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10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER**

13 30-2020-01176161-CU-PO-CJC

14 EMMA SOFIA SALDANA ANDRADE, a minor,))
by and through her guardian ad litem; ELENA))
15 SAREEN SALDANA ANDRADE, a minor, by))
and through her guardian ad litem; SAMANTHA))
16 BELEN SALDANA ANDRADE, a minor, by and))
through her guardian ad litem; EMMA SOFIA))
17 SALDANA ANDRADE, by and through her))
guardian ad litem. as Successor in Interest of))
18 Henry Eduardo Saldana-Mejia, deceased;))
EMMA SOFIA SALDANA ANDRADE, by and))
19 through her guardian ad litem. as Successor in))
Interest of Gabriela Andrade, deceased))

20)
21 Plaintiffs,)
22)

23 vs.)
24)
25)

26 GRACE ELIZABETH COLEMAN, an))
individual; JAMES COLEMAN, an individual;))
27 KELLI COLEMAN, an individual; and DOES 1))
through 50, inclusive,))

28 Defendants.)
_____)

CASE NO.: **Assigned for All Purposes**
Judge Glenn Salter

COMPLAINT FOR DAMAGES

1. **WRONGFUL DEATH**
Negligence – Auto
2. **WRONGFUL DEATH**
Negligent Entrustment of Auto
3. **NEGLIGENCE**
Auto
4. **NEGLIGENCE**
Negligent Entrustment of Auto

[filed concurrently with 1) Applications for Appointment of Guardian Ad Litem; 2) Declaration of Cristian Dayana Saldana Mejia in Support of Commencing Action as Decedents’ Successor in Interest (CCP § 377.32)]

JURISDICTION

1. This Court has jurisdiction of this matter where Plaintiffs’ injuries were sustained in the

1 Court’s jurisdiction. The nature and extent of Plaintiffs’ injuries are in excess of the Superior Court’s
2 jurisdictional minimum of \$25,000.00.

3 **PARTIES**

4 2. Plaintiff, EMMA SOFIA SALDANA ANDRADE (“EMMA”), is a resident of the State
5 of California, County of Orange, and at all times relevant herein was residing in the County of Orange.
6 EMMA is a minor and is represented by her guardian ad litem, Cristian Dayana Saldana Mejia, pursuant
7 to this court’s order granting Plaintiff’s ex parte application for appointment of Cristian Dayana Saldana
8 Mejia as her guardian ad litem. EMMA is the daughter of Decedents, Henry Eduardo Saldana-Mejia
9 and Gabriela Andrade, and a proper party pursuant to California Code of Civil Procedure § 377.60 and
10 California Probate Code § 6402.

11 3. Plaintiff, ELENA SAREEN SALDANA ANDRADE (“ELENA”), is a resident of the
12 State of California, County of Orange, and at all times relevant herein was residing in the County of
13 Orange. EMMA is a minor and is represented by her guardian ad litem, Cristian Dayana Saldana Mejia,
14 pursuant to this court’s order granting Plaintiff’s ex parte application for appointment of Cristian Dayana
15 Saldana Mejia as her guardian ad litem. EMMA is the daughter of Decedents, Henry Eduardo Saldana-
16 Mejia and Gabriela Andrade, and a proper party pursuant to California Code of Civil Procedure § 377.60
17 and California Probate Code § 6402.

18 4. Plaintiff, SAMANTHA BELEN SALDANA ANDRADE (“SAMANTHA”), is a resident
19 of the State of California, County of Orange, and at all times relevant herein was residing in the County
20 of Orange. EMMA is a minor and is represented by her guardian ad litem, Cristian Dayana Saldana
21 Mejia, pursuant to this court’s order granting Plaintiff’s ex parte application for appointment of Cristian
22 Dayana Saldana Mejia as her guardian ad litem. EMMA is the daughter of Decedents, Henry Eduardo
23 Saldana-Mejia and Gabriela Andrade, and a proper party pursuant to California Code of Civil Procedure
24 § 377.60 and California Probate Code § 6402.

25 5. Plaintiff EMMA SOFIA SALDANA ANDRADE (“EMMA”) is a successor in interest
26 of both Henry Eduardo Saldana-Mejia and Gabriela Andrade (“Decedents”) who died on December 8,
27 2020, and succeeds to this cause of action because there is no personal representative of the Decedents’
28 estates. EMMA brings this complaint, acting by and through her guardian ad litem, in the capacity of

1 successor in interest. EMMA’s guardian ad litem has executed and filed the declaration under penalty
2 of perjury required by Code of Civil Procedure Section 377.32.

3 6. Plaintiffs are informed and believe, and thereon allege, Defendant GRACE ELIZABETH
4 COLEMAN (hereinafter “COLEMAN”), is a resident of the State of California, and at all times relevant
5 herein was residing in the County of Orange.

6 7. Plaintiffs are informed and believe, and thereon allege, Defendant JAMES COLEMAN
7 is a resident of the State of California, and at all times relevant herein was residing in the County of
8 Orange.

9 8. Plaintiffs are informed and believe, and thereon allege, Defendant KELLI COLEMAN
10 is a resident of the State of California, and at all times relevant herein was residing in the County of
11 Orange.

12 9. The true names and capacities of defendants sued herein as Does 1 through 50, inclusive,
13 are unknown to Plaintiffs who hereby sue such defendants by such fictitious names. Each of the
14 defendants named herein as a DOE is in some manner responsible for the events sued upon. Plaintiffs
15 will amend this complaint to insert the true names and capacities of each DOE defendant when and if
16 ascertained.

17 10. Plaintiffs are informed and believe and thereon allege that defendants, and each of them,
18 were the agents, and/or employees, and/or servants of the remaining defendants herein, and each of them,
19 and were at all times herein relevant, acting within the scope of their employment and/or agency
20 relationship.

21 **FACTS COMMON TO ALL CAUSES OF ACTION**

22 11. On December 8, 2020, at approximately 7:45 p.m., Decedents and their daughters
23 EMMA (age 5), ELENA (age 4) and SAMANTHA (age 1) were driving near Pelican Hill Road and
24 Newport Coast Drive in the City of Newport Beach when Defendant COLEMAN ran a red light and
25 collided into their vehicle. At the time of the collision the three girls were in their pajamas looking
26 forward to being with their mother and father and viewing holiday lighting together.

27 12. At the time of the collision COLEMAN was driving a 2010 Land Rover owned by her
28 parent(s) Defendants JAMES COLEMAN and/or KELLI COLEMAN.

1 13. Decedents briefly survived the collision but succumbed to their massive injuries shortly
2 thereafter. The cause of decedents' death was determined to be multiple blunt force traumatic injuries
3 they received when Defendant COLEMAN hit them while driving Defendant JAMES COLEMAN's
4 and/or KELLI COLEMAN's Land Rover. Plaintiffs EMMA, ELENA AND SAMANTHA suffered
5 severe injuries, including multiple broken legs and head injuries, and were transported from the collision
6 scene by ambulance, never to see their parents again.

7 14. On information and belief, and alleged thereon, at the time of the collision COLEMAN
8 was driving with a Blood Alcohol Content of .22%. On information and belief, and alleged thereon, just
9 100 days before she drove drunk and killed the Decedents and injured Plaintiffs, COLEMAN was
10 arrested on August 29, 2020, for driving under the influence with a Blood Alcohol Content of .15%. On
11 information and belief, and alleged thereon, in or about June, 2019, COLEMAN drove while intoxicated
12 and struck a parked vehicle then fled the scene. Additionally, based on information and belief and
13 alleged thereon, Defendant COLEMAN has a known history of alcohol and substance abuse predating
14 December 8, 2020.

15 15. On or about December 9, 2020, a felony information was filed against COLEMAN that
16 included charges under California Penal Code § 187 (a) for murdering Decedents and felony charges
17 under California Vehicle Code § 23153 (a) for driving under the influence with enhancements pursuant
18 to Cal. Penal Code § 12022.7 (a) for causing great bodily injury to Plaintiffs (Orange County Superior
19 Court Case No. 20HF1932). Additionally, under the same case number COLEMAN has been charged
20 with driving under the influence in violation of California Vehicle Code § 23152 (a) arising out of the
21 August 29, 2020 arrest.

22 16. Plaintiffs were extremely close to their parents and derived great pleasure from spending
23 time with their mother and father, relying on them for their love, comfort, compassion and support.

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1 **FIRST CAUSE OF ACTION**

2 **WRONGFUL DEATH (Negligence)**

3 (By all Plaintiffs – except EMMA SOFIA SALDANA ANDRADE as Successor in Interest of
4 Henry Eduardo Saldana-Mejia and Gabriela Andrade – Against Defendants
5 COLEMAN and Does 1-50)

6 17. Plaintiffs reallege and incorporate each and every allegation contained in paragraphs 1
7 through 16, as though fully set forth herein.

8 18. On December 8, 2020, Defendant COLEMAN, while driving a Land Rover owned by
9 Defendants JAMES COLEMAN and/or KELLI COLEMAN, caused the Land Rover to violently
10 collided into the vehicle occupied by Decedents and Plaintiffs.

11 19. Defendant COLEMAN owed a duty to Decedents not to so improperly operate the vehicle
12 she was driving in a manner that would cause it to collide into Decedents' vehicle.

13 20. Defendant COLEMAN breached her duty to Decedents when she improperly operated
14 the vehicle she was driving, causing it to collide into Decedents' vehicle.

15 21. It was foreseeable to Defendant COLEMAN that as a result of her breach of duty to
16 Decedents that such breach would result in serious bodily injury and/or death to Decedents. As a direct
17 and proximate result of Defendant COLEMAN's breach of her duty as alleged herein, Decedents died
18 on December 8, 2020.

19 22. At the time of the collision Defendant COLEMAN was driving in violation of Cal.
20 Vehicle Code § 23152 which provides in relevant part:

21 (a) It is unlawful for a person who is under the influence of any alcoholic
22 beverage to drive a vehicle.

23 (b) It is unlawful for a person who has 0.08 percent or more, by weight,
24 of alcohol in his or her blood to drive a vehicle.

25 23. Cal. Vehicle Code § 23152 is intended to prevent people from driving while intoxicated
26 so as to prevent injury and death. Decedents, as members of the general public, were in the class of
27 persons intended to be protected by Vehicle Code section 23152. On December 8, 2020, Defendant
28 COLEMAN, in violation of Vehicle Code section 23152, operated a vehicle while intoxicated and did

1 cause her vehicle to collide into Decedents' vehicle.

2 24. As a result of COLEMAN's violation of Vehicle Code section 23152, her negligence in
3 causing Decedents' injuries and subsequent deaths shall be presumed as a matter of law.

4 25. As a proximate result of Defendant COLEMAN's breach of her duty resulting in the
5 death of Decedents, Plaintiffs have sustained loss resulting from the loss of the society, comfort,
6 companionship and attention of Decedents as well as the protection they afforded and the household
7 services they rendered. As a further proximate result of Defendant COLEMAN's breach of her duty as
8 alleged herein and of the death of Decedents, Plaintiffs have incurred funeral and burial expenses.

9 26. The herein cause of action is based on COLEMAN's commission of a felony offense, for
10 which she is being prosecuted, therefore, if COLEMAN is convicted, Plaintiffs can recover attorneys
11 fees pursuant to Cal. Code Civil Proc. § 1021.4, *Award of Attorney Fees to Prevailing Plaintiff in*
12 *Damage Action Based on Commission of Felony Offense*, which provides: "In an action for damages
13 against a defendant based upon that defendant's commission of a felony offense for which that defendant
14 has been convicted, the court may, upon motion, award reasonable attorney's fees to a prevailing plaintiff
15 against the defendant who has been convicted of the felony."
16

17 SECOND CAUSE OF ACTION

18 WRONGFUL DEATH (Negligent Entrustment of Auto)

19 (By all Plaintiffs – except EMMA SOFIA SALDANA ANDRADE as Successor in Interest of
20 Henry Eduardo Saldana-Mejia and Gabriela Andrade – Against Defendants JAMES COLEMAN,
21 KELLI COLEMAN and Does 1-50)

22 27. Plaintiffs reallege and incorporate each and every allegation contained in paragraphs 1
23 through 26, as though fully set forth herein.

24 28. On or about December 8, 2020, Decedents were driving in their vehicle when Defendant
25 COLEMAN, driving a 2010 Land Rover ("the subject vehicle") owned by Defendants JAMES
26 COLEMAN and/or KELLI COLEMAN, caused the vehicle to collide with Decedents.

27 29. Plaintiffs allege on information and belief that, prior to the collision on December 8,
28 2020, JAMES COLEMAN and/or KELLI COLEMAN permitted Defendant COLEMAN access to use

1 the subject vehicle on that day and at the time the impact occurred.

2 30. Plaintiffs allege on information and belief that, at the time JAMES COLEMAN and/or
3 KELLI COLEMAN permitted defendant COLEMAN access to use the subject vehicle, JAMES
4 COLEMAN and/or KELLI COLEMAN knew, or should have known, that Defendant COLEMAN was
5 incompetent and unfit to drive the subject vehicle due to her two prior events in June 2019 and August,
6 2020 related to driving under the influence. Further, JAMES COLEMAN and/or KELLI COLEMAN
7 knew, or should have known, that permitting COLEMAN to use the subject vehicle posed a significant
8 risk of harm to the general public, of which Decedents were members, due to COLEMAN's documented
9 history of driving while intoxicated and their knowledge of her alcohol and substance abuse.

10 31. It was foreseeable to JAMES COLEMAN and/or KELLI COLEMAN that as a result of
11 permitting COLEMAN access to use the subject vehicle she would use it while intoxicated and likely
12 cause harm to members of the general public, of which Decedents were members. Where harm was
13 foreseeable, JAMES COLEMAN and/or KELLI COLEMAN owed a duty of care to Decedents and
14 members of the general public not to permit COLEMAN access to use the subject vehicle where she was
15 both incompetent and unfit to operate the subject vehicle.

16 32. JAMES COLEMAN and/or KELLI COLEMAN did breach their duty of care to
17 Decedents when they permitted COLEMAN access to use the subject vehicle on December 8, 2020. As
18 a direct and proximate result of JAMES COLEMAN's and/or KELLI COLEMAN's breach of duty,
19 COLEMAN used the subject vehicle while intoxicated and struck Decedents which resulted in their
20 deaths.

21 33. As a proximate result of JAMES COLEMAN's and/or KELLI COLEMAN's breach of
22 its duty as alleged herein resulting in the death of Decedents, Plaintiffs have sustained loss resulting from
23 the loss of the society, comfort, companionship and attention of Decedents as well as the protection they
24 afforded and the household services they rendered.

25 34. As a further proximate result of JAMES COLEMAN's and/or KELLI COLEMAN's
26 breach of their duty as alleged herein resulting in the death of Decedents, Plaintiffs have incurred funeral
27 and burial expenses.

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1 **THIRD CAUSE OF ACTION**

2 **NEGLIGENCE**

3 (By all Plaintiffs Against Defendants COLEMAN and Does 1-50)

4 35. Plaintiff realleges and incorporates each and every allegation contained in paragraphs 1
5 through 26, as though fully set forth herein.

6 36. As a direct and proximate result of Defendant COLEMAN’s negligence as alleged in
7 paragraphs 18 through 24 hereinabove, Plaintiffs have suffered injuries to their bodies, incurred medical
8 bills for treatment of their injuries and endured pain and suffering resulting from their injuries.

9 37. At the time of the collision Defendant COLEMAN had previously been arrested for
10 driving while intoxicated. At the time of her prior arrest in August, 2020, her drivers license was
11 physically taken from her and she was provided with written warnings regarding the probable dangerous
12 consequences of driving intoxicated and in violation of Vehicle Code section 23152. Additionally, on
13 information and belief, in June, 2019, COLEMAN drove while intoxicated and struck a parked vehicle
14 – acquiring actual knowledge of the physical harm drinking and driving can cause. Additionally, prior
15 to obtaining her license COLEMAN was provided with information and education about the probable
16 physical harms and potential of death that could be caused by driving while intoxicated. Despite the
17 extensive knowledge COLEMAN had about the high likelihood she would cause harm to others if she
18 drove while intoxicated, she wilfully and deliberately failed to avoid those consequences when she chose
19 to drive intoxicated on December 8, 2020. In so doing, Defendant COLEMAN acted in a malicious and
20 oppressive manner in order to harm Decedents and Plaintiffs, or with a willful and conscious disregard
21 for the rights of Decedents and Plaintiffs and the potential of causing them death and/or injury. The
22 conduct of Defendant COLEMAN was despicable, and justifies an award of punitive damages against
23 her in an amount sufficient to deter her, and others of her kind, from engaging in such conduct again in
24 the future.

25 38. The herein cause of action is based on COLEMAN’s commission of a felony offense, for
26 which she is being prosecuted, therefore, if COLEMAN is convicted, Plaintiffs can recover attorneys
27 fees pursuant to Cal. Code Civil Proc. § 1021.4.

1 **FOURTH CAUSE OF ACTION**

2 **NEGLIGENCE (Negligent Entrustment of Auto)**

3 (By all Plaintiffs Against Defendants JAMES COLEMAN, KELLI COLEMAN and Does 1-50)

4 39. Plaintiff realleges and incorporates each and every allegation contained in paragraphs 1
5 through 15, 28 through 32, as though fully set forth herein.

6 40. Plaintiffs alleges on information and belief that Defendants JAMES COLEMAN and
7 KELLI COLEMAN were aware, prior to entrusting and/or permitting access to the subject vehicle to
8 Defendant COLEMAN, that she had been arrested for driving under the influence just 100 days prior
9 to the day she killed Decedents and injured Plaintiffs. Additionally, Defendants JAMES COLEMAN
10 and KELLI COLEMAN were aware, prior to entrusting the subject vehicle to Defendant COLEMAN,
11 that in June, 2019 she had been involved with a collision into a parked car resulting from COLEMAN
12 driving while intoxicated. Additionally, Defendants JAMES COLEMAN and KELLI COLEMAN knew,
13 or should have known, that COLEMAN did not possess a valid driver's license on December 8, 2020,
14 yet still permitted her to use and/or access to the subject vehicle. Plaintiffs further allege on information
15 and belief that JAMES COLEMAN and KELLI COLEMAN were aware of COLEMAN's extensive
16 history of alcohol and substance abuse prior to December 8, 2020.

17 41. Plaintiffs alleges on information and belief that prior to December 8, 2020, Defendant
18 JAMES COLEMAN had been convicted of driving while intoxicated and was made aware through such
19 conviction and subsequent court warnings and alcohol classes of the high likelihood of harm and death
20 that is likely to occur from a person operating motor vehicles while intoxicated.

21 42. As a direct and proximate result of Defendant JAMES COLEMAN's and/or KELLI
22 COLEMAN's negligence as alleged in paragraphs 28 through 32, hereinabove, Plaintiffs have suffered
23 injuries to their bodies, incurred medical bills for treatment of their injuries and endured pain and
24 suffering resulting from their injuries.

25 43. JAMES COLEMAN and/or KELLI COLEMAN were aware, or should have been aware,
26 prior to entrusting the subject vehicle to Defendant COLEMAN, that she had a propensity to drive under
27 the influence of alcohol and cause accidents, and that COLEMAN was likely to drive the subject vehicle
28 while intoxicated. By entrusting and/or allowing access to the subject vehicle to COLEMAN, JAMES

1 COLEMAN and/or KELLI COLEMAN acted with conscious disregard for the safety of others, and
2 specifically for Decedents and Plaintiffs.

3 44. In permitting COLEMAN, a person with prior arrests for DUI and property damage while
4 driving, to operate the subject vehicle, JAMES COLEMAN and/or KELLI COLEMAN were aware of
5 the probable dangerous consequences of such conduct, and despite that knowledge, wilfully and
6 deliberately failed to avoid those consequences when COLEMAN was allowed to use and/or access to
7 the subject vehicle. In so doing, JAMES COLEMAN and/or KELLI COLEMAN acted in a malicious
8 and oppressive manner in order to harm Decedents and Plaintiffs, or with a willful and conscious
9 disregard for the rights of Decedents and Plaintiffs and the potential of causing death and injury. The
10 conduct of Defendants JAMES COLEMAN and/or KELLI COLEMAN was despicable, and justifies
11 an award of punitive damages against them in an amount sufficient to deter them, and others of their
12 kind, from engaging in such conduct again in the future.

13
14 **WHEREFORE**, Plaintiffs pray judgment as follows:

15 1. **On the First Cause of Action for Wrongful Death (Negligence):**

- 16 a. For a money judgment, according to proof, awarded to Plaintiffs to compensate
17 for the deaths of Henry Eduardo Saldana-Mejia and Gabriela Andrade that includes:
18 1) Economic damages for loss of financial support, loss of gifts and benefits, funeral
19 and burial expenses, and 2) General damages for the loss of love, companionship,
20 comfort, care, assistance, protection, affection, society, moral support, training and
21 guidance.
22 b. For interest on all past economic damages in the legal amount from December 8,
23 2020, to the date of judgment.
24 c. For attorneys fees pursuant Cal. Code of Civil Proc. § 1021.4.

25 2. **On the Second Cause of Action for Wrongful Death (Negligent Entrustment):**

- 26 a. For a money judgment, according to proof, awarded to Plaintiffs to compensate
27 for the deaths of Henry Eduardo Saldana-Mejia and Gabriela Andrade that includes:
28 1) Economic damages for loss of financial support, loss of gifts and benefits, funeral

1 and burial expenses, and 2) General damages for the loss of love, companionship,
2 comfort, care, assistance, protection, affection, society, moral support, training and
3 guidance.

4 b. For interest on all past economic damages in the legal amount from December 8,
5 2020, to the date of judgment.

6 3. **On the Third Cause of Action for Negligence (Auto):**

7 a. For a money judgment awarding Plaintiffs general and special damages for past
8 and future pain and suffering, past and future medical expenses, according to proof;

9 b. For interest per Cal. Civil Code § 3287 on all past economic damages in the legal
10 amount from the date such damages became certain to the date of judgment.

11 c. For incidental and consequential damages according to proof at the time of trial;

12 d. For a money judgment awarding Plaintiffs punitive damages in an amount
13 sufficient to deter Defendant COLEMAN, as well as others of her kind, from
14 engaging in such conduct again in the future;

15 e. For attorneys fees pursuant Cal. Code of Civil Proc. § 1021.4.

16 4. **On the Fourth Cause of Action for Negligent Entrustment (Auto):**

17 a. For a money judgment awarding Plaintiffs general and special damages for past
18 and future pain and suffering, past and future medical expenses, according to proof;

19 b. For interest per Cal. Civil Code § 3287 on all past economic damages in the legal
20 amount from the date such damages became certain to the date of judgment.

21 c. For incidental and consequential damages according to proof at the time of trial;

22 d. For a money judgment awarding Plaintiffs punitive damages in an amount
23 sufficient to deter Defendant COLEMAN, as well as others of her kind, from
24 engaging in such conduct again in the future;

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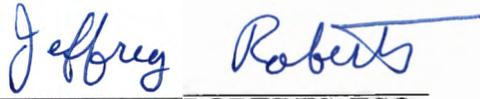
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5. As to Each and Every Cause of Action:

- a. For costs of suit herein incurred; and
- b. For such other and further relief as the Court may deem just and proper.

Dated: December 24, 2020

ROBERTS | JEANDRON LAW

By: 

JEFFREY T. ROBERTS, ESQ.

Attorney for Plaintiffs, Emma Sofia Saldana Andrade, Elena Sareen Saldana Andrade, Samantha Belen Saldana Andrade and Emma Sofia Saldana Andrade as successor in interest to Henry Eduardo Saldana-Mejia and Gabriela Andrade, deceased

Dated: December 24, 2020

NEMETH LAW FIRM

By: 

BRETT I. NEMETH, ESQ.

Attorney for Plaintiffs, Emma Sofia Saldana Andrade, Elena Sareen Saldana Andrade, Samantha Belen Saldana Andrade and Emma Sofia Saldana Andrade as successor in interest to Henry Eduardo Saldana-Mejia and Gabriela Andrade, deceased