

I. INTRODUCTION

1. On May 28, 2026, the long-time Dallas community icon and renowned volunteer and activist, Sylvia Collins, was violently killed in her own apartment by a bomb-like explosion that caused her to be burned alive, as a neighbor heard her screams. Sylvia's gruesome death was senseless and easily preventable—if all parties had complied with known safety requirements, the law, and ordinary common sense.

2. The massive explosion, which turned a residential street in the Oak Cliff community of Dallas into an image of a war zone, was the result of yet another leak in a gas pipeline owned by Atmos Energy, in an area where work was also being performed by, on behalf of, or with the consent of the other company Defendants.¹

3. Companies are never allowed to engage in the type of reckless and dangerous conduct that resulted in this tragedy. There is no set of circumstances where this is excusable or allowed to happen. Sylvia Collins believed in justice, was willing to fight for it, and gave everything she had to help others. On May 28, 2026, she never had a chance. This lawsuit is brought to get justice for Sylvia, and to hold all responsible parties fully accountable so

¹ Plaintiff hereby gives notice that ECS Companies is a likely additional party, to be joined later for procedural reasons.

that this never happens again.

**II.
DISCOVERY CONTROL PLAN**

4. Plaintiff intends to conduct discovery under Level 3 of Texas Rule of Civil Procedure 190.4, and affirmatively pleads that she seeks damages that are within the jurisdictional limits of the Court. Pursuant to Rule 47, Plaintiff states that she seeks monetary relief over \$1,000,000.00.

**III.
PARTIES**

5. Plaintiff Michelle Collins, Individually and as Anticipated Representative of the Estate of Sylvia Collins, Deceased, is an individual residing in Dallas, Texas. The last three digits of her social security number are [REDACTED]. Michelle Collins is the daughter of Sylvia Collins, Deceased.

6. Defendant Atmos Energy Corporation (“Atmos”) is a Texas corporation doing business in the State of Texas and may be served with process by serving its registered agent Corporation Service Company d/b/a CSC – Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701-3218. The issuance of a citation is requested.

7. Defendant Barba Drilling Co. LLC (“Barba”) is a Texas limited liability company doing business in the State of Texas and may be served with process by serving its registered agent, Manuel D. Barba, 15750 Seabolt Place,

Building 8, Unit 75, Addison, Texas 75001. The issuance of a citation is requested.

8. Defendant Sir Julian, LLC (“Sir Julian”) is an Arizona limited liability company doing business in the State of Texas and may be served with process by serving its registered agent, Samuel A. Aflalo, 803 W. Davis Street, Dallas, Texas 75208. The issuance of a citation is requested.

9. Defendant Samuel A. Aflalo is an individual who resides in Dallas County, Texas. He may be served with process at his residence, 5907 Prospect Avenue, Dallas, Texas 75206. The issuance of citation is requested.

10. Defendant Revival Property Company, LLC (“Revival Property”) is a Texas limited liability company doing business in the State of Texas and may be served with process by serving its registered agent, Paracorp, Incorporated, 14001 W. State Highway 29, #102, Liberty Hill, Texas 78642. The issuance of a citation is requested.

11. Defendant O-SDA Industries, LLC (“O-SDA”), is a Texas limited liability company doing business in the State of Texas and may be served with process by serving its registered agent, Megan De Luna, 1505 Pasadena Drive, Austin, Texas 78757. The issuance of a citation is requested.

IV.
JURISDICTION AND VENUE

12. This Court has subject matter jurisdiction over this lawsuit because the amount in controversy exceeds the minimum jurisdictional limits of this Court.

13. Venue of this action is proper in Dallas County, Texas pursuant to Texas Civil Practice and Remedies Code § 15.002(a)(1) because Dallas County is the county in which all or a substantial part of the events or omissions giving rise to the claim occurred.

V.
FACTS

14. At the time of this explosion, on May 28, 2026, Sylvia Collins resided at The Clyde apartment community at 409 East 9th Street, in Oak Cliff, Dallas County, Texas. Upon information and belief, The Clyde was owned and operated by Defendants Sir Julian, LLC, and Samuel A. Aflalo. Defendant Revival Property Company, LLC, served as The Clyde's property management company. Defendants Sir Julian, Aflalo, and Revival Property managed, controlled, and oversaw day-to-day operations at The Clyde.

15. Upon information and belief, when this tragedy occurred, Defendant O-SDA Industries, LLC, was taking steps toward purchasing The Clyde. As part of this anticipated purchase, and in connection with a

geotechnical report, Defendant Barba Drilling Co., LLC, was contracted to perform rigging work at the property. Defendants O-SDA and Barba Drilling managed, controlled, and oversaw the subject geotechnical work and related rigging, along with anticipated defendant ECS Companies, Defendant O-SDA's engineering firm directly responsible for Defendant Barba's work.

16. On the day of the explosion and at all relevant times, Defendant Atmos provided natural gas to The Clyde and surrounding businesses. Atmos managed, operated, owned, controlled, and designed the natural gas distribution system that entered and surrounded The Clyde. Residents reported the smell of gas in the days before the explosion. Defendant Atmos notoriously has an unusually high rate of leaks, including an excessive rate of third-party strikes, and a known history of poorly maintained gas lines and explosions causing serious injury and death in North Texas.

VI. NEGLIGENCE

17. To the extent not inconsistent herewith, Plaintiff incorporates each of the preceding paragraphs as if fully set forth herein.

18. Defendants each had a duty to exercise ordinary care, that is, to do what a person of ordinary prudence would have done under the same or similar circumstances.

19. Defendants did not use that degree of care that would be used by a person of ordinary prudence under the same or similar circumstances.

20. Defendants breached the duty of care.

21. Defendants' breach of duty proximately caused Sylvia's injuries and death, and Plaintiff's damages.

VII. GROSS NEGLIGENCE

22. To the extent not inconsistent herewith, Plaintiff incorporates each of the preceding paragraphs as if fully set forth herein.

23. Defendants' conduct, when viewed objectively from Defendants' standpoint at the time of the occurrence, involved an extreme degree of risk when considering the probability and magnitude of the potential harm to others, namely, the risk of serious injury or death to residents like Sylvia.

24. Defendants had actual, subjective awareness of the risk involved, but nevertheless proceeded with conscious indifference to the rights, safety, and welfare of others, including residents like Sylvia.

25. Defendants' acts and/or omissions as described above proximately caused Sylvia's injuries and death, and Plaintiff's damages.

26. Plaintiff is entitled to recover exemplary damages under Texas Civil Practice and Remedies Code § 41.003(a).

VIII.
SURVIVAL ACTION

27. To the extent not inconsistent herewith, Plaintiff incorporates each of the preceding paragraphs as if fully set forth herein.

28. Plaintiff Michelle Collins is the anticipated legal representative of the Estate of Sylvia Collins, Deceased.

29. Decedent Sylvia Collins had a cause of action for personal injury to her health and/or her person before she died.

30. Decedent Sylvia Collins was entitled to bring an action for her injuries if she had lived.

31. Defendants' wrongful acts caused the injuries and death of Sylvia Collins, as set forth herein.

32. Michelle Collins brings this survival action against Defendants under the Texas Survival Act and seeks recovery of damages including, but not limited to, physical pain and fear of impending death, mental anguish, and physical impairment.

IX.
WRONGFUL DEATH ACTION

33. To the extent not inconsistent herewith, Plaintiff incorporates each of the preceding paragraphs as if fully set forth herein.

34. Plaintiff Michelle Collins is the daughter of Decedent Sylvia Collins.

35. Defendants are all persons as defined by Texas Civil Practice and Remedies Code § 71.001(2).

36. Defendants' wrongful acts and omissions caused the death of Decedent Sylvia Collins, as set forth herein.

37. Decedent Sylvia Collins would have been entitled to bring an action for her injuries if she had lived.

38. Defendants' actions caused Plaintiff to suffer actual injuries.

39. Plaintiff brings this wrongful death claim against Defendants under the Texas Wrongful Death Act, Texas Civil Practice and Remedies Code § 71.002. Plaintiff also brings this wrongful death claim under the constitution of the State of Texas. Plaintiff seeks recovery of damages including, but not limited to, past and future loss of care, support advice, and counsel; past and future loss of reasonable contributions of pecuniary value; past and future loss of companionship and society; past and future mental anguish; and past and future loss of enjoyment of life.

X. DAMAGES

40. To the extent not inconsistent herewith, Plaintiff incorporates each of the preceding paragraphs as if fully set forth herein.

41. As a proximate result of the negligent acts and omissions of Defendants as set forth above, Plaintiff suffered actual damages including, but not limited to, past and future pain and suffering; past and future mental anguish; past and future medical, pharmaceutical, care, therapy, and treatment expenses; past and future loss of care, maintenance, support, services, advice, counsel, and reasonable contributions of a pecuniary value; past and future loss of society and companionship; past and future lost earning capacity; past and future lost income; past physical impairment; past disfigurement; past and future loss of enjoyment of life; and funeral expenses. In addition to each of these damages, Plaintiff also seeks pre-judgment and post-judgment interest as well as all compensable costs.

**XI.
EXEMPLARY DAMAGES**

42. To the extent not inconsistent herewith, Plaintiff incorporates each of the preceding paragraphs as if fully set forth herein.

43. Defendants acted with gross negligence as the term is defined in Texas Civil Practice and Remedies Code § 41.001(7), (11), which justifies an award of punitive damages under Texas law, for which Plaintiff seeks judgment.

**XII.
JURY DEMAND**

44. Plaintiff respectfully request that the trial of this cause be by jury, and Plaintiff will tender the requisite fee.

**XIII.
MISNOMER, ALTER EGO, AND MISIDENTIFICATION**

45. If any parties are misnamed or not included here, Plaintiff contends that such error and/or omission is a “misidentification,” “misnomer,” and/or “alter ego” of the parties named. Alternatively, Plaintiff contends that any “corporate veils” should be pierced to properly include those whose negligence caused injury and damages to Plaintiff, in the interest of justice.

**XIV.
PRAYER**

Plaintiff requests that Defendants be cited to appear and answer, and that on final trial Plaintiff have judgment, jointly and severally against Defendants for:

- a. Actual and compensatory damages, with interest from accrual to judgment;
- b. Past and future pain and suffering;
- c. Past and future mental anguish;
- d. Past and future loss of society and companionship;
- e. Past physical impairment;
- f. Past and future loss of care, support, advice, and counsel;

- g. Past and future loss of reasonable contributions of a pecuniary value past and future loss of enjoyment of life;
- h. All other economic and non-economic damages allowed by law;
- i. Punitive and exemplary damages;
- j. Costs of court;
- k. Pre-judgment and post-judgment interest at the maximum rate allowable by law; and
- l. All such other and further relief to which Plaintiff may justly be entitled, at law or in equity.

DATED the 31st day of May, 2026.

Respectfully submitted,

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