

CAUSE NO. 2024-45576

**LARRY PARKER, JOSEPH LEWIS
CHARLES BUSH and DAMARCUS
POWELL**

Plaintiffs,

VS.

**CHRISTOPHER MAURICE BROWN,
LIVE NATION WORLDWIDE, INC.,
LIVE NATION MARKETING INC.,
JOHN DOE a/k/a "SINKO CEEJ,"
OMOLOLU OMARI AKINLOLU a/k/a
"HOOD BOSS," and MARKIES
DEANDRE CONWAY a/k/a
"YELLA BEEZY"**

Defendants.

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

127TH JUDICIAL DISTRICT

PLAINTIFFS' FIRST AMENDED PETITION AND JURY DEMAND

COME NOW, LARRY PARKER, JOSEPH LEWIS, CHARLES BUSH, and DAMARCUS POWELL and file this Amended Petition and Jury Demand against CHRISTOPHER MAURICE BROWN, LIVE NATION WORLDWIDE, INC., LIVE NATION MARKETING, INC., JOHN DOE a/k/a "SINKO CEEJ," OMOLOLU OMARI AKINLOLU a/k/a "HOOD BOSS," and MARKIES DEANDRE CONWAY a/k/a "YELLA BEEZY," and would respectfully show the Court as follows:

I.

SUMMARY OF THE CASE

This case arises from a violent assault perpetuated by a troubled recording artist with a checkered past. Without justifiable provocation, performer Christopher Maurice Brown ("Chris Brown"), and his paid entourage, brutally and severely beat Plaintiffs Larry Parker, Joseph Lewis, Charles Bush, and Da Marcus Powell. Chris Brown has a long history of violence. The Plaintiffs herein are the latest in a long line of individuals who have suffered at Brown's hands. The latest

incident, which is the subject of this case, occurred on July 20, 2024, following Brown's performance at the Dickies Arena in Ft. Worth. The concert was presented and marketed by the LiveNation Defendants. The violence included Brown and his entourage surrounding the Plaintiffs, throwing chairs at them, and repeatedly kicking, stomping, and beating them. The unprovoked violence included multiple strikes to the Plaintiffs' heads and chests, and ultimately involved stomping them while they were down. The brutal, violent assault participated in and directed by Brown, severely injured all Plaintiffs. Chris Brown's egregious conduct must be stopped. Through this action, Plaintiffs seek to hold responsible Brown, Brown's presenters and promoters, as well as his paid entourage, for this outrageous and violent behavior. This case seeks both compensatory and punitive damages in excess of \$50 million.

II. **PARTIES**

Plaintiff, Larry Parker is an Individual who resides in Dallas County and address is 1901 Knightsbridge, Unit 2205, Rd., Farmers Branch, Texas 75234.

The last three numbers of Larry Parker's driver's license number are 588. The last three numbers of Larry Parker's social security number is 198.

Plaintiff Joseph Lewis is an Individual who resides in Harris County and address is 1 Hermann Museum Circle, Apt. 1042, Houston, Texas 77004.

The last three numbers of Joseph Lewis's driver's license number are 836. The last three numbers of Joseph Lewis's social security number is 176.

Plaintiff, Charles Bush is an Individual who resides in Denton County and address is 2 Hayes Ct, Trophy Club, Texas 76262.

The last three numbers of Charles Bush's driver's license number are 883. The last three numbers of Larry Parker's social security number is 304.

Plaintiff, Damarcus Powell is an Individual who resides in Denton County and address is 1824 Shoeville Dr., Little Elm, Texas 75068.

The last three numbers of Damarcus Powell's driver's license number are 010. The last three numbers of Larry Parker's social security number is 369.

Defendant CHRISTOPHER MAURICE BROWN is California resident and resides at 19602 Citrus Ridge Drive in Tarzana, California. He may be served through the Texas Secretary of State or via personal service wherever he can be found.

Defendant LIVE NATION WORLDWIDE, INC. is a Foreign For-Profit Corporation whose principal place of business is located in Houston, Harris County, Texas. It may be served with process by serving its registered agent Corporate Creations Network Inc. at 5444 WESTHEIMER SUITE 1000 Houston, Texas 77056 or wherever it may be found.

Defendant LIVE NATION MARKETING, INC. is a Foreign For-Profit Corporation whose principal place of business is located in Houston, Harris County, Texas. It may be served with process by serving its registered agent Corporate Creations Network Inc. at 5444 WESTHEIMER SUITE 1000 Houston, Texas 77056 or wherever it may be found.

Defendant JOHN DOE'S residence and whereabouts is unknown.

Defendant OMOLOLU OMARI AKINLOLU is a Texas resident and can be served at 9155 Monarch Mist Lane Houston, Texas 77070 or wherever he may be found.

Defendant MARKIES DEANDRE CONWAY is a Texas resident and can be served at 1021 Glenhaven Drive Hutchins, Texas, Dallas County or wherever he may be found.

III. **DISCOVERY CONTROL PLAN**

Plaintiffs assert that a Level 3 Discovery Control Plan should govern this case.

IV.
CLAIM FOR RELIEF

The damages sought are within the jurisdictional limits of this court. Plaintiffs currently seek monetary relief in excess of \$1,000,000, including damages of any kind, penalty, costs, expenses, punitive damages, pre-judgment interest, and attorney's fees.

V.
JURISDICTION AND VENUE

This Court has subject matter jurisdiction over this cause of action because it involves an amount in excess of the minimum jurisdictional limits of this Court. This lawsuit is not subject to removal to federal court because multiple Plaintiffs and multiple Defendants are domiciled in Texas.

This Court has personal jurisdiction over the Defendants Live Nation because it has its corporate office in the State of Texas.

This Court has personal jurisdiction over Defendants because they do business in Texas and the causes of action herein arose in Texas. Specifically, Defendants is subject to personal jurisdiction here because the incident in question arises from or relates to a concert they marketed, sold tickets for, and hosted Texas.

The subject matter in controversy is within the jurisdictional limits of this Court.

Venue of this lawsuit is proper in Harris County, Texas under Tex. Civ. Prac. Rem. Code § 15.002 (a)(4) because Harris County is the county in which one or more of the defendants resided at the time of the accrual of the cause of action.

VI.
MISNOMER & ALTER EGO

In the event any parties are misnamed or are not included herein, it is Plaintiff's contention that such was a "misidentification," "misnomer," and/or such parties are/were "alter egos" of parties named herein.

VII.

BACKGROUND FACTS

A. Introduction to the Parties

Plaintiffs reside in Denton County. Larry Parker is a victim of a brutal assault by Brown and his entourage and suffered head injuries. He was hospitalized, has received continuing medical treatment, and will need to undergo extensive medical treatment for the damages he suffered in the attack, including head injuries. Plaintiffs Bush, Lewis, and Powell were all beat and suffered bodily injuries, including neck, shoulder, and back injuries. All Plaintiffs are receiving medical treatment and will need further treatment in the future.

Defendant Chris Brown resides in California. He has a checkered past. Brown has several times been reported to be involved in incidents of violence and assault, beating men and women alike. Brown specifically plead guilty to felony assault but evaded prison for beating his girlfriend, performer Rihanna. In that incident, Brown damaged pulverized Rihanna's face and put her in the hospital. Last year, Brown reportedly "stomped" and dealt crushing blows to the head of concertgoer. In another incident, Brown reportedly threw a tequila bottle directly at a patron, severely and permanently injuring him. Other bad conduct and violent conduct reportedly involving Brown has occurred across the globe. Nonetheless, LiveNation shamelessly profits and promotes Brown's The 11:11 Tour and brought Brown to Texas for financial gain. LiveNation failed to insure that the participants of the concert who may be around Brown, and his associates, were safe.



Chris Brown's entourage of assailants includes known felons. Defendant Sinko Ceej, another musician and member of the blood gang, has spent at least eight years in prison and is a known companion of Brown. Sinko participated in the violence directed at the Plaintiffs.



Defendant Markies Conway is a former Crip gang member who has been arrested on multiple occasions for possession of a firearms, sexual assault and possession carrying a weapon.



Defendant Hood Boss is also known as Omololu Omari Akinlolu is a known Brown companion. Brown specifically instructed them to hurt and injure the Plaintiffs and threw a chair directly at Bush.



B. Brutal Attack by Brown and his Entourage at the LiveNation Chris Brown Event

On July 20, 2024, Plaintiffs attended a LiveNation marketed and produced concert wherein Brown was featured. The concert occurred at the Dickies Arena in Fort Worth, Texas. After the

show concluded, Plaintiffs, along with approximately forty women, were invited backstage to Chris Brown's VIP area, an event promoted and marketed by the LiveNation Defendants. Upon entry to the VIP area, Chris Brown instructed all of the women to relinquish their phones and place them on a table. Subsequently, Defendants Brown and his entourage left, closed the door and stationed a security guard in front of it. After approximately thirty minutes of waiting, Brown entered the VIP area. At this time, having grown tired of waiting, Plaintiffs were ready to leave and began to attempt to exit the lounge area. Immediately prior to leaving, Plaintiff Bush approached Brown to shake his hand and congratulate him on a good show. Bush stated, "Good show, it's been a while, but I'm glad to see you are doing well. It's been a long time since I have seen you." Brown shook Bush's hand and replied, "Hey, yeah it has been, and I appreciate it." As Plaintiffs then started to exit, a member of Brown's entourage remarked loudly to Brown, "Man, you don't remember you two were beefing." Brown then took a liquor cup and said, "Oh yeah, we were. What's up, niXXX? I don't forget shit." Without any further discussion or any response by Bush, Brown then instructed his entourage to "fuck Plaintiff Bush up." Hearing this, Bush attempted to quickly leave with the companions he had brought to the show. At this point, Brown and approximately seven to ten members of his entourage followed Plaintiff Bush into the hallway and began to assault Bush and his companions. One of Brown's entourage, known by the alias Sinko, ran to the left side of the crowd and punched Bush in the chest. Simultaneously, another of Brown's entourage, stage alias Hood Boss, picked up a chair and threw it at Bush's head.

Defendant Brown then turned his attention to Plaintiff Larry Parker, instructing Markies Deandre Conway and others to "fuck Plaintiff Parker up." Severely outnumbered, Plaintiff Parker fled into the staircase, attempting to exit at the bottom of the stairs. Upon arrival, Parker discovered that the door was locked. Upon instruction by Brown, Parker was then punched in the face and

chest, kicked in the head for over ten minutes, and stomped on by Defendant Brown and his associates. Brown encouraged his companions to join in the assault simultaneously. Brown and his entourage then continued to beat Plaintiff Parker closed fist for almost minutes, repeatedly stomping on Defendant Parker's head, kicking his face and ribs, and causing severe bodily injury. Brown. The entourage also punched Da Marcus in the shoulder and Lewis in the shoulder and chest.

All Plaintiffs are injured, some severe. All are undergoing medical treatment.

VIII. **CAUSES OF ACTION**

A. ASSAULT AND BATTERY – ALL INDIVIDUAL DEFENDANTS

Plaintiffs incorporate the above paragraphs as if set forth in full below.

Plaintiff sues the individual Defendants for assault and battery in tort.

By beating, kicking, and brutalizing Plaintiffs repeatedly punching them in the body and head, and then repeatedly punching on him as they laid defenseless on the ground, Defendants deliberately used violent force against Plaintiffs with the intent to inflict actual damage.

Defendants subjected Plaintiffs to unwanted, forceful, intentional and harmful contact constituting battery upon Plaintiffs' person.

B. NEGLIGENCE/GROSS NEGLIGENCE – ALL DEFENDANTS

Plaintiffs reallege and incorporate by reference, every allegation contained in this Petition, as though set forth fully herein.

At all relevant times, Defendants had a duty of reasonable care in the protection and safeguarding of persons in attendance at The 11:11 Tour concert.

Based upon information and belief, Defendants breached their duty of reasonable care by failing to maintain the concert premises in a reasonably safe condition, including but not limited to: (1) failing to properly surveil people coming and going; (2) failing to monitor the premises with closed-circuit television (CCTV); (3) failing to timely respond or otherwise act upon patrons' need for immediate medical attention; (4) failing to notice or take precautions against assault; (5) failing to adequately staff employees and security to maintain control of the persons present (6) failing to adequately train and supervise employees on the reporting and discovery of injured individuals and/or person and/or injurious activity; (7) failing to adequately provide safe entrance and exit plans in general and in emergency situations; (8) failing to employ adequate safety measures; and (9) failing to intervene when it became dangerous and life-threatening for its attendees.

Defendants are further liable for the negligence of their employees pursuant to the doctrine of *respondeat superior*, and the negligence of their agents under the doctrine of Vicarious Liability.

At all relevant times, Defendants knew or should have known that it was reasonably foreseeable that breach of their duties to keep their premises reasonably safe in the aforementioned manner(s) might result in catastrophic injury and harm to others, including concertgoers, such as Plaintiffs.

As a direct and proximate result of Defendants' negligence, Plaintiffs sustained serious injuries and damages, including physical injuries, severe emotional distress, pain and suffering, medical expenses, and other economic and non-economic damages in amounts in excess of the jurisdictional limits of this Court.

Defendants' conduct indicates that Defendants knew of the risk of harm, but proceeded with indifference to the welfare of the Plaintiffs. As such, Defendants' conduct indicates malice and was grossly negligent.

C. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS – ALL DEFENDANTS

Plaintiffs reallege and incorporate by reference, every allegation contained in this Petition, as though set forth fully herein.

With malicious and evil intent, Defendant Brown and his entourage intentionally threatened, beat and brutalized Plaintiffs, intending to harm attendees at the concert, including Plaintiffs. Brown and his entourage's intentional act instructing his own security to injure and beat up the Plaintiffs, including at least one who was deceased resulted in the infliction of serious physical injuries and emotional distress to Plaintiffs. Further, the other Defendants are similarly liable for their actions in failing to stop the assault despite the pleas and cries.

The foregoing conduct is beyond outrageous and beyond acting with conscious disregard of the probability that Plaintiffs, and other concert attendees, would be injured knowing that the foregoing persons were present when he maliciously and with evil intent, continued beat up the Plaintiffs. Defendants' actions were extreme and exceeded all bounds of behavior tolerated in a civilized community.

As a direct and proximate result of Defendants' intentional conduct, Plaintiffs suffered severe emotional distress. His conduct was a substantial factor in causing Plaintiffs' severe emotional distress.

**IX.
DAMAGES**

As a direct and proximate result of the foregoing events, Plaintiffs suffered damages in the past and, in reasonable probability, will continue to suffer damages in the future, including physical pain and mental anguish, loss of wages and loss of earning capacity, disfigurement, physical impairment, and medical care, all for which Plaintiffs seek recovery herein. Plaintiffs seek all

allowable damages for their injuries allowed by Texas law, to include damages for past, present and future mental anguish, pain and suffering, and medical expenses.

X.
EXEMPLARY DAMAGES

Plaintiffs seek to recover exemplary damages against Defendants based on their gross negligence in causing the incident and resulting injuries and damages made the basis of this suit. Because the acts of the individual Defendants are also criminal acts, the punitive damages sought are not subject to capping.

XI.
DEMAND FOR JURY TRIAL

Plaintiffs respectfully demand a jury trial and tender the appropriate fee with this petition.

XII.
PRESERVATION OF EVIDENCE

Plaintiffs hereby request and demand that Defendants preserve and maintain all evidence pertaining to any claim or defense related to the incident made the basis of this lawsuit or the damages resulting therefrom, including statements, photographs, videotapes, audiotapes, surveillance or security tapes, bodycam footage, business or medical records, incident reports, bills, telephone call slips or records, correspondence, facsimiles, e-mail, voicemail, text messages, any evidence involving the incident in question, and any electronic image or information related to the referenced incident or damages. Defendants are further instructed to inform all entities or persons for whom they contract, including the venue and retained security, that they have a duty to preserve evidence. Failure to maintain such items will constitute “spoliation” of the evidence.

XIII.
PRAYER

For all of the aforementioned reasons, Plaintiffs pray for judgment against Defendants CHRISTOPHER MAURICE BROWN, LIVE NATION WORLDWIDE, INC., LIVE NATION MARKETING, INC., JOHN DOE a/k/a "SINKO CEEJ," OMOLOLU OMARI AKINLOLU a/k/a "HOOD BOSS," and MARKIES DEANDRE CONWAY a/k/a "YELLA BEEZY," in the amount of no less than fifty million dollars (\$50,000,000) for actual damages for pecuniary losses, pain and suffering, disfigurement, mental anguish, and past, present, and future medical expenses; and exemplary damages; pre-judgment and post-judgment interest as allowed by law; all costs of Court; and all such other and further relief, at law and in equity, to which he may be justly entitled.

Respectfully submitted,

THE BUZBEE LAW FIRM

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Anthony Buzbee on behalf of Anthony Buzbee

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Filing Description: Plaintiff's First Amended Petition and Jury Demand

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