

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION

DAVID A. D. DAO,

Petitioner,

v.

CITY OF CHICAGO, a municipal  
corporation, and  
UNITED AIRLINES, INC., a corporation,

Respondents.

No.

2017CH05227  
CALENDAR/ROOM 09  
TIME 00:00  
General Chancery

**PETITIONER'S EMERGENCY BILL OF DISCOVERY**

Petitioner, DAVID A. D. DAO, by his attorneys, CORBOY & DEMETRIO, P.C., and  
GOLAN CHRISTIE TAGLIA LLP, petitions this Court for an Emergency Bill of Discovery, and  
in support thereof, states as follows:

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1. On April 9, 2017, DAVID A. D. DAO was a passenger on United Express Flight No. 3411, scheduled to fly from Chicago, O'Hare International Airport to Louisville, Kentucky.

2. After being duly processed by the ticket agent, checked in by the attendant, and seated in his assigned passenger seat, Petitioner was forcibly dragged and removed from the said aircraft by City employees, sustaining personal injury.

3. The Respondents include the City of Chicago, a municipal corporation, which operated Chicago O'Hare International Airport, and United Airlines, a corporation, who owned and operated Flight No. 3411.

4. Petitioner believes it is crucial and essential that the following be preserved and protected pursuant to court order:

- (a) all April 9, 2017, surveillance video recordings depicting the boarding of all passengers on United Express Flight No. 3411;
- (b) the cockpit voice recording (CVR) for United Express Flight No. 3411 on April 9, 2017;
- (c) complete April 9, 2017, passenger list for United Express Flight No. 3411;
- (d) complete April 9, 2017, employee and crew list for United Express Flight No. 3411;
- (e) all incident reports prepared by Respondents herein;
- (f) the protocol of United Airlines in force and effect for the removal of passengers from commercial aircraft as of April 9, 2017; and
- (g) the personnel files of the Aviation Department police who removed Petitioner from the plane.

5. The requested preservation and protection for items (a) through (g) is necessary, since each of those items are in the possession of one or both of the Respondents, and Petitioner currently has no access to them and believes that serious prejudice will inure to the Petitioner if said relief is not granted.

WHEREFORE, Petitioner, DAVID A. D. DAO, prays for the entry of an Order granting the aforesaid relief.

Respectfully submitted,



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Thomas A. Demetrio

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AFFIDAVIT

I, Thomas A. Demetrio of Corboy & Demetrio, P.C., as one of the attorneys for Petitioner, DAVID A. D. DAO, am familiar with the facts set forth in the Bill of Discovery.

Based upon my limited investigation to date, I state, under oath, that all of the allegations are true and correct to the best of my knowledge.



Thomas A. Demetrio

SUBSCRIBED AND SWORN to before me  
this 11<sup>th</sup> day of April, 2017.



NOTARY PUBLIC



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