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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **IN AND FOR THE COUNTY OF SAN FRANCISCO**

13 **STEVEN PINCUS**, individually, as heir to  
14 **RYAN PINCUS** and as successor in  
15 interest to the **ESTATE OF RYAN**  
**PINCUS**;

16 **MAUREEN PINCUS**, individually, as heir  
17 to **RYAN PINCUS** and as successor in  
18 interest to the **ESTATE OF RYAN**  
**PINCUS**;

19 **Plaintiffs**

20 **vs.**

21 **UNIVERSAL PROTECTION SERVICE,**  
22 **LP,**  
23 **dba Allied Universal Security Services,**  
a California Limited Liability Company;  
24 and  
25 **DOES 1–15**, inclusive,

26 **Defendants.**

CASE NO.

**COMPLAINT FOR:**

- 1) **NEGLIGENCE –  
WRONGFUL DEATH**
- 2) **NEGLIGENT HIRING –  
WRONGFUL DEATH**
- 3) **NEGLIGENT SUPERVISION –  
WRONGFUL DEATH**
- 4) **SURVIVAL ACTION**

**JURY TRIAL DEMANDED**

27  
28  
**COMPLAINT**

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1 **I. INTRODUCTION**

2 1. Ryan Pincus (“RYAN”) was shot and killed by Anthony Hodges, an armed  
3 security guard employed by Defendant Universal Protection Service, LP (“DEFENDANT”) on  
4 August 4, 2023. RYAN’s parents, Steven and Maureen Pincus (“PLAINTIFFS”) bring this action  
5 to hold DEFENDANT accountable for its role in RYAN’s murder.

6 2. Steven and Maureen Pincus had two children: RYAN, born in 1986, and his sister  
7 Lauren, born the following year. They raised RYAN and his sister in Madison, New Jersey, just  
8 outside Manhattan. RYAN went to Madison High School, where he was the captain of the  
9 wrestling team. He went on to West Virginia University, where he graduated in 2009 with a  
10 degree in communications.



19 3. After West Virginia, RYAN followed in his father Steven’s footsteps and began a  
20 career in the insurance business. RYAN spent the first eight years of his career working in the  
21 New York metropolitan area. He lived with his parents for one of those years; during the other  
22 years, he would see his parents at least twice per month. They would get together for family  
23 dinners to celebrate birthdays, holidays, or nothing at all; and they would spend their summers at  
24 the Jersey Shore in Lavallette.

25 4. In 2018, RYAN was promoted and moved to Los Angeles. Despite moving across  
26 the country, he continued to see his parents several times per year. He was working for companies  
27 headquartered in the New York area, and when he would visit the home office, he would stay  
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1 with his parents rather than in a hotel. His parents would also visit him in LA at least once per  
2 year.

3 5. The Pincus family would also take family trips together, including to Mexico,  
4 Vancouver, Spain, and Pebble Beach. They had trips planned for Montana, Miami, and Denver.  
5 RYAN will not be joining them.



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15 6. RYAN was thoughtful and generous. Of the 525 people that came to RYAN’s  
16 memorial service, several of them spoke about RYAN helping them when they were down. One  
17 friend, a single mom, recounted RYAN giving her money when she couldn’t make ends meet.  
18 Several others spoke of RYAN “kicking me in the ass” when they were struggling emotionally.  
19 His freshman year roommate from WVU—an honors engineering student—shared how RYAN  
20 helped him come out of his shell twenty years earlier. RYAN’s family and friends have been  
21 devastated by their loss, caused by the negligence of DEFENDANT. The emotional toll of  
22 RYAN’s death was so great that his father Steven was forced to retire.

23 **II. JURISDICTION AND VENUE**

24 7. This Court has subject matter jurisdiction over all causes of action alleged herein  
25 because it is a court of general jurisdiction and the amount in controversy exceeds the  
26 jurisdictional minimum of this Court.

27 8. This Court has personal jurisdiction over all parties to this action because each  
28 party either resides in or has sufficient minimum contacts with the State of California such that

1 the exercise of personal jurisdiction comports with traditional notions of fair play and substantial  
2 justice.

3 9. Venue is proper in the County of San Francisco because the events and conduct  
4 which caused or combined to cause RYAN's injuries and death occurred in the County of San  
5 Francisco, State of California and RYAN sustained his fatal injuries in the County of San  
6 Francisco.

7 **III. PARTIES**

8 **A. Plaintiffs**



22 10. Plaintiff STEVEN PINCUS ("STEVEN") was, at all relevant times, a resident of  
23 Warren, New Jersey and father of RYAN. STEVEN brings this action on his own behalf and as  
24 successor-in-interest to the ESTATE OF RYAN PINCUS.

25 11. Plaintiff MAUREEN PINCUS ("MAUREEN") was, at all relevant times, a  
26 resident of Warren, New Jersey and mother of RYAN. MAUREEN brings this action on her own  
27 behalf and as successor-in-interest to the ESTATE OF RYAN PINCUS.

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**B. Defendants**

12. Defendant Universal Protection Service, LP, d/b/a Allied Universal Security Services (“ALLIED” or “DEFENDANT”) was, at all relevant times, a California Limited Partnership. At the time of the attack, ALLIED employed Anthony Hodges, the security guard that killed RYAN, to provide security services to the Hotel Bijou and the businesses and community in the area immediately adjacent to where RYAN was killed.

**C. Decedent**

13. Decedent RYAN PINCUS was, at all relevant times, a resident of Los Angeles, California, son to STEVEN PINCUS and MAUREEN PINCUS. RYAN was killed on August 4, 2023 and died intestate. At the time of his death, RYAN was not married and was without issue.





1           **D.     The Shooter**

2           14.     Anthony Hodges (“HODGES”), the security guard employed by ALLIED, for the  
3 benefit of all named and unnamed Defendants, was, at all relevant times, a resident of the State of  
4 California. At the time of the shooting, HODGES was employed by ALLIED and providing  
5 security services for all Defendants, named and as of yet unnamed.

6           **E.     Unnamed and Doe Defendants**

7           15.     Defendant Does 1 through 15 were, at all relevant times, persons and entities that  
8 entered into a joint venture to provide security to the area where RYAN was killed on the date  
9 RYAN was killed.

10          16.     The true names and capacities, whether individual, corporate, associate or  
11 otherwise of the Defendants DOES 1 through 15, inclusive, are unknown to PLAINTIFFS who  
12 therefore sue said Defendants by such fictitious names pursuant to Code of Civil Procedure  
13 section 474. PLAINTIFFS further allege that each fictitious Defendant is in some manner  
14 responsible for the acts and occurrences set forth herein. PLAINTIFFS will amend this Complaint  
15 to show their true names and capacities when the same are ascertained, as well as the manner in  
16 which each fictitious Defendant is responsible.

17          **F.     Agency, Concert of Action, and Conspiracy**

18          17.     At all times herein mentioned, each of the Defendants, inclusive, were the agent,  
19 servant, employee, partner, aider and abettor, co-conspirator and/or joint venturer of each of the  
20 remaining defendants named herein and were at all times operating and acting within the purpose  
21 and scope of said agency, service, employment, partnership, conspiracy, alter ego and/or joint  
22 venture, and each defendant has ratified and approved the acts of each of the remaining  
23 defendants. Each of the DEFENDANTS, including but not limited to DOES 1-15, aided and  
24 abetted, encouraged, and/or rendered substantial assistance to the other defendants in breaching  
25 their obligations to PLAINTIFFS as alleged herein. In taking action to aid and abet and  
26 substantially assist the commission of these wrongful acts and other wrongdoings complained of,  
27 as alleged herein, each of the Defendants acted with an awareness of his or her primary  
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wrongdoing and realized that his or her conduct would substantially assist the accomplishment of the wrongful conduct, wrongful goals, and wrongdoing.

**IV. FACTUAL BASIS FOR CLAIMS**

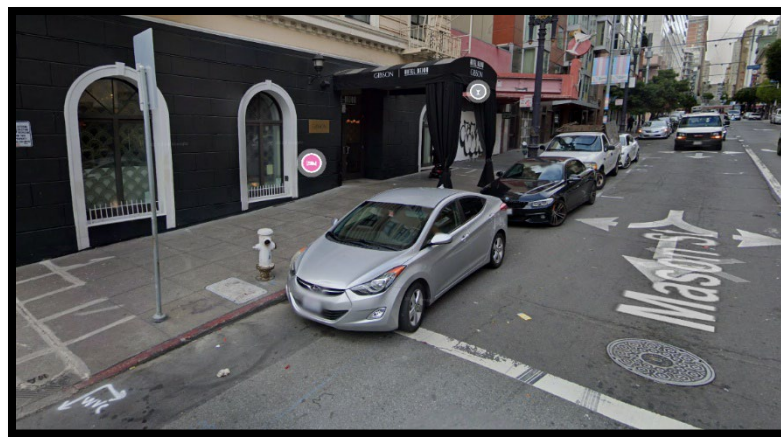
18. RYAN, 37, was murdered at approximately 12:30 A.M. on August 4, 2023, in San Francisco by a single gunshot wound to the torso.

19. At the time of his murder, RYAN was living in Los Angeles and working as an insurance executive. He had no criminal record, did not own a firearm, and was in San Francisco for a business trip.

20. RYAN spent his final evening on earth socializing with friends and business associates. RYAN went to a Giants game and stopped for dinner before walking back towards his hotel room at the Marriott at 780 Mission Street.

21. On RYAN'S walk to his hotel, for no known reason, he was approached by HODGES, who was on duty for ALLIED near the intersection of Mason and Eddy streets in San Francisco.

22. Over a roughly 3 ½ minute period, without provocation or justification, HODGES verbally and then physically attacked RYAN. HODGES escalated the confrontation from verbal to physical, and ultimately ended his attack on RYAN by drawing his gun and fatally shooting him.



*Google Streetview Image of the Location where RYAN was killed*

23. HODGES fled the scene and has not been seen since despite efforts by the SFPD and other law enforcement to locate him.



1           24.     RYAN's family first learned of his murder when RYAN's mother received a call  
2 from the San Francisco Medical Examiner's office the morning of August 4, while waiting to have  
3 her hair done. The examiner informed Ms. Pincus via telephone that her son had been shot and  
4 killed. She quickly rushed home and collapsed on the floor with her husband. She was  
5 inconsolable and an emotional wreck as was RYAN's father, sister, extended family and  
6 girlfriend.

7           25.     RYAN's family flew out to California to meet with the medical examiner, find a  
8 funeral home and retrieve his belongings. These final tasks were only the beginning of their  
9 suffering.

10          26.     As a direct and legal result of the negligent, wrongful, reckless, and/or unlawful  
11 conduct of DEFENDANTS, and/or each of them, RYAN and PLAINTIFFS suffered the damages  
12 hereafter alleged.

13     **V.     CAUSES OF ACTION**

14                                     **FIRST CAUSE OF ACTION**  
15                                     **NEGLIGENCE – WRONGFUL DEATH**  
16                                     **(Against all Defendants)**

17          27.     PLAINTIFFS hereby re-allege and incorporate by reference each and every  
18 allegation set forth above, as if fully set forth in detail herein.

19          28.     On August 4, 2023, HODGES was working as a security guard for ALLIED near  
20 the intersection of Mason and Eddy Streets in San Francisco.

21          29.     At that time and place, HODGES owed RYAN a duty to exercise reasonable care  
22 in his role as a security guard.

23          30.     At that place and time, HODGES, in a reasonably foreseeable manner due to the  
24 nature of his employment, so negligently, wrongfully, recklessly, willfully, and/or unlawfully  
25 confronted RYAN so as to cause RYAN's death.

26          31.     At that place and time, HODGES was acting as the agent and/or employee of  
27 DEFENDANTS and HODGES was acting with the scope of his agency and employment when he  
28 harmed RYAN.





1 **FOURTH CAUSE OF ACTION**  
2 **SURVIVAL ACTION**  
3 **(Against all Defendants)**

4 49. PLAINTIFFS hereby re-allege and incorporate by reference each allegation above  
5 as though fully set forth herein and allege as follows upon information and belief.

6 50. As a direct and proximate result of the wrongful, negligent, reckless, unlawful,  
7 and/or wrongful acts and omissions of DEFENDANTS, RYAN was killed on August 4, 2023.

8 51. On August 4, 2023, and prior to his death, RYAN suffered damages including but  
9 not limited to costs for medical care, lost and/or damages property, and pre-death pain and  
10 suffering from physical injuries resulting from the discharge of a firearm.

11 52. Had he survived, RYAN would have been entitled to bring an action against  
12 DEFENDANTS, and/or each of them, to recover the aforementioned damages he sustained prior  
13 to his death.

14 53. PLAINTIFFS STEVEN PINCUS and MAUREEN PINCUS, individually, as heirs  
15 to RYAN PINCUS and as successors in interest to the ESTATE OF RYAN PINCUS, bring this  
16 Survival Claim to recover RYAN's pre-death damages in RYAN's stead.

17 **VI. PRAYER FOR RELIEF**

18 WHEREFORE, PLAINTIFFS pray that this Court enter judgment in their favor on every  
19 claim for relief set forth above as follows:

- 20 1. For general damages and compensatory damages in an amount according to proof  
21 at trial and beyond the jurisdictional minimum of this Court.
- 22 2. For economic losses according to proof at trial.
- 23 3. For past and future loss of Ryan Pincus' love, companionship, comfort, care,  
24 assistance, protection, affection, society, and moral support according to proof at  
25 trial.
- 26 4. For Ryan's pre-death pain and suffering, in an amount according to proof at trial.
- 27 5. For medical and related expenses according to proof at trial.
- 28 6. For property damages according to proof at trial.
7. For interest upon any judgment entered as provided by law.

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- 8. For costs of suit incurred herein.
- 9. Such further and additional relief as this Court deems proper.

Dated: September 5, 2024

**COTCHETT, PITRE & McCARTHY, LLP**

  
\_\_\_\_\_  
BLAIR V. KITTLE  
*Attorney for Plaintiffs*

**VII. JURY DEMAND**

PLAINTIFFS demand a trial by jury as to all claims in this action.

Dated: September 5, 2024

**COTCHETT, PITRE & McCARTHY, LLP**

  
\_\_\_\_\_  
BLAIR V. KITTLE  
*Attorney for Plaintiffs*