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21 SUPERIOR COURT OF THE STATE OF CALIFORNIA
22 COUNTY OF SAN MATEO

23 GAN YE and XIAO YUN ZHENG,
24 Individually, as Heirs and Successors in Interest
25 of, YE MENG YUAN, Deceased,

26 Plaintiffs,
27 v

28 CITY AND COUNTY OF SAN FRANCISCO,
29 JOANNE HAYES-WHITE (SFFD), an
30 individual, ANTENOR MOLLOY (SFFD), an
31 individual, ANTHONY ROBINSON (SFFD), an
32 individual, TOM SIRAGUSA (SFFD), an
33 individual, MARK GONZALES (SFFD), an
34 individual, JOHN LITTLEFIELD (SFO), an
35 individual, TRYG MCCOY (SFO), an individual,
36 JOHN L MARTIN (SFO), an individual,
37 DENISE SCHMITT(SFPD), an individual,
38 CHRISTINE EMMONS (SFFD), an individual,
39 ROGER PHILLIPS (SFFD), an individual,
40 MICHELLE GRINDSTAFF (SFFD), an
41 individual, Michael Kirk (SFFD), an individual,
42 HENRY CHOY (SFO), an individual, DERRICK
43 LEE (SFPD), an individual, JIMMY YEE
44 (SFFD), an individual, and DOES 1 through 100,

45 Defendants

46 Case No.

47 *CIV 530008*

48 COMPLAINT FOR DAMAGES

49 JURY TRIAL DEMANDED

1 Plaintiffs Gan Ye and Xiao Yun Zheng (collectively “Plaintiffs”), individually and as the
2 heirs and successors in interest of Ye Meng Yuan, deceased, by and through their attorneys,
3 respectfully allege against defendants The City and County of San Francisco, Joanne Hayes-
4 White, Fire Chief, San Francisco Fire Department, Antenor Molloy, EMS Captain, San
5 Francisco Fire Department (Airport Division), Anthony Robinson, Captain, San Francisco Fire
6 Department (Airport Division); Tom Siragusa, Assistant Chief, San Francisco Fire Department,
7 Mark Gonzales, Deputy Chief of Operations, San Francisco Fire Department, John Littlefield,
8 Deputy Director of Operations, San Francisco Airport, Tryg McCoy, Chief Operating Officer,
9 San Francisco Airport, John L. Martin, Airport Director, San Francisco Airport, Denise Schmitt,
10 Deputy Chief, San Francisco Police Department (Airport Bureau), Christine Emmons,
11 Lieutenant, San Francisco Fire Department, Roger Phillips, Firefighter, San Francisco Fire
12 Department (Airport Division), Jimmy Yee, Firefighter, San Francisco Fire Department (Airport
13 Division), Michelle Grindstaff, Firefighter, San Francisco Fire Department (Airport Division),
14 Michael Kirk, Firefighter/Paramedic, San Francisco Fire Department (Airport Division), Henry
15 Choy, Airport Safety Officer, San Francisco International Airport (Operations Division); Derrick
16 Lee, Police Officer, San Francisco Police Department (Airport Bureau), and DOES 1 through
17 100 (collectively, “Defendants”) as follows
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19 **I. NATURE OF THE ACTION**

20 1. This action arises from the tragic and avoidable death of Plaintiffs’ 16-year-old
21 daughter Ye Meng Yuan, who perished after the crash of Asiana Airlines Flight No OZ 214
22 (“Flight 214”). Ye Meng Yuan was injured during the crash and abandoned by several rescue
23 workers employed by the City and County of San Francisco (the “City and County”). The rescue
24 workers observed Ye Meng Yuan lying helpless on the ground but, inexplicably, failed to
25 evaluate her condition, treat her, mark her location, or remove her from the perilous location
26 where she lay curled in the “fetal position”. Minutes later, Ye Meng Yuan was run over by two
27 separate aircraft rescue firefighting (“ARFF”) vehicles. Plaintiffs assert survival and wrongful
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1 death claims against Defendants, and seek, among other things, statutory and compensatory
2 damages authorized under the California Government Claims Act and all recoverable damages
3 permitted under 42 U S C § 1983 for the deprivation of rights secured by the Constitution and
4 the laws of the United States

5 **II. THE PARTIES**

6 2 Plaintiff Gan Ye is the natural father, successor in interest, and heir of Ye Meng
7 Yuan

8 3. Plaintiff Xiao Yun Zheng is the natural mother, successor in interest, and heir of
9 Ye Meng Yuan

10 4 Plaintiffs assert wrongful death claims for the death of Ye Meng Yuan pursuant to
11 Code of Civil Procedure section 377 60, *et seq* Ye Meng Yuan has no other beneficiaries, heirs,
12 or successors in interest pursuant to Code of Civil Procedure section 377 60, *et seq*
13 Additionally, as successors in interests, Plaintiffs assert survivor claims on behalf of Ye Meng
14 Yuan, pursuant to Code of Civil Procedure sections 377 10, *et seq* Attached hereto is the
15 Plaintiffs' Declaration, filed in compliance with the provisions of California Code of Civil
16 Procedure section 377 32

17 5 Defendant City and County of San Francisco is a municipal body and county of
18 the State of California, with the capacity to sue and be sued At all times relevant to the facts
19 alleged, the City and County was responsible for assuring that its own actions, omissions,
20 policies, procedures, practices and customs and those of its employees, contractors, agents,
21 departments, divisions and agencies complied with all applicable laws and duties The San
22 Francisco International Airport (the "Airport" or "SFO"), the San Francisco Fire Department
23 ("SFFD"), and the San Francisco Police Department ("SFPD"), are separate City and County
24 departments, which are under the control of the City and County

25 6 At all relevant times, defendant Lt Christine Emmons ("Emmons") was a
26 firefighter, paramedic and/or emergency medical technician employed by the City and County as
27 a member of the SFFD, and was acting within the course and scope of her employment and

1 under color of law Defendant Emmons is sued in her personal capacity On information and
2 belief, defendant Emmons is a citizen of the State of California.

3 7 At all relevant times, defendant Roger Phillips ("Phillips") was a firefighter,
4 paramedic and/or emergency medical technician employed by the City and County as a member
5 of the SFFD, and was acting within the course and scope of his employment and under color of
6 law Defendant Phillips is sued in his personal capacity On information and belief, defendant
7 Phillips is a citizen of the State of California

8 8 At all relevant times, defendant Jimmy Yee ("Yee") was a firefighter, paramedic
9 and/or emergency medical technician employed by the City and County as a member of the
10 SFFD, and was acting within the course and scope of his employment and under color of law.
11 Defendant Yee is sued in his personal capacity On information and belief, defendant Yee is a
12 citizen of the State of California.

13 9 At all relevant times, defendant Michelle Grindstaff ("Grindstaff") was a
14 firefighter, paramedic and/or emergency medical technician employed by the City and County as
15 a member of the SFFD, and was acting within the course and scope of her employment and
16 under color of law Defendant Grindstaff is sued in her personal capacity On information and
17 belief, defendant Grindstaff is a citizen of the State of California

18 10 At all relevant times, defendant Michael Kirk ("Kirk") was a firefighter,
19 paramedic and/or emergency medical technician employed by the City and County as a member
20 of the SFFD, and was acting within the course and scope of his employment and under color of
21 law Defendant Kirk is sued in his personal capacity On information and belief, defendant Kirk
22 is a citizen of the State of California

23 11 At all relevant times, defendant Henry Choy ("Choy") was employed by the City
24 and County as a San Francisco Airport airfield safety officer, and was acting within the course
25 and scope of his employment and under color of law Defendant Choy is sued in his personal
26 capacity On information and belief, defendant Choy is a citizen of the State of California.

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1 12 At all relevant times, defendant Derrick Lee (“Lee”) was a Police Officer
2 employed by the City and County as a member of the San Francisco Police Department, and was
3 acting within the course and scope of his employment and under color of law. Defendant Lee is
4 sued in his personal capacity. On information and belief, defendant Lee is a citizen of the State
5 of California.

6 13 At all relevant times, defendant Antenor Molloy (“Malloy”) was employed by the
7 City and County as the Emergency Medical Services Captain with the SFFD and was acting
8 within the course and scope of his employment and under color of law. On information and
9 belief, defendant Malloy was acting as a managing agent for the City and County and was
10 responsible for the administration, supervision, hiring, and/or training of persons, agents and
11 employees working for the SFFD, including in the area of emergency medical services. On
12 information and belief, defendant Malloy is a citizen of the State of California.

13 14 At all relevant times, defendant Anthony Robinson (“Robinson”) was employed
14 by the City and County as a Fire Captain with the SFFD and was acting within the course and
15 scope of his employment and under color of law. On information and belief, defendant
16 Robinson was acting as a managing agent for the City and County and was responsible for the
17 administration, supervision, hiring, and/or training of persons, agents and employees working for
18 the SFFD, including in the area of emergency medical services. On information and belief,
19 defendant Robinson is a citizen of the State of California.

20 15 At all relevant times, defendant Tom Siragusa (“Siragusa”) was employed by the
21 City and County as the Assistant Chief with the SFFD and was acting within the course and
22 scope of his employment and under color of law. On information and belief, defendant Siragusa
23 was acting as a managing agent for the City and County and was responsible for the
24 administration, supervision, hiring, and/or training of persons, agents and employees working for
25 the SFFD, including in the area of emergency medical services. On information and belief,
26 defendant Siragusa is a citizen of the State of California.

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1 16 At all relevant times, defendant Mark Gonzales (“Gonzales”) was employed by
2 the City and County as the Deputy Chief of Operations with the SFFD and was acting within the
3 course and scope of his employment and under color of law. On information and belief,
4 defendant Gonzales was acting as a managing agent for the City and County and was responsible
5 for the administration, supervision, hiring, and/or training of persons, agents and employees
6 working for the SFFD, including in the area of emergency medical services. On information and
7 belief, defendant Gonzales is a citizen of the State of California.

8 17 At all relevant times, defendant Joanne Hayes-White (“White”) was employed by
9 the City and County as the Chief of the SFFD and was acting within the course and scope of her
10 employment and under color of law. On information and belief, defendant Hayes-White was
11 acting as a managing agent for the City and County and was responsible for the administration,
12 supervision, hiring, and/or training of persons, agents and employees working for the SFFD,
13 including in the area of emergency medical services. On information and belief, defendant
14 Hayes-White is a citizen of the State of California.

15 18 At all relevant times, defendant John Littlefield (“Littlefield”) was employed by
16 the City and County as the Deputy Director of Operations for the San Francisco Airport and was
17 acting within the course and scope of his employment and under color of law. On information
18 and belief, defendant Littlefield was acting as a managing agent for the City and County and was
19 responsible for the administration, supervision, hiring, and/or training of persons, agents and
20 employees working for the Airport, including in the area of emergency medical services. On
21 information and belief, defendant Littlefield is a citizen of the State of California.

22 19 At all relevant times, defendant Tryg McCoy (“McCoy”) was employed by the
23 City and County as the Chief Operating Officer with the San Francisco Airport and was acting
24 within the course and scope of his employment and under color of law. On information and
25 belief, defendant McCoy was acting as a managing agent for the City and County and was
26 responsible for the administration, supervision, hiring, and/or training of persons, agents and
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1 employees working for the Airport, including in the area of emergency medical services On
2 information and belief, defendant McCoy is a citizen of the State of California

3 20. At all relevant times, defendant John L. Martin ("Martin") was employed by the
4 City and County as the Airport Director of the San Francisco Airport and was acting within the
5 course and scope of his employment and under color of law On information and belief,
6 defendant Martin was acting as a managing agent for the City and County and was responsible
7 for the administration, supervision, hiring, and/or training of persons, agents and employees
8 working for the Airport, including in the area of emergency medical services On information
9 and belief, defendant Martin is a citizen of the State of California

10 21 At all relevant times, defendant Denise Schmitt ("Schmitt") was employed by the
11 City and County as the Deputy Chief with the SFPD Airport Bureau and was acting within the
12 course and scope of her employment and under color of law On information and belief,
13 defendant Schmitt was acting as a managing agent for the City and County and was responsible
14 for the administration, supervision, hiring, and/or training of persons, agents and employees
15 working for the SFPD, including in the area of emergency medical services On information and
16 belief, defendant Schmitt is a citizen of the State of California

17 22 Plaintiffs are unaware of the true names and capacities, whether individual,
18 corporate, associate, or otherwise, of defendants sued herein as DOES 1 through 100, inclusive,
19 and therefore sue said defendants by such fictitious names Plaintiffs will seek leave of the Court
20 to amend this complaint to allege the true names and capacities of said fictitiously named
21 defendants when the same have been ascertained

22 23 At all times relevant, Defendants, including DOES 1 through 100, were
23 employees, independent contractors, and duly appointed, qualified, and acting deputies, police
24 officers, firefighters, airport or airfield security officers, elected officials, emergency medical
25 technicians, paramedics, medical providers, nurses, and/or other agents of the City and County
26 acting within the course and scope of their employment and/or agency. Each of the Defendants
27 caused the death of Ye Meng Yuan, and/or is responsible for the conduct (including omissions)
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1 and breaches described herein which resulted in or led to the death of Ye Meng Yuan by, *inter*
2 *alia*, personally participating in the conduct, or acting jointly and in concert with others who did
3 so, by authorizing, acquiescing, or failing to take action to prevent the unlawful conduct by
4 promulgating policies and procedures pursuant to which the conduct occurred, by failing and
5 refusing, with deliberate indifference to the rights of Plaintiffs and Ye Meng Yuan, to initiate and
6 maintain adequate training, supervision, and staffing, by failing to maintain proper and adequate
7 policies, procedures, customs and protocols; and by ratifying such conduct.

8 24 Whenever and wherever reference is made in this Complaint to any act by
9 Defendants, such allegations and references shall also be deemed to mean the acts and failures to
10 act of each Defendant, including Does 1 through 100, individually, jointly, and/or severally

11 **III. PRELIMINARY ALLEGATIONS**

12 25 Plaintiffs filed a timely claim pursuant to Gov Code sections 910 *et seq.* on
13 January 2, 2014, and a timely amendment was filed on January 6, 2014 (the “Claim”) By letter
14 dated February 14, 2014, the Claim was rejected This action has been filed within the time
15 allowed by Government Code section 945.6

16 26 This action is brought in accord with the Government Claims Act, including
17 Government Code sections 815 *et seq.*, 820 *et seq.*, 910 *et seq.*, and 950 *et seq.* It is also being
18 brought under 42 U.S.C. § 1983, and under the 14th Amendment of the United States
19 Constitution Plaintiffs further allege that the conduct of each Defendant deprived Ye Meng
20 Yuan of her constitutional right to life, and to her constitutional right to medical care for serious
21 medical needs and deprived Plaintiffs of their constitutional right to family relations

22 27. The amount in controversy is in excess of the jurisdictional minimum of this
23 Court.

24 28 This Court has subject matter jurisdiction over all causes of action asserted herein
25 pursuant to the California Constitution, Article VI, Section 10, and by virtue of Defendants'
26 violations of California law.

1 29 This Court also has concurrent jurisdiction over claims brought under 42 U S C §
2 1983.

3 30. Venue is proper in this County because many of the acts, omissions and
4 transactions complained of occurred in County. On information and belief, some of the
5 Defendants reside in this County

IV. FACTS

A. The San Francisco Airport (SFO)

8 31 The Airport is a department of the City and County but is located outside of San
9 Francisco's geographic boundaries, in an unincorporated area of San Mateo County. SFO is the
10 largest airport in northern California and accommodates both international and domestic flights.
11 SFO is bounded by the San Francisco Bay to the north and east and by land to the west and
12 south

13 32. The SFFD staffs the SFFD-Airport Bureau (“SFFD-AB”) under an inter-
14 departmental work order agreement between the Airport and the SFFD. The SFFD Chief
15 appoints an Assistant Deputy Chief to manage the SFFD-AB, comprised of three firehouses on
16 Airport property with ARFF personnel dedicated not only to Airport fire fighting but also to
17 providing emergency medical services (“EMS”) and emergency response and rescue. The
18 SFFD-AB is also responsible for responding to medical calls for service on Airport property and
19 is staffed with paramedic personnel, who are constantly on duty at SFO. The SFFD-AB
20 responds to numerous medical calls each month.

33 The SFPD staffs the Airport Bureau of the San Francisco Police Department
("SFPD-AB") Within the Bureau, there are a number of specialized police units dedicated to
the safety and security of the Airport. The SFPD-AB plays a crucial role in the Airport's
emergency response capabilities

1 **B. Ye Meng Yuan Survived The Crash Of Flight 214 And Evacuated The**
2 **Aircraft**

3 34 On July 6, 2013, Asiana Airlines Flight No OZ 214 (“Flight 214”) departed
4 Incheon International Airport, South Korea, destined for San Francisco International Airport
5 (“SFO”) Flight 214 was conducted with a BOEING 777-200ER aircraft (the “Aircraft”) and
6 had 307 passengers and crew-members on board Ye Meng Yuan was one of the passengers

7 35. At approximately 11 27 a.m PDT on July 6, 2013, the Aircraft operated as Flight
8 214 struck the sea wall just short of the threshold of runway 28L during the final seconds of its
9 attempted landing (the “Crash”) After impact with the sea wall, the Aircraft crash landed on
10 Runway 28L and eventually came to rest approximately 2400 feet from the sea wall to the left of
11 the runway

12 36 On information and belief, Ye Meng Yuan was not ejected during the accident
13 sequence, and her death was not caused by being ejected from the Aircraft. On information and
14 belief, either on her own or with assistance, Ye Meng Yuan exited the Aircraft down one of the
15 two slide ramps on the left side of the Aircraft Thereafter, she was observed by multiple City
16 and County employees, agents and/or contractors on the ground near a paved cart road in front of
17 the Aircraft’s “2L” slide

18 **C. Ye Meng Yuan Was Abandoned, Left For Dead, And Run Over By Two**
19 **Separate “ARFF Units”**

20 37 The City and County employees, agents and/or contractors responsible for
21 providing emergency medical services at the Airport and who responded to the Crash are
22 collectively and individually referred to herein as “Rescue Workers” The Rescue Workers
23 include members of the SFFD, the SFPD, Airfield Safety Officers for the Airport (“ASOs”),
24 and/or other agencies, departments, and divisions of the City and County

25 38 Ye Meng Yuan remained in the same location near the cart road, when several of
26 the Rescue Workers spotted her, including, but not limited to, defendants Choy (ASO),
27 Grindstaff (SFFD), Kirk (SFFD), Lee (SFPD), Emmons (SFFD), Phillips (SFFD), Yee (SFFD),
28 and Does 1 through 50 (collectively, the “Rescue Worker Defendants”). These Rescue Worker

1 Defendants were on the ground and/or in ARFF vehicles when they spotted Ye Meng Yuan, and
2 at least some were, at the time, performing solely medical, rescue and triage operations.

3 39 Inexplicably, the Rescue Worker Defendants failed to assess Ye Meng Yuan,
4 communicate her location to command, and failed to mark her location. They did not take her
5 pulse. They did not check her breathing. They failed to conduct any triage on her. They failed
6 to move her to a safe location and abandoned her in a hazardous position that subjected her to
7 grave risk of harm.

8 40 According to witness statements, SFFD firefighter Phillips, riding on "ARFF Unit
9 10", observed Ye Meng Yuan while approaching the Aircraft. Phillips left the vehicle to help the
10 driver, Jimmy Yee, maneuver "ARFF Unit 10" around Ye Meng Yuan. Phillips alerted Emmons
11 that a passenger was lying in the field, but Emmons responded that they should move on.

12 41. Approximately 15 minutes after Ye Meng Yuan was seen lying helpless on the
13 ground in the fetal position by Phillips and the other Rescue Worker Defendants and after
14 Emmons had been informed that she was lying on the ground, "ARFF Unit 10" ran her over. At
15 the time of impact, Ye Meng Yuan was in the same location where the Rescue Worker
16 Defendants had initially observed her. When "ARFF Unit 10" ran over Ye Meng Yuan, the
17 impact caused devastating blunt force traumatic injuries that resulted in her untimely death. At
18 the time she was run over by "ARFF Unit 10," all of the other passengers and crew members
19 who were on board Flight 214 had been removed from the close proximity of the Aircraft and
20 were outside any zone of danger.

21 42. Elyse Duckett is an SFFD firefighter assigned to the Airport Division. Duckett
22 maneuvered "ARFF Unit 37" into the area where Ye Meng Yuan was located shortly after
23 "ARFF Unit 10" had run over and killed Ye Meng Yuan. At the time, Ye Meng Yuan's remains
24 were still unmarked and obscured by foam put down by "ARFF Unit 10." Duckett then ran over
25 Ye Meng Yuan in "ARFF Unit 37" while departing the scene of the Crash. On information and
26 belief, at the time Ye Meng Yuan was struck by "ARFF Unit 37," she was already deceased as a
27 result of having been run over by "ARFF Unit 10."

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1 43 The Rescue Worker Defendants created a danger to Ye Meng Yuan, and/or
2 rendered her more vulnerable to existing danger. They knew Ye Meng Yuan was in a location
3 close to the Aircraft where she lay non-ambulatory and unable to protect herself. In deliberate
4 indifference to known and obvious dangers, the Rescue Worker Defendants failed to examine Ye
5 Meng Yuan, failed to ensure she was placed or moved to a safe location, failed to mark her
6 location, failed to protect her from moving vehicles in the vicinity of the Aircraft where it was
7 known that vehicles would be traveling, failed to alert commanders at the scene, failed to
8 properly assess and triage Ye Meng Yuan, failed to properly treat Ye Meng Yuan; and
9 abandoned Ye Meng Yuan in a perilous location

10 D. The City And County Deliberately Ignored Its Responsibility To Provide
11 Mandated Training And Supervision For Airport Emergency Medical
12 Services Personnel

13 44 Personnel with supervisory and command duties and/or policymakers, who were
14 employees or independent contractors of the City and County, recklessly, and with deliberate
15 indifference to known and obvious dangers, failed to ensure that both they and the rank and file
16 responders received proper training, failed to implement appropriate procedures, and violated
17 legally required mandates designed to prevent injury and death during aircraft emergencies.
18 Such individuals include defendants Molloy, EMS Captain, SFFD, Robinson, Captain, SFFD,
19 Siragusa, Assistant Chief, SFFD, Martin, Airport Director, SFO, McCoy, Chief Operating
20 Officer, SFO, Gonzales, Deputy Chief of Operations, SFFD, Littlefield, Deputy Director of
21 Operations, SFO, Schmitt, Deputy Chief, SFPD (Airport Bureau); Hayes-White, Chief of
22 Department, SFFD, and Does 51-95 (collectively and individually, the "Supervisor
23 Defendants")

24 45 The SFO, SFFD, and SFPD, and/or other departments, agencies and divisions of
25 the City and County are responsible for providing emergency medical services for SFO, pursuant
26 to the Federal Aviation Regulations, 14 C.F.R. Part 139 ("Part 139"), and must certify
27 compliance with certain provisions of Part 139. Part 139 constitutes an enactment within the
28 meaning of Government Code Section 815.6

1 46 Part 139 requires the Federal Aviation Administration (“FAA”) to issue airport
2 operating certificates to airports, such as SFO. To obtain a certificate, an airport must agree to
3 certain operational and safety standards and provide for such things as aircraft rescue and
4 firefighting services and adequate rescue equipment. Airport Operating Certificates serve to
5 ensure safety in air transportation to passengers, such as Ye Meng Yuan

6 47 Part 139 319 imposed on the City and County, acting by and through its
7 departments and/or divisions, including SFO, SFFD, SFPD, a duty to ensure, *inter alia*, the
8 following

- 9 a All rescue personnel are properly trained. Such personnel must be trained prior to
10 initial performance of rescue and firefighting duties and receive recurrent instruction
11 every 12 consecutive calendar months. The curriculum for initial and recurrent
12 training must include emergency aircraft evacuation assistance and familiarization
13 with firefighters’ duties under the airport emergency plan,
- 14 b All rescue and firefighting personnel must participate in at least one live-fire drill
15 prior to initial performance of rescue and firefighting duties and every 12 consecutive
16 calendar months thereafter, and
- 17 c Rescue and firefighting personnel must be properly trained in basic emergency
18 medical services, with a minimum 40 hours in length, which cover, among other
19 things, the following topics (i) Cardiopulmonary resuscitation, (ii) Shock, (iii)
20 Primary patient survey, (iv) Moving patients, and (v) Triage

21 48 Additionally, Part 139 325 requires SFO, in cooperation and conjunction with the
22 SFFD and SFPD, to develop and maintain an emergency plan (the “Emergency Plan”) designed
23 to minimize personal injury in an emergency. The plan must include the following.

- 24 a appropriate procedures for responding to emergencies such as aircraft incidents and
25 accidents;

1 b. appropriate provisions for medical services, including transportation and medical
2 assistance for the largest passenger carrying aircrafts that the airport can reasonably
3 expect to serve, and
4 c. appropriate procedures to ensure proper training for emergency responders

5 49 On information and belief, in deliberate indifference to known and obvious
6 dangers, the City and County, Supervisor Defendants, and Does 96-100 breached the foregoing
7 mandatory duties and the Emergency Plan by failing to ensure that rescue and firefighting
8 personnel were properly trained in accordance with the requirements described above and failing
9 to institute procedures for ensuring proper emergency medical services, assessment, rescue,
10 triage and treatment in response to the Crash. Among other things, on information and belief,
11 the City and County, Supervisor Defendants, and Does 96-100 had a policy of forbidding the
12 removal of those believed to be deceased from an accident scene for investigative purposes,
13 without requiring basic procedures to determine whether an accident victim is, in fact, dead

14 **V. CAUSES OF ACTION**

15 **FIRST CAUSE OF ACTION**

16 **(For Wrongful Death Based on Negligence and/or Gross Negligence as Authorized Under
the Government Claims Act,
By Plaintiffs Against All Defendants)**

17 50 Plaintiffs incorporate by reference as though fully stated herein all of the
18 foregoing paragraphs

19 51 The City and County, acting by and through various of its departments, agencies
20 and/or divisions, including, but not limited to SFFD, SFPD and SFO are responsible for
21 providing, *inter alia*, emergency medical services for the San Francisco International Airport
22 ("SFO"), pursuant to, *inter alia*, 14 C.F.R. § 139.319. With SFO being the tenth busiest airport
23 in the United States, they are tasked with ensuring the protection of over half a million
24 passengers each week.

25 52 At all relevant times mentioned above, the Rescue Worker Defendants were
26 employees and/or independent contractors who responded to the Crash

1 53 At all relevant times, the Supervisor Defendants were employees and/or
2 independent contractors who had supervisory, training, and command duties with regard to
3 providing emergency medical services and rescue operations at the Airport

4 54 At all relevant times, the Supervisor Defendants and the Rescue Workers were
5 acting within the scope of their employment and/or agency for the City and County. The City
6 and County is vicariously liable for the misconduct, negligence, recklessness, and gross
7 negligence of its agents and employees, pursuant to, *inter alia*, Government Code sections 815.2
8 and 815.4

9 55 The Rescue Worker Defendants and the Supervisor Defendants are also
10 personally liable for their acts and omissions described herein

11 56. At all relevant times mentioned above, the Rescue Worker Defendants and the
12 Supervisor Defendants owed Ye Meng Yuan and Plaintiffs a duty to, *inter alia*, exercise
13 reasonable and ordinary care and to avoid injury to Ye Meng Yuan, to provide rescue and
14 medical services in a safe and reasonable manner, and to otherwise coordinate response efforts in
15 a proper, safe, careful and reasonable manner

16 57 The Rescue Worker Defendants and each of them breached their duty of care to
17 Ye Meng Yuan and Plaintiffs and acted with deliberate indifference to known and obvious
18 dangers, with a lack of due or proper care and/or with an extreme departure from what a
19 reasonably careful person would do in the same situation to prevent harm to oneself or to others,
20 through, *inter alia*, the following acts and omissions, which are set forth in greater detail above

- 21 a. Failing to ensure she was placed in a safe location;
- 22 b. Failing to assess and treat Ye Meng Yuan,
- 23 c. Failing to remove Ye Meng Yuan from a hazardous location in the vicinity of the
24 Aircraft, where they knew vehicles would be operating and traversing,
- 25 d. Failing to mark Ye Meng Yuan's presence and/or location and/or protect her from
26 vehicles in the area,

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- e Deliberately and knowingly abandoning Yc Meng Yuan, who was unable to protect herself, in a hazardous location, where they knew she would be in harm's way in the vicinity of the operations that involved vehicles, and
- f Failing to coordinate response efforts in a proper, safe, careful and reasonable manner

6 58 Also, the Supervisor Defendants, as set forth above, recklessly, and/or
7 negligently, in breach of their duty of care, failed to ensure that both they and the rank and file
8 responders received proper training and failed to implement appropriate and federally mandated
9 procedures to prevent injury and death during aircraft emergencies, as set forth in Paragraphs 44
10 through 49, which are incorporated herein. Among other things, they acted with a lack of due or
11 proper care, in deliberate indifference to known and obvious dangers, and/or with an extreme
12 departure from what a reasonably careful person would do in the same situation to prevent harm
13 to oneself or to others, through, *inter alia*, the following acts and omissions

- a Failing to implement appropriate training and procedures to identify, assess, treat, and triage injured victims,
- b Failing to implement appropriate training and policies to identify, communicate the location of, and track injured victims, and
- c Failing to implement appropriate training and procedures to assess, mark, protect, treat, and/or move passengers, like Ye Meng Yuan, to a safe location

59 As a direct and proximate result of the negligence, carelessness, gross negligence,
recklessness, deliberate indifference to known and obvious dangers, and/or other wrongful acts
and/or omissions of the Rescue Worker Defendants and the Supervisor Defendants, Ye Meng
Yuan suffered multiple blunt injuries from being run over by ARFF Unit 10, causing her death

24 60 As a result of Ye Meng Yuan's death, Plaintiffs sustained pecuniary and non-
25 pecuniary losses, including, without limitation, grief, loss of society, loss of support, services,
26 care, comfort, affection, moral support, solace, and other losses for which recovery is authorized
27 under applicable law.

61 As a further direct result of Ye Meng Yuan's death, Plaintiffs incurred expenses for funeral, burial, and other related costs in an amount to be determined at trial

SECOND CAUSE OF ACTION

**(For Wrongful Death Based on Breached Mandatory Duties Imposed by Enactment, as
Authorized Under the Government Claims Act,
By Plaintiffs Against Defendant the City and County, the Supervisor Defendants, and
DOES 96-100)**

62 Plaintiff's incorporate by reference as though fully stated herein all of the foregoing paragraphs

63 Pursuant to Government Code section 815.6, a public entity is liable for the breach of mandatory duty imposed by enactment by, among other things statutes or regulations

64 The SFO, SFFD, and SFPD, the Supervisor Defendants and/or other departments, agencies and divisions of the City and County and Does 96-100 are responsible for providing emergency medical services for SFO, pursuant to the Federal Aviation Regulations, 14 C F R. Part 139 (“Part 139”), and must certify compliance with certain provisions of Part 139. Part 139 constitutes an enactment within the meaning of Government Code Section 815.6

65 As set forth in Paragraphs 44 through 49 above, in deliberate indifference to known and obvious dangers, the SFO, SFPD, the SFFD, the City and County, the Supervisor Defendants, and Does 96-100 breached their mandatory duties under Part 139 and the Emergency Plan.

66 As a direct and proximate result of the breach of such duties set forth above, Ye Meng Yuan was injured and killed, causing Plaintiffs' damages and losses

67 As a result of Ye Meng Yuan's death, Plaintiffs sustained pecuniary and non-pecuniary losses, including, without limitation, grief, loss of society, loss of support, services, care, comfort, affection, moral support, solace, and other losses for which recovery is authorized under applicable law

68 As a further direct result of Ye Meng Yuan's death, Plaintiffs incurred expenses for funeral, burial, and other related costs in an amount to be determined at trial.

THIRD CAUSE OF ACTION

**(For Survival Claims Based on Negligence and/or Gross Negligence as Authorized Under
the Government Claims Act,
By Plaintiffs Against All Defendants)**

69 Plaintiffs incorporate by reference as though fully stated herein all of the foregoing paragraphs

70 Plaintiffs are the sole heirs, beneficiaries, and successors in interest of Ye Meng Yuan

71 Plaintiffs incorporate Paragraphs 51 through 59 as though fully set forth herein.

72. As a direct and proximate result of the foregoing, acts and failures to act, Ye Meng Yuan suffered personal injury, pain and suffering, property loss, grave and fatal injur

73. Pursuant to Code of Civil Procedure section 377 34, Plaintiffs are seeking to recover for all losses or damages that Ye Meng Yuan sustained or incurred before death, in an amount to be determined at trial

FOURTH CAUSE OF ACTION

**(For Survival Claim Based on Breached Mandatory Duties Imposed by Enactment, as
Authorized Under the Government Claims Act,
By Plaintiffs Against Defendant the City and County, the Supervisor Defendants, and
DOES 96-100)**

74 Plaintiffs incorporate by reference as though fully stated herein all of the foregoing paragraphs

75 Plaintiffs are the sole heirs, beneficiaries, and successors in interest of Ye Meng
Yuan

76 Plaintiffs incorporate Paragraphs 63 through 66 as though fully set forth herein.

77. As a direct and proximate result of the foregoing Ye Meng Yuan suffered personal injury, pain and suffering, property loss, grave and fatal injuries, and other losses for which recovery is authorized under applicable law.

1 78 Pursuant to Code of Civil Procedure section 377.34, Plaintiffs are seeking to
2 recover for all losses or damages that Ye Meng Yuan sustained or incurred before death, in an
3 amount to be determined at trial.

4 **FIFTH CAUSE OF ACTION**

5 **(For Violation of Constitutional and Federally Protected Rights and Wrongful Death,
as Authorized Under 42 U.S.C. § 1983,
6 By Plaintiffs Against the Rescue Worker Defendants)**

7 79 Plaintiffs incorporate by reference as though fully stated herein all of the
8 foregoing paragraphs

9 80 As a result of the acts set forth herein, Plaintiffs and Ye Meng Yuan were
10 subjected to deprivation of rights by the Rescue Worker Defendants, which rights include, but
11 are not limited to, privileges and immunities secured to Plaintiffs and Ye Meng Yuan by the
12 Constitution and laws of the United States. By reason of such acts, the Rescue Worker
13 Defendants have violated the constitutional rights and liberty interests of Plaintiffs and Ye Meng
14 Yuan, which are protected under, among other things, the 14th Amendment's prohibition against
15 depriving a person of life and family relationships without due process of law

16 81 At all relevant times, the Rescue Worker Defendants were acting under color of
17 law and of statutes, or ordinances, regulations, customs, and usages of the law of the United
18 States, State of California, and of the City and County

19 82 The Rescue Worker Defendants are personally liable for their acts and omissions
20 described herein

21 83 At all relevant times, the Rescue Worker Defendants were responsible for, *inter*
22 *alia*, emergency medical services for SFO and required to provide such services in the event of a
23 large passenger aircraft incident.

24 84 At all relevant times mentioned above, the Rescue Worker Defendants and the
25 Supervisor Defendants owed Ye Meng Yuan and Plaintiffs a duty to, *inter alia*, exercise
26 reasonable and ordinary care and to avoid injury to Ye Meng Yuan, to provide rescue and

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1 medical services in a safe and reasonable manner, and to otherwise coordinate response efforts in
2 a proper, safe, careful and reasonable manner

3 85 The Rescue Worker Defendants and each of them breached their duty of care to
4 Ye Meng Yuan and Plaintiffs and acted recklessly and/or in callous or deliberate indifference to
5 known and obvious dangers, with a lack of due or proper care and/or with an extreme departure
6 from what a reasonably careful person would do in the same situation to prevent harm to oneself
7 or to others, through, *inter alia*, the following acts and omissions, which are set forth in greater
8 detail above

- 9 a Failing to ensure Ye Meng Yuan was placed in a safe location,
- 10 b Failing to assess and treat Ye Meng Yuan,
- 11 c Failing to remove Ye Meng Yuan from a hazardous location in the vicinity of the
12 Aircraft, where they knew vehicles would be operating and traversing,
- 13 d Failing to mark Ye Meng Yuan's presence and/or location and/or protect her from
14 vehicles in the area, and
- 15 e Deliberately and knowingly abandoning Ye Meng Yuan, who was unable to
16 protect herself, in a hazardous location where they knew she would be in harm's
17 way in the vicinity of the operations that involved vehicles

18 86. At all times herein mentioned, the Rescue Worker Defendants knew, or should
19 have known, of Ye Meng Yuan's injuries and perilous condition and location; were deliberately
20 indifferent to them, ignored them, and failed to provide access to and delivery of medical care,
21 assessment, triage, and attention to Ye Meng Yuan

22 87 The conduct of the Rescue Workers was so egregious and outrageous and
23 contrary to the right to life implicit in ordered liberty and common decency so as to shock the
24 conscious of the community.

25 88 Further, each of the Rescue Worker Defendants delayed, denied, and deprived Ye
26 Meng Yuan of medical care and attention for her injuries and condition and abandoned her in a
27 dangerous situation in such a manner resulting in harm, injury, and death.

1 89 As a direct result of the Rescue Worker Defendants' deliberate indifference and
2 conduct, Ye Meng Yuan was deprived of the necessary and indicated medical intervention, care,
3 treatment, was abandoned in a perilous location, and suffered serious injuries and death; and, as
4 a result of the injury, pain, and suffering Ye Meng Yuan suffered prior to her death, Plaintiffs
5 claim damages for loss of life and pain and suffering prior to Ye Meng Yuan's death as a
6 survivor action

7 90. As a result of the foregoing violations which caused and/or contributed to the
8 death of Ye Meng Yuan, Plaintiffs sustained pecuniary and non-pecuniary losses, including,
9 without limitation, grief, loss of society, loss of support, services, care, comfort, affection, moral
10 support, solace and other losses for which recovery is authorized under applicable law

11 91. As a further direct result of Ye Meng Yuan's death, Plaintiffs incurred expenses
12 for funeral, burial, attorney's fees, and seek recovery for all damages authorized by law in an
13 amount to be determined at trial

SIXTH CAUSE OF ACTION

15 (For Violation of Constitutional and Federally Protected Rights and Wrongful Death,
16 as Authorized Under 42 U.S.C. § 1983, For a Policy, Custom, or Practice, Failing to Train
17 and Supervise, and Violations of Statutory Duty Causing Constitutional Violations
By Plaintiffs Against Defendant City and County, the Supervisor Defendants and DOES 96
- 100)

18 92. Plaintiffs incorporate by reference as thought fully set forth herein all of the
foregoing paragraphs.

20 93 As a result of the acts set forth herein, Plaintiffs and Ye Meng Yuan were
21 subjected to deprivation of rights by the defendant City and County, the Supervisor Defendants,
22 and Does 96 through 100 (collectively and individually, the “City and County Defendants”),
23 which rights include, but are not limited to, privileges and immunities secured to Plaintiffs and
24 Ye Meng Yuan by the Constitution and laws of the United States. By reason of such acts, the
25 City and County Defendants have violated the constitutional rights and liberty interests of
26 Plaintiffs and Ye Meng Yuan, which are protected under, among other things, the 14th

1 Amendment's prohibition against depriving a person of life and family relationships without due
2 process of law

3 94 At all relevant times, the City and County Defendants were acting under color of
4 law and of statutes, or ordinances, regulations, customs, and usages of the law of the United
5 States, State of California, and of the City and County.

6 95 The City and County Defendants, through their agents, servants, and employees,
7 and/or subordinates had the duty and responsibility for the training and supervision of the Rescue
8 Workers, including the Rescue Worker Defendants, regarding emergency medical services
9 following passenger aircraft incidents. This includes, but is not limited to, training in
10 cardiopulmonary resuscitation, shock, primary patient survey, moving patients, and triage.

11 96 Additionally, the City and County Defendants were required to develop and
12 maintain the Emergency Plan, as set forth in Paragraph 44 through 49 above, designed to
13 minimize injury or death in an emergency

14 97 At all relevant times, the City and County Defendants knew or should have
15 known that the Rescue Workers, including the Rescue Worker Defendants, would be faced with
16 situations similar to the circumstances and facts heretofore alleged, wherein the Rescue Workers
17 would be required to respond to emergencies, such as aircraft incidents and accidents involving
18 the large passenger carrying aircrafts, and absent appropriate training, supervision and
19 procedures, injury and death would be likely to occur

20 98 The City and County Defendants failed to provide, under the color of State law,
21 adequate training to the Recue Workers, including the Rescue Worker Defendants, and to
22 implement necessary procedures and methods to avoid injury and death to an injured passenger
23 in a large aircraft accident, including but not limited to the following.

24 a the proper and reasonable procedures for assessing an accident scene and ensuring
25 that injured passengers are removed from the immediate threat of harm,
26 b the proper and reasonable procedures for assessing injured passengers,

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- c the proper and reasonable procedures for triage and identifying injured passengers,
- d the proper and reasonable procedures to for conducting cardiopulmonary resuscitation,
- e the proper and reasonable procedures for treating shock, and
- f the proper and reasonable procedures for communicating and marking the location of injured passengers

8 99. At all relevant times, the City and County Defendants had a constitutional and
9 federally mandated duty to provide supervision and training to ensure implementation of the
10 foregoing procedures, which, if implemented, would have prevented the further injury and death
11 of Ye Meng Yuan.

12 100. On information and belief, at all relevant times, the City and County Defendants
13 had a policy of not requiring strict adherence to compliance with appropriate training procedures
14 or with its own Emergency Plan.

15 101 The death of Ye Meng Yuan was caused pursuant to a policy and custom of the
16 City and County Defendants of inadequate training and supervision of the Rescue Workers,
17 including the Rescue Worker Defendants, their failure to provide adequate protocols, and their
18 failure to follow existing protocols

19 102 The City and County Defendants' policy or custom of grossly inadequate training
20 and supervision of the Rescue Workers and failures relating to protocols demonstrated gross
21 negligence and/or recklessness amounting to deliberate indifference to the clearly established
22 constitutional rights of others, including Ye Meng Yuan, to be free from the deprivation of life
23 without due process of law

24 103 The reckless or grossly negligent manner in which the City and County
25 Defendants trained and supervised their personnel, failed to provide protocols, and failed to
26 follow existing protocols created a high risk of injury mortal danger or death to others, including
27 Ye Meng Yuan.

1 104 The City and County Defendants, who include policymakers, knew that the
2 Rescue Workers, including the Rescue Worker Defendants, would be likely to encounter a large
3 passenger aircraft incident, requiring medical and rescue operations

4 105. The inadequacies of its protocols and the training and supervision provided by the
5 City and County Defendants were so obvious and likely or probable to result in the violation of
6 constitutional rights that the City and County Defendants acted with deliberate indifference to
7 the need to protect citizens and acquiesced in and/or implicitly authorized the deprivation of Ye
8 Meng Yuan's and Plaintiffs rights including Ye Meng Yuan's right to life in the events following
9 the Crash

10 106 The City and County Defendants had knowledge of an obvious risk to the
11 constitutional rights of persons that the Rescue Workers would come in contact with and they
12 consciously failed to act despite the obvious risk

13 107. The above alleged constitutional violations committed by the Rescue Worker
14 Defendants were proximately caused by the City and County Defendants' deliberate indifference
15 to the training and supervision of the Rescue Workers, including the Rescue Worker Defendants,
16 and by the customs, practices, decisions, and policies of the City and County Defendants

17 108 As a legal cause of the City and County Defendants' deliberate indifference and
18 conduct, Ye Meng Yuan was deprived of the necessary and indicated medical intervention, care,
19 treatment, was abandoned in a perilous location, and suffered serious injuries and death. As a
20 result of the injury, pain, and suffering Ye Meng Yuan suffered prior to her death, Plaintiffs
21 claim damages for loss of life and pain and suffering prior to Ye Meng Yuan's death as a
22 survivor action

23 109 As a result of the foregoing violations and Ye Meng Yuan's death, Plaintiffs
24 sustained pecuniary and non-pecuniary losses, including, without limitation, grief, loss of
25 society, loss of support, services, care, comfort, affection, moral support, solace and other losses
26 for which recovery is authorized under applicable law

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110 As a further direct result of Ye Meng Yuan's death, Plaintiffs incurred expenses for funeral, burial, attorney's fees, and seek recovery for all damages authorized by law in an amount to be determined at trial

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs hereby demand and pray for judgment against the Defendants, and each of them, as follows

A To enter judgment in favor of Plaintiffs against Defendants on all causes of action as alleged in the Complaint,

B To award compensatory and pecuniary damages in an amount to be ascertained at trial,

C To award costs of suit incurred herein,

D For attorney's fees to the extent authorized by law, and

F For such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury of any and all issues in this action so triable of right

Dated August 13, 2014

KREINDLER & KREINDLER LLP

Gretchen M. Nelson
Anthony Tarricone
Justin T. Green
Gabriel S. Barenfeld
Attorneys for Plaintiffs

ATTACHMENT

DECLARATION OF GAN YEAND XIAO YUN ZHENG, SUCCESSORS IN INTEREST
OF YE MENG YUAN [CODE CIV. PROC., § 377.32]

We, Gan Ye and Xiao Yun Zheng, do declare as follows

- 1 Ye Meng Yuan is the name of the decedent
- 2 Ye Meng Yuan died on July 6, 2013, at San Francisco International Airport in California
- 3 We are Ye Meng Yuan's natural parents
- 4 There is no proceeding now pending in California for administration of Ye Meng Yuan's estate
- 5 We are authorized to act on behalf of the decedent as her successors in interest (as defined in Section 377 11 of the California Code of Civil Procedure) with respect Ye Meng Yuan's interest in the action or proceeding
- 6 No other person has a superior right to commence this action or proceeding or to be substituted for the decedent in the pending action or proceeding
- 7 Attached hereto as Exhibit A is a certified copy of the Death Certificate for the decedent, Ye Meng Yuan

We declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

By Gan Ye
Gan Ye

Dated July 31st, 2014

at No.74 Zhong Guo China
Qiao. jiang shan City,
zhe Jiang Province, 324100

By Xiao Yun Zheng
Xiao Yun Zheng

Dated July 31st, 2014

at No.74 Zhong Guo China
Qiao Jiang Shan City
zhe Jiang Province, 324100

叶敢先生和郑晓云女士,作为叶梦圆小姐权益继承人的声明

[案卷编号, 民事, § 377.32]

我们, 叶敢和郑晓云, 在此作以下声明:

- 1 遇难者的姓名为叶梦圆。
- 2 叶梦圆在加利福尼亚州的旧金山国际机场, 于2013年7月6日遇难身故。
- 3 我们是叶梦圆的生身父母。
- 4 在加利福尼亚州没有未被决定的关于叶梦圆的身份的程序。
- 5 我们作为身故的叶梦圆的权益继承人(加利福尼亚州民事诉讼法典第377章之定义)被授权代表叶梦圆在法律活动和程序中的权益。
- 6 没有其他任何人有更高的权利着手该项法律活动或者诉讼程序或者在未决定的法律活动或诉讼程序中取代该身故者。
7. 在此附上的作为证物A的是经认证的, 遇难者叶梦圆的死亡证明的副本。

我们在明白加利福尼亚州关于伪证罪处罚的规定后, 声明前述所言是真实并且正确的。

由 叶 敢
叶敢

日期 2014年 7 月 31 日

于中华人民共和国 浙江省江山市
中脉桥74号

邮编 324100

由 郑晓云
郑晓云

日期 2014年 7 月 31 日

于中华人民共和国 浙江省江山市
中脉桥74号

邮编 324100

EXHIBIT A

**COUNTY OF SAN MATEO
HEALTH SYSTEM
SAN MATEO, CALIFORNIA**

CERTIFICATE OF DEATH

3201341002607

USE BLACK INK ONLY / NO INK WATERMARKS OR ALTERATIONS
(S-1997-500)

(STATE FILE NUMBER)		2. MOBILE		3. LAST (Family) YE		3201341002607					
DECEASED'S PERSONAL DATA		4. DATE OF DEATH (month/year)		5. AGE Yrs. 16		6. FUNERAL ONE YEAR DAYS Hours Minutes		7. DATE OF DEATH (month/year) 07/06/2013 FND 1530			
		06/17/1997									
DECEASED'S PERSONAL DATA		10. SOCIAL SECURITY NUMBER NONE		11. EVER IN U.S. ARMED FORCES <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		12. MARITAL STATUS (check in box) NEVER MARRIED		13. EDUCATION (Highest Level Degree Not mentioned on back) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
DECEASED'S PERSONAL DATA		14. BIRTH STATE/FOREIGN COUNTRY CHINA		15. WAS DECEASED HISPANIC/LATINO/SPANISH? (yes/no marked on back)		16. DECEASED'S NAME - Up to 3 names may be listed (not mentioned on back) CHINESE		17. USUAL OCCUPATION - type of work or trade if any. DO NOT USE RETIRED STUDENT			
DECEASED'S PERSONAL DATA		18. KIND OF BUSINESS OR INDUSTRY (not grocery store, road construction, employment agency etc.) EDUCATION		19. YEARS IN OCCUPATION 10							
DECEASED'S PERSONAL DATA		20. DECEASED'S RESIDENCE (street and number or location) BUILDING 27 LU XI SHAN ZHUANG #101		21. CITY JIANG SHAN		22. COUNTY/PROVINCE ZHE JIANG		23. ZIP CODE 16		24. YEARS IN COUNTY CHINA	
INFORMANT NAME		25. INFORMANT'S NAME, RELATIONSHIP GAN YE, FATHER		26. MOBILE		27. INFORMANT'S MAILING ADDRESS (NAME AND NUMBER OF STREET AND NUMBER OF CITY OR TOWN)		28. INFORMANT'S MAILING ADDRESS (NAME AND NUMBER OF STREET AND NUMBER OF CITY OR TOWN)			
								BUILDING 27 LU XI SHAN ZHUANG #101, JIANG SHAN, CHINA			
INFORMANT NAME		29. NAME OF SURVIVING SPOUSE/SPF-FIRST GAN		30. MOBILE		31. LAST (DEATH NAME) YE		32. BIRTH STATE CHINA			
INFORMANT NAME		33. NAME OF FATHER/MENTH-PAST XIAO YUN		34. MOBILE		35. LAST (BIRTH NAME) ZHENG		36. BIRTH STATE CHINA			
INFORMANT NAME		37. DEPOSITION DATE (month/year) 07/25/2013		38. PLACE OF FINAL DISPOSITION/RESIDENCE BUILDING 27 LU XI SHAN ZHUANG #101 JIANG SHAN, ZHE JIANG PROVINCE, CHINA		39. SIGNATURE OF EMBALMER ► JACK JENSEN		40. LICENSE NUMBER EMB 7728			
INFORMANT NAME		41. TYPE OF DECEASED CR/TR/RES		42. SIGNATURE OF LOCAL REGISTRAR ► SCOTT MORROW, MD		43. LICENSE NUMBER FD 1797		44. DATE (month/year) 07/22/2013			
PLACE OF DEATH		101. PLACE OF DEATH SAN FRANCISCO INTERNATIONAL AIRPORT		102. FACILITY ADDRESS OR LOCATION WHERE FOUND (name and number or location) 900 NORTH FIELD ROAD, RUNWAY 28L		103. CITY SAN BRUNO		104. OTHER THAN HOSPITAL SPECIFY ONE <input type="checkbox"/> P. <input type="checkbox"/> EMT <input type="checkbox"/> DOA <input type="checkbox"/> Hospital <input type="checkbox"/> Home <input checked="" type="checkbox"/> On Air			
PLACE OF DEATH		105. CAUSE OF DEATH H. MULTIPLE BLUNT INJURIES		106. OTHER (check all that apply) Estab. the chain of events (e.g. disease, injury, or complication) that directly caused death. DO NOT enter hereditary events such as hereditary heart disease, hereditary eye disease, hereditary deafness without mentioning the etiology. DO NOT ADD ETIOLOGY. Infectious disease, hereditary disease, hereditary eye disease, hereditary deafness without mentioning the etiology.		107. DATE (month/year) 07/06/2013		108. FACILITY REPORTED TO CORONER Direct Mortuary Death and Death MINS 13-01116			
PLACE OF DEATH		109. DEATH REPORTED TO CORONER Direct Mortuary Death and Death MINS 13-01116		110. DATE (month/year) 07/06/2013		111. DEATH REPORTED TO CORONER Direct Mortuary Death and Death MINS 13-01116					
PLACE OF DEATH		112. OTHER (check all that apply) NO		113. DATE (month/year) 07/22/2013		114. DATE (month/year) 07/22/2013					
PLACE OF DEATH		115. WAS AUTOPSY PERFORMED? NO		116. DATE (month/year) 07/22/2013		117. DATE (month/year) 07/22/2013					
PLACE OF DEATH		118. DATE (month/year) 07/22/2013		119. SIGNATURE AND TITLE OF CORONER ROGER FIELDING		120. LICENSE NUMBER 07/06/2013 UNK					
PLACE OF DEATH		121. SIGNATURE AND TITLE OF CORONER ROGER FIELDING		122. DATE (month/year) 07/22/2013		123. TYPE/NAME/TITLE OF DOCTOR/DEPUTY CORONER ROGER FIELDING, DEPUTY CORONER					
PLACE OF DEATH		124. STATE REGISTRAR A B C D E		125. DATE (month/year) 07/22/2013		126. FAX NUMBER 0100010020000001*		127. CENSUS TRACT			

CERTIFIED COPY OF VITAL RECORDS

STATE OF CALIFORNIA
COUNTY OF SAN MATEO } SS

DATE ISSUED

07/23/2013

This is a true and exact reproduction of the document officially registered and placed on file in the office of the SAN MATEO COUNTY HEALTH SYSTEM.

Herminia Gabe
By _____

* 0 0 0 7 7 0 8 5 2 *

SCOTT MORROW M.D.

HEALTH OFFICER AND REGISTRAR

FONCO (Rev) 8/4/13

This copy not valid unless prepared on engraved border displaying seal and signature of County Health Officer

