



seek treatment for injuries including but not limited to cervical strain and sprain, cervical radiculitis, cervical radiculopathies, myalgia, muscle spasm, migraine headaches, intense pain that radiates from her shoulders and into her arms and fingers, exacerbation of pre-existing conditions and various other external injuries the full extent of which are presently unknown.

Defendants, Live Nation Entertainment, Incorporated, Roc Nation, LLC, Greenlee Security Services, LLC, Festival Management Services, LLC, US Security Care, Incorporated, National Event Services, Incorporated, and Sequel Tour Solutions, LLC d/b/a Team Sequel knew or should have known that such injuries to Ms. Wade, an invitee at the Festival, were reasonably likely to occur to the extent Defendant Mayers was permitted to traverse directly through the crowd of concert-goers in attendance at the Festival, especially given Defendant Mayers' history of violence in public. As event organizers and entities retained to provide security services at the Festival, these Defendants were obligated to reasonably anticipate and prevent potential harm to Ms. Wade.

Defendants' Contentions

a. Contentions of Rakim "A\$AP Rocky" Mayers

Defendant Rakim Mayers specifically disputes plaintiff's characterization of his actions and specifically denies that he caused any offensive or harmful forcible physical contact with plaintiff let alone intended to cause such contact. Mayers acknowledges that while he was attempting to move through the crowd after completing his set to observe the performance of another performer that a group of people aggressively moved towards him. Whether plaintiff was involved in that group is yet to be determined. Mayers disputes the scandalous and impertinent allegations raised by plaintiff unrelated to the incident alleged by plaintiff and further avers he is not responsible for the acts of unidentified individuals who may have been in close proximity to him and plaintiff, but over whose actions he had no control nor duty to

control. Plaintiff originally reported having been slapped in the face by a security guard according to Abington Memorial Hospital records of September 13, 2013. It is also significant to note that on August 21, 2011, plaintiff had been charged with giving a false report to law-enforcement authorities by giving false identification information after being pulled over for driving with a suspended registration. Her credibility is certainly at issue.

*b. Contentions of Live Nation Entertainment, Incorporated and Roc Nation, LLC*

Live Nation Entertainment, Incorporated and Roc Nation, LLC (collectively “Live Nation and Roc Nation”) deny the allegations in the plaintiff’s Complaint in that they hired and provided appropriate security for the patrons. Live Nation and Roc Nation do not have any direct evidence as the happening of the accident or any of the alleged injuries. Live Nation and Roc Nation have joined the security companies that were hired to work the event and were the entities responsible for managing and directing all of the security for this particular concert.

*c. Contentions of US Security Care, Incorporated*

U.S. Security Care, Inc. (US Security) denies the allegations of negligence against them in Live Nation’s Joinder Complaint. Although the actual location of the alleged incident has not yet been disclosed, US Security denies that they had any responsibility for guarding or protecting the location or persons involved in this litigation. US Security believes it was assigned to working entry/exit gates and some of the tents at the time of alleged incident and was not assigned to any area where concert goers were viewing the performances. Further, they were never made aware that the alleged incident occurred until they received the Joinder Complaint. US Security is not responsible for the acts of the performers or any unidentified individuals or third parties who may have been in close proximity to the plaintiff, but over whom they had no control nor duty to control.

d. Contentions of Greenlee Security Services, LLC

It is the position of Greenlee Security Services LLC that they were not responsible for security where the plaintiff's incident allegedly occurred.

**2. Informal Disclosures**

As part of the Rule 26(f) conference, the parties agreed to cooperate as much as possible in the informal production of documents related to this case. Pursuant to Rule 26(a), Ms. Wade served her initial disclosures on all parties on or about November 7, 2014. US Security served its initial disclosures on all parties on or about December 4, 2014. The other parties anticipate having served their initial disclosures in advance of the Pre-Trial Conference set for December 8, 2014 at 4 p.m.

**3. Formal Discovery**

The parties expect that most of the relevant documents in this case will be exchanged through formal discovery requests. The parties propose that the Court set a discovery deadline of July 7, 2015.

The parties agree that attorney-client communications and documents and information considered "attorney work product" or "trial preparation material" shall not be required to be produced. The parties do not envision any unique privilege-related issues at this time, but anticipate entering into a confidentiality agreement with regard to certain relevant documents and information exchanged between Live Nation Entertainment, Incorporated, Roc Nation LLC and third-party defendants in this matter. The parties have discussed a "clawback agreement" and have otherwise agreed to work together in resolving any such issues before seeking any relief from the Court.

Finally, the parties have agreed that each party will bear its own cost of production unless there is a significant change in the anticipated scope of electronic discovery.

**4. Electronic Discovery**

The parties do not anticipate this case involving a significant amount of electronic discovery. Nonetheless, each of the parties has agreed to undertake procedures to preserve electronically stored information related to this case.

**5. Expert Witness Disclosures**

The parties respectfully request that the timing and sequence of expert witness disclosures be discussed with the Court at the scheduled pre-trial conference.

**6. Early Settlement or Resolution**

The parties are in favor of early resolution in this case. The parties anticipate that a settlement conference conducted by a Magistrate Judge and/or by a private ADR provider may be productive. Counsel have advised their clients of the availability of alternative dispute resolution options and all parties consent to the use of a settlement conference by either a Magistrate Judge or a mutually-agreeable private ADR provider.

**7. Trial**

The parties request the scheduling of a date certain for trial.

**8. Other Matters**

Currently certain John Doe individuals and corporations are included as defendants in the Complaint. Depending on what is revealed during discovery in this case, Plaintiff foresees the possibility of amending the caption of this case to include the natural names of these currently unknown defendants.

**DILWORTH PAXSON LLP**

BY: /s/ Alexander J. Nassar  
Alexander J. Nassar, Esq.  
*Attorneys for Plaintiff, Lisamarie Wade*

**KANE PUGH KNOELL TROY &  
KRAMER, LLP**

BY: /s/ Andrew J. Kramer  
Andrew J. Kramer, Esq.  
*Attorneys for Defendants, Live Nation  
Entertainment, Incorporated and Roc  
Nation, LLC*

**MARGOLIS EDELSTEIN**

BY: /s/ Donald M. Davis  
Donald M. Davis, Esq.  
*Attorneys for Defendant, Rakim "A\$AP  
Rocky" Mayers*

**COOPER LEVENSON, P.A.**

BY: /s/ Carmelo T. Torraca  
Carmelo T. Torraca, Esq.  
*Attorneys for Defendant, Festival  
Management Services, LLC*

**MINTZER, SAROWITZ, ZERIS, LEDVA  
& MEYERS, LLP**

BY: /s/ David S. Cohen  
David S. Cohen, Esq.  
*Attorneys for Defendant, US Security  
Care, Incorporated*

**MARSHALL DENNEHEY WARNER  
COLEMAN & GOGGIN**

BY: /s/ John S. Tucci, Jr.  
John S. Tucci, Jr., Esq.  
*Attorneys for Defendant, Greenlee  
Security Services, LLC*

**CARMELO T. TORRACA, ESQ.**  
COOPER LEVENSON, P.A.  
1125 Atlantic Avenue  
3rd Floor  
Atlantic City, NJ 08401  
ctorraca@cooperlevenson.com

**ANDREW J. KRAMER, ESQ.**  
KANE, PUGH, KNOELL & DRISCOLL  
510 Swede Street  
Norristown, PA 19401  
akramer@kanepugh.com

**DAVID S. COHEN, ESQ.**  
MINTZER, SAROWITZ, ZERIS, LEDVA &  
MEYERS, LLP  
1500 Market Street, Suite 4100  
Philadelphia, PA 19102  
dcohen@defensecounsel.com

**JOHN S. TUCCI, JR., ESQ.**  
MARSHALL DENNEHEY WARNER  
COLEMAN & GOGGIN  
2000 Market Street  
Suite 2300  
Philadelphia, PA 19103  
jstucci@mdwgc.com

The foregoing document has also been forwarded to the following Third-Party  
Defendants by First Class U.S. Mail:

**Sequel Tour Solutions, LLC d/b/a Team Sequel**  
30200 Telegraph Road, Suite 400  
Manchester, MI 48025

**National Event Services, Inc.**  
501 Baily Road  
Yeadon, PA 19050

/s/ Alexander J. Nassar  
Alexander J. Nassar, Esquire