

Stark v Springs Park - Plaintiff Witnesses

Dakota Stark - Key Points

- **(4-5) Parent of Wade**
- **(9-10) Date of Wade's Death**
- **(13-16) Wade was a 7th grader playing JV soccer and was very tall for his age**
- **(22-24) Wade took a big hit at a soccer game, but appeared to DS to be ok**
- **(27) Coach took team for pizza and then Springs Park for jumping**
- **(29) Wade wore a long sleeve shirt**
- **(32) Team traveled on a bus**
- **(33) DS arrives around 3 pm with 2 year-old child**
- **(33) Wade had been to Springs Park before, DS had not**
- **(37-40) DS visited other parks with watcher in every room, video monitors in the snack area, benches outside jump area to observe**
- **(42) Springs Park more crowded, too many kids**
- **(45) Against DS better judgment, they stayed**
- **(48) Familiar with Ex 6**
- **(56) DS witnessed high school age kids in 2-4 year old section. No watchers or staff there.**
- **(60) Trampoline dodgeball for older kids**
- **(64) None of screens with safety warnings were working**
- **(66) Was asked to sign waiver by SP Staff**
- **(69) DS asked to read form and SP staff not enough time**
- **(71) Against "better judgment" signed form, did not get a copy**

Stark v Springs Park - Plaintiff Witnesses

Dakota Stark - Key Points -Cont'd

- **(73) DS can identify Ex 3 - Waiver**
- **(74) Felt rushed, doesn't recall initialing pages, didn't see signs like in Ex 2**
- **(78) Knew Wade would play dodgeball**
- **(80) SP walls were glass**
- **(81) Parents could only sit in vending area, not jumping area**
- **(84) Saw Wade on the screen "every so often", Jason with DS**
- **(86) Checked emails and facebook while WS jumping**
- **(88) Put phone down when heard scream from Dodgeball Zone**
- **(89) Screen WS had been on had people standing around him.**
- **(92) Dodgeball zone marked 13 and up**
- **(93) Wade was 12**
- **(95) Walked on padded springs to get to Wade**
- **(103) EMTs put WS in collar, on backboard, in ambulance**
- **(107-108) DS crushed, irreplaceable part of life taken**
- **(112) Burying a child is worst thing for parents**
- **(113-14) DS can identify Ex 5 - Cause of death - spinal cord severed.**
- **(119-120) Filed suit after reading Barton's article, retained Barton for lawsuit**
- **(122) Wants financial penalty, shut down Springs Park**
- **(123) "They killed our son"**

Stark v Springs Park - Plaintiff Witnesses

Robin Hill - Key Points

- **(1-2) 14 years old, good friends with WS, Meadow Bay**
- **(7-8) Did things w WS - jumped at trampoline parks**
- **(10 -14) Into trampoline parks, different locations**
- **(17) Had been to SP with WS several times wout parents**
- **(21) WS took hard hit at soccer game**
- **(22) WS went down hard on shoulders, neck and head, bounced back and returned to the game**
- **(32-3) Large crowd entering SP, screens not working, no waiver, no rules displayed**
- **(33) RH familiar with Ex 2, Rules, knows the rules**
- **(34) Safety rules posted in park**
- **(39-40) Signed waiver, got wristband. No one read forms. Doesn't know anyone who reads forms.**
- **(42) Signed own waiver, wrote age as 13, only 12**
- **(43) Got a blue wristband for 13 and over crowd**
- **(47) SP staff let them get away with things that other places do not**
- **(50) Dodgeball zones always very aggressive**
- **(52) Times when no watchers in 13+ Dodgeball, made it a "free for all".**
- **(53) Staff would egg them on to throw harder or jump higher.**
- **(54) Never saw anyone checking wristbands when going into different trampoline areas**
- **(57-60) Areas are coded by color and match assigned wristband, doesn't recall seeing those rule enforced**
- **(64) WS was a great athlete**

Stark v Springs Park - Plaintiff Witnesses

Robin Hill - Key Points

- (69) WS wanted to go in 13+ room, wristband was red
- (71) RH knew WS had wrong wristband, done it before
- (72) WS wearing long sleeve shirt to cover wrists
- (73) No SP people asked about wristband or seemed to notice; staff did not seem to care
- (77) Knew things were going to be rough be rough in 13+
- (79) Two watchers there, one soon left - did not return
- (81) One watcher, people trying to “kill each other”
- (82-85) JB stepped in, not trying to keep the peace.
Encouraged kids to throw harder, knock other kids down
- (90) Rules say not to intentionally hit someone in head
- (92) Kid hit so hard flipped backwards, landed on back
- (94-95) Huge, big guy won game, football player/college
- (103) Dodgeball a free-for-all
- (104) WS stayed where the mats cover the springs
- (107) Watcher saw everything that happened, no positive of negative statements made
- (109) RH can identify Ex 6
- (110) Wade was smallest of five in Dodgeball
- (119-121) Wade hit in left shoulder, lost balance, yelled as he fell, head and neck hit back edge mats, sickening cracking noise, WS did not move
- (130) DS came in and walked along padded mats
- (133) Got WS on backboard and slid him off trampoline
- (136) WS death was due to his neck breaking at the base of his head
- (141) It was very hard reliving that day, testifying again

Stark v Springs Park - Plaintiff Witnesses

Mills Barton, MD - Key Points

- **(1) 57, San Diego, played sports growing up**
- **(4) Bachelors, Northwestern, MD, Johns Hopkins, Residency, Shock Trauma Unit Univ. Maryland**
- **(9-11) Team physician - Ind. Colts, Board certified in Orthopedic Surgery/Sports Medicine, practiced 30 years.**
- **(13-18) Chief of Emergency Medicine at Scripps Mercy, CV is Ex #7, consultant, testifies all over the country**
- **(20) Contacted by Starks in May, 2023, a peer-reviewed article in journal got their attention.**
- **(23-28) Description of article, higher levels of medical care needed at trampoline parks**
- **(29-32) All trampoline parks should have a EMT Level I**
- **(33-4) EMT does not reduce injuries, expedites care**
- **(36) EMT is an additional cost to business, most parks don't hire them, high school kids with CPR training**
- **(40) If SP had EMT, would not have saved WS**
- **(41) Better controls over guests and enforcement of rules, keep young away from old, would have prevented death**
- **(44) Spoke to DS, RH, JB, and SW, reviewed Ex 6 - SP diagram, Ex 4 - 911 call, Coroner's Report Ex 5.**
- **(48) Can review a case without emotion**
- **(49) Trampoline parks are inherently dangerous**
- **(52) Some Ins. Co.'s treat trampolines as greater risk than pool on same property**
- **(55) Testified a dozen times where Ins.Co. was involved**
- **(56-7) Trampoline risky, trampoline park multiply risk**
- **(58-9) Most trampoline injuries occur because people crashing into one another**

Mills Barton, MD - Key Points

Stark v Springs Park - Plaintiff Witnesses

- **(63-4) NIH, 100,000 trampoline injuries in ER each year**
- **(65-69) No record of all injuries like cuts, bumps, sprains, dislocations, actually injuries are ten-fold NIH #**
- **(70) Reviewed Ex 1, SP Injury Report**
- **(73) WS, first incident requiring EMS**
- **(75-6) Death likely caused by impact to protective mats and supportive springs**
- **(77-8) Dodgeball and trampoline, increased risk of harm**
- **(80-82) Nothing in Ex 5, Autopsy, indicates soccer injury contributed to WS death**
- **(82-4) Death was direct result of activity at SP**
- **(85-89) Description of how WS died**
- **(90-92) WS very healthy, no toxicology, should a long life**
- **(94) Professional opinion - Fall could not have caused death wout mats being moved, damaged, not right thickness, WS must have hit springs or metal framing**
- **(98-100) SW a member of IATP, step in right direction, meets bare minimum guidelines**
- **(101) Meet with SW, familiar with Ex 6, Familiar with rules, Ex 2, on screen and walls**
- **(106) Conducted examination of equipment, including pads, not allowed area underneath trampoline, pads 1 inch thick.**
- **(110) SP exceeded IATP requirements by using one inch vs half inch pads, were worn thin, SW said pads never replaced**
- **(115-116) Mats compress over time, more important to replace them than seat cushions at house**
- **(119-120) Without schedule to replace, ability to protect greatly impaired.**
- **(121-125) Statement of causation making SP liable. “death of WS direct responsibility of Springs Park”**