

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

MAUREEN OBRIST, as next of kin and
wrongful-death beneficiaries of MICHAEL
OBRIST AND JEAN OBRIST, deceased;
and MAUREEN OBRIST, individually,

Plaintiff,

vs.

TENNESSEE VALLEY AUTHORITY, a
corporation,

Defendant.

Case No.:

JURY DEMAND

COMPLAINT

COMES the Plaintiff, through their undersigned counsel, and sue Defendant, and in support thereof state as follows:

This lawsuit arises from the tragic deaths of Michael and Jean Obrist, who drowned on the early morning hours of September 28, 2024, following Hurricane Helene. The Tennessee Valley Authority (“TVA”), as operator of the Nolichucky Dam, had actual knowledge that excessive rainfall and flood conditions placed the dam and downstream residents in imminent danger. Despite this knowledge, TVA failed to provide adequate warnings to those living in the dam’s floodplain. Instead, TVA issued limited and inadequate notifications through social media platforms such as X (formerly known as Twitter) and Facebook – communications that were insufficient to alert residents of the life-threatening risk.

As a direct result of TVA’s failure to provide any adequate warning, Michael and Jean Obrist were overtaken by floodwaters and lost their lives. Their adult daughter, Maureen Obrist, was present during the incident. She witnessed her parents lose their lives in the floodwaters,

sustained physical and emotional injuries herself, and continues to endure ongoing trauma and significant impairment in her daily life.

PARTIES

1. Maureen Obrist is a resident of Jefferson County, Tennessee, and the adult daughter of Michael Obrist and Jean Obrist (the “Decedents”). There is no surviving spouse. She brings this wrongful-death action as next of kin under Tenn. Code Ann. §§ 20-5-106 and 20-5-107, for the benefit of all statutory beneficiaries, including recovery of the Decedents’ pre-death damages as permitted by Tennessee law. This action is brought by one of the Decedents’ children for the benefit of all statutory beneficiaries and does not seek double recovery.

2. Maureen Obrist also brings an *individual* claim for negligent infliction of emotional distress arising from her contemporaneous perception of the fatal events and resulting serious emotional injuries.

3. Defendant Tennessee Valley Authority (“TVA”) is a wholly owned Government corporation created by Congress, 16 U.S.C. § 831 et seq., with principal offices in Knoxville, Tennessee, and is authorized to sue and be sued under 16 U.S.C. § 831c(b). TVA owns and operates the Nolichucky Dam and exercised operation control over public warnings and emergency coordination regarding flood risk.

JURISDICTION AND VENUE

4. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. § 1331. The Tennessee Valley Authority (“TVA”) is a federal corporation created by Act of Congress, 16 U.S.C. § 831 et seq., and Congress has expressly authorized TVA to “sue and be sued” in its corporate name, as stated in 16 U.S.C. § 831c(b). The Supreme Court holds that this waiver is broad and that implied limits apply only where liability would gravely interfere with governmental functions. *Federal Housing Administration v. Burr*, 309 U.S. 242, 245-246 (1940); *Thacker v. TVA*, 587 U.S. 218, 224 (2019).

5. This Court has personal jurisdiction over TVA because it is headquartered and conducts substantial operations in this District, and the events and harms alleged occurred here. *See* Fed. R. Civ. P. 4(k)(1)(A); 28 U.S.C. § 1391(c)(2).

6. Venue is proper in the Eastern District of Tennessee under 28 U.S.C. § 1391(b)(2). Under E.D. Tenn. L.R. 3.1.2(a)-(b), it is properly filed in the Northeastern Division (Greenville) because the events occurred in Greene and Cocke Counties.

FACTUAL ALLEGATIONS

7. All preceding statements of Plaintiff's Complaint are incorporated herein and re-alleged as if expressly set forth herein.

8. Tennessee Valley Authority ("TVA") is a federally owned electric utility corporation headquartered in Knoxville, Tennessee.

9. While TVA is government-owned, it operates like a private for-profit company and receives no taxpayer funding.

10. TVA is the largest public power utility in the United States, providing electricity to approximately ten million people. Its operations include nuclear, coal-fired, natural gas-fired, hydroelectric, and renewable generation.

11. In addition to power generation, TVA is responsible for flood control through its network of twenty-nine hydroelectric dams across Tennessee Valley.

12. TVA was created by Congress in 1933 through the Tennessee Valley Authority Act, 16 U.S.C. § 831 et seq., with mandates including navigation, flood control, electricity generation, and regional planning.

13. The Nolichucky River runs through eastern Tennessee, passing through Greene County and surrounding communities downstream from the Nolichucky Dam.

14. The Nolichucky Dam, located at or near Asheville Highway in Greeneville, Tennessee, is a concrete overflow structure located near Greeneville, Tennessee. It is ninety-four feet high and 482 feet long, with an ogee-type spillway and flashboard crest.

15. Once used for power generation, the Nolichucky Dam is now primarily maintained for flood control and recreational purposes.

16. TVA is the owner and operator of the Nolichucky Dam.

17. TVA had the ability to monitor water levels, predict potential failure, and provide timely and adequate warnings to residents downstream of the dam.

18. Hurricane Helene was a powerful and deadly tropical cyclone that caused widespread catastrophic damage and numerous fatalities across the Southeastern United States in late September 2024.

19. On the morning of September 25, 2024, Hurricane Helene had intensified into a hurricane.

20. That same morning, the National Weather Service (“NWS”) office in Morristown, Tennessee, issued warnings indicating heavy rain before the remnants, followed by possible severe flooding through Friday, September 27, 2024.

21. On September 25, 2024, the National Hurricane Center (“NHC”) warned that Helene would bring rainfall accumulations of six to twelve inches, with isolated totals near eighteen inches, resulting in catastrophic flooding.

22. Hurricane Helene made landfall in Florida on September 26, 2024, at peak intensity before moving inland and weakening. By September 27, 2024, Hurricane Helene’s remnants passed over Tennessee, bringing record-breaking rainfall to the region.

23. On September 26, 2024, the Tennessee Emergency Management Agency (“TEMA”) announced it was monitoring Hurricane Helene and preparing for impact.

24. By the afternoon of September 27, 2024, TVA announced on social media that it was making releases from Douglas Dam due to rising water levels, noting expected flooding but assuring the public that levels would not exceed flood stage in Knoxville, Tennessee.

25. On September 27, 2024, TVA issued a “Condition Yellow” alert on its X account at approximately 9:55 p.m., indicating that Nolichucky Dam was approaching its structural

threshold to withstand excessive floodwater and that local county emergency management officials were “coordinating evacuations as appropriate.”

26. At 12:13 a.m., on September 28, 2024, TVA escalated to a “Condition Red” alert, announcing that dam failure was imminent and that potentially life-threatening flooding could occur downstream as far as Douglas Reservoir.

27. TVA continued to post intermittent updates on social media, including a 6:55 a.m., stating that its dam safety teams were assessing the structure. By 9:55 a.m., on September 28, 2024, TVA announced that the Nolichucky Dam had “crested” and remained intact, with water receding.

28. TVA disseminated dam and flood-status information to the public primarily through posts on X (Twitter) and Facebook and did not deploy any mass-notification system capable of pushing alerts to all mobile devices or landlines in the affected area, nor did it coordinate for issuance of such alerts through local emergency authorities.

29. Based upon information and belief, TVA did not identify with specificity the downstream neighborhoods at immediate risk, did not instruct the residents to take a concrete protective action (e.g., evacuate immediately to higher ground), and were issued only after TVA had escalated its internal status from Condition Yellow to Condition Red, leaving residents, including the Decedents, without reasonable time to evacuate.

30. Given the timing, content, and channels TVA chose, these communications were not reasonably calculated to deliver timely, clear, and urgent warnings to at-risk residents.

31. On the evening of September 27, 2024, Michael and Jean Obrist, along with their adult daughter, Maureen Obrist, were at their residence located at 1898 Goodwater Road, Mosheim, TN 37818.

32. Maureen had been monitoring local television news updates regarding the severe weather in the area.

33. Despite her vigilance in following televised reports, the family did not receive any adequate or direct warning from TVA regarding the imminent flooding risk.

34. In the early morning hours of September 28, 2024, the family received a phone call from a nearby neighbor urgently warning them that there was an imminent and dangerous flooding risk in the area, and that they should evacuate immediately.

35. In response, Michael, Jean, and Maureen Obrist rushed outside and entered their vehicle in an attempt to evacuate.

36. As they attempted to reverse down the driveway, a sudden surge of floodwater overtook the car, rushing from the rear of the vehicle over the top of the vehicle.

37. The vehicle stalled, likely as a result of the rising water, leaving the family trapped and unable to evacuate to higher ground.

38. Plaintiff Maureen Obrist exited the vehicle in an effort to return to the house for safety but was immediately overtaken by rushing water.

39. Maureen was swept toward the house, where she managed to cling desperately to a column on the front porch.

40. From her position on the porch, Maureen Obrist watched helplessly as the family's car, with her parents inside, began to drift away with the floodwater.

41. As the vehicle was swept away, Maureen could hear her parents scream for help.

42. The calls for help continued for a period before ceasing. When they fell silent, Maureen understood that her parents had died.

43. Eventually, Maureen was able to make her way into the house, where she used the landline telephone to call 911.

44. Emergency responders later rescued Maureen by airboat and transported her to a nearby hospital, where she was treated for injuries sustained in the flooding.

45. The following morning, Michael and Jean Obrist were discovered deceased in or near the vehicle, which had been washed down the driveway and into a small tributary near the home.

46. The tragic deaths of Michael and Jean Obrist, and the severe injuries and trauma suffered by Plaintiff Maureen Obrist, were a direct and foreseeable result of TVA's failure to adequately warn and protect residents from the imminent flooding.

47. TVA's warnings regarding the Nolichucky Dam were untimely, inconsistent, inadequate, and insufficient to protect residents. Reliance on social media posts alone was not a reasonable method of conveying imminent life-threatening danger to downstream communities.

48. More effective measures were readily available, including direct emergency alerts (e.g., reverse 911, wireless emergency alerts, coordinated broadcasts), but TVA failed to utilize them.

49. TVA's limited notices did not provide adequate time for the Obrist family to evacuate safely.

50. Had TVA discharged its duty to provide adequate warnings of the imminent flooding risk, Michael and Jean Obrist would not have perished, and Plaintiff Maureen Obrist would not have been forced to endure the trauma of watching and/or hearing her parents perish.

51. TVA knew or should have known, based on internal status levels of the Nolichucky Dam (including "Condition Yellow/Red"), real-time hydrologic data, and its emergency-warning protocols, that downstream residents faced an imminent and extreme risk of death or serious injury. Despite that knowledge, TVA consciously disregarded this substantial and unjustifiable risk by (1) issuing warnings lacking appropriate urgency and content, and (2) failing to employ mass-reach channels reasonably available through coordination with local emergency authorities. This conduct was reckless under Tennessee law and will be proven by clear and convincing evidence.

CAUSES OF ACTION

COUNT I:

NEGLIGENCE (WRONGFUL DEATH)

52. All preceding statements of Plaintiff's Complaint are incorporated herein and re-alleged as if expressly set forth herein.

53. This cause of action is brought pursuant to Tenn. Code Ann. § 20-5-106, which provides that a wrongful death claim allows a decedent's surviving spouse or children to sue for injuries caused by another, with the right of action passing to them and not extinguished by the decedent's death.

54. Michael and Jean Obrist were married to each other; neither had a surviving spouse.

55. Plaintiff Maureen Obrist has standing to bring this action pursuant to Tenn. Code Ann. § 20-5-107, as children of Decedents.

56. Defendant owed a duty of care to Michael and Jean Obrist, as well as other residents in the surrounding area who would reasonably foreseeably be affected by flooding downstream of the Nolichucky Dam. Defendant owed a duty of reasonable care to Michael and Jean Obrist and other downstream residents, given Defendant's superior knowledge of the dam's status and the impending flood conditions.

57. Courts have held that a defendant who controls a hazardous condition has a duty to warn those who may be foreseeably affected by that condition. *See e.g., Dallas Power & Light Co. v. Ford Motor Co.*, 499 F.2d 400 (5th Cir. 1974). There, the court emphasized that the defendant's superior knowledge and control over the situation created an obligation to take reasonable steps to prevent harm to others. Applying this principle, Defendant had a similar duty to warn residents, including Decedents, of the imminent flooding risk.

58. Defendant breached this duty by failing to adequately warn Decedents and other residents of the imminent risk of flooding. Although Defendant issued some warnings through

social media channels, including X and Facebook, these warnings were insufficient under the circumstances and failed to adequately communicate the imminent flooding danger.

59. Defendant's failure to provide an adequate and timely warning caused the deaths of Michael and Jean Obrist. Had Defendant given a clear, direct, and urgent warning of the imminent life-threatening flooding, the Obrists would have had sufficient time to safely evacuate or move to higher ground.

60. At the time Defendant failed to provide adequate and timely warnings to downstream residents, it was reasonably foreseeable that such a failure would place residents, including the Obrist family, at imminent risk of life-threatening flooding and drowning.

61. The deaths of Michael and Jean Obrist caused Maureen Obrist, as surviving heir, to suffer damages, including but not limited to, loss of love, companionship, comfort, society, and other damages recoverable under Tennessee law, in an amount to be proven at trial.

62. As a legal, direct, and proximate result of the acts and/or omissions of Defendant, Plaintiff sustained economic and non-economic damages and will continue to sustain such damages into the future, in an amount to be proven at trial.

63. In addition to compensatory damages, Plaintiff seeks punitive damages for TVA's reckless conduct, to be proven by clear and convincing evidence as required by Tenn. Code Ann. § 29-39-104.

64. The conduct alleged in this Count concerns TVA's operational execution of warnings and the coordination it voluntarily undertook. These day-to-day decisions are comparable to those made regularly by private utility companies. Even if somehow characterized as governmental, imposing liability under these facts would not gravely interfere with TVA's performance of its functions. *See Federal Housing Administration v. Burr*, 309 U.S. 242, 245-246 (1940); *Thacker v. TVA*, 587 U.S. 218, 224-225 (2019).

COUNT II:
NEGLIGENCE (SURVIVAL ACTION)

65. All preceding statements of Plaintiff's Complaint are incorporated herein and re-alleged as if expressly set forth herein.

66. Pursuant to Tenn. Code Ann. § 20-5-106, the causes of action for injuries suffered by Michael and Jean Obrist prior to their deaths survive and may be prosecuted by their children, Maureen Obrist.

67. At all relevant times herein, Defendant owed a duty of reasonable care to residents, including Decedents, who were reasonably foreseeable to be affected by dangerous downstream flooding.

68. Defendant breached this duty by failing to adequately warn residents, including the Obrist family, of the imminent risk of flooding.

69. As a direct and proximate result of Defendant's negligence, Michael and Jean Obrist endured significant injuries and damages during the flooding incident before they drowned, including but not limited to, severe emotional distress, extreme fear and terror, physical pain and suffering, and mental anguish.

70. Defendant's failure to provide an adequate and timely warning caused the deaths of Michael and Jean Obrist. Had Defendant given a clear, direct, and urgent warning of the imminent life-threatening flooding, the Obrists would have had sufficient time to safely evacuate or move to higher ground.

71. At the time Defendant failed to provide adequate and timely warnings to downstream residents, it was reasonably foreseeable that such a failure would place residents, including the Obrist family, at imminent risk of life-threatening flooding and drowning.

72. As a legal, direct, and proximate result of the acts and/or omissions of Defendant, Michael and Jean Obrist sustained these non-economic damages prior to death, in an amount to be proven at trial.

73. In addition to compensatory damages, Plaintiff seeks punitive damages for TVA's reckless conduct, to be proven by clear and convincing evidence as required by Tenn. Code Ann. § 29-39-104.

74. The conduct alleged in this Count concerns TVA's operational execution of warnings and the coordination it voluntarily undertook. These day-to-day decisions are comparable to those made regularly by private utility companies. Even if somehow characterized as governmental, imposing liability under these facts would not gravely interfere with TVA's performance of its functions. *See Federal Housing Administration v. Burr*, 309 U.S. 242, 245-246 (1940); *Thacker v. TVA*, 587 U.S. 218, 224-225 (2019).

COUNT III:

NEGLIGENCE

(By Plaintiff Maureen Obrist)

75. All preceding statements of Plaintiff's Complaint are incorporated herein and re-alleged as if expressly set forth herein.

76. At all relevant times herein, Defendant owed a duty of reasonable care to residents, including Plaintiff Maureen Obrist, who was reasonably foreseeable to be affected by dangerous downstream flooding conditions.

77. Defendant breached this duty by failing to adequately warn residents, including Maureen Obrist, of the imminent risk of flooding.

78. As a direct and proximate result of Defendant's negligence, Maureen Obrist suffered physical and emotional injuries, including but not limited to, physical injuries, emotional distress and trauma, and psychological harm.

79. As a direct and proximate result of Defendant's negligence, Maureen Obrist has incurred medical expenses and will continue to incur medical expenses into the future.

80. As a legal, direct, and proximate result of the acts and/or omissions of Defendant, Plaintiff Maureen Obrist sustained economic and non-economic damages and will continue to sustain such damages in the future, in an amount to be proven at trial.

81. In addition to compensatory damages, Plaintiff seeks punitive damages for TVA's reckless conduct, to be proven by clear and convincing evidence as required by Tenn. Code Ann. § 29-39-104.

82. The conduct alleged in this Count concerns TVA's operational execution of warnings and the coordination it voluntarily undertook. These day-to-day decisions are comparable to those made regularly by private utility companies. Even if somehow characterized as governmental, imposing liability under these facts would not gravely interfere with TVA's performance of its functions. *See Federal Housing Administration v. Burr*, 309 U.S. 242, 245-246 (1940); *Thacker v. TVA*, 587 U.S. 218, 224-225 (2019).

COUNT IV:

**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS (BYSTANDER –
OBSERVATION OF PARENTS' DEATHS)**

(By Plaintiff Maureen Obrist)

83. All preceding statements of Plaintiff's Complaint are incorporated herein and re-alleged as if expressly set forth herein.

84. Tennessee law permits recovery for negligent infliction of emotional distress where a close relative contemporaneously perceives the serious injury or death of a loved one caused by defendant's negligence or arrives immediately thereafter before the scene has materially changed. *See Ramsey v. Beavers*, 931 S.W.2d 527 (Tenn. 1996)). Plaintiff Maureen Obrist is the adult daughter of Michael and Jean Obrist. She personally and contemporaneously perceived the events culminating in her parents' deaths during the subject flooding.

85. In addition, at the time of Defendant's negligence, Maureen Obrist was herself within the zone of danger of rapidly rising floodwaters, faced an immediate risk of serious bodily injury or death, and reasonably feared for her own safety while the events unfolded.

86. Defendant owed Maureen Obrist a duty of reasonable care and breached that duty by failing to provide timely, clear, and effective warnings using channels reasonably calculated to reach residents at risk, as alleged throughout this Complaint.

87. As a direct and proximate result of Defendant's negligence, Maureen Obrist personally observed her parents' vehicle become inundated with floodwaters and heard their cries for help. While clinging to a porch column, Maureen Obrist heard the pleas of her parents until their cries fell silent, signifying their apparent death.

88. Maureen Obrist suffered serious or severe emotional injuries including, without limitation, shock, trauma, intrusive recollections, sleep disturbance, and other symptoms consistent with post-traumatic stress, which have substantially impaired her daily functioning. Plaintiff will establish these injuries by expert medical and/or psychological proof consistent with *Camper v. Minor*, 915 S.W.2d 437, 446 (Tenn. 1996) and *Flax v. DaimlerChrysler*, 272 S.W.3d 521, 529-31 (Tenn. 2008).

89. A reasonably constituted person would be unable to adequately cope with the emotional impact of witnessing the violent deaths of her parents under these circumstances.

90. Plaintiff has incurred and will continue to incur medical expenses, and has sustained past and future pain, suffering, and loss of enjoyment of life, in amounts to be proven at trial.

91. Accordingly, Plaintiff is entitled to recover compensatory damages for her negligent infliction of emotional distress.

92. The conduct alleged in this Count concerns TVA's operational execution of warnings and the coordination it voluntarily undertook. These day-to-day decisions are comparable to those made regularly by private utility companies. Even if somehow characterized as governmental, imposing liability under these facts would not gravely interfere with TVA's performance of its functions. *See Federal Housing Administration v. Burr*, 309 U.S. 242, 245-246 (1940); *Thacker v. TVA*, 587 U.S. 218, 224-225 (2019).

COUNT V:
NEGLIGENT UNDERTAKING

93. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

94. This Count is pled in the alternative to the general negligence claims and is based on TVA's voluntary undertaking of public-warning and emergency-coordination services, and its negligent performance of that undertaking under Restatement (Second) of Torts § 324A.

95. Defendant TVA undertook to provide public warnings and to coordinate with local emergency agencies regarding imminent flood risk associated with the Nolichucky River and Nolichucky Dam. TVA recognized or should have recognized that these services were necessary for the protection of downstream residents. *See Grogan v. Ugglu*, 535 S.W.3d 864, 872-74 (Tenn. 2017) and *Biscan v. Brown*, 160 S.W.3d 462, 482-483 (Tenn. 2005) (explaining assumed-duty principles).

96. Having undertaken these services, TVA owed a duty to exercise reasonable care in performing them, including issuing timely, clear, and effective warnings through channels reasonably calculated to reach at-risk residents and coordinating with local emergency authorities to disseminate those warnings.

97. TVA breached its duty by failing to issue timely, clear, and appropriately urgent public warnings and by failing to employ reasonably available mass-notification channels calculated to reach at-risk residents. TVA also failed to reasonably coordinate with local emergency authorities to ensure dissemination and protective-action guidance.

98. As a result of TVA's negligent performance of its undertaken warning and coordination services, Plaintiff suffered the wrongful deaths of Michael and Jean Obrist (with all beneficiary damages recoverable under Tennessee law) and the Decedents' pre-death damages (including conscious pain and suffering), as well as Maureen Obrist's individual NIED damages. Damages sought under this Count are coextensive with, and not in addition to, the wrongful-death and survival damages sought elsewhere; Plaintiff does not seek double recovery.

99. The conduct alleged in this Count concerns TVA's operational execution of warnings and the coordination it voluntarily undertook. These day-to-day decisions are comparable to those made regularly by private utility companies. Even if somehow characterized as governmental, imposing liability under these facts would not gravely interfere with TVA's performance of its functions. *See Federal Housing Administration v. Burr*, 309 U.S. 242, 245-246 (1940); *Thacker v. TVA*, 587 U.S. 218, 224-225 (2019).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment against Defendant as follows:

1. For compensatory damages (including economic and noneconomic damages), according to proof;
2. To the extent permitted by law, punitive damages against Defendant for reckless conduct, in an amount to be determined in a bifurcated proceeding under Tenn. Code Ann. § 29-39-104;
3. For wrongful death damages, including but not limited to, the pecuniary value of the lives of Michael and Jean Obrist, loss of consortium, companionship, guidance, and society, and funeral and burial expenses;
4. For survival damages, including but not limited to, the conscious pain and suffering endured by Michael and Jean Obrist prior to death;
5. For costs of suit, as permitted by law;
6. For all statutorily allowed damages;
7. For pre-judgment interest as permitted by law; and
8. For such other and further relief as this Court deems just and proper.

REQUEST FOR TRIAL BY JURY

Plaintiff demands a trial by a jury on all issues so triable.

Respectfully Submitted this 25th day of September 2025.

/s/ Alexis T. Greene, Esq.

Alexis T. Greene, Esq. #041255

Attorney for Plaintiff

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Pro hac vice application forthcoming

Of Counsel for Plaintiff

COST BOND

I hereby acknowledge myself as surety for all costs in this cause in accordance with
T.C.A. § 20-12-120.

/s/ Alexis T. Greene, Esq.

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