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Filed and Attested by the
Office of Judicial Records
17 NOV 2025 08:41 am
K BREWINGTON

KRISTEN L. BEHRENS, ESQ., as Administratrix of the ESTATE OF RAUL MEZA ARREDONDO
1650 Market Street, Suite 1200
Philadelphia, PA 19103

And

KRISTEN L. BEHRENS, ESQ., as Administratrix of the ESTATE OF LIZETH MURILLO OSUNA
1650 Market Street, Suite 1200
Philadelphia, PA 19103

Plaintiffs

v.

MED JETS, S.A. DE C.V. d/b/a JET RESCUE
Av. Chapultepec No. 15 11B OFNA 1
Col. Ladron de Guevara
Guadalajara, Jalisco, Mexico
CP. 44660

And

PHILADELPHIA COUNTY COURT OF COMMON PLEAS

NOVEMBER TERM, 2025

No.

JURY TRIAL DEMANDED

Case ID: 251102313

JOHN DOES 1-10

And

ABC CORPORATIONS (1-10)

Defendants

NOTICE

"NOTICE "You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by an attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. "YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE. PHILADELPHIA BAR ASSOCIATION LAWYER REFERRAL and INFORMATION SERVICE One Reading Center Philadelphia, Pennsylvania 19107 (215) 238-6333	"AVISO "Le han demandado en corte. Si usted quiere defenderse contra las demandas nombradas en las páginas siguientes, tiene veinte (20) dias, a partir de recibir esta demanda y la notificatión para entablar personalmente o por un abogado una comparecencia escrita y tambien para entablar con la corte en forma escrita sus defensas y objeciones a las demandas contra usted. Sea avisado que si usted no se defiende, el caso puede continuar sin usted y la corte puede incorporar un juicio contra usted sin previo aviso para conseguir el dinero demandado en el pleito o para conseguir culquier otra demanda o alivio solicitados por el demandante. Usted puede perder dinero o propiedad u otros derechos importantes para usted. USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE ABOGADO (O NO TIENE DINERO SUFICIENTE PARA PARGAR A UN ABOGADO), VAYA EN PERSONA O LLAME POR TELEFONO LA OFICINA NOMBRADA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASSISTENCIA LEGAL. ESTA OFICINA PUEDE PROPORCIONARLE LA INFORMACION SOBRE CONTRATAR A UN ABOGADO. SI USTED NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO, ESTA OFICINA PUEDE PROPORCIONARLE INFORMACION SOBRE AGENCIAS QUE OFRECEN SERVICIOS LEGALES A PERSONAS QUE CUMPLEN LOS REQUISITOS PARA UN HONORARIO REDUCIDO O NINGUN HONORARIO. ASSOCIACION DE LICENDIADOS DE FILADELFIA SERVICO DE REFERENCA E INFORMACION LEGAL One Reading Center Filadelfia, Pennsylvania 19107 Telefono: (215) 238-6333

CIVIL ACTION COMPLAINT

INTRODUCTION

1. On January 31, 2025, Med Jets SA de CV d/b/a Jet Rescue (hereinafter "Med Jets") Flight 056, a Learjet 55 aircraft owned and operated by Med Jets, suffered a catastrophic event

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approximately one minute after taking off from Northeast Philadelphia Airport, sending the jet plummeting from the sky.

2. The subject Learjet 55 aircraft slammed into the ground near the busy and populated intersection of Roosevelt Boulevard and Cottman Avenue in Philadelphia, erupting in a massive explosion that engulfed multiple vehicles and houses and sent fiery debris raining down on terrified and helpless bystanders.

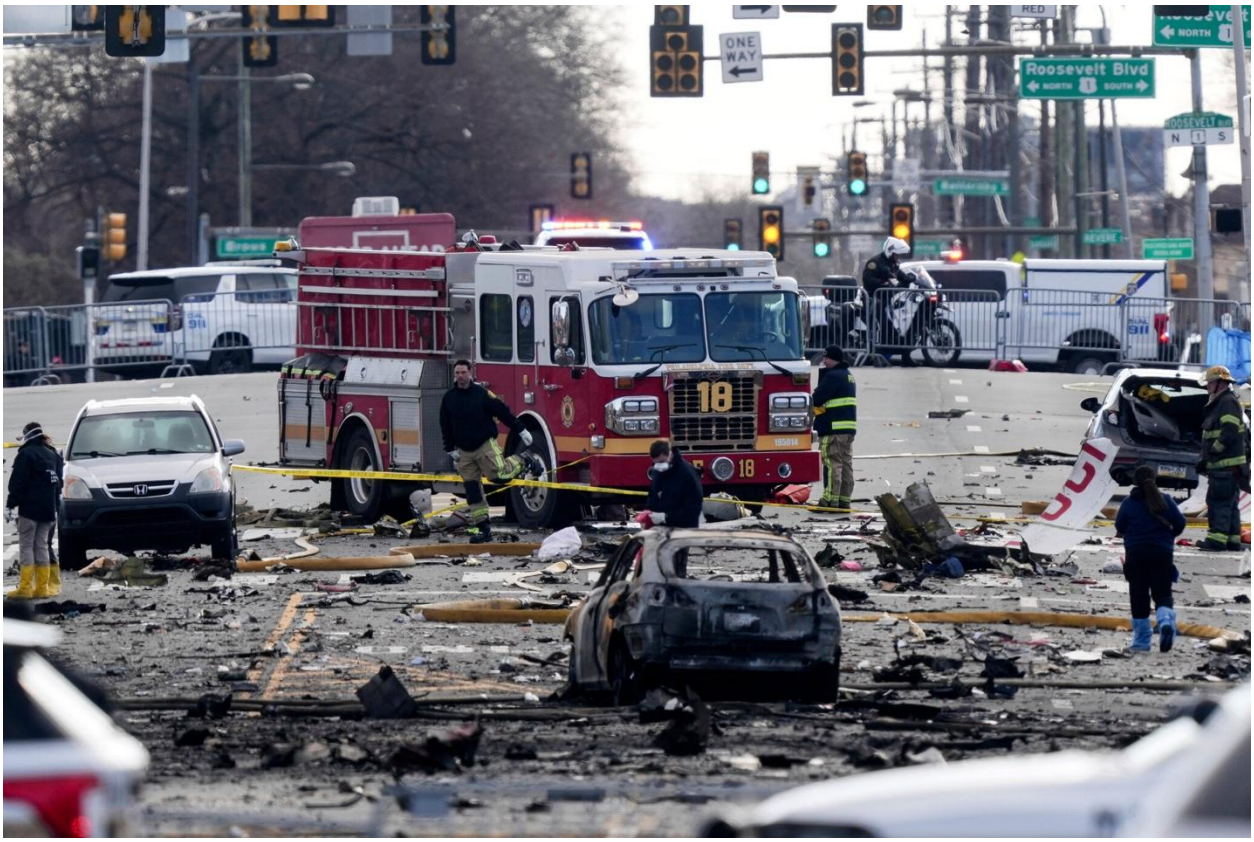
3. Med Jets Flight 056 was carrying six (6) Mexican nationals, including two pilots, a neonatal physician, a paramedic, and a mother and her child who had received life-saving care at Shriners Children's Hospital. The flight and was headed to Tijuana, Mexico with a stop at Springfield-Branson National Airport.

4. All six passengers on the Med Jets flight died in the crash, a seventh person was killed in their vehicle, an eighth person died months later from the devastating injuries she suffered, and over twenty people were seriously injured.



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PARTIES

A. Raul Meza Arredondo

5. Raul Meza Arredondo, deceased, was the pediatrician on board Med Jets Flight 056 and was providing medical care to Valentina Guzman Murillo, his minor patient, during her journey to and from Philadelphia for her life-saving treatment. Raul Meza Arredondo perished in the crash.



6. On May 14, 2025, Plaintiff, Kristen Behrens, Esq., was appointed as the Administratrix of the Estate of Raul Meza Arredondo by the Office of the Register of Wills of Philadelphia County, Pennsylvania. *See* **Exhibit A**, Letters of Administration for the Estate of Raul Meza Arredondo.

7. Raul Meza Arredondo was, at all times relevant hereto and prior to his death, an adult individual and citizen of the country of Mexico, residing at Calle Pavo Real No. 73, Atizapan de Zaragoza, Mexico. At all times relevant hereto, Raul Meza Arredondo was domiciled in Mexico.

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8. Plaintiff, Kristen Behrens, Esq., brings this action as the Administratrix of the Estate of Raul Meza Arredondo on behalf of all statutory wrongful death and survival beneficiaries pursuant to 42 Pa.C.S.A. § 8301 and 42 Pa.C.S.A. § 8302.

9. Raul Meza Arredondo, deceased, is survived by his minor daughter, L.M.D., mother, Veronica Arredondo, and father, Raul Meza, as well as his partner, Norma Thalia Diaz Madrigal.

B. Lizeth Murillo Osuna

10. Lizeth Murillo Osuna, deceased, traveled on board Med Jets Flight 056 to Philadelphia so her minor daughter, Valentina Guzman Murillo, could receive life-saving medical care at Shriners Children's Hospital in Philadelphia.

11. Lizeth Murillo Osuna was returning home to Mexico with her daughter, Valentina Guzman Murillo, on Med Jets Flight 056 and perished in the crash.



12. On May 14, 2025, Plaintiff, Kristen Behrens, Esq., was appointed as the Administratrix of the Estate of Lizeth Murillo Osuna by the Office of the Register of Wills of Philadelphia County, Pennsylvania. *See* **Exhibit B**, Letters of Administration for the Estate of Lizeth Murillo Osuna.

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13. Lizeth Murillo Osuna was, at all times relevant hereto and prior to her death, an adult individual and citizen of the country of Mexico, residing at Calle M y D Poinente #328, Ensenada, Mexico. At all times relevant hereto, Lizeth Murillo Osuna was domiciled in Mexico.

14. Plaintiff, Kristen Behrens, Esq., brings this action as the Administratrix of the Estate of Lizeth Murillo Osuna on behalf of all statutory wrongful death and survival beneficiaries pursuant to 42 Pa.C.S.A. § 8301 and 42 Pa.C.S.A. § 8302.

15. Lizeth Murillo Osuna, deceased, is survived by her mother, Elmira Osuna Aguilar, and father, Ezequiel Murillo Soto.

16. Under 28 U.S.C. § 1332(c)(2), Kristen Behrens, as Administratrix of the Estate of Lizeth Murillo Osuna and as Administratrix of the Estate of Raul Meza Arredondo, shall be deemed to be a citizen of Mexico.

C. Defendants

17. Defendant, Med Jets S.A. DE C.V. d/b/a Jet Rescue (hereinafter "Med Jets"), is a Mexican corporation or other business entity organized and existing under the laws of the country of Mexico, with a principal place of business located at Av. Chapultepec No. 15 11B OFNA 1, Col. Laron de Guevara, Guadalajara, Jalisco, Mexico, CP. 44660.

18. At all times relevant hereto, Defendant, Med Jets, purposely established significant contacts in Pennsylvania, carried out, and continues to carry out, substantial, continuous, and systematic activities and business in the Commonwealth of Pennsylvania, and regularly conducts and conducted business in Philadelphia County.

19. At all times relevant hereto, Defendant, Med Jets, was acting by and through its employees, servants, and actual, apparent, and ostensible agents, acting within the course scope of their employment, service, and/or agency with Defendant, Med Jets.

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20. This Court has specific personal jurisdiction over Defendant, Med Jets because, at all times relevant hereto, Defendant purposely availed itself of Pennsylvania by establishing certain minimum contacts with the Commonwealth of Pennsylvania and Plaintiffs' claims herein arise directly out of and/or relate to Defendant's purposely established minimum contacts such that maintenance of this suit in this Court does not offend traditional notions of fair play and substantial justice. Namely, Defendant, Med Jets, established sufficient minimum contacts with the Commonwealth of Pennsylvania by operating its Learjet 55, the subject Flight 056, specifically to Philadelphia, Pennsylvania in order to transport a medical patient to a hospital facility in Philadelphia, by and through agreement(s) with Shriners Children's Hospital in Philadelphia, and flying into and out of Northeast Philadelphia Airport which is owned and operated by the City of Philadelphia.

21. Plaintiffs' claims herein arise directly out of and/or relate to Defendant, Med Jets', operation of the subject Learjet 55 aircraft in Pennsylvania and its crash in Philadelphia.

22. Exercise of specific personal jurisdiction over the Defendant, Med Jets, by a Pennsylvania court in this case would not offend traditional notions of fair play and substantial justice, and Med Jets should reasonably expect to be haled into court in Pennsylvania and specifically in Philadelphia after crashing its aircraft in Philadelphia.

23. Defendants, John Does 1-10, are currently unknown individuals who were responsible for inspection, maintenance, repairs, and/or upkeep of the aircraft fleet owned and operated by Med Jets, including but not limited to the subject Learjet involved in this tragedy.

24. Pursuant to Pennsylvania Rule of Civil Procedure 2005, Defendants, John Does 1-10, are currently unidentified, fictitious defendants added "John Doe" designations to this action

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where their names/identities are unknown despite a reasonable and diligent search. Their identities, after reasonable investigation, are unknown to Plaintiff.

25. A reasonable and diligent search was conducted to determine the actual names/identities of John Does 1-10.

26. Plaintiffs reserve the right to amend this Complaint and name said unknown individuals, designated John Does 1-10, as aforementioned, as defendants pursuant to Pennsylvania Rule of Civil Procedure 2005 and 1033.

27. Defendants, ABC Corporations 1-10, are currently unknown corporations or other business entities who were responsible for the design, manufacture, sale, supply, retrofit, inspection, maintenance, repair, and/or upkeep of the subject Learjet involved in this tragedy and/or its component parts and/or systems which were involved in causing this crash.

28. Pursuant to Pennsylvania Rule of Civil Procedure 2005, Defendants, ABC Corporations 1-10, are currently unidentified, fictitious defendants added "ABC Corporation" designations to this action where their names/identities are unknown despite a reasonable and diligent search. Their identities, after reasonable investigation, are unknown to Plaintiff.

29. A reasonable and diligent search was conducted to determine the actual names/identities of ABC Corporations 1-10.

30. Plaintiffs reserve the right to amend this Complaint and name said unknown corporations, designated ABC Corporations 1-10, as aforementioned, as defendants pursuant to Pennsylvania Rule of Civil Procedure 2005 and 1033.

FACTS

31. On January 31, 2025, at approximately 6:06 p.m., Med Jets Flight 056, a Learjet 55 with Mexican registration XA-UCI, call sign MTS056, owned and operated by Defendant, Med

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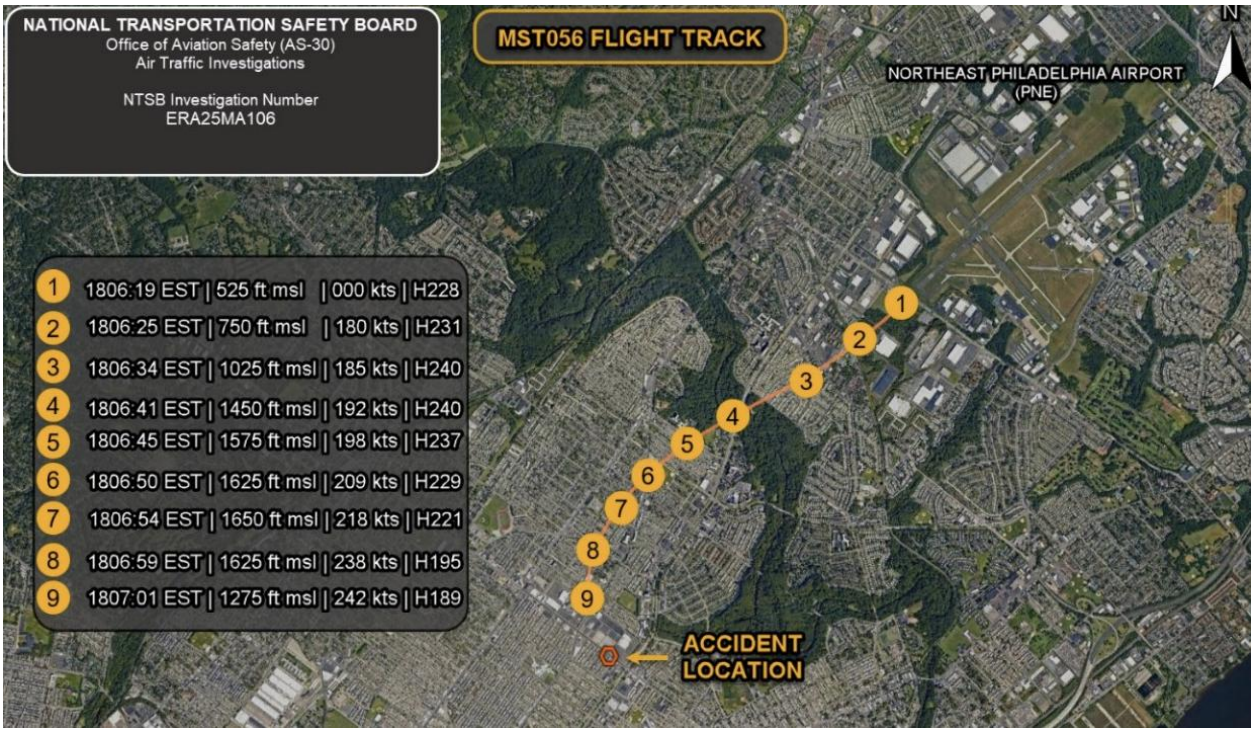
Jets, departed runway 24 at Northeast Philadelphia Airport (PNE), ultimately destined for Tijuana, Mexico with a brief stop Springfield-Branson National Airport for refueling.



32. Med Jets Flight 056 was carrying six Mexican nationals—two pilots, a neonatal physician, Raul Meza Arredondo, a paramedic, and a pediatric patient and her mother, Lizeth Murillo Osuna. The pediatric patient had received months of life-saving treatment at Shriners Children's Hospital in Philadelphia and was being transported home to Mexico.

33. Med Jets Flight 056 proceeded southwest and ascended to an altitude of approximately 1,650 feet mean sea level in the air, and during its ascent made a slight right turn, a gradual left turn, and then suffered a catastrophic event that caused the aircraft to plummet from the sky and crash near the intersection of Roosevelt Boulevard and Cottman Avenue in Philadelphia.

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34. Med Jets Flight 056 was in the air for approximately one minute before it fell from the sky due to mechanical failure, a failure to ensure the aircraft was properly weighted and balanced, and/or pilot error.

35. The aircraft impacted the ground at an estimated descent angle of approximately twenty-two degrees and with such destructive force that the aircraft erupted in a massive explosion that engulfed surrounding vehicles and homes and sent fiery debris raining down over a nearly six-block area.

36. The unfathomable force of the crash resulted in highly fragmented wreckage that penetrated numerous homes, commercial buildings, and vehicles in the nearby area and post-crash investigations measured the debris field at an astonishing 1,410 feet in length and 840 feet in width.

37. The catastrophically forceful impact left a crater that looked as if it were created by heavy military artillery and which buried the aircraft's cockpit voice recorder (CVR) under eight feet of soil and debris.

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38. Post-crash investigations by the National Transportation Safety Board (NTSB) discovered that the Med Jets Flight 056 CVR did not record the accident flight and in fact had likely not recorded audio for several years.

39. Defendant, Med Jets, as the owner and operator of the subject Learjet 55, had a duty to ensure the aircraft was maintained in a safe and operable condition such that it would not suffer a catastrophic failure during flight and crash.

40. Defendant, Med Jets, as the owner and operator of the subject Learjet 55, had a duty to ensure the aircraft was in a safe and operable condition before departing from Mexico to travel to Philadelphia.

41. Defendant, Med Jets, as the owner and operator of the subject Learjet 55, had a duty to ensure the weight and balance of the aircraft was proper and would not impact the aircraft's ability to fly safely.

42. Defendant, Med Jets, as the owner and operator of the subject Learjet 55, had a duty to ensure the aircraft was in a safe and operable condition before departing PNE on the night of the tragedy.

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43. Defendant, Med Jets, as the owner and operator of the subject Learjet 55, had a duty to properly and safely operate the aircraft at all times, including during its flight departing from PNE on the night of the tragedy.

44. Defendant, Med Jets, as the owner and operator of the subject Learjet 55, had a duty to issue a distress signal and alert the flight tower immediately upon the aircraft's loss of control and/or uncontrolled descent.

45. This is not the first fatal crash involving Med Jets' aircrafts and pilots. Upon information and belief, on November 1, 2023, a Learjet 35A owned and operated by the Med Jets Defendants, suffered a deadly crash upon landing at Cuernavaca Airport in Morales, Mexico after departing from its base of operations at Toluca International Airport in the city of Toluca, Mexico. All five crew members on board were killed in the crash.

46. When Med Jets Flight 056 impacted the ground, it erupted in a massive explosion that engulfed the nearby area in a fireball of ignited jet fuel, incinerating the passengers on board the aircraft, including Plaintiffs' decedents, Raul Meza Arredondo and Lizeth Murillo Osuna.

47. As a direct and proximate result of the carelessness, negligence, and recklessness of Defendants, Med Jets, John Does 1-10, and ABC Corporations 1-10, Raul Meza Arredondo, suffered severe, disabling, and excruciating injuries, including but not limited to, his agonizing death resulting from being engulfed in flames and incinerated when the subject Learjet 55 crashed and erupted in a massive fireball.

48. As a direct and proximate result of the carelessness, negligence, and recklessness of Defendants, Med Jets, John Does 1-10, and ABC Corporations 1-10, which resulted in the tragic and untimely death of Raul Meza Arredondo, his beneficiaries have in the past and will in the future continue to suffer great pecuniary loss including, but not limited to, loss of support, loss of

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aid, loss of services, loss of companionship, loss of consortium, loss of comfort, loss of counseling, and loss of guidance, and have suffered profound psychological and emotional loss.

49. As a direct and proximate result of the carelessness, negligence, and recklessness of Defendants, Med Jets, John Does 1-10, and ABC Corporations 1-10, Raul Meza Arredondo's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for various funeral, burial, and estate administration expenses for which Plaintiff is entitled to compensation.

50. As a direct and proximate result of the carelessness, negligence, and recklessness of Defendants, Med Jets, John Does 1-10, and ABC Corporations 1-10, Plaintiff claims all damages suffered by the Raul Meza Arredondo and his wrongful death beneficiaries by reason of his untimely death, including, without limiting the generality thereof, the following: severe injuries to Raul Meza Arredondo, including severe burn injuries and traumatic blunt force injuries, immense fear of impending death during the subject aircraft's plummet out of the sky, and other injuries resulting in death; the anxiety, horror, and fear of impending death and related mental disturbance; immense conscious pain and suffering, and other intangible losses which Raul Meza Arredondo suffered prior to his death; loss of earnings and earnings capacity suffered by Raul Meza Arredondo and/or his Estate and/or wrongful death beneficiaries from the date of his death until the time in the future that he would have lived had he not died as a result of this accident; and the loss and total limitation and deprivation of his normal activities, pursuits, and pleasures from the date of his death until such time in the future as he would have lived had he not died as a result of this accident, all to his beneficiaries' loss and detriment.

51. As a direct and proximate result of the carelessness, negligence, and recklessness of Defendants, Med Jets, John Does 1-10, and ABC Corporations 1-10, Lizeth Murillo Osuna,

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suffered severe, disabling, and excruciating injuries, including but not limited to, her agonizing death resulting from being engulfed in flames and incinerated when the subject Learjet 55 crashed and erupted in a massive fireball.

52. As a direct and proximate result of the carelessness, negligence, and recklessness of Defendants, Med Jets, John Does 1-10, and ABC Corporations 1-10, which resulted in the tragic and untimely death of Lizeth Murillo Osuna, her beneficiaries have in the past and will in the future continue to suffer great pecuniary loss including, but not limited to, loss of support, loss of aid, loss of services, loss of companionship, loss of consortium, loss of comfort, loss of counseling, and loss of guidance, and have suffered profound psychological and emotional loss.

53. As a direct and proximate result of the carelessness, negligence, and recklessness of Defendants, Med Jets, John Does 1-10, and ABC Corporations 1-10, Lizeth Murillo Osuna's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for various funeral, burial, and estate administration expenses for which Plaintiff is entitled to compensation.

54. As a direct and proximate result of the carelessness, negligence, and recklessness of Defendants, Med Jets, John Does 1-10, and ABC Corporations 1-10, Plaintiff claims all damages suffered by the Estate of Lizeth Murillo Osuna and her wrongful death beneficiaries by reason of her untimely death, including, without limiting the generality thereof, the following: severe injuries to Lizeth Murillo Osuna, including severe burn injuries, traumatic blunt force injuries, immense fear of impending death during the subject aircraft's plummet out of the sky, and other injuries resulting in her death; the anxiety, horror, and fear of impending death and related mental disturbance; immense conscious pain and suffering, and other intangible losses which Lizeth Murillo Osuna suffered prior to her death; loss of earnings and earnings capacity

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suffered by Lizeth Murillo Osuna and/or her Estate and/or wrongful death beneficiaries from the date of her death until the time in the future that she would have lived had she not died as a result of this accident; and the loss and total limitation and deprivation of her normal activities, pursuits, and pleasures from the date of her death until such time in the future as she would have lived had she not died as a result of this accident, all to her beneficiaries' loss and detriment.

55. Defendants, Med Jets, John Does 1-10, and ABC Corporations 1-10, are jointly and severally liable for the injuries and damages suffered by Plaintiffs' decedents and their respective estates and wrongful death beneficiaries.

COUNT I – NEGLIGENCE

ALL PLAINTIFFS v. MED JETS S.A. de C.V. d/b/a JET RESCUE

56. Plaintiffs hereby incorporate all preceding paragraphs of this Complaint by reference the same as though fully set forth herein.

57. Defendant, Med Jets, was the owner and operator of Med Jets Flight 056, a Learjet 55 with Mexican registration XA-UCI, call sign MTS056.

58. Upon information and belief, the subject Learjet 55 owned and operated by Med Jets, was over forty years old and was originally manufactured in approximately 1983.

59. Defendant, Med Jets, as the owner and operator of the subject Learjet 55, had a duty to ensure the aircraft was maintained in a safe and operable condition such that it would not suffer a catastrophic failure during flight and crash.

60. Defendant, Med Jets, as the owner and operator of the subject Learjet 55, had a duty to ensure the aircraft was in a safe and operable condition before departing from Mexico to travel to Philadelphia.

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61. Defendant, Med Jets, as the owner and operator of the subject Learjet 55, had a duty to ensure the aircraft was in a safe and operable condition before departing PNE on the night of the tragedy.

62. Defendant, Med Jets, as the owner and operator of the subject Learjet 55, had a duty to ensure the subject aircraft was routinely and adequately inspected by competent and qualified individuals to identify any and all maintenance and/or repair needs for the aircraft.

63. Defendant, Med Jets, as the owner and operator of the subject Learjet 55, had a duty to ensure the weight and balance of the aircraft was proper and would not impact the aircraft's ability to fly safely.

64. Defendant, Med Jets, as the owner and operator of the subject Learjet 55, had a duty to properly and safely operate the aircraft at all times, including during its flight departing from PNE on the night of the tragedy.

65. Defendant, Med Jets, as the owner and operator of the subject Learjet 55, had a duty to issue a distress signal and alert the flight tower immediately upon the aircraft's loss of control and/or uncontrolled descent.

66. Defendant, Med Jets, had a duty to ensure that all pilots and crew members involved in the operation of the subject Learjet 55 were properly and adequately trained and qualified to operate this highly specialized aircraft.

67. Defendant, Med Jets, breached these aforementioned duties and this tragedy occurred as a result.

68. The disaster and resulting catastrophic injuries and deaths suffered by Plaintiffs' decedents and their respective estates and wrongful death beneficiaries, were the direct and proximate result of the carelessness, negligence, and recklessness of Defendant, Med Jets, by and

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through its employees, servants, and/or agents, both generally and in the following particular respects:

a. Failing to operate the subject Learjet 55 aircraft in a safe manner;

b. Crashing the subject Learjet 55;

c. Failing to ensure the subject Learjet 55 aircraft was maintained in a safe and operable condition;

d. Failing to engage in regular and routine maintenance for the subject Learjet 55;

e. Failing to regularly and adequately inspect the subject Learjet 55 aircraft to identify maintenance and/or repair needs;

f. Failing to have qualified and competent individuals perform routine and thorough inspections of the subject Learjet 55;

g. Failing to repair the subject Learjet 55;

h. Failing to ensure the subject Learjet 55 was in a safe and operable condition prior to departing from Mexico to fly to Philadelphia;

i. Failing to ensure the subject Learjet 55 was in a safe and operable condition prior to departing PNE on the night of the tragedy;

j. Failing to ensure the subject Learjet 55 was properly and safely weighted and balanced prior to departing PNE;

k. Failing to ensure the subject Learjet 55 was properly refueled before prior to departing PNE;

l. Failing to timely and properly communicate distress to the flight tower;

m. Failing to appropriately and safely react to mechanical failure(s) of the aircraft during the flight;

n. Failing to develop, implement, and enforce proper, necessary, and appropriate policies, procedures, and/or protocols regarding inspection, maintenance, and repair of the subject Learjet 55;

o. Failing to perform an adequate pre-flight inspection or check of the subject Learjet 55;

p. Failing to ensure the pilots and all flight crew were properly and adequately trained and capable of safely operating the subject Learjet 55, a highly specialized aircraft;

q. Violating applicable industry standards and regulations related to inspection, maintenance, and repair of the subject Learjet 55;

r. Violating applicable industry standards and regulations related to operation of the subject Learjet 55; and

s. Acting unreasonably under the circumstances then and there existing.

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69. By reason of the carelessness, negligence, and recklessness of Defendant, Med Jets, Plaintiffs' decedents, and their respective estates and wrongful death beneficiaries, were caused to sustain the profound damages described herein.

70. By conducting itself as set forth herein, Defendant Med Jets' acts and/or omissions were a substantial factor in, a factual cause of, and/or increased the risk of harm to Plaintiffs' decedents and their respective estates and wrongful death beneficiaries.

71. Defendant Med Jets is jointly and severally liable for the damages alleged and claimed herein.

WHEREFORE, Plaintiffs, Kristen L. Behrens, Esq. as Administratrix of the Estate of Raul Meza Arredondo and Kristen L. Behrens, Esq., as Administratrix of the Estate of Lizeth Murillo Osuna, claim of Defendant, Med Jets SA de CV d/b/a Jet Rescue, jointly and severally, sums in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages pursuant to Pa.R.Civ.P. 238, interest, and allowable costs of suit and bring this action to recover same.

COUNT II – WRONGFUL DEATH

KRISTEN L. BEHRENS, ESQ., as Administratrix of the ESTATE OF RAUL MEZA ARREDONDO v. MED JETS SA de CV d/b/a JET RESCUE

72. Plaintiff, hereby incorporates all preceding paragraphs of this Complaint by reference the same as though fully set forth herein.

73. Raul Meza Arredondo, is survived by his minor daughter, L.M.D., mother, Veronica Arredondo, and father, Raul Meza, as well as his partner, Norma Thalia Diaz Madrigal.

74. By reason of the death of Raul Meza Arredondo, his beneficiaries have in the past and will in the future suffer great pecuniary loss, including but not limited to, loss of support, loss

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of aid, loss of services, loss of companionship, loss of comfort, loss of counseling, loss of guidance, and profound psychological and emotional loss.

75. As a direct and proximate result of Defendant, Med Jets', carelessness, negligence, and recklessness, Raul Meza Arredondo's wrongful death beneficiaries have incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and medicine rendered to decedent until the time of his death and to incur various funeral, burial, and estate and administration expenses for which Plaintiff and decedent's wrongful death beneficiaries are entitled to compensation in this proceeding.

76. Plaintiff brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and claim all benefits and recoverable damages under the Wrongful Death Act on behalf of all persons entitled to recover under the law.

WHEREFORE, Plaintiff claims of Defendant, Med Jets SA de CV d/b/a Jet Rescue, jointly and severally, sums in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages pursuant to Pa.R.Civ.P. 238, interest, and allowable costs of suit and bring this action to recover same.

COUNT III – SURVIVAL ACTION

KRISTEN L. BEHRENS, ESQ., as Administratrix of the ESTATE OF RAUL MEZA ARREDONDO v. MED JETS SA de CV d/b/a JET RESCUE

77. Plaintiff, hereby incorporates all preceding paragraphs of this Complaint by reference the same as though fully set forth herein.

78. Plaintiff, Kristen L. Behrens, Esq., as Administratrix of the Estate of Raul Meza Arredondo, brings this action under and by virtue of 42 Pa.C.S.A. § 8302, commonly known as the Pennsylvania Survival Act.

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79. Plaintiff claims on behalf of the Estate of Raul Meza Arredondo all damages suffered by the Estate by reason of the death of Raul Meza Arredondo, including without limiting the generality of the following: severe injuries to Raul Meza Arredondo, including severe burn injuries and traumatic blunt force injuries, immense fear of impending death during the subject aircraft's plummet out of the sky, and other injuries resulting in death; the anxiety, horror, and fear of impending death and related mental disturbance; immense conscious pain and suffering, and other intangible losses which Raul Meza Arredondo suffered prior to his death; loss of earnings and earnings capacity suffered by Raul Meza Arredondo and/or his Estate and/or wrongful death beneficiaries from the date of his death until the time in the future that he would have lived had he not died as a result of this accident; and the loss and total limitation and deprivation of his normal activities, pursuits, and pleasures from the date of his death until such time in the future as he would have lived had he not died as a result of this accident, all to his beneficiaries' loss and detriment, by reason of the conduct of Defendant.

WHEREFORE, Plaintiff claims of Defendant, Med Jets SA de CV d/b/a Jet Rescue, jointly and severally, sums in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages pursuant to Pa.R.Civ.P. 238, interest, and allowable costs of suit and bring this action to recover same.

COUNT IV – WRONGFUL DEATH

KRISTEN L. BEHRENS, ESQ., as Administratrix of the ESTATE OF LIZETH MURILLO OSUNA v. MED JETS SA de CV d/b/a JET RESCUE

80. Plaintiff, hereby incorporates all preceding paragraphs of this Complaint by reference the same as though fully set forth herein.

81. Lizeth Murillo Osuna is survived by her mother, Elmira Osuna Aguilar, and father, Ezequiel Murillo Soto.

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82. By reason of the death of Lizeth Murillo Osuna, her beneficiaries have in the past and will in the future suffer great pecuniary loss, including but not limited to, loss of support, loss of aid, loss of services, loss of companionship, loss of comfort, loss of counseling, loss of guidance, and profound psychological and emotional loss.

83. As a direct and proximate result of Defendant, Med Jets', carelessness, negligence, and recklessness, Lizeth Murillo Osuna's wrongful death beneficiaries have incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and medicine rendered to decedent until the time of her death and to incur various funeral, burial, and estate and administration expenses for which Plaintiff and decedent's wrongful death beneficiaries are entitled to compensation in this proceeding.

84. Plaintiff brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and claim all benefits and recoverable damages under the Wrongful Death Act on behalf of all persons entitled to recover under the law.

WHEREFORE, Plaintiff claims of Defendant, Med Jets SA de CV d/b/a Jet Rescue, jointly and severally, sums in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages pursuant to Pa.R.Civ.P. 238, interest, and allowable costs of suit and bring this action to recover same.

COUNT V – SURVIVAL ACTION

KRISTEN L. BEHRENS, ESQ., as Administratrix of the ESTATE OF LIZETH MURILLO OSUNA v. MED JETS SA de CV d/b/a JET RESCUE

85. Plaintiff, hereby incorporates all preceding paragraphs of this Complaint by reference the same as though fully set forth herein.

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86. Plaintiff, Kristen L. Behrens, Esq., as Administratrix of the Estate of Lizeth Murillo Osuna, brings this action under and by virtue of 42 Pa.C.S.A. § 8302, commonly known as the Pennsylvania Survival Act.

87. Plaintiff claims on behalf of the Estate of Lizeth Murillo Osuna all damages suffered by the Estate by reason of the death of Lizeth Murillo Osuna, including without limiting the generality of the following: severe injuries to Lizeth Murillo Osuna, including severe burn injuries, traumatic blunt force injuries, immense fear of impending death during the subject aircraft's plummet out of the sky, and other injuries resulting in her death; the anxiety, horror, and fear of impending death and related mental disturbance; immense conscious pain and suffering, and other intangible losses which Lizeth Murillo Osuna suffered prior to her death; loss of earnings and earnings capacity suffered by Lizeth Murillo Osuna and/or her Estate and/or wrongful death beneficiaries from the date of her death until the time in the future that she would have lived had she not died as a result of this accident; and the loss and total limitation and deprivation of her normal activities, pursuits, and pleasures from the date of her death until such time in the future as she would have lived had she not died as a result of this accident, all to her beneficiaries' loss and detriment, by reason of the conduct of Defendant.

WHEREFORE, Plaintiff claims of Defendant, Med Jets SA de CV d/b/a Jet Rescue, jointly and severally, sums in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages pursuant to Pa.R.Civ.P. 238, interest, and allowable costs of suit and bring this action to recover same.

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SALTZ MONGELUZZI BENDESKY P.C.

BY: */s/ Jeffrey P. Goodman*
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ANDREW R. DUFFY
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BY: */s/ Ricardo M. Martinez-Cid*
RICARDO M. MARTINEZ-CID*
LEA P. BUCCIERO*
**To apply pro hac vice*

Attorneys for Plaintiffs

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VERIFICATION

The averments or denials of fact contained in the foregoing are true based upon the signer's personal knowledge or information and belief. If the foregoing contains averments which are inconsistent in fact, signer has been unable, after reasonable investigation, to ascertain which of the inconsistent averments are true, but signer has knowledge or information sufficient to form a belief that one of them is true. This Verification is made subject to the penalties of the 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

/s/ Kristen L. Behrens
KRISTEN L. BEHRENS, ESQ.
As Administratrix of the Estate of Lizeth Murillo Osuna and
As Administratrix of the Estate of Raul Meza Arredondo

Date: November 5, 2025

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