



Syracuse University

College of Law

Syracuse National Trial Competition

BOBBY BLAIR

v.

GO WEST MOVIES, INC.

EXHIBITS

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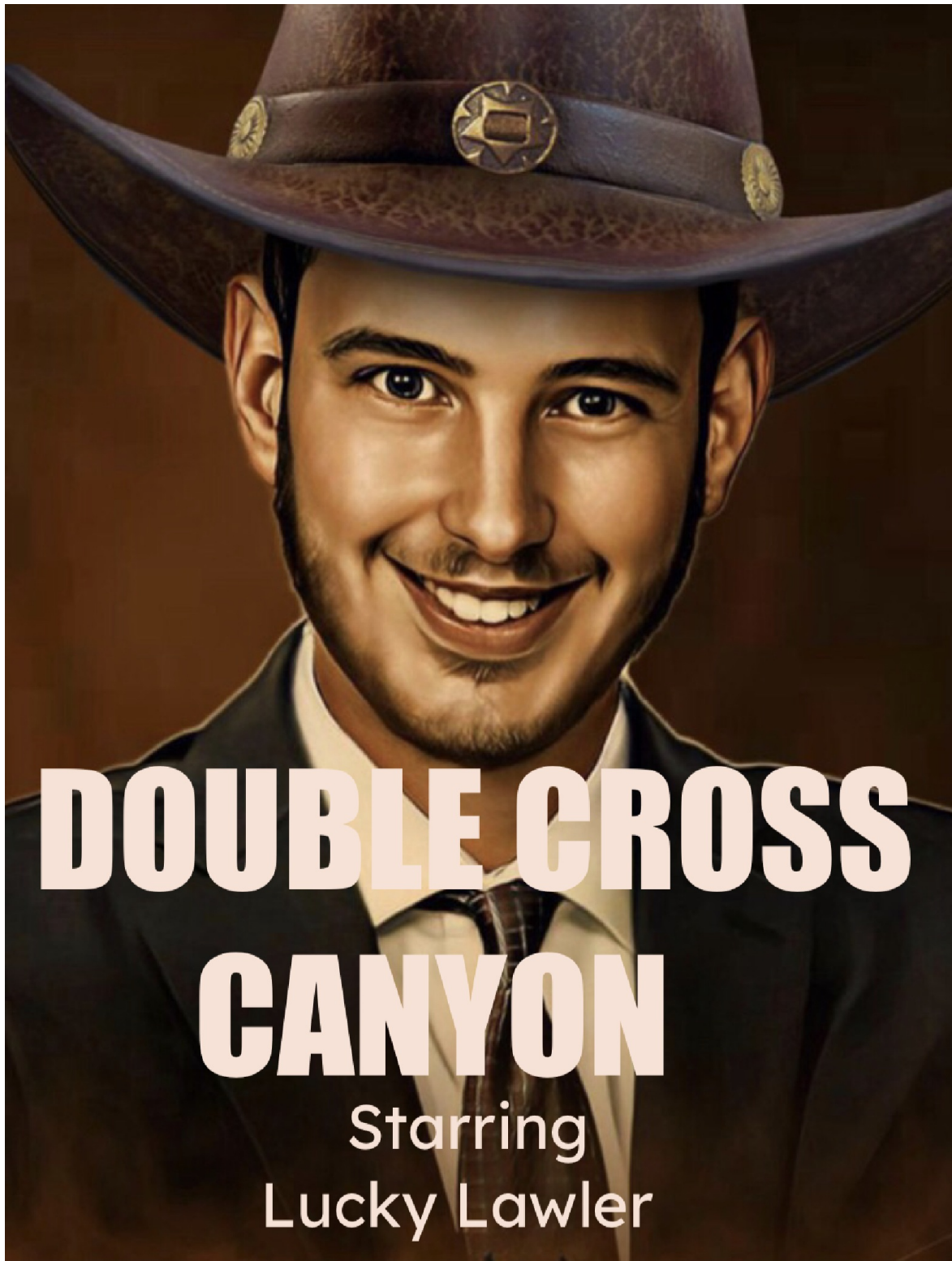


EXHIBIT 1



EXHIBIT 2

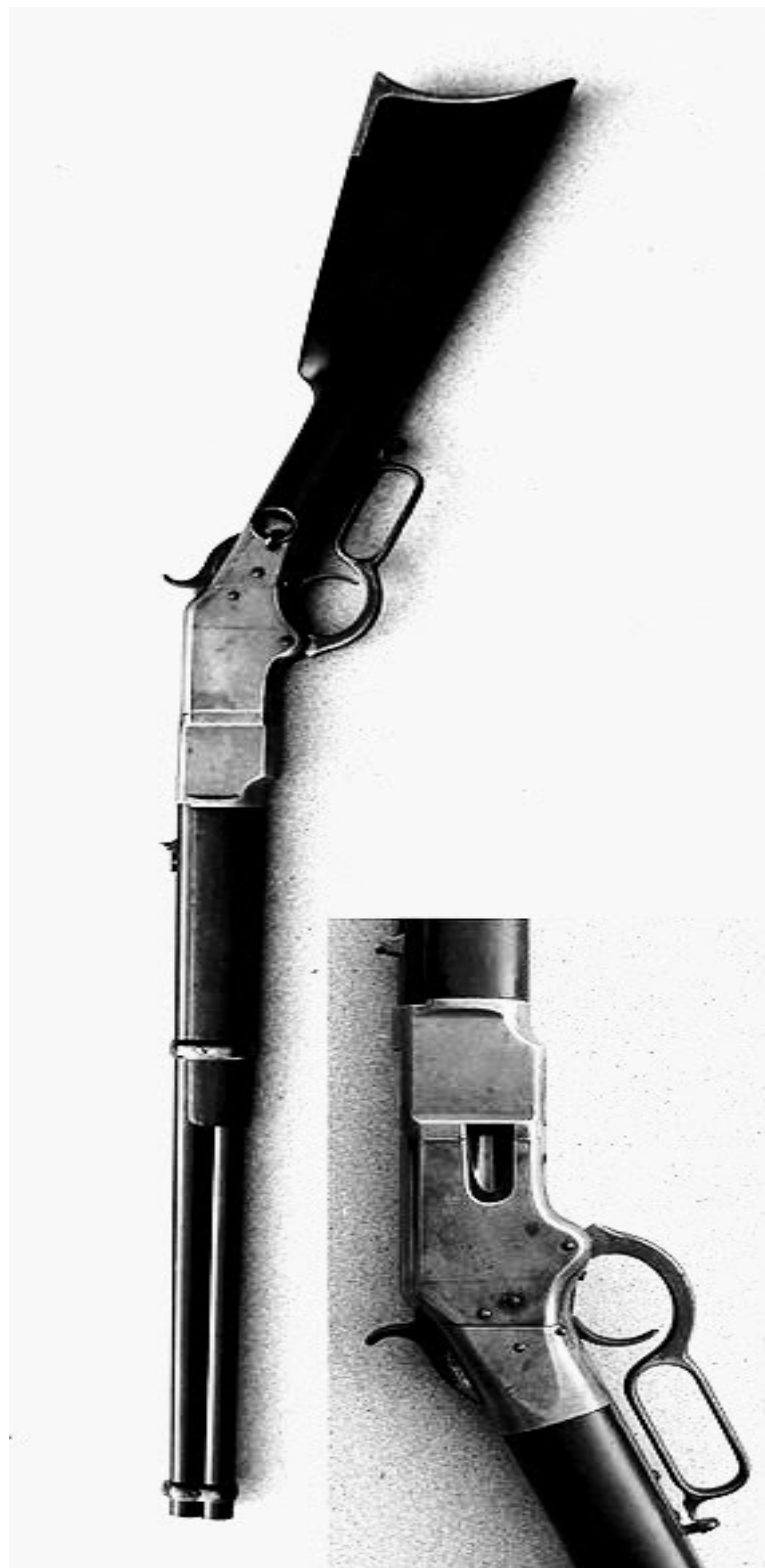


EXHIBIT 3



EXHIBIT 4

COLT PEACEMAKER

W. MASON.
Revolving Fire-Arms.

No. 158,957.

Patented Jan. 19, 1875.

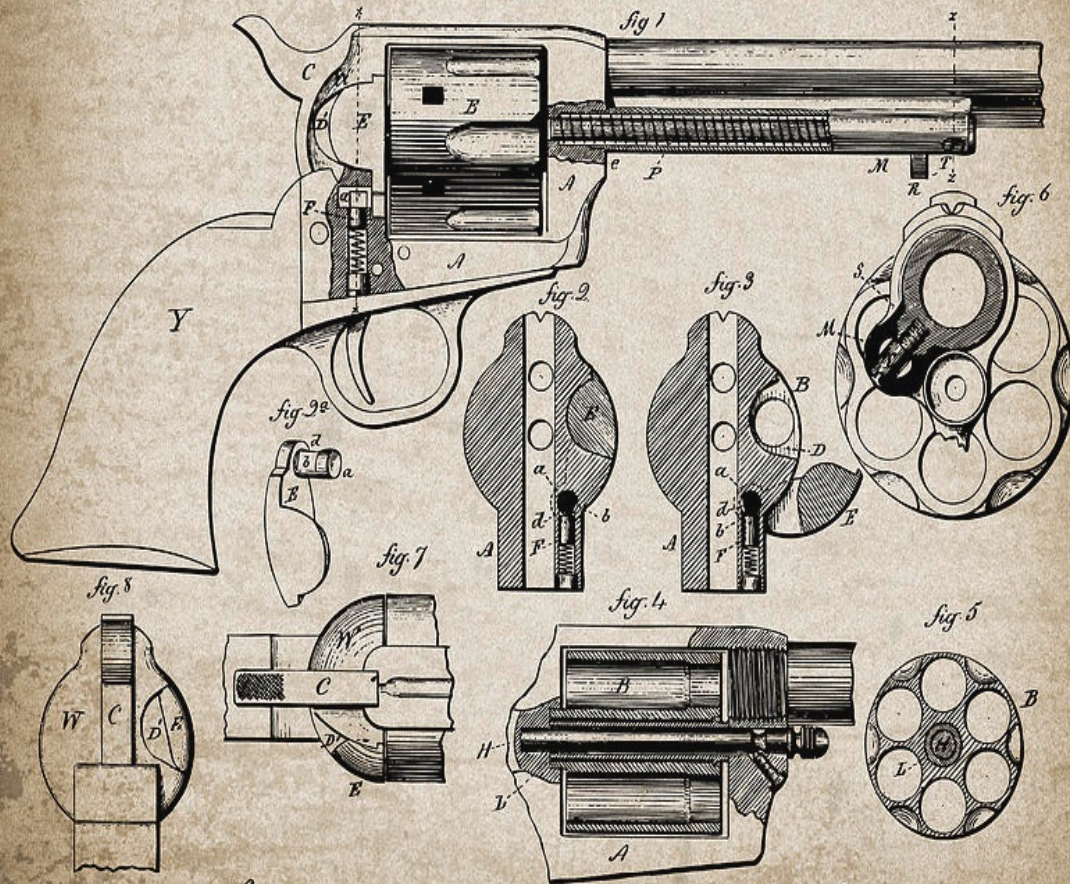


EXHIBIT 5



EXHIBIT 6



EXHIBIT 7



EXHIBIT 8

GO WEST MOVIES, INC

GENERAL SAFETY RULES

GENERAL SAFETY RULES: You are at a semi-remote location, and you may not be familiar with the terrain, animals or other potential dangers on site. As such, you must follow these safety rules:

1. **STAY AWAY FROM POTENTIALLY DANGEROUS LOCATIONS** such as the rock formations, caverns, caves, rough terrain, and loose rocks, among other potentially dangerous areas.
2. **STAY AWAY FROM POTENTIALLY DANGEROUS ANIMALS:** There may be potentially dangerous animals and/or arachnids on location. Among other things, stay away from all animals such as coyotes, wild hogs, raccoons, snakes, venomous spiders, scorpions, and ticks, as many of these animals and/or arachnids are capable of causing serious injury or death.
3. **STAY AWAY FROM ALL FIREARMS:** While firearms that may be used on set to the extent necessary for a scene, stay away from the firearms as they are capable of causing serious injury or death.
4. **INSTRUCTION:** If you have any complaints or concerns regarding safety issues or are aware of any possible breaches of the safety protocols, to immediately report this by text or email to the On-Site Producer and Firearm Instructor.

PAY ATTENTION AND KEEP SAFE

GO WEST MOVIES, INC

FIREARM SAFETY RULES

FIVE MAIN RULES OF FIREARM SAFETY: While there are many rules of firearm safety, the five rules below are of paramount importance and must be followed by everyone at all times to ensure your own safety and the safety of others.

1. **ALWAYS REMEMBER THAT FIREARMS ARE DANGEROUS:** Firearms are capable of causing serious injury or death, and both live ammunition and blanks are capable of causing serious injury or death.
2. **ALWAYS TREAT EVERY FIREARM AS IF IT IS LOADED:** You should always treat a firearm as if it is loaded. This is the first rule of firearm safety.
3. **ALWAYS KEEP THE FIREARM POINTED IN A SAFE DIRECTION.** Your firearm should only be pointed in a direction that, if it were to be fired, the bullet would not impact anything you would not want to damage or destroy. It's important to follow this rule because if a firearm discharges and it is pointed in a safe direction, no harm will come to pass. Never point your firearm at anything you do not intend to shoot. This is particularly important when loading or unloading a firearm. In the event of an accidental discharge, no injury can occur as long as the firearm is pointing in a safe direction.
4. **ALWAYS KEEP FIREARMS UNLOADED WHEN NOT ACTUALLY IN USE.** Always keep a firearm unloaded until ready to use. In addition to always keeping a firearm unloaded until you are ready to use it, always check/confirm that it's unloaded when picking it up or receiving it from another person. After verifying the firearm is unloaded, the person handling it should always treat it as if it is loaded.
5. **ALWAYS KEEP YOUR FINGER OFF THE TRIGGER UNTIL READY TO SHOOT.** Never put your finger on the trigger until you are ready to shoot. While there have been documented incidents where firearm accidents occurred even though no one pulled the trigger, negligent discharges mostly occur because someone pulled the trigger by mistake. Eliminate that possibility by never placing a finger on the trigger. meaning do not have a finger inside the trigger guard unless planning to fire the firearm.

GO WEST MOVIES, INC

FIREARM SAFETY PROTOCOLS

FIREARM SAFETY PROTOCOLS: Go West Movies, Inc. has established firearm safety protocols which you must follow. You are the last and best defense against anyone being injured, including yourself, which is why it is of paramount importance that you follow these safety protocols at all times.

1. **NEVER** bring a firearm, live ammunition or blanks on the movie set or anywhere on location. If you see anyone bring a firearm, live ammunition or blanks on the movie set or anywhere on location, immediately advise the Firearm Instructor.
2. **NEVER** take possession of, aim or fire a firearm on set with live ammunition, or take possession of, aim or fire a firearm that you suspect is loaded with live ammunition.
3. **NEVER** take possession of a firearm unless the Fire Instructor provides you with the firearm.
4. **NEVER** take possession of a firearm on set unless the Fire Instructor has first told you or verified that the firearm is loaded or unloaded.
5. **NEVER** hold, aim or fire a firearm unless you check/confirm/verify that it's unloaded or unloaded when picking it up or receiving it from another person.
6. **NEVER** hold, aim, or fire a firearm in an unsafe manner. **NEVER** point, aim, or fire a firearm at anyone including yourself. **NEVER** point, aim or fire your firearm at anything you do not intend to shoot.
7. **NEVER** engage in horseplay with any firearm. Firearms are not a joke!
8. **NEVER** attempt to adjust, modify or repair a firearm yourself. Any and all weapon jams, malfunctions, and corrections must only be made by the Fire Instructor.
9. **NEVER** let others handle the firearm that was given to you by the Fire Instructor for any reason. You must keep possession of a firearm at all times. **NEVER** keep a Firearm in your possession after you no longer require it for the scene.
10. **NEVER** deviate from the instructions and training provided by the Fire Instructor, including instructions and training on how to operate a firearm before during and after you come in possession of the firearm, and other basic firearm safety rules.

GO WEST MOVIES, INC

FIREARM INSTRUCTOR SAFETY RULES

FIREARM INSPECTOR RULES: Go West Movies, Inc. has established firearm safety rules that the Fire Instructor will follow, however, it is important that everyone review these rules. The Firearm Instructor is responsible to do the following:

1. **AUTHENTIC FIREARMS WILL BE USED:** The Firearm Instructor will select, procure and/or purchase authentic and historically accurate firearms, and select, procure and/or purchase ammunition or blanks for the firearm.
2. **STORE AND MAINTAIN FIREARMS:** Store, examine and maintain all firearms, ammunition and/or blanks, in safe condition and at a secure location, which the Firearm Instructor has exclusive access to.
3. **PROVIDE TRAINING:** Provide adequate training to all those who will be handling and/or operating a firearm on set, including training them on how to handle, inspect and operate a firearm before during and after they come in possession of the firearm, and other basic firearm safety rules.
4. **SAFETY INSPECTION:** Perform a safety inspection before bringing it on set to ensure that it's in good working condition, that no foreign objects in the barrel or cylinders, and that there is no live ammunition or blanks in the chamber.
5. **TRANSPORT FIREARM TO SET:** Transport the firearm to the set after the safety inspection is performed. When it's transported to the set, the firearm must be unloaded.
6. **LOAD FIREARM ON SET:** Load the firearm to the extent necessary for shooting the scene and do so while on set and before turning over custody of the firearm to the operator.
7. **ADVISE OPERATOR:** Advise the operator what has been loaded in the firearm, before turning over custody of the firearm to the actor/operator.
8. **MONITOR OPERATOR:** Monitor the operator who is handling and/or operating the firearm to ensure that they are doing so in a reasonable and safe manner.
9. **SECURE FIREARM WHEN NOT IN USE:** Advise the operator not to keep the firearm after they don't need it any longer. After you take back possession of the firearm, return it to a safe and secure location to be stored.
10. **INSTRUCTIONS:** Advise everyone involved in the production that if they have any complaints or concerns regarding safety issues or are aware of any possible breaches of the safety protocols, to immediately report this by text or email to the On-Site Producer and Firearm Instructor.



EXHIBIT 13



EXHIBIT 14



**CARTER CITY HOSPITAL AND HEATH CARE CENTER
309 SUMMIT AVENUE, CARTER CITY, TEXAS
PATIENT CARE REPORT**

Date and Time Incident:	July 31, 2022 at 4:30 PM
Incident Location:	Crook Creek Ranch
Patient Name:	Bobby Blair
Address:	Mule Deer Motel, Carter City, Texas
Date of Birth:	August 23, 1992
Marital Status:	Single
Chief Complaint:	Gun Shot Wound to Left Foot
Treating Physician:	Dr. Angela DeCarlo

HISTORY: I was in ER on consult for possible surgery, when patient, Bobby Blair, arrived in ER. Due to nature of injury, I was asked to examine patient. The patient is 29 years old, and presented with what appeared to be an accidental, self-inflicted, through-and-through, gunshot injury to left foot. Patient appeared to be in extreme pain but was oriented x 3. No dilation. Slightly elevated heart rate. Left-handed. Patient reported that s/he was on location at Crook Creek Ranch and was filming a scene. Patient was in barn with holster and gun. Patient said gun discharged for no reason. Patient said s/he will never shoot a gun again. Attorney asked for copy of medical record.

EXAMINATION: Examination of left lower extremity revealed an entry wound on the dorsum of the left foot, with a larger exit wound on the plantar aspect. X-ray revealed comminuted fractures of the second, third, fourth, and fifth metatarsal.

TREATMENT: Immediate excisional debridement performed. Negative pressure wound therapy applied. After initial debridement, wire was utilized for fixation of the second metatarsal fracture, and an external fixator applied to the fifth metatarsal due to extensive bone loss. A free gracilis muscle flap used to fill defect. Plans for a vascularized bone graft at a later date. Flap was tunneled through the wound to the plantar aspect of the foot, with an overlying split-thickness skin graft. Patient's postoperative course not expected to be complicated, and a secondary bone graft is not likely. Gracilis flap used to reconstruct the bony and soft tissue defects and secondary muscle fibrosis appears to provide adequate skeletal support. Expected that patient should be full weight-bearing in 4 months. Unsure when patient can return to preoperative activities.

Dated: July 31, 2022 11:30 PM 11:00 OO AM

Signed: Angela DeCarlo, MD

GO WEST MOVIES, INC

APRIL 18, 2022: GREY, HAD MY ASSISTANT COLLECT INFO FOR YOU ON LUCKY, HOPE & THE NEW & OLD HIRES. SAME LOCATION CROOK CAVERN RANCH, CARTER CITY, TEXAS. DROP DEAD DATE IS AUGUST 23, 2022. ARRANGE FOR FAN FAVORITE, THE MULE DEER MOTEL AND TRANSPORT. HANNIBAL HAKES

LUKE LAWLER: Born on November 13, 1962. From South Dakota. Lawler began acting at age 10. Has no formal training as an actor throughout his career. Because of his good-looks, good-nature & the fact he's good with a gun, Lawler has been cast almost exclusively in Westerns. Between 1972 & 2022, Lawler had been cast in more low-budget Westerns than John Wayne. In his early years, Lawler was often cast as a hired-gun, who was quick on the draw, or a slick-dressed card shark, who had sticky fingers. In the past ten years, Lawler has often been cast as a cantankerous sheriff, or a hot-headed villain. Lawler always said that he, like the characters he played, was a sharp shooting, fast talking cowboy, who was ornery as his favorite horse. While Lawler was an excellent marksman, his cast mates over the years were not, which is one of the reasons why Lawler became known as "Lucky," because he survived so many near misses during gun fights. In 2015, Lawler received a nomination for Best Actor in the movie, The Heist. In 2017, Lawler received a Golden Globe Award in a new category, Best Loved Actor. Lawler has always had a large & loyal fan base. Favorite horse, Crazy Carly, & favorite revolver, Buddy Boy, have following of over 500,000 fans. Cast Lawler in starring role in Double Cross Canyon, as Pat Garrett, man who shot Billy the Kid.

HOPE HARPER: Born on March 27, 1980. In 2000, Harper received an Associates Degree in Culinary Arts from the Culinary Institute of America. Between 2001 & 2011, Harper worked as a chef in Poughkeepsie, New York. In 2012, Harper returned to school, & in 2014, she received her Bachelor of Arts degree in Drama from Marist College. In 2016, Harper was cast in one episode of the series Outlander. In 2018, Harper was cast in three episodes of the series Lucifer. In 2020, Harper was cast in a supporting role in a series, The Wild West Chronicles. In 2021, Harper was cast in a supporting role in an independent movie (Western). Cast Harper in a supporting role in Double Cross Canyon, as Pat Garrett's second wife, Apolinaria Gutierrez.

TODD TRAVIS & ACE ANDREW: Todd Travis was born on April 2, 1987. Ace Andrew was born on May 9, 1987. They are cousins, & grew up together in Nashville, Tennessee. After graduating from highschool, they began their career as country western singers, & their popularity has been on the rise ever since. In 2012, their first album hit Cousin is Ace Andrew. Travis grew up in Nashville, Tennessee. After graduating from highschool, Travis & Andrew began career as country western singers. Popularity has been on the rise ever since. In 2012, their first album hit the top of the charts, as did their next four albums. In 2019, Travis & Andrew they were cast as feuding brothers in the television series, Yellowstone, & were in two episodes in 2020, & four episodes in 2021. In 2022, Travis Hakes cast them as supporting actors in the movie, Double Cross Canyon. Cast Travis as Pat Garrett's son, Dudley Garrett, & Andrew as Carl Adamson, the man who was with Pat Garrett when he was shot & killed.

BOBBY BLAIR: Born on August 23, 1992, & is from Nutley, New Jersey. In 2013, Blair graduated with a Bachelor of Arts Degree in Drama from New York University Tisch School of the Arts. In 2015, Blair was cast in one episode of the series, Homeland. In 2016, Blair was cast in a recurring role in six episodes of the series, Bull. In 2017, Blair was cast in a recurring role in six episode of the series, Blue Blood. In 2018, Blair was cast in a minor role in an independent movie. In 2020, Blair was cast in a minor role in an independent movie. In 2021, Blair was cast as a supporting actress in an independent movie. In 2020, Blair was cast as a supporting actor in a movie on streaming service. When not acting, Blair works as a bartender in New York City (2013 to 2017), & as a drama instructor in New York City (2018 to 2022). Cast Blair as a supporting actor in Double Cross Canyon.

PRODUCTION TEAM CREW STUNT & MINOR CAST/EXTRAS: Hired Grey Groman (On-Site Producer), Laura Lily (Director), Jet Jeffrey (Firearms Instructor), Jacob John (Writer/Script Supervisor), Christy Cheng (Sound Production Director), Nate Nicholas (Set/Costume Designer), Rachel Ramsdell (Crew Coordinator), Brandon Benjamin (Stunt Coordinator), Michelle Martin (Makeup Artist), Gary Guzman (Animal Trainer) Hired 8 crew members, 8 stunt artists, & 8 extras/actors. All crew, stunt artists & minor extras/actors had been hired previously for Killer Canyon.

CELOTTO STUDIOS, INC.: Pursuant to contract Celotto is on board for 50% of the cost of production of movie, matching Go West's 50% investment. Celotto & Go West split the profits. Go West will perform all work on the movie from pre-production to post-production. Celotto agreed to perform all work associated with the marketing & distribution of the movie. Agreement contingent upon Go West completing the filming & post-production work on movie & delivering the completed movie to Celotto on or before August 23, 2022, or \$10,000 a day penalty.