

assigns, agents, attorneys, affiliates, predecessors, successors, assigns and/or representative, and any other individuals or entity with any authority whatsoever, whether actual or apparent, are restrained and enjoined from changing, altering, destroying, or modifying the evidence related to the November 5, 2021 concert that resulted in injuries and fatalities, including, but not limited to, including, but not limited to, the subject premises, and its fixtures and improvements, as they existed on November 5, 2021, including, but not limited to, the stage infrastructure, barricades, vehicles, permits, documents, electronically stored information, surveillance footage, and all equipment and appurtenances near and/or involved with the incident in question until Plaintiffs are given an opportunity to inspect such evidence. Defendants are further restrained and enjoined from altering, destroying, or modifying the following:

- Any and all photographs and videos of the scene of the incident, parties involved, the premises, and/or equipment involved in the incident;
- Any and all documents or communications regarding the scene of the incident, parties, premises, and/or equipment involved in the incident;
- Any and all documents or records relating to the incident, including but not limited to OSHA records or records exchanged with any other governmental agency in connection with the incident in question;
- Any and all emails, electronic data, documents, statements, diaries, calendar entries, memos, incident reports, call slips or telephone messages, text messages, facsimiles, voicemail messages and correspondence related to the incident;
- Any and all operational logs, inspection reports, operating manuals, actual audio recording or any transcript of any recorded statements, and mobile, radio, and dispatch records related to the incident; and
- All permits, job safety analyses, site safety plans, site safety surveys, escape plans, ingress/egress plans, emergency response plans, crowd control plans, permits, and other documents relating to the operations taking place at the time of the incident in question.

It is further ORDERED that Plaintiff's attorneys and investigative staff, including, but not limited to consulting experts, shall be allowed access to the incident scene where the incident occurred to inspect, photograph, and film the scene. It is further,

ORDERED that Plaintiffs and Defendant shall appear before the Court on _____, 2021, at _____ o'clock ____m. to show cause why a temporary injunction should not be issued as requested by the Plaintiffs. The clerk of court is hereby directed to issue a show cause notice to Defendant to appear at the temporary injunction hearing.

This Order shall not be effective unless and until Plaintiffs execute and file with the clerk a bond, in conformity with the law, or cash deposit in lieu thereof, in an amount of _____ dollars (\$_____).

This Order shall further expire _____ days after signing, unless extended by order of this Court.

The clerk shall, upon filing by the Plaintiffs of the bond hereinafter required, and upon approving the same according to the law, issue a temporary restraining order in conformity with the law and the terms of this Order.

SIGNED on _____, 2021.

PRESIDING JUDGE