

**FILED**  
**SAN MATEO COUNTY**

**AUG 13 2014**

Clerk of the Superior Court

By *[Signature]*  
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SAN MATEO**

**GAN YE and XIAO YUN ZHENG,**

Individually, as Heirs and Successors in Interest  
of, YE MENG YUAN, Deceased,

Plaintiffs,

v

CITY AND COUNTY OF SAN FRANCISCO,  
JOANNE HAYES-WHITE (SFFD), an  
individual, ANTENOR MOLLOY (SFFD), an  
individual, ANTHONY ROBINSON (SFFD), an  
individual, TOM SIRAGUSA (SFFD), an  
individual, MARK GONZALES (SFFD), an  
individual, JOHN LITTLEFIELD (SFO), an  
individual, TRYG MCCOY (SFO), an individual,  
JOHN L MARTIN (SFO), an individual,  
DENISE SCHMITT (SFPD), an individual,  
CHRISTINE EMMONS (SFFD), an individual,  
ROGER PHILLIPS (SFFD), an individual,  
MICHELLE GRINDSTAFF (SFFD), an  
individual, Michael Kirk (SFFD), an individual,  
HENRY CHOY (SFO), an individual, DERRICK  
LEE (SFPD), an individual, JIMMY YEE  
(SFFD), an individual, and DOES 1 through 100,

**Defendants**

Case No.

**GW 530 008**

**COMPLAINT FOR DAMAGES**

**JURY TRIAL DEMANDED**

**FAXED**

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

18                                   **I. NATURE OF THE ACTION**

19           1.       This action arises from the tragic and avoidable death of Plaintiffs' 16-year-old  
20 daughter Ye Meng Yuan, who perished after the crash of Asiana Airlines Flight No. OZ 214  
21 ("Flight 214"). Ye Meng Yuan was injured during the crash and abandoned by several rescue  
22 workers employed by the City and County of San Francisco (the "City and County"). The rescue  
23 workers observed Ye Meng Yuan lying helpless on the ground but, inexplicably, failed to  
24 evaluate her condition, treat her, mark her location, or remove her from the perilous location  
25 where she lay curled in the "fetal position". Minutes later, Ye Meng Yuan was run over by two  
26 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  
28

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.

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.

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  
27  
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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)  
28

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.



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

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

#### IV. FACTS

**A. The San Francisco Airport (SFO)**

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

32. The SFFD staffs the SFFD-Airport Bureau (“SFFD-AB”) under an inter-departmental work order agreement between the Airport and the SFFD. The SFFD Chief appoints an Assistant Deputy Chief to manage the SFFD-AB, comprised of three firehouses on Airport property with ARFF personnel dedicated not only to Airport fire fighting but also to providing emergency medical services (“EMS”) and emergency response and rescue. The SFFD-AB is also responsible for responding to medical calls for service on Airport property and is staffed with paramedic personnel, who are constantly on duty at SFO. The SFFD-AB 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".  
28

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;  
26  
27  
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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**  
17 **the Government Claims Act,**  
18 **By Plaintiffs Against All Defendants)**

19 50 Plaintiffs incorporate by reference as though fully stated herein all of the  
20 foregoing paragraphs

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

27 52 At all relevant times mentioned above, the Rescue Worker Defendants were  
28 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 traveling,
- 25           d     Failing to mark Ye Meng Yuan's presence and/or location and/or protect her from
- 26                 vehicles in the area,
- 27
- 28

- e Deliberately and knowingly abandoning Ye 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

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

60 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.



1           61       As a further direct result of Ye Meng Yuan's death, Plaintiffs incurred expenses  
2 for funeral, burial, and other related costs in an amount to be determined at trial

3                               **SECOND CAUSE OF ACTION**  
4           **(For Wrongful Death Based on Breached Mandatory Duties Imposed by Enactment, as**  
5           **Authorized Under the Government Claims Act,**  
6           **By Plaintiffs Against Defendant the City and County, the Supervisor Defendants, and**  
7           **DOES 96-100)**

8           62       Plaintiffs incorporate by reference as though fully stated herein all of the  
9 foregoing paragraphs

10          63       Pursuant to Government Code section 815.6, a public entity is liable for the  
11 breach of mandatory duty imposed by enactment by, among other things statutes or regulations

12          64       The SFO, SFFD, and SFPD, the Supervisor Defendants and/or other departments,  
13 agencies and divisions of the City and County and Does 96-100 are responsible for providing  
14 emergency medical services for SFO, pursuant to the Federal Aviation Regulations, 14 C.F.R.  
15 Part 139 ("Part 139"), and must certify compliance with certain provisions of Part 139. Part 139  
16 constitutes an enactment within the meaning of Government Code Section 815.6

17          65       As set forth in Paragraphs 44 through 49 above, in deliberate indifference to  
18 known and obvious dangers, the SFO, SFPD, the SFFD, the City and County, the Supervisor  
19 Defendants, and Does 96-100 breached their mandatory duties under Part 139 and the  
20 Emergency Plan.

21          66       As a direct and proximate result of the breach of such duties set forth above, Ye  
22 Meng Yuan was injured and killed, causing Plaintiffs' damages and losses

23          67       As a result of Ye Meng Yuan's death, Plaintiffs sustained pecuniary and non-  
24 pecuniary losses, including, without limitation, grief, loss of society, loss of support, services,  
25 care, comfort, affection, moral support, solace, and other losses for which recovery is authorized  
26 under applicable law

27          68       As a further direct result of Ye Meng Yuan's death, Plaintiffs incurred expenses  
28 for funeral, burial, and other related costs in an amount to be determined at trial.

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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,**  
6                                   **as Authorized Under 42 U.S.C. § 1983,**  
7                                   **By Plaintiffs Against the Rescue Worker Defendants)**

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

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

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

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

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

25           84       At all relevant times mentioned above, the Rescue Worker Defendants and the  
26 Supervisor Defendants owed Ye Meng Yuan and Plaintiffs a duty to, *inter alia*, exercise  
27 reasonable and ordinary care and to avoid injury to Ye Meng Yuan, to provide rescue and  
28

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 traveling,
- 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.

28

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

90. As a result of the foregoing violations which caused and/or contributed to the death of Ye Meng Yuan, 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

91. 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

## SIXTH CAUSE OF ACTION

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

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

93 As a result of the acts set forth herein, Plaintiffs and Ye Meng Yuan were subjected to deprivation of rights by the defendant City and County, the Supervisor Defendants, and Does 96 through 100 (collectively and individually, the “City and County Defendants”), which rights include, but are not limited to, privileges and immunities secured to Plaintiffs and Ye Meng Yuan by the Constitution and laws of the United States. By reason of such acts, the City and County Defendants have violated the constitutional rights and liberty interests of 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 Rescue 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,  
27  
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1 c the proper and reasonable procedures for triage and identifying injured  
2 passengers,  
3 d the proper and reasonable procedures to for conducting cardiopulmonary  
4 resuscitation,  
5 e the proper and reasonable procedures for treating shock, and  
6 f the proper and reasonable procedures for communicating and marking the  
7 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.  
28

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



1 110 As a further direct result of Ye Meng Yuan's death, Plaintiffs incurred expenses  
2 for funeral, burial, attorney's fees, and seek recovery for all damages authorized by law in an  
3 amount to be determined at trial

4 PRAYER FOR RELIEF

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

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

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

11 C To award costs of suit incurred herein,

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

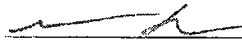
13 F For such other and further relief as the Court deems just and proper.

14 DEMAND FOR JURY TRIAL

15 Plaintiffs demand a trial by jury of any and all issues in this action so triable of right  
16

17 Dated August 17, 2014

18 KREINDLER & KREINDLER LLP

19  
20  
21   
22 Gretchen M. Nelson  
23 Anthony Tarricone  
24 Justin T. Green  
25 Gabriel S. Barenfeld  
26 *Attorneys for Plaintiffs*  
27  
28

ATTACHMENT

**DECLARATION OF GAN YE AND 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

By Xiao Yun Zheng  
Xiao Yun Zheng

Dated July 31<sup>ST</sup>, 2014

Dated July 31<sup>ST</sup>, 2014

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

the Jiang Province, 324100

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

the 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 11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  
中外桥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  
中外桥74号

邮编 324100

# **EXHIBIT A**

# COUNTY OF SAN MATEO

## HEALTH SYSTEM

### SAN MATEO, CALIFORNIA

#### CERTIFICATE OF DEATH

3201341002607

|   |  |  |  |
|---|--|--|--|
| STATE (SEE INSTRUCTIONS)  |  | LOCAL REGISTRATION NUMBER  |  |
| 1. NAME OF DECEDENT - FIRST (Given)<br><b>MENGYUAN</b>  |  | 3. LAST (Family)<br><b>YE</b>  |  |
| 2. MIDDLE<br><b>YUAN</b>  |  | 4. DATE OF BIRTH (mm/dd/yyyy)<br><b>06/17/1997</b>   |  |
| 5. AGE Yrs.<br><b>16</b>  |  | 6. SEX<br><b>F</b>   |  |
| 7. BIRTH DATE/FORUM COUNTRY<br><b>CHINA</b>   |  | 8. SOCIAL SECURITY NUMBER<br><b>NONE</b>   |  |
| 9. BIRTH DATE/FORUM COUNTRY<br><b>CHINA</b>   |  | 10. SOCIAL SECURITY NUMBER<br><b>NONE</b>  |  |
| 11. EVER IN U.S. ARMED FORCES?<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO   |  | 12. MARITAL STATUS (FROM 1st Date of Death)<br><b>NEVER MARRIED</b>  |  |
| 13. EDUCATION - Highest Level Completed (See instructions on back)<br><b>10</b>   |  | 14. DATE OF DEATH (mm/dd/yyyy)<br><b>07/06/2013</b>  |  |
| 15. US DECEASED HISPANIC/LATINO/SPANISH? (If yes, see instructions on back)<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO  |  | 16. DECEDENT'S RACE - Up to 3 races may be listed (see instructions on back)<br><b>CHINESE</b>                           |  |
| 17. USUAL OCCUPATION - Type of work for most of life. DO NOT USE RETIRED<br><b>STUDENT</b>  |  | 18. KIND OF BUSINESS OR INDUSTRY (e.g. grocery store, road construction, employment agency, etc.)<br><b>EDUCATION</b>    |  |
| 19. YEARS IN OCCUPATION<br><b>10</b>  |  |  |  |
| 20. DECEDENT'S RESIDENCE (Street and number or location)<br><b>BUILDING 27 LU XI SHAN ZHUANG #101</b>   |  |  |  |
| 21. CITY<br><b>JIANG SHAN</b>   |  | 22. STATE/PROVINCE<br><b>ZHE JIANG</b>   |  |
| 23. ZIP CODE<br><b>16</b>   |  | 24. YEARS IN COUNTRY<br><b>16</b>  |  |
| 25. STATE/FORUM COUNTRY<br><b>CHINA</b>   |  |  |  |
| 26. INFORMANT'S NAME, RELATIONSHIP, ADDRESS (Street and number or care facility number, city or town, state and zip)<br><b>GAN YE, FATHER BUILDING 27 LU XI SHAN ZHUANG #101, JIANG SHAN, CHINA</b>   |  |  |  |
| 27. NAME OF SURVIVING SPOUSE/SPOUSE-FIRST<br><b>GAN</b>   |  | 28. LAST (BIRTH NAME)<br><b>YE</b>   |  |
| 29. NAME OF FATHER-IN-LAW-FIRST<br><b>GAN</b>   |  | 30. LAST (BIRTH NAME)<br><b>YE</b>   |  |
| 31. NAME OF MOTHER-IN-LAW-FIRST<br><b>XIAO YUN</b>  |  | 32. LAST (BIRTH NAME)<br><b>ZHENG</b>  |  |
| 33. DEATH DATE (mm/dd/yyyy)<br><b>07/25/2013</b>  |  | 34. PLACE OF DEATH (Residence, GAN YE - FATHER BUILDING 27 LU XI SHAN ZHUANG #101 JIANG SHAN, ZHE JIANG PROVINCE, CHINA) |  |
| 35. TYPE OF DEATH (See instructions)<br><b>CR/T/R/S</b>   |  | 36. SIGNATURE OF EMBALMER<br><b>JACK JENSEN</b>  |  |
| 37. NAME OF FUNERAL ESTABLISHMENT<br><b>CYPRESS LAWN FUNERAL HOME</b>   |  | 38. LICENSE NUMBER<br><b>FD 1797</b>   |  |
| 39. SIGNATURE OF LOCAL REGISTRAR<br><b>SCOTT MORROW, MD</b>   |  | 40. DATE (mm/dd/yyyy)<br><b>07/22/2013</b>   |  |
| 41. PLACE OF DEATH<br><b>SAN FRANCISCO INTERNATIONAL AIRPORT</b>  |  |  |  |
| 42. COUNTY<br><b>SAN MATEO</b>  |  |  |  |
| 43. FACILITY ADDRESS (STREET LOCATION WHERE FOUND (Street and number or location))<br><b>900 NORTH FIELD ROAD, RUNWAY 28L</b>   |  |  |  |
| 44. CITY<br><b>SAN BRUNO</b>  |  |  |  |
| 45. CAUSE OF DEATH (Enter the Chain of Events - disease, injury, or complication - that directly caused death. DO NOT enter terminal events such as cardiac arrest, respiratory arrest, or ventricular fibrillation without showing the etiology. DO NOT abbreviate.)<br><b>MULTIPLE BLUNT INJURIES</b> |  |  |  |
| 46. NAME OF CAUSE OF DEATH (If multiple causes, list all causes on separate lines, and indicate the underlying cause of death.)<br><b>MULTIPLE BLUNT INJURIES</b>   |  |  |  |
| 47. ICD-10 CODE<br><b>13-01116</b>  |  |  |  |
| 48. ICD-10 CODE<br><b>13-01116</b>  |  |  |  |
| 49. ICD-10 CODE<br><b>13-01116</b>  |  |  |  |
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| 69. ICD-10 CODE<br><b>13-01116</b>  |  |  |  |
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| 71. ICD-10 CODE<br><b>13-01116</b>  |  |  |  |
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