

FILED 11 JUL '12 15:39 USDC-ORP

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

Stacey Alexandra Wilson Betts

(Enter full name of plaintiff(s))

Plaintiff(s),

v.

JUSTIN BIEBER, ISLAND DEF JAM RECORDS

VULCAN SPORTS AND ENTERTAINMENT,

AEG WORLDWIDE

(Enter full name of ALL defendant(s))

Defendant(s).

Civil Case No.

(to be assigned by Clerk of the Court)

COMPLAINT

Jury Trial Demanded

☐ Yes

☐ No

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: STACEY WILSON BETTS

Street Address:

City, State & Zip Code: WILSONVILLE OR 97070

Telephone No.

COMPLAINT

Revised: July 20, 2010

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Defendant No. 1 Name: JUSTIN BIEBER
Street Address: [REDACTED]
City, State & Zip Code: NEW YORK, NEW YORK, 10019
Telephone No. [REDACTED]

Defendant No. 2 Name: ISLAND DEF JAM RECORDS
Street Address: [REDACTED]
City, State & Zip Code: NEW YORK, NEW YORK 10019
Telephone No. [REDACTED]

Defendant No. 3 Name: VULCAN SPORTS AND ENTERTAINMENT
Street Address: [REDACTED]
City, State & Zip Code: SEATTLE WASHINGTON 98104
Telephone No. [REDACTED]

Defendant No. 4 Name: AEG WORLDWIDE
Street Address: [REDACTED]
City, State & Zip Code: LOS ANGELES CA 90015
Telephone No. [REDACTED]

II. JURISDICTION

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. A case involving the United States Constitution or federal laws or treaties is a federal question case. A case in which a citizen of one state sues a citizen of another state and the amount in damages claimed is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction (*check all that apply*)

☐ Federal Question

☒ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory, or treaty right is at issue?

- C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state of citizenship OREGON

Defendant(s) state(s) of citizenship NEW YORK, CALIFORNIA, OREGON, WASHINGTON

III. STATEMENT OF CLAIMS

Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

I TOOK MY DAUGHTER TO A JUSTIN BIEBER CONCERT JULY 14 2010 AT THE ROSE QUARTER IN PORTLAND OREGON. DUE TO AN UNFORESEEN ASPECT OF THE SHOW, I WAS INJURED BY A SOUND BLAST THAT EXCEEDED SAFE DECIBEL LEVELS. I SUFFER HEARING LOSS, SEVERE TINNITUS AND HYPERACUSIS IN BOTH EARS. THE INCIDENT OF INJURY WAS WHEN JUSTIN BIEBER CLIMBED INTO A HEART SHAPED, ALUMINUM/STEEL GONDOLA AND WAS PULLED OUT OVER THE CROWD. MR. BIEBER CREATED A WAVE LIKE EFFECT OF SCREAMING BY POINTING INTO VARIOUS SECTIONS OF THE ARENA. THEN ENTICED THE CROWD INTO A FRENZY OF SCREAMS BY CONTINUOUSLY WAVING HIS ARMS IN A QUICK AND UPWARD MOTION, WHEREAS I WAS STRUCK WITH A SOUND BLAST. THE GONDOLA THAT JUSTIN BIEBER WAS SUSPENDED IN ACTED AS A SOUND CONDUCTOR CREATING A SOUND BLAST THAT PERMANENTLY DAMAGED BOTH OF MY EARS. ISLAND DEF JAM RECORDS REPRESENTS JUSTIN BIEBER, WITH HIS MANAGER AND PROMOTOR, AEG WORLDWIDE, DESIGNS AND DEVELOPES JUSTIN BIEBER'S SHOWS. THE ROSE QUARTER, OWNED BY VULCAN SPORTS AND ENTERTAINMENT IS WHERE THE INJURY TOOK PLACE IN PORTLAND OREGON.

Claim II

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

I AM WORKING WITH DR. SAWYER, A RESPECTED AUDIOLOGIST FROM KAISER, HAVE HAD MULTIPLE HEARING TESTS AND BEGAN WORKING WITH THE DR. MARSHA JOHNSON OF THE OREGON TINNITUS AND HYPERACUSIS CLINIC THIS YEAR. I HAVE LEARNED THAT MY HEARING LOSS AND TINNITUS AND HYPERACUSIS IS A PERMANENT INJURY. TINNITUS IS A LOUD HIGH PITCHED, WHOOSHING, PULSATING SOUND IN BOTH OF MY EARS WHICH CREATES ANXIETY, LOSS OF SLEEP, AND DEPRESSION. HYPERACUSIS IS A CONDITION THAT MAKES ME MORE SENSITIVE TO CERTAIN SOUNDS AND PITCH RANGES, MAKING SOME EVERYDAY SOUNDS SEEM LOUD AND HARD TO LISTEN TO. DUE TO THE NEGLIGENCE OF JUSTIN BEIBER, ISLAND DEF JAM RECORD, ROSE QUARTER OWNED BY VULCAN SPORTS AND THE PROMOTOR AEG WORLDWIDE, I SUFFERED A SOUND BLAST DURING A CONCERT BECAUSE A STEEL/ALUMINUM GONDOLA ACTED AS A SOUND CONDUCTOR. I AM AN ORDINARY PERSON WHO BOUGHT A SERVICE, I TOOK MY DAUGHTER TO A POP CONCERT. I HAD NO REASONABLE WAY TO ANTICIPATE THE GONDOLA COULD CREATE A SOUND BLAST THAT WOULD PERMANENTLY DAMAGE MY EARS. EXPERIENCED PROMOTORS, SOUND ENGINEERS, MANAGERS AND ARTISTS ARE RESPONSIBLE TO MAINTAIN SAFE DECIBELS AT ALL TIMES DURING THEIR EVENTS. DUE TO THEIR NEGLIGENCE AND MY SUBSEQUENT INABILITY TO PROTECT MYSELF, MY QUALITY OF LIFE HAS BEEN PERMANENTLY REDUCED IN ADDITION TO THE INJURY.

Claim III

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

(If you have additional claims, describe them on another piece of paper, using the same outline.)

IV. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

I RESPECTFULLY ASK THE COURT TO GRANT AN AWARD OF \$9,230,000.000 FOR EXPENSES, PAIN AND SUFFERING, LOSS OF QUALITY OF LIFE, SEVERE TINNITUS, HYPERACUSIS AND PERMANENT DISABILITY AND IMPAIRMENT TO BOTH OF MY EARS. I ALSO REQUEST ANY AND ALL COURT RELATED FEE'S OR COSTS, WITNESS, TRAVEL AND ANY SUBSEQUENT ATTORNEY FEE'S BE PAID BY DEFENDANTS.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 11 day of JULY, 20.

(Signature of Plaintiff(s))