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CIRCUIT COURT OF
TUSCALOOSA COUNTY, ALABAMA
MAGARIA HAMNER BOBO, CLERK

IN THE CIRCUIT COURT OF TUSCALOOSA COUNTY, ALABAMA

ARPIL CHANELLE MOORE, as the personal representative of the ESTATE OF KIERSTEN RUSSELL, deceased **Plaintiff,** **v.** **MARRIOTT INTERNATIONAL, INC. d/b/a AC HOTEL TUSCALOOSA DOWNTOWN;** **WA AC CRIMSON, LLC;** **MARRIOTT INTERNATIONAL ADMINISTRATIVE SERVICES, INC.;** **TIFFANY ALLEN;** **and FICTICIOUS PARTY DEFENDANTS**	)	**CV-2026-_____** **JURY TRIAL DEMANDED**

No. 1, whether singular or plural, that manager, other employee, person or persons who responded to April Moore's emergency call on behalf of the hotel known as AC Hotel Tuscaloosa Downtown that made the basis of this suit, the negligence, wantonness, breach of contract, breach of duty of care, or other actionable conduct of whom contributed to cause injuries to KIERSTEN RUSSELL, which ultimately resulted in death;

No. 2, whether singular or plural, that person or entity who was responsible for providing and administering an operative Automated External Defibrillator ("AED") on the occasion made the basis of this suit, the negligence, wantonness, breach of contract, breach of duty of care, or other actionable conduct of whom contributed to cause injuries to KIERSTEN RUSSELL, which ultimately resulted in death;

No. 3, whether singular or plural, are those persons, corporations, partnerships, limited liability companies, associations, or other legal entities whose true names are presently unknown to Plaintiff, that were the employer(s), principal(s), franchisor(s), management company(s), or other entities responsible for hiring, training, supervising, and retaining the individual or individuals described as Fictitious Party Defendants No. 1-2.

COMPLAINT

Parties, Jurisdiction and Venue

1. KIERSTEN RUSSELL, deceased, was a resident of Duncanville, Texas at the time of the incident made the basis of this lawsuit. Plaintiff, April Channell Moore, Personal

Representative of the Estate of KIESRTEN RUSSELL, deceased, is an individual over the age of 19, and is currently a resident of Duncanville, Texas.

2. Defendant Marriott International, Inc., d/b/a AC Hotel Tuscaloosa Downtown (hereinafter "AC Hotel"), is a foreign corporation with its principal place of business in Montgomery County, Maryland, operating and doing business in Tuscaloosa County, Alabama on the date of the occurrence made the basis of this suit.

3. Defendant Marriott International Administrative Services, Inc. (hereinafter "MIAS, Inc.") is a foreign corporation with its principal place of business in Montgomery County, Maryland, operating and doing business in Tuscaloosa County, Alabama on the date of the occurrence made the basis of this suit.

4. Defendant WA AC Crimson, LLC (hereinafter "WAACC, LLC") is a foreign limited liability company with its principal place of business in New York County, New York, and doing business in Tuscaloosa County, Alabama on the date of the occurrence made the basis of this suit.

5. Defendant Tiffany Allen (hereinafter "Ms. Allen) is an individual over the age of 19, and resides in Tuscaloosa County, Alabama.

6. Fictitious Party Defendants Nos. 1-3, whether singular or plural, are the respective individuals and/or entities, other than those previously identified, who fit the descriptions above and whose correct identities are unknown to the plaintiff at this time, or, if their identities are known to the plaintiff, their identities as proper party defendants are unknown to the plaintiff at this time, but will be substituted by amendment once ascertained.

7. Venue is proper in this division and district pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claim occurred in Tuscaloosa County, Alabama.

Factual Averments Common to All Counts

1. On June 3, 2025, eighteen-year-old Kiersten Russell visited Alabama from Texas with her mother, April Channel Moore. She and her mother were staying at the Defendant AC Hotel Tuscaloosa Downtown. That evening, April left Kiersten alone in their room for a few hours before returning. When April re-entered the hotel room, she found Kiersten lying on the bathroom floor in distress.

2. Upon discovering Kiersten, April called 911 and began administering CPR to her daughter. A 911 dispatcher reached out to a hotel representative to alert them of the ongoing emergency. Following this communication, the hotel manager, upon information and belief, Defendant Tiffany Allen, came to room. However, rather than using a master key to enter, Ms. Allen knocked on April's door, requesting April to open the door. This required April to stop administering CPR to her daughter to open the door for Ms. Allen. Ms. Allen asked what was going on, and April quickly explained the emergency. Ms. Allen did not bring an AED, or automated external defibrillator, nor did she enter the room and offer any assistance.

3. Later, EMS arrived at April's room with Ms. Allen. However, Ms. Allen once again failed to bring a master key and instead knocked on the door, again requiring April to pause her resuscitative efforts to open the door. Upon taking Kiersten's vitals, EMTs confirmed cardiac arrest and administered approximately 15-20 minutes of ACLS on the scene.

4. The responding EMTs then loaded Kiersten into an ambulance and transported her to DCH Regional Hospital, where ACLS continued. Kiersten was pronounced dead that day at 10:48pm.

COUNT I

NEGLIGENCE/WANTONNESS/WRONGFUL DEATH:

AC Hotel; MIAS, Inc; WAACC, LLC; Tiffany Allen

5. Plaintiff re-adopts and re-alleges all preceding paragraphs as if fully set out herein with respect to all defendants.

6. Defendants AC Hotel, MIAS, Inc., WAACC, LLC, Ms. Allen, and Fictitious Defendants 1-3 all had a duty to provide for the safety of hotel guests pursuant to federal guidelines, state law and/or city ordinance.

7. Defendants AC Hotel, MIAS, Inc., WAACC, LLC, Ms. Allen, and Fictitious Defendants 1-3, including any individuals who were acting as employees or agents of any Defendant at relevant times, had a duty to exercise such reasonable care, skill, and diligence as other similarly situated entities or individuals in the same general line of practice ordinarily have and exercise under similar circumstances.

8. Defendants AC Hotel, MIAS, Inc., WAACC, LLC, Ms. Allen, and Fictitious Defendants 1-3 acted negligently and wantonly in the following ways: (1) By failing to provide adequate training for employees to render first aid; (2) by failing to properly respond to Kiersten's emergency; (3) by failing to properly provide a master key to enter April's room and interrupting necessary CPR; (4) by failing to provide proper AED training to employees; (5) by failing to provide proper training for employees' use of an AED; (6) by improperly and inappropriately

following required guidelines and protocols for responding to emergencies; (7) by failing to have a functioning AED; and (8) by improperly delaying/interfering with emergency medical services.

9. As a proximate result of the above-described acts and/or omissions, Kiersten died on June 3, 2025.

10. Hotel Defendants are vicariously liable to Plaintiff for the negligent, wanton, and/or wrongful acts or omissions of their agents and/or employees.

11. Fictitious party defendants, whose more correct names and identities are unknown to Plaintiff but will be more correctly named when ascertained, are the respective individuals or entities who or which are named fictitiously in the caption above. Plaintiff specifically alleges said acts of negligence against the manager or hotel employee who was involved and interacted with April. Plaintiff does not know her name but as soon as the name is identified, said individual will be added as a party defendant.

WHEREFORE, PREMISES CONSIDERED, Plaintiff April Channelle Moore demands judgment against these defendants, jointly and severally, for punitive damages in an amount determined by a jury that will adequately reflect the enormity of the wrongful conduct of these defendants, that will punish them, and that will deter them and others from future misconduct, together with costs.

Respectfully submitted,

s/ Derrick A. Mills
Attorney for Plaintiff

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PLEASE SERVE DEFENDANT BY CERTIFIED MAIL AS FOLLOWS:

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c/o Corporation Service Company, Inc.
641 South Lawrence Street
Montgomery, AL 36104

Marriott International Administrative Services, Inc.
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Montgomery, AL 36104

WA AC Crimson, LLC
c/o Vcorp Agent Services, Inc.
2 North Jackson Street
Montgomery, AL 36104

Tiffany Allen
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Tuscaloosa, AL 35405

s/ Derrick A. Mills