

ROBB & ROBB LLC
1200 Main Street, Ste. 3900
Kansas City, MO 64105
816-474-8080

1 GARY C. ROBB (*pro hac vice*)
gcr@robbrobb.com
2 ANITA PORTE ROBB (*pro hac vice*)
apr@robbrobb.com
3 ANDREW C. ROBB (*pro hac vice*)
acr@robbrobb.com
4 BRITTANY SANDERS ROBB (*pro hac vice*)
bsr@robbrobb.com
5 ROBB & ROBB LLC
6 1200 Main Street, Suite 3900
7 Kansas City, Missouri 64105
Telephone: (816) 474-8080
8 Facsimile: (816) 474-8081

9 BRAD D. BRIAN (State Bar No. 79001)
brad.brian@mto.com
10 LUIS LI (State Bar No. 156081)
Luis.li@mto.com
11 MUNGER, TOLLES & OLSON LLP
12 350 South Grand Avenue, Fiftieth Floor
Los Angeles, California 90071-3426
13 Telephone: (213) 683-9100
14 Facsimile: (213) 687-3702

15 Attorneys for Plaintiffs

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **COUNTY OF LOS ANGELES, NORTHWEST DISTRICT**

18 VANESSA BRYANT, individually and as
19 Successor in Interest to KOBE BRYANT,
20 Deceased; VANESSA BRYANT as Successor in
21 Interest to GB, a minor, deceased; NB, a minor, by
22 her Natural Mother and Guardian Ad Litem,
23 VANESSA BRYANT; BB, a minor, by her Natural
24 Mother and Guardian Ad Litem, VANESSA
25 BRYANT; and CB, a minor, by her Natural Mother
26 and Guardian Ad Litem, VANESSA BRYANT,

27 Plaintiffs,

28 vs.

ISLAND EXPRESS HELICOPTERS, INC., a
California Corporation; ISLAND EXPRESS
HOLDING CORP., a California Corporation; and
BERGE ZOBAYAN as Personal Representative of
and/or Successor in Interest to ARA GEORGE
ZOBAYAN, a California Resident,

Defendants.

Case No. 20STCV07492

Hon. Virginia Keeny

PLAINTIFFS' NOTICE OF
DEMURRER AND DEMURRER TO
ISLAND EXPRESS DEFENDANTS'
CROSS-COMPLAINT;
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
GARY C. ROBB

Date: October 23, 2020

Time: 8:30 a.m.

Dept.: W

Action Filed: 02/24/2020

Trial Date: None

Reservation ID: 653628587774

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

2 PLEASE TAKE NOTICE that on October 23, 2020 at 8:30 a.m., by LACourtConnect,
3 Plaintiffs Vanessa Bryant, individually, and as Successor in Interest to Kobe Bryant, GB (a minor),
4 and her surviving minor children (together “Plaintiffs”), through their counsel of record, will and
5 hereby move this Court to issue a Demurrer to Defendants Island Express Helicopters, Inc. and
6 Island Express Holding Corp.’s (together “Defendants”) Cross-Complaint.

7 This Motion will be based on this notice, the attached memorandum of points and authorities,
8 the Declaration of Gary C. Robb, the Appendix of Exhibits A-H, the records and files of this action,
9 and the oral and documentary evidence which may be introduced at the hearing.

10 DATED: September 18, 2020

Respectfully submitted,

11 **ROBB & ROBB LLC**

12 By: /s/ Gary C. Robb
13 GARY C. ROBB*
14 ANITA PORTE ROBB*
15 ANDREW C. ROBB*
16 BRITTANY SANDERS ROBB*
17 One Kansas City Place
1200 Main Street, Suite 3900
Kansas City, Missouri 64105
Telephone: (816) 474-8080

18 *Petition for Admission Granted

19 BRAD D. BRIAN
20 LUIS LI
21 **MUNGER, TOLLES & OLSON LLP**
22 350 South Grand Avenue, Fiftieth Floor
Los Angeles, California 90071-3426
Telephone: (213) 683-9100

23 Attorneys for Plaintiffs VANESSA BRYANT,
24 individually and as Successor in Interest to KOBE
25 BRYANT, Deceased; VANESSA BRYANT as
26 Successor in Interest to GB, a minor, deceased; NB, a
27 minor, by her Natural Mother and Guardian Ad
28 Litem, VANESSA BRYANT; BB, a minor, by her
Natural Mother and Guardian Ad Litem, VANESSA
BRYANT; and CB, a minor, by her Natural Mother
and Guardian Ad Litem, VANESSA BRYANT

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**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFFS’
DEMURRER TO DEFENDANTS’ CROSS-COMPLAINT**

Vanessa Bryant, individually, and as Successor in Interest to Kobe Bryant, GB (a minor), and her surviving minor children (together “Plaintiffs”) respectfully submit this Memorandum of Law in Support of their Demurrer to Defendants Island Express Helicopters, Inc. and Island Express Holding Corp.’s (together “Defendants”) Cross-Complaint.

INTRODUCTION AND PRELIMINARY STATEMENT

Defendants unlawfully and improperly seek to deprive Mrs. Bryant of her lawful choice of forum in California state court. Defendants’ Cross-Complaint manipulates federal law and this Court’s jurisdiction in a transparent and untenable attempt to forum-shop their way into federal court. Under the Federal Tort Claims Act (“FTCA”), the federal courts are the sole and exclusive forum for any claim against a federal employee “acting within the scope of his employment at the time of the incident out of which the claim arose.” Defendants’ Cross-Complaint names two air traffic controllers, both of whom Defendants admit were “acting within the scope of their employment . . . for a Federal Aviation Administration Terminal Radar Approach Facility.” As the Government has indicated in a letter to Defendants’ counsel, the allegations in Defendants’ Cross-Complaint undeniably state an FTCA claim that may only be heard in a federal court. And yet, Defendants still bring their Cross-Complaint before this Court in an obvious and futile attempt to win removal to federal court.

Fortunately, and unsurprisingly, California law prevents such an attempt to abuse and manipulate federal law. State courts in both California and throughout the country have dismissed for lack of subject matter jurisdiction claims arising under federal laws—including the FTCA—that confer exclusive jurisdiction to the federal courts. Because the FTCA provides an *exclusive* remedy in federal court, state courts lack subject matter jurisdiction to adjudicate such claims. Here, Defendants’ Cross-Complaint sneakily tracks the exact language of the FTCA but fails to acknowledge that the sole remedy for an FTCA claim is federal court. If Defendants believe that the Cross-Complaint Defendants share liability for Plaintiffs’ underlying claim, they may bring an FTCA action for contribution or indemnification in federal court. Defendants may not, however,

ROBB & ROBB LLC
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1 disguise an obvious and unmistakable FTCA claim as a state-law tort claim with hope to forum-
2 shop this action into federal court. Accordingly, this Court should dismiss Defendants’ Cross-
3 Complaint for lack of subject matter jurisdiction.

4 **I. FACTUAL BACKGROUND AND PROCEDURAL CONTEXT OF MOTION**

5 On January 26, 2020, a helicopter carrying Kobe Bryant, GB, and seven others crashed in
6 Los Angeles County, killing everyone onboard. On February 24, 2020, Plaintiffs brought suit in
7 Los Angeles County against Island Express Helicopters, Inc., Island Express Holding Corp., and the
8 Defendant estate of the helicopter pilot alleging that they were negligent.

9 On August 14, 2020, Defendants filed a Cross-Complaint against Kyle Larsen and Matthew
10 Conley, “both of whom were acting in the course and scope of their employment as Air Traffic
11 Controllers for the Southern California TRACON (‘SOCAL’), a Federal Aviation Administration
12 Terminal Radar Approach Control Facility, at all times relevant to this Cross Complaint.” (Robb
13 Decl. ¶3, “Ex. A” ¶13). Defendants’ Cross-Complaint alleges that the helicopter crash was “caused
14 by a series of erroneous acts and/or omissions committed by Cross-Defendants Larsen and Conley.”
15 (*Id.*)

16 On September 16, 2020, Barry F. Benson, Director of the Aviation, Space & Admiralty
17 Litigation Section at the United States Department of Justice, sent a letter to counsel for Defendants.
18 The letter reads, in pertinent part:

19 It has come to our attention that your client, Island Express Helicopters, Inc. has filed
20 Cross-Complaints against Kyle Larsen and Matthew Conley in Los Angeles County
21 Superior Court. . . . Be advised, under the Federal Tort Claims Act, the federal district
22 courts have exclusive jurisdiction of civil actions against the United States “for injury
23 or loss of property, or personal injury or death cause by the negligent or wrongful act
24 of omission of any employee of the Government while acting within the scope of his
office or employment” 28 U.S.C. § 1346(b)(1). **As such, if the claims asserted
against Larsen and Conley are not withdrawn, the United States will remove
these actions to federal court and file motions to dismiss.**

25 (See Robb Decl. ¶ 4, “Ex. B.” [emphasis added].)
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1 **II. LEGAL AUTHORITY AND ANALYSIS**

2 **A. This Court Does Not Have Subject Matter Jurisdiction Over Defendants’ Cross-**
3 **Complaint.**

4 “The principle of subject matter jurisdiction relates to the inherent authority of the court
5 involved to deal with the case or matter before it. Thus, in the absence of subject matter jurisdiction,
6 a trial court has no power to hear or determine the case.” (*Varian Medical Systems, Inc. v. Delfino*
7 (2005) 35 Cal.4th 180, 196 [citations omitted].) “Subject matter jurisdiction either exists or does
8 not exist at the time the action is commenced.” (*Brewer v. Carter* (2013) 218 Cal.App.4th 1312,
9 1316-17; *see also Plas v. Superior Court* (1984) 155 Cal.App.3d 1008, 1015 n.5.) “A proceeding
10 is commenced the date the action is filed.” (*In re S.W.* (2007) 148 Cal.App.4th 1501, 1508.)

11 This Court does not have subject matter jurisdiction over Defendants’ Cross-Complaint.
12 Federal courts provide the exclusive remedy for claims that arise under the FTCA. (*See infra,*
13 *Section 1.*) Here, Defendants’ Cross-Complaint unmistakably and intentionally states a claim under
14 the FTCA with full knowledge that the Cross-Complaint will result in removal to federal court.
15 Both California and other states have confirmed that state courts lack subject matter jurisdiction
16 over claims that arise under federal law, including the FTCA. (*See infra, Section 2.*) In recognition
17 of both the intent of the FTCA and state jurisdictional law, this Court should dismiss Defendants’
18 Cross-Complaint for lack of subject matter jurisdiction.¹

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23 ¹ Supreme Court jurisprudence forecloses any contention that Plaintiffs do not have standing to
24 challenge removal to federal court and protect the forum of their choice. (*See Int’l Primate*
25 *Protection League v. Administrators of Tulane Educ. Fund* (1991) 500 U.S. 72, 77 [affirming party’s
26 standing to challenge removal and finding “petitioners’ injury is clear, for they have lost the right
27 to sue in Louisiana court—the forum of their choice”].) Regardless, this Court can and must
28 determine *sua sponte* whether it has jurisdiction over all claims that come before it. (*See People v.*
Zarazua (2009) 179 Cal.App.4th 1054, 1059 [“A court has jurisdiction to determine its own
jurisdiction, for a basic issue in any case before a tribunal is its power to act, and it must have
authority to decide that question in the first instance.”]; *Walker v. Superior Court* (1991) 53 Cal.3d
257, 267 [“Nor can it be questioned that courts have inherent authority to . . . inquire into their own
jurisdiction.”].)

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816-474-8080

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1. Federal courts provide the exclusive remedy for claims that arise under the FTCA.

The FTCA allows a party to seek damages from the United States for certain torts committed by federal employees. (See 28 U.S.C. § 1346(b).) Section 1346(b) provides, in relevant part:

[T]he district courts . . . shall have exclusive jurisdiction of civil actions on claims against the United States, for money damages . . . for injury or loss of property, or personal injury or death caused by the negligent or wrongful act or omission of any employee of the Government while acting within the scope of his office or employment[.]

It is well-established that “[a]n action against the United States under the FTCA is the exclusive remedy for claims resulting from the negligent or wrongful act or omission of any employee of the Government while acting within the scope of his office or employment. The FTCA grants [federal] district courts with exclusive jurisdiction over such actions.” (See *Binder v. United States* (C.D. Cal., Aug. 18, 2014, No. 14-01152) 2014 WL 12591839, at *2 n.1 [citation omitted]; see also *Simmons v. Himmerreich* (2016) 136 S.Ct. 1843, 1846.) Since federal courts are the exclusive forum for FTCA claims, any state-court action arising under the FTCA “shall” be removed to federal court. (28 U.S.C. § 2679(d)(2).)

For a civil action against an individual party to be converted into an action against the United States under the FTCA, the individual party must have been “acting within the scope of his employment at the time of the incident out of which the claim arose.” (28 U.S.C. § 2679; see also *Osborn v. Haley* (2007) 549 U.S. 225, 232.) If a party was “acting within the scope of his employment at the time of the incident out of which the claim arose,” the civil action against that party “shall be deemed an action against the United States” and the government “shall defend any civil action or proceeding brought in any court against” that party. (28 U.S.C. § 2679 [emphasis added].)

ROBB & ROBB LLC
1200 Main Street, Ste. 3900
Kansas City, MO 64105
816-474-8080

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2. Defendants’ Cross-Complaint states claims under the FTCA, thereby depriving this Court of subject matter jurisdiction.

Defendants’ Cross-Complaint unambiguously and directly states claims under the FTCA. “To state a claim against the United States under the FTCA, Plaintiff must show . . . that the person who committed the tort was a federal employee acting within the scope of his employment.” (See *Curry v. FPC Lompoc Med Director* (C.D. Cal., April 26, 2017) 2017 WL 1520415, at *6, citing *Balser v. Dep’t of Justice* (9th Cir. 2003) 327 F.3d 903, 908). In order to eliminate any and all doubt about whether their claims arise under the FTCA, Defendants’ Cross-Complaint *quotes nearly verbatim* the applicable language of section 2679 to ensure that Defendants allege that “the person who committed the tort was a federal employee acting within the scope of his employment.” (See *Curry v. FPC Lompoc Med Director, supra*, 2017 WL 1520415, at *6; compare 28 U.S.C. § 2679(d)(1) [an action “shall be deemed an action against the United States” where “*defendant employee was acting within the scope of his office or employment at the time of the incident out of which the claim arose*” [emphasis added]], with Robb Decl. ¶3, “Ex. A” ¶13 [“The accident was caused by a series of erroneous acts and/or omissions committed by Cross-Defendants Larsen and Conley, both of whom were acting in the course and scope of their employment as Air Traffic Controllers for the Southern California TRACON (“SOCAL”), a Federal Aviation Administration Terminal Radar Approach Control Facility, at all times relevant to this Cross Complaint.”] [emphasis added].) And, if it was not already plainly obvious from the face of Defendants’ Cross-Complaint, the Government sent a letter to Defendants’ counsel confirming that their Cross-Complaint arises under the FTCA, and that “if the claims asserted against [Cross-Complaint Defendants] are not withdrawn, the United States will remove these actions to federal court and file motions to dismiss.” (See Robb Decl. ¶4, “Ex. B.”)

Defendants cannot dispute that (1) Defendants *know* their Cross-Complaint names individuals “acting within the scope of [their] employment at the time of the incident out of which

ROBB & ROBB LLC
1200 Main Street, Ste. 3900
Kansas City, MO 64105
816-474-8080

1 the claim arose,”² (see 28 U.S.C. § 2679), (2) Defendants *know* “the FTCA is the exclusive remedy
2 for claims resulting from the negligent or wrongful act or omission of any employee of the
3 Government while acting within the scope of his office or employment,” (see *Binder v. United*
4 *States, supra*, 2014 WL 12591839, at *2 n.1), and (3) Defendants *know* that “[t]he FTCA grants
5 [federal] district courts with exclusive jurisdiction over such actions.” (See *id.*) And yet,
6 Defendants still chose to bring their Cross-Complaint here in state court. It is unmistakably obvious
7 that the sole purpose of Defendants’ Cross-Complaint is to manipulate and abuse both the FTCA
8 and this Court’s jurisdiction in order to forum-shop their way into federal court. (See 28 U.S.C. §
9 2679 [“[A]ny civil action or proceeding commenced upon such claim in a State court shall be
10 removed . . . to the district court of the United States for the district and division embracing the place
11 in which the action or proceeding.”].)

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14 Fortunately, courts in California and across the country prohibit such a blatant abuse of
15 federal law and subject matter jurisdiction. Courts have dismissed for lack of subject matter
16 jurisdiction state-court claims that arise under the both the FTCA and other federal laws that confer
17 exclusive jurisdiction to the federal courts. While California courts have not had occasion to address
18 their subject matter jurisdiction over FTCA claims, California courts have dismissed cases arising
19 under federal patent law, for which Congress—like the FTCA—has conferred exclusive jurisdiction
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22 ² It is undisputed and undeniable that Cross-Defendants Larsen and Conley were acting within the
23 scope of their employment at all times relevant to Defendants’ claims. This is not a case where
24 there is any doubt about whether Cross-Defendants’ negligent acts and/or omissions occurred during
25 the course of their employment duties, *i.e.*, communication with the pilot of the crashed helicopter.
26 (See Robb Decl. ¶3, “Ex. A” ¶¶ 14-30.) Indeed, because tort claims against air traffic controllers
27 *always* implicate the controller’s actions during the course and scope of employment, Plaintiffs are
28 unaware of any tort claim made against any air traffic controller that was *not* governed by the FTCA.
(See, e.g., *United States v. Varig Airlines* (1984) 467 U.S. 797, 812; *Ellen v. United States* (9th Cir.
2002) 32 Fed. Appx. 270, 272.) Should Defendants argue that there is doubt about Cross-
Defendants’ status as federal employees acting within the scope of their employment at all times
relevant to this action, such an argument 1) ignores well-established federal law, and 2) contradicts
Defendants’ own allegations in paragraph 13 of their Cross-Complaint, and 3) conflicts with the
Government’s view of Defendants’ Cross-Complaint. (See Robb Decl. ¶ 4, “Ex. B.”)

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1 to the federal courts. (*See Benitez v. Williams* (2013) 219 Cal.App.4th 270, 276 [“The federal courts
2 have exclusive jurisdiction over copyright infringement causes of action. The trial court thus
3 correctly determined that it did not have subject matter jurisdiction over plaintiff’s copyright
4 infringement claim.” (citation omitted)]; *Holiday Matinee, Inc. v. Rambus, Inc.* (2004) 118
5 Cal.App.4th 1413, 1423 [same].) State courts that have had occasion to determine jurisdiction over
6 FTCA claims have quickly dismissed those claims for lack of subject matter jurisdiction.³ (*See*
7 *Bone v. Otis Elevator Co.* (La.Ct.App. 2018) 261 So.3d 948, 950 [“28 U.S.C. § 1346(b)(1) vests
8 exclusive jurisdiction over actions arising under the FTCA to the federal court. The petition for
9 damages specifically raises claims against Otis arising under the FTCA. Otis properly challenged
10 the district court's jurisdiction to adjudicate the FTCA claims[.]”]; *Holz v. Reese* (Pa.Sup.Ct., May
11 18, 2016, No. 2225 MDA 2015) 2016 WL 2908455, at *2 [“Because Appellant’s complaints state
12 claims under the FTCA, we further conclude that the trial court lacked subject matter jurisdiction
13 over the same. Congress has explicitly restricted FTCA claims to the jurisdiction of the federal
14 courts.”]; *Smith v. Swarthout* (Mich.Ct.App. 1992) 491 N.W.2d 590, 591-92 [“The FTCA [is]
15 exclusive of any other civil action or proceeding by reason of the same subject matter against the
16 employee . . . whose act or omission gave rise to the claim. . . . [F]ederal courts were the only forums
17 available for such actions; state courts do not have jurisdiction to entertain FTCA claims.” [citations
18 omitted]]; *Banasiewicz v. Laudone* (Conn.Sup.Ct., Jan. 29, 1991, No. 513248) 1991 WL 25634, at
19 *1 [“As the claim asserted here against the United States must, if at all, be brought under the FTCA,
20 the United States District Court has exclusive jurisdiction of such a claim under 28 U.S.C. 1346(b).
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27 ³ Where California authority on a certain topic is limited—as it is here—California courts have
28 looked to out-of-state authority for persuasion. (*See Global Modular, Inc. v. Kadana Pacific, Inc.*,
(2017) 15 Cal.App.5th 127, 136 [“Although these [out-of-state] decisions are not binding on us, we
consider them insofar as we find their reasoning persuasive.”].)

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816-474-8080

1 Therefore, the United States is immune from suit on a tort claim in the state courts, and the superior
2 court has no subject matter jurisdiction.”].)

3 Defendants’ Cross-Complaint admittedly and unambiguously states a claim under the
4 FTCA, and this Court lacks subject matter jurisdiction over it. The Government has confirmed that
5 Defendants’ Cross-Complaint states claims under the FTCA, and that it intends to remove the case
6 to federal court. (See Robb Decl. ¶4, “Ex. B.”) Defendants hope to manipulate this Court’s
7 jurisdiction and abuse the purpose of the FTCA by knowingly bringing a claim in this action that
8 can be heard only in federal court. However, California law guards against such a direct and
9 unambiguous abuse of its jurisdiction. “Subject matter jurisdiction either exists or does not exist at
10 the time the action is commenced.” (*Brewer v. Carter, supra*, 218 Cal.App.4th at 1316-17.) “At the
11 time this action [was] commenced,” Defendants’ Cross-Claim stated allegations that arise *only*
12 under the FTCA, and federal courts have exclusive subject matter jurisdiction over claims that arise
13 under the FTCA. (See *id.*; *Binder v. United States, supra*, 2014 WL 12591839, at *2 n.1).
14 Accordingly, this Court should dismiss Defendants’ Cross-Complaint for lack of subject matter
15 jurisdiction because it states claims that must be heard exclusively in a federal forum. (See *Varian*
16 *Medical Systems, Inc. v. Delfino* (2005) 35 Cal.4th 180, 196 [“[I]n the absence of subject matter
17 jurisdiction, a trial court has no power to hear or determine the case.”].)⁴
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24 ⁴ Although Defendants’ Cross-Complaint lacks jurisdiction in this court, Defendants are not without
25 remedy against the Cross-Complainants. Defendants can still bring a separate FTCA action for
26 indemnification or contribution in federal court—the exclusive forum for such claims—following
27 the disposition of the Plaintiffs’ claim in state court. (See, e.g., *A.Q.C. ex rel. Castillo v. Bronx-*
28 *Lebanon Hosp. Center* (S.D.N.Y. Jan. 20, 2012) 2012 WL 170902, at *6 [collecting cases explaining
that a defendant may still—after its third-party cross-claim was dismissed for lack of subject matter
jurisdiction—“bring[] a later, separate action for indemnification or contribution following the
disposition of plaintiff’s claim in state court”].).

CONCLUSION

This Court must protect Plaintiffs’ “right to sue in [California] court—the forum of their choice” by dismissing Defendants’ transparent attempt manipulate the FTCA by knowingly and intentionally filing a claim in this Court that can only be heard in a federal forum. (See *Int’l Primate Protection League v. Administrators of Tulane Educ. Fund* (1991) 500 U.S. 72, 77). Accordingly, the Court should join its sister states—and other California courts that have addressed similar claims arising under federal law—and dismiss Defendants’ Cross-Complaint for lack of subject matter jurisdiction.

WHEREFORE, for the above-stated reasons, Plaintiffs respectfully request that this Court enter its Order as follows:

- (A) Dismissing Defendants’ Cross-Complaint for Lack of Subject Matter Jurisdiction, and
- (B) For such other and further relief as the Court deems just and proper.

DATED: September 18, 2020

Respectfully submitted,

ROBB & ROBB LLC

By: /s/ Gary C. Robb

GARY C. ROBB*
ANITA PORTE ROBB*
ANDREW C. ROBB*
BRITTANY SANDERS ROBB*
One Kansas City Place
1200 Main Street, Suite 3900
Kansas City, Missouri 64105
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BRAD D. BRIAN
LUIS LI
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, Fiftieth Floor
Los Angeles, California 90071-3426
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Attorneys for Plaintiffs VANESSA BRYANT,
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DECLARATION OF GARY C. ROBB

I, Gary C. Robb, declare as follows:

1. I am an attorney at law duly licensed to practice law before the Missouri, Illinois, and U.S. Supreme Court bars. I have been a partner with Robb & Robb LLC in Kansas City, Missouri since 1984.

2. I serve as lead counsel in this action for Vanessa Bryant, individually, and as Successor in Interest to Kobe Bryant, GB (a minor), and her surviving minor children, (together, "Plaintiffs"). I was admitted before this Court pro hac vice on June 22, 2020. If called upon to testify, I will be able to state the below based on my personal knowledge as follows:

3. Attached in the accompanying Appendix of Exhibits A-H as "**Exhibit A**" is a true and accurate copy of Defendants' Cross-Complaint, filed on August 14, 2020.

4. Attached in the accompanying Appendix of Exhibits A-H as "**Exhibit B**" is a letter dated September 16, 2020, from Barry F. Benson, Director at the Aviation, Space & Admiralty Litigation section of the United States Department of Justice, to counsel for Defendant Island Express Helicopters.

8. Attached in the accompanying Appendix of Exhibits A-H as "**Exhibit C**" is a true and accurate copy of *Bone v. Otis Elevator Co.* (La.Ct.App. 2018) 261 So.3d 948, 950, before the Court of Appeal of Louisiana.

9. Attached in the accompanying Appendix of Exhibits A-H as "**Exhibit D**" is a true and accurate copy of *Holz v. Reese* (Pa.Sup.Ct., May 18, 2016, No. 2225 MDA 2015) 2016 WL 2908455, before the Superior Court of Pennsylvania.

10. Attached in the accompanying Appendix of Exhibits A-H as "**Exhibit E**" is a true and accurate copy of *Smith v. Swarthout* (Mich.Ct.App. 1992) 491 N.W.2d 590, 591-92, before the Court of Appeals of Michigan.

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11. Attached in the accompanying Appendix of Exhibits A-H as “**Exhibit F**” is a true and accurate copy of *Banasiewicz v. Laudone* (Conn.Sup.Ct., Jan. 29, 1991, No. 513248) 1991 WL 25634, before the Superior Court of Connecticut. Counsel have been unable to locate an original image of this decision, so the Westlaw version is attached.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 18, 2020, in Kansas City, Missouri.

/s/ Gary C. Robb
GARY C. ROBB

ROBB & ROBB LLC
1200 Main Street, Ste. 3900
Kansas City, MO 64105
816-474-8080

PROOF OF SERVICE

STATE OF MISSOURI, COUNTY OF JACKSON

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Jackson, State of Missouri. My business address is One Kansas City Place, 1200 Main Street, Suite 3900, Kansas City, Missouri 64105.

On September 18, 2020, I served true copies of the following document(s) described as:

PLAINTIFFS' NOTICE OF DEMURRER AND DEMURRER TO ISLAND EXPRESS DEFENDANTS' CROSS-COMPLAINT; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF GARY C. ROBB

on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION Pursuant to CRC 2.251: I caused a copy of the document(s) to be sent from e-mail address janello@robbrobb.com to the persons at the e-mail addresses listed on the attached Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of Missouri that the foregoing is true and correct.

Executed on September 18, 2020, at Kansas City, Missouri.

/s/ Jacie M. Anello

Jacie M. Anello

ROBB & ROBB LLC
1200 Main Street, Ste. 3900
Kansas City, MO 64105
816-474-8080

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Ross Cunningham, Esq.
Don Swaim, Esq.
D. Todd Parrish, Esq.
CUNNINGHAM SWAIM, LLP
4015 Main Street, Suite 200
Dallas, Texas 75226
Tel: (214) 646-1495
rcunningham@cunninghamswaim.com
dswaim@cunninghamswaim.com
tparrish@cunninghamswaim.com

Michael J. Terhar, Esq.
CUNNINGHAM SWAIM, LLP
2 N. Lake Avenue, Suite 550
Pasadena, California 91101
mterhar@cunninghamswaim.com

Arthur I. Willner, Esq.
**LEADER BERKON COLAO &
SILVERSTEIN LLP**
660 South Figueroa
Suite 1150
Los Angeles, CA 90017
Tel: (213) 234-1750
awillner@leaderberkon.com

Raymond L. Mariani, Esq.
**LEADER BERKON COLAO &
SILVERSTEIN LLP**
630 Third Avenue, Floor 17
New York, New York 10017
rmariani@leaderberkon.com

Attorneys for Defendant
BERGE ZOBAYAN AS SUCCESSOR IN
INTEREST for ARA GEORGE ZOBAYAN

Attorneys for Defendants
ISLAND EXPRESS HELICOPTERS, INC.
and ISLAND EXPRESS HOLDING CORP.

ROBB & ROBB LLC
1200 Main Street, Ste. 3900
Kansas City, MO 64105
816-474-8080



Make a Reservation

VANESSA BRYANT, INDIVIDUALLY AND AS SUCCESSOR IN INTEREST TO KOBE BRYANT, DECEASED, et al. vs ISLAND EXPRESS HELICOPTERS, INC., A CALIFORNIA CORPORATION, et al.

Case Number: 20STCV07492 Case Type: Civil Unlimited Category: Other Personal Injury/Property Damage/Wrongful Death

Date Filed: 2020-02-24 Location: Van Nuys Courthouse East - Department W

Reservation	
Case Name: VANESSA BRYANT, INDIVIDUALLY AND AS SUCCESSOR IN INTEREST TO KOBE BRYANT, DECEASED, et al. vs ISLAND EXPRESS HELICOPTERS, INC., A CALIFORNIA CORPORATION, et al.	Case Number: 20STCV07492
Type: Demurrer - without Motion to Strike	Status: RESERVED
Filing Party: Vanessa Bryant, individually and as Successor in Interest to KOBE BRYANT, Deceased (Plaintiff)	Location: Van Nuys Courthouse East - Department W
Date/Time: 10/23/2020 8:30 AM	Number of Motions: 1
Reservation ID: 653628587774	Confirmation Code: CR-RR7IRSGAIL3JWM2X3

Fees			
Description	Fee	Qty	Amount
Demurrer - without Motion to Strike	60.00	1	60.00
Credit Card Percentage Fee (2.75%)	1.65	1	1.65
TOTAL			\$61.65

Payment	
Amount: \$61.65	Type: Visa
Account Number: XXXX7834	Authorization: 03243G

Print Receipt

Reserve Another Hearing