action against defendants for the injuries he suffered during his lifetime. Their respective estates are entitled to recover the full range of money damages, including economic damages and damages for pain and suffering.

207. Under state common and statutory law, each plaintiff listed in this count asserts this cause of action.

**COUNT VIII**

**WRONGFUL DEATH, LOSS OF CONSORTIUM, SOLATIUM**

(State common and statutory law)

208. Paragraphs 1 through 207 are incorporated herein as if fully set forth.

209. Plaintiffs Robert Lee Beecham, Alice Fay Ford, Revell Scott, and the Estate of Robin L. Beecham, the surviving next of kin of decedent Kenneth Terence Ford, and plaintiffs Patrocina Goins and Carlos Goins, the surviving next of kin of decedent James E. Goins, have suffered sorrow, mental anguish, bereavement, grief, and solace including loss of society, companionship, comfort, guidance, kindly offices and advice of their decedents. Plaintiffs Robert Lee Beecham, Alice Faye Ford, Revell Scott, the Estate of Robin L. Beecham, Patrocina Goins and Carlos Goins are entitled to the full range of loss of consortium and solatium damages resulting from the wrongful deaths of their respective decedents.

210. As a direct and proximate result of defendants' acts, Kenneth Terence Ford and James E. Goins suffered severe and permanent injuries to mind and body and experienced severe physical and mental pain and suffering before their injuries resulted in their deaths; and their estates have sustained loss of reasonably expected income of the decedent and other economic losses and losses of accretions, as well as loss of services, protection, care and assistance provided by the respective decedents. Their estates are also entitled to compensation for the expenses incurred for the care, treatment and hospitalization their respective decedents received incident to the injuries they sustained resulting in their deaths.

211. Had Kenneth Terence Ford and James E. Goins survived, each would have had a cause of action against defendants for the injuries he suffered during his lifetime. Their respective estates are entitled to recover the full range of money damages, including economic damages and damages for pain and suffering.

212. Under state common and statutory law, each plaintiff listed in this count asserts this cause of action.

**COUNT IX**

**WRONGFUL DEATH, LOSS OF CONSORTIUM, SOLATIUM  
AND INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

(State common and statutory law)

213. Paragraphs 1 through 213 are incorporated herein as if fully set forth.

214. Defendants' actions of exploding a bomb in the "La Belle" discotheque were extreme and outrageous conduct which intentionally and recklessly caused each of the persons listed in the next paragraph to suffer severe emotional distress.

215. Plaintiffs Robert Lee Beecham, Alice Fay Ford, Revell Scott, and the Estate of Robin L. Beecham, the surviving next of kin of decedent Kenneth Terence Ford, and plaintiffs Patrocinia Goins and Carlos Goins, the surviving next of kin of decedent James E. Goins, have suffered severe emotional distress, sorrow, mental anguish, bereavement, grief, and solace including loss of society, companionship, comfort, guidance, kindly offices and advice of their respective decedents. Plaintiffs Robert Lee Beecham, Alice Faye Ford, Revell Scott, the Estate of Robin L. Beecham, Patrocinia Goins, and Carlos Goins are entitled to the full range of loss of consortium, solatium and emotional distress damages resulting from the wrongful deaths of their respective decedents.

216. As a direct and proximate result of defendants' acts, Kenneth Terence Ford and James E. Goins suffered severe and permanent injuries to mind and body and experienced severe physical and mental pain and suffering before their injuries resulted in their deaths; and their estates have sustained loss of reasonably expected income of the decedent and other economic losses and losses of accretions, as well as loss of services, protection, care and assistance provided by the respective decedents. Their estates are also entitled to compensation for the expenses incurred for the care, treatment and

hospitalization their respective decedents received incident to the injuries they sustained resulting in their deaths.

217. Had Kenneth Terence Ford and James E. Goins survived, each would have had a cause of action against defendants for the injuries he suffered during his lifetime. Their respective estates are entitled to recover the full range of money damages, including economic damages and damages for pain and suffering.

218. Under state common and statutory law, each plaintiff listed in this count asserts this cause of action.

**COUNT X**

**SURVIVAL**

(State common and statutory law)

219. Paragraphs 1 through 218 are incorporated herein as if fully set forth.

220. As a direct and proximate result of defendants' acts, Kenneth Terence Ford and James E. Goins suffered severe and permanent injuries to mind and body and experienced severe physical and mental pain and suffering before their injuries resulted in their deaths; and their estates have sustained loss of reasonably expected income of the decedent and other economic losses and losses of accretions, as well as loss of services, protection, care and assistance provided by the respective decedents. Their estates are also entitled to compensation for the expenses incurred for the care, treatment and



hospitalization their respective decedents received incident to the injuries they sustained resulting in their deaths.

221. Had Kenneth Terence Ford and James E. Goins survived, each would have had a cause of action against defendants for the injuries he suffered during his lifetime. Their respective estates are entitled to recover the full range of money damages, including economic damages and damages for pain and suffering, for their survival action claims.

222. Under state common and statutory law, each plaintiff listed in this count asserts this cause of action.

**COUNT XI**

**ASSAULT**

(State common and statutory law)

223. Paragraphs 1 through 222 are incorporated herein as if fully set forth.

224. Defendants' actions of exploding a bomb in the "La Belle" discotheque constituted an assault upon each of the persons listed in the next paragraph. Defendants, by their actions, intended to, and did, cause a harmful or offensive contact with each of the persons listed and an imminent apprehension of such contact by each of the persons listed and each of the persons listed were thereby put in such reasonable imminent apprehension.

225. As a direct and proximate result of these acts, Kenneth Terence Ford, James E. Goins and Nermin Haney were killed, and Troy Deon Euring, Gerald Ford, Richard George, Alfred Jackson, David Jackson, Larry Jefferson,

Dalton E. Porteous, Anthony Sailor, Robert Lee Sims, Henry Carl Smith, Melvin Spencer, Romana Wells, Tyrell White, Anthony Bernard Ballard, Donna Marie DaGraca, Christopher A. Gordon-Somers, Wade McArthur Harris, Jr., Ralph Hunter, Alex L. Jackson, Earl Thomas Marshall, Sr., Frank Wesley McGee, Jr., Clarence Rambo, Forrest Ward, Thomas Leon Woodland, Jeffrey Wynes, Carlos Marquez, Andre W. Woodson, Ruthlyn Resha Baxter, Brandon Borders, Rickey Eugene Borders, Lee Robert Brown, III, Shawn Butler, Darryl Allen Byers, Jordan Edwards, James Earl Frazier, Michaela Haugabook, Timothy Glen Henderson, Charlie Chris Hill, Roosevelt Johnson, Robert Eugene Jones, Ronald Jones, Gary Lungrin, Charles J. Maxwell, James Winfield May, Paul Andrew McCathron, Andre McGhee, Delionel B. Meadows, Manuel Anthony Medina, Bryan Mills, Lynn Arnett Morgan, Wayne P. Neeley, Miguel H. Spruill, Ronald Tate, Alvin Levert Wallace, Robert Weldon, Lloyd Elliot Wells, Earnest Eugene Wilson, and Marshaun A. R. Winston suffered severe personal injuries as set forth above.

226. Each of the plaintiffs set forth in the preceding paragraph suffered personal injury and these plaintiffs are entitled to receive the full range of money damages, including economic damages and damages for pain and suffering, established by law.

227. Each plaintiff asserts that he or she is entitled to judgment on this count pursuant to the applicable common and statutory laws of the District of Columbia or the state where each plaintiff was domiciled at the time of the incident at issue in this case.

**COUNT XII**

**BATTERY**

(State common and statutory law)

228. Paragraphs 1 through 227 are incorporated herein as if fully set forth.

229. Defendants' actions of exploding a bomb in the "La Belle" discotheque constituted a battery upon each of the persons listed in the next paragraph. Defendants, by their actions, intended to, and did, cause an unlawful, harmful and offensive contact with each of the persons listed.

230. As a direct and proximate result of these acts, Kenneth Terence Ford, James E. Goins and Nermin Haney were killed, and Troy Deon Euring, Gerald Ford, Richard George, Alfred Jackson, David Jackson, Larry Jefferson, Dalton E. Porteous, Anthony Sailor, Robert Lee Sims, Henry Carl Smith, Melvin Spencer, Romana Wells, Tyrell White, Anthony Bernard Ballard, Donna Marie DaGraca, Christopher A. Gordon-Somers, Wade McArthur Harris, Jr., Ralph Hunter, Alex L. Jackson, Earl Thomas Marshall, Sr., Frank Wesley McGee, Jr., Clarence Rambo, Forrest Ward, Thomas Leon Woodland, Jeffrey Wynes, Carlos Marquez, Andre W. Woodson, Ruthlyn Resha Baxter, Brandon Borders, Rickey Eugene Borders, Lee Robert Brown, III, Shawn Butler, Darryl Allen Byers, Jordan Edwards, James Earl Frazier, Michaela Haugabook, Timothy Glen Henderson, Charlie Chris Hill, Roosevelt Johnson, Robert Eugene Jones, Ronald Jones, Gary Lungrin, Charles J. Maxwell, James Winfield May, Paul Andrew McCathron, Andre McGhee, Delionel B. Meadows, Manuel Anthony Medina, Bryan Mills,

Lynn Arnett Morgan, Wayne P. Neeley, Miguel H. Spruill, Ronald Tate, Alvin Levert Wallace, Robert Weldon, Lloyd Elliot Wells, Earnest Eugene Wilson, and Marshaun A. R. Winston suffered severe personal injuries as set forth above.

231. Each of the plaintiffs set forth in the preceding paragraph suffered personal injury and these plaintiffs are entitled to receive the full range of money damages, including economic damages and damages for pain and suffering, established by law.

232. Each plaintiff asserts that he or she is entitled to judgment on this count pursuant to the applicable common and statutory laws of the District of Columbia or the state where each plaintiff was domiciled at the time of the incident at issue in this case.

### **COUNT XIII**

#### **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

(State common and statutory law)

233. Paragraphs 1 through 232 are incorporated herein as if fully set forth.

234. Defendants' actions of exploding a bomb in the "La Belle" discotheque were extreme and outrageous conduct which intentionally and recklessly caused each of the persons listed in the next paragraph to suffer severe emotional distress.

235. As a direct and proximate result of defendants' acts, Kenneth Terence Ford, James E. Goins, Troy Deon Euring, Gerald Ford, Richard George, Alfred Jackson, David Jackson, Larry Jefferson, Dalton E. Porteous, Anthony

Sailor, Robert Lee Sims, Henry Carl Smith, Melvin Spencer, Romana Wells, Tyrell White, Anthony Bernard Ballard, Donna Marie DaGraca, Christopher A. Gordon-Somers, Wade McArthur Harris, Jr., Ralph Hunter, Alex L. Jackson, Earl Thomas Marshall, Sr., Frank Wesley McGee, Jr., Clarence Rambo, Forrest Ward, Thomas Leon Woodland, Jeffrey Wynes, Carlos Marquez, Andre W. Woodson, Ruthlyn Resha Baxter, Brandon Borders, Rickey Eugene Borders, Lee Robert Brown, III, Shawn Butler, Darryl Allen Byers, Jordan Edwards, James Earl Frazier, Michaela Haugabook, Timothy Glen Henderson, Charlie Chris Hill, Roosevelt Johnson, Robert Eugene Jones, Ronald Jones, Gary Lungrin, Charles J. Maxwell, James Winfield May, Paul Andrew McCathron, Andre McGhee, Delionel B. Meadows, Manuel Anthony Medina, Bryan Mills, Lynn Arnett Morgan, Wayne P. Neeley, Miguel H. Spruill, Ronald Tate, Alvin Levert Wallace, Robert Weldon, Lloyd Elliot Wells, Earnest Eugene Wilson, and Marshaun A. R. Winston suffered severe emotional distress as set forth above.

236. Each of the plaintiffs set forth in the preceding paragraph suffered severe emotional distress and these plaintiffs are entitled to receive the full range of money damages, including economic damages and damages for pain and suffering, established by law.

237. Each plaintiff asserts that he or she is entitled to judgment on this count pursuant to the applicable common and statutory laws of the District of Columbia or the state where each plaintiff was domiciled at the time of the incident at issue in this case.

**COUNT XIV**

**CLAIM FOR PERSONAL INJURY**

(State common and statutory law)

238. Paragraphs 1 through 237 are incorporated herein as if fully set forth.

239. As a direct and proximate result of defendants' actions, as set forth above, Kenneth Terence Ford, James E. Goins, Troy Deon Euring, Gerald Ford, Richard George, Alfred Jackson, David Jackson, Larry Jefferson, Dalton E. Porteous, Anthony Sailor, Robert Lee Sims, Henry Carl Smith, Melvin Spencer, Romana Wells, Tyrell White, Anthony Bernard Ballard, Donna Marie DaGraca, Christopher A. Gordon-Somers, Wade McArthur Harris, Jr., Ralph Hunter, Alex L. Jackson, Earl Thomas Marshall, Sr., Frank Wesley McGee, Jr., Clarence Rambo, Forrest Ward, Thomas Leon Woodland, Jeffrey Wynes, Carlos Marquez, Andre W. Woodson, Ruthlyn Resha Baxter, Brandon Borders, Rickey Eugene Borders, Lee Robert Brown, III, Shawn Butler, Darryl Allen Byers, Jordan Edwards, James Earl Frazier, Michaela Haugabook, Timothy Glen Henderson, Charlie Chris Hill, Roosevelt Johnson, Robert Eugene Jones, Ronald Jones, Gary Lungrin, Charles J. Maxwell, James Winfield May, Paul Andrew McCathron, Andre McGhee, Delionel B. Meadows, Manuel Anthony Medina, Bryan Mills, Lynn Arnett Morgan, Wayne P. Neeley, Miguel H. Spruill, Ronald Tate, Alvin Levert Wallace, Robert Weldon, Lloyd Elliot Wells, Earnest Eugene Wilson, and Marshaun A. R. Winston suffered severe personal injuries as set forth above.

240. Each of the plaintiffs set forth in the preceding paragraph suffered personal injuries and these plaintiffs are entitled to receive the full range of money damages, including economic damages and damages for pain and suffering, established by law.

241. Each plaintiff asserts that he or she is entitled to judgment on this count pursuant to the applicable common and statutory laws of the District of Columbia or the state where each plaintiff was domiciled at the time of the incident at issue in this case.

**COUNT XV**

**ASSAULT**

(State common and statutory law)

242. Paragraphs 1 through 241 are incorporated herein as if fully set forth.

243. Defendants' actions of exploding a bomb in the "La Belle" discotheque constituted an assault upon each of the persons listed in the next paragraph. Defendants, by their actions, intended to, and did, cause a harmful or offensive contact with each of the persons listed and an imminent apprehension of such contact by each of the persons listed and each of the persons listed were thereby put in such reasonable imminent apprehension.

244. As a direct and proximate result of these acts, Kenneth Terence Ford, James E. Goins and Nermin Haney were killed, and Troy Deon Euring, Gerald Ford, Richard George, Alfred Jackson, David Jackson, Larry Jefferson, Dalton E. Porteous, Anthony Sailor, Robert Lee Sims, Henry Carl Smith, Melvin

Spencer, Romana Wells, Tyrell White, Anthony Bernard Ballard, Donna Marie DaGraca, Christopher A. Gordon-Somers, Wade McArthur Harris, Jr., Ralph Hunter, Alex L. Jackson, Earl Thomas Marshall, Sr., Frank Wesley McGee, Jr., Clarence Rambo, Forrest Ward, Thomas Leon Woodland, Jeffrey Wynes, Carlos Marquez, Andre W. Woodson, Ruthlyn Resha Baxter, Brandon Borders, Rickey Eugene Borders, Lee Robert Brown, III, Shawn Butler, Darryl Allen Byers, Jordan Edwards, James Earl Frazier, Michaela Haugabook, Timothy Glen Henderson, Charlie Chris Hill, Roosevelt Johnson, Robert Eugene Jones, Ronald Jones, Gary Lungrin, Charles J. Maxwell, James Winfield May, Paul Andrew McCathron, Andre McGhee, Delionel B. Meadows, Manuel Anthony Medina, Bryan Mills, Lynn Arnett Morgan, Wayne P. Neeley, Miguel H. Spruill, Ronald Tate, Alvin Levert Wallace, Robert Weldon, Lloyd Elliot Wells, Earnest Eugene Wilson, and Marshaun A. R. Winston suffered severe personal injuries as set forth above.

245. Each of the plaintiffs set forth in the preceding paragraph suffered personal injury and these plaintiffs are entitled to receive the full range of money damages, including economic damages and damages for pain and suffering, established by law.

246. Under state common and statutory law, each plaintiff asserts this cause of action.

**COUNT XVI**

**BATTERY**

(State common and statutory law)



247. Paragraphs 1 through 246 are incorporated herein as if fully set forth.

248. Defendants' actions of exploding a bomb in the "La Belle" discotheque constituted a battery upon each of the persons listed in the next paragraph. Defendants, by their actions, intended to, and did, cause an unlawful, harmful and offensive contact with each of the persons listed.

249. As a direct and proximate result of these acts, Kenneth Terence Ford, James E. Goins and Nermin Haney were killed, and Troy Deon Euring, Gerald Ford, Richard George, Alfred Jackson, David Jackson, Larry Jefferson, Dalton E. Porteous, Anthony Sailor, Robert Lee Sims, Henry Carl Smith, Melvin Spencer, Romana Wells, Tyrell White, Anthony Bernard Ballard, Donna Marie DaGraca, Christopher A. Gordon-Somers, Wade McArthur Harris, Jr., Ralph Hunter, Alex L. Jackson, Earl Thomas Marshall, Sr., Frank Wesley McGee, Jr., Clarence Rambo, Forrest Ward, Thomas Leon Woodland, Jeffrey Wynes, Carlos Marquez, Andre W. Woodson, Ruthlyn Resha Baxter, Brandon Borders, Rickey Eugene Borders, Lee Robert Brown, III, Shawn Butler, Darryl Allen Byers, Jordan Edwards, James Earl Frazier, Michaela Haugabook, Timothy Glen Henderson, Charlie Chris Hill, Roosevelt Johnson, Robert Eugene Jones, Ronald Jones, Gary Lungrin, Charles J. Maxwell, James Winfield May, Paul Andrew McCathron, Andre McGhee, Delionel B. Meadows, Manuel Anthony Medina, Bryan Mills, Lynn Amett Morgan, Wayne P. Neeley, Miguel H. Spruill, Ronald Tate, Alvin Levert Wallace, Robert Weldon, Lloyd Elliot Wells, Earnest Eugene Wilson, and Marshaun A. R. Winston suffered severe personal injuries as set forth above.

250. Each of the plaintiffs set forth in the preceding paragraph suffered personal injury and these plaintiffs are entitled to receive the full range of money damages, including economic damages and damages for pain and suffering, established by law.

251. Under state common and statutory law, each plaintiff asserts this cause of action.

**COUNT XVII**

**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

(State common and statutory law)

252. Paragraphs 1 through 251 are incorporated herein as if fully set forth.

253. Defendants' actions of exploding a bomb in the "La Belle" discotheque were extreme and outrageous conduct which intentionally and recklessly caused each of the persons listed in the next paragraph to suffer severe emotional distress.

254. As a direct and proximate result of defendants' acts, Kenneth Terence Ford, James E. Goins, Troy Deon Euring, Gerald Ford, Richard George, Alfred Jackson, David Jackson, Larry Jefferson, Dalton E. Porteous, Anthony Sailor, Robert Lee Sims, Henry Carl Smith, Melvin Spencer, Romana Wells, Tyrell White, Anthony Bernard Ballard, Donna Marie DaGraca, Christopher A. Gordon-Somers, Wade McArthur Harris, Jr., Ralph Hunter, Alex L. Jackson, Earl Thomas Marshall, Sr., Frank Wesley McGee, Jr., Clarence Rambo, Forrest Ward, Thomas Leon Woodland, Jeffrey Wynes, Carlos Marquez, Andre W.