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8 Attorneys for Defendant
9 OC HELICOPTERS, LLC

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – VAN NUYS

11 VANESSA BRYANT, individually and as
12 Successor in Interest to KOBE BRYANT,
13 Deceased; VANESSA BRYANT as Successor
14 in Interest to GB, a minor, deceased;
15 NB a minor, by her Natural Mother and
16 Guardian Ad Litem, VANESSA BRYANT;
17 BB, a minor, by her Natural Mother and
18 Guardian Ad Litem, VANESSA BRYANT;
19 And CB, a minor, by her Natural Mother and
20 Guardian Ad Litem, VANESSA BRYANT,

21 Plaintiffs,

22 vs.

23 ISLAND EXPRESS HELICOPTERS, INC., a
24 California Corporation; ISLAND EXPRESS
25 HOLDING CORP., a California Corporation;
26 BERGE ZOBAYAN, as Personal
27 Representative of and/or Successor in Interest
28 To ARA GEORGE ZOBAYAN, a California
Resident; and OC HELICOPTERS, LLC, a
California Limited Liability Company.

Defendants.

CASE NO. 20STCV07492

Assigned to the Honorable Virginia Keeny,
Dept. W

**OC HELICOPTERS, LLC'S ANSWER
TO SECOND AMENDED COMPLAINT
OF VANESSA BRYANT, ET AL.**

1 Defendant OC HELICOPTERS, LLC (“Defendant”), for itself and itself alone, answers
2 the Second Amended Complaint filed by VANESSA BRYANT, individually and as Successor
3 in Interest to KOBE BRYANT, Deceased; VANESSA BRYANT as Successor in Interest to
4 GB, a minor, deceased; NB a minor, by her Natural Mother and Guardian Ad Litem,
5 VANESSA BRYANT; BB, a minor, by her Natural Mother and Guardian Ad Litem,
6 VANESSA BRYANT; and CB, a minor, by her Natural Mother and Guardian Ad Litem,
7 VANESSA BRYANT (collectively “Plaintiffs”), as follows:

8 The Second Amended Complaint in this matter being unverified, Defendant, pursuant to
9 section 431.30(d) of the Code of Civil Procedure, now files its General Denial to the unverified
10 Second Amended Complaint, and in answering all the allegations contained therein, denies
11 generally and specifically each cause of action contained therein, and further denies that
12 Plaintiffs have sustained or will sustain damages in the sums alleged, or in any other sum or
13 sums, or at all because of Defendant’s conduct.

14 For further and separate answers to Plaintiffs’ Second Amended Complaint, and by way
15 of affirmative defenses, Defendant alleges as follows:

16 **FIRST AFFIRMATIVE DEFENSE**

17 Defendant is informed and believes, and based thereon alleges, that the Second
18 Amended Complaint, and each cause of action therein, fails to state facts sufficient to constitute
19 any cause of action.

20 **SECOND AFFIRMATIVE DEFENSE**

21 Defendant is informed and believes, and based thereon alleges, that Plaintiffs, or any of
22 them, are barred from obtaining relief because the injuries and damages allegedly sustained by
23 Plaintiffs, if any, were legally caused by the intervening and superseding actions of others,
24 which intervening and superseding actions bar or diminish Plaintiffs’ recovery, if any, against
25 this answering Defendant.

26 **THIRD AFFIRMATIVE DEFENSE**

27 Defendant is informed and believes, and based thereon alleges, that Plaintiffs’ damages,
28 if any, were actually and legally caused, in whole or in part, by the negligence or other fault of

1 third parties, persons, corporations, or entities, and, by reason thereby, Plaintiffs' alleged
2 injuries and damages, if any, should be reduced according to the proportion of comparative
3 fault attributable to said third parties, persons, corporations, or entities.

4 **FOURTH AFFIRMATIVE DEFENSE**

5 Defendant is informed and believes, and based thereon alleges, that if Plaintiffs suffered
6 damages or injury as alleged in the Second Amended Complaint, such damage and injury, if
7 any, was the result of the sole, primary, affirmative, and active negligence and/or fault of other
8 named defendants and/or other persons or entities not presently known to this answering
9 Defendant, and Defendant is thereby entitled to full indemnity and contribution from them.

10 **FIFTH AFFIRMATIVE DEFENSE**

11 Defendant is informed and believes, and based thereon alleges, that its acts, as it
12 pertains to the allegations contained in the Second Amended Complaint, were reasonable,
13 privileged, justified, lawful, and undertaken in good faith compliance with all applicable laws,
14 statutes, regulations, and contractual obligations.

15 **SIXTH AFFIRMATIVE DEFENSE**

16 Defendant is informed and believes, and based thereon alleges, that Plaintiffs, or any of
17 them, are barred from obtaining relief because any duty or obligation allegedly owed to
18 Plaintiffs, contractual or otherwise, has been fully performed, satisfied, excused, and/or
19 discharged.

20 **SEVENTH AFFIRMATIVE DEFENSE**

21 Defendant is informed and believes, and based thereon alleges, that there is no causal
22 connection between the damages alleged in the Second Amended Complaint and any act or
23 omission attributable to answering Defendant.

24 **EIGHTH AFFIRMATIVE DEFENSE**

25 Defendant is informed and believes, and based thereon alleges, that the Second
26 Amended Complaint, and each cause of action therein, fails to the extent that Defendant was
27 not the proximate cause or legal cause of Plaintiffs' injury.

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WHEREFORE, Defendant prays:

1. That Plaintiffs take nothing by their Second Amended Complaint;
2. That Defendant be awarded its costs of suit in defense of Plaintiffs' Second Amended Complaint;
3. For such other and further relief as the Court deems proper.

Dated: October 23, 2020

LAW OFFICES OF DINA ADHAM

By: 
DINA ADHAM
Attorney for Defendant
OC HELICOPTERS, LLC

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PROOF OF SERVICE
1013a(3) CCP

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 1230 Rosecrans Avenue, Suite 300, PMB 698, Manhattan Beach, California 90266. My address for electronic service is dadham@adhamlawgroup.com.

On the date below, I electronically served the foregoing document(s), described as

OC HELICOPTERS, LLC'S ANSWER TO SECOND AMENDED COMPLAINT OF VANESSA BRYANT, ET AL.

on each of the interested parties in this action by attaching the original a true and correct PDF copy thereof addressed as follows:

SEE ATTACHED SERVICE LIST

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 23, 2020, at Redondo Beach, California.

Dina Adham


Signature

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SERVICE LIST

<p>Gary C. Robb, Esq. Anita Porte Robb, Esq. Andrew C. Robb, Esq. Brittany Sanders Robb, Esq. ROBB & ROBB One Kansas City Place, Suite 3900 1200 Main Street Kansas City, MO 64105 (816) 474-8080 gcr@robbrobb.com apr@robbrobb.com acr@robbrobb.com bsr@robbrobb.com</p> <p>Brad D. Brian, Esq. Luis Li, Esq. MUNGER, TOLLES & OLSON LLP 350 S. Grand Avenue, 50th floor Los Angeles, CA 90071-3426 (213) 683-9100 Brad.brian@mto.com Luis.li@mto.com</p> <p>Attorneys for Plaintiffs</p>	<p>Arthur I. Willner, Esq. LEADER BERKON COLAO & SILVERSTEIN, LLP 660 S. Figueroa, Suite 1150 Los Angeles, CA 90017 (213) 234-1750 awillner@leaderberkon.com</p> <p>Raymond L. Mariani, Esq. LEADER BERKON COLAO & SILVERSTEIN, LLP 630 Third Avenue, Floor 17 New York, NY 10017 rmariani@leaderberkon.com</p> <p>Attorneys for Defendant Berge Zobayan as successor in interest for Ara George Zobayan</p> <p>Ross Cunningham, Esq. Don Swaim, Esq. D. Todd Parrish, Esq. CUNNINGHAM SWAIM, LLP 4015 Main Street, Suite 200 Dallas, Texas 75226 (214) 646-1495 rcunningham@cunninghamswaim.com dswaim@cunninghamswaim.com tparrish@cunninghamswaim.com</p> <p>Michael J. Terhar, Esq, CUNNINGHAM SWAIM, LLP 2 N. Lake Avenue, Suite 550 Pasadena, CA 91101 mterher@cunninghamswaim.com</p> <p>Attorneys for Island Express Helicopters, Inc. and Island Express Holding Corp.</p>
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