

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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SUSAN CASSINELLI and JOSEPH
CARAMANNO,

Plaintiffs,

-against-

Index No. _____

SUMMONS

ARCHDIOCESE OF NEW YORK,

Defendant.

-----X

TO THE ABOVE NAMED DEFENDANT:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to answer the Complaint, a copy of which is hereby served upon you, and to serve a copy of your Answer to the Complaint upon the undersigned attorneys listed below within twenty (20) days after the service of this Summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this Summons is not personally delivered to you within the State of New York); and in the case of your failure to appear or answer, judgment by default will be taken against you for the relief demanded herein.

Dated: July 15, 2019
New York, New York

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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SUSAN CASSINELLI and JOSEPH
CARAMANNO,

Plaintiffs,

-against-

Index No. _____

COMPLAINT

ARCHDIOCESE OF NEW YORK,

Defendant.

-----X

Plaintiffs Susan Cassinelli and Joseph Caramanno, by and through their lawyers, Jeff Anderson & Associates, PA and Robins Kaplan, LLP, as and for their Complaint in this matter against Defendant Archdiocese of New York, state and allege as follows:

PARTIES

1. Plaintiff Susan Cassinelli is an adult resident of the State of New York.
2. Plaintiff Joseph Caramanno is an adult resident of the State of New York.
3. At all times material, Defendant Archdiocese of New York (hereinafter “Archdiocese”) was and continues to be an organization or entity which includes, but is not limited to, civil corporations, decision-making entities, officials, and employees, authorized to conduct business and conducting business in the State of New York with its principal place of business at 1101 First Avenue, New York, NY 10022.
4. Defendant Archdiocese was created in approximately 1850. Later, Defendant Archdiocese created a corporation called the New York Archdiocese to conduct some of its affairs.
5. Defendant Archdiocese operates its affairs as both a corporate entity and as an organization named the Archdiocese of New York. Both of these entities and all other affiliated corporations and entities are controlled by the Archbishop and are included in this Complaint as

the “Archdiocese.” The Archbishop is the top official of the Archdiocese and is given authority over all matters within the Archdiocese as a result of his position.

6. Defendant Archdiocese functions as a business by engaging in numerous revenue producing activities and soliciting money from its members in exchange for its services.

7. Defendant Archdiocese’s actions and policies have tremendous impact and influence on the daily lives of individuals within the community including Catholics and non-Catholics.

8. Defendant Archdiocese has several programs which seek out the participation of children in the Archdiocese’s activities. Defendant Archdiocese, through its officials, has control over those activities involving children.

9. Defendant Archdiocese allows and encourages its priests to spend time with minor parishioners, permitting its priests to take parishioners off parish and school premises on trips to public pools, public parks, and other public locations.

10. Defendant Archdiocese has the power to appoint, supervise, monitor, and fire each person working with children in the Archdiocese.

11. At all times material, the Archbishop of the Archdiocese controlled, operated, and managed the affairs of the Archdiocese.

12. The current Archbishop of Defendant Archdiocese is Timothy Cardinal Dolan (hereinafter “Cardinal Dolan”).

FACTS

13. At all times material, Father Donald Timone (hereinafter “Fr. Timone”) was a Roman Catholic priest employed by Defendant Archdiocese. Fr. Timone remained under the direct supervision, employ, and control of the Archdiocese.

14. At all times material, Monsignor John Paddack (hereinafter “Msgr. Paddack”) was a Roman Catholic priest employed by Defendant Archdiocese. Msgr. Paddack remained under the direct supervision, employ, and control of the Archdiocese.

15. Defendant Archdiocese repeatedly placed Fr. Timone and Msgr. Paddack in positions where they had access to and worked with children as an integral part of their work. Defendant Archdiocese gave Fr. Timone and Msgr. Paddack access to vulnerable, unsuspecting children after learning of Fr. Timone’s and Msgr. Paddack’s sexual abuse of minors.

A. Father Donald Timone

16. On information and belief, Fr. Timone served at parishes and schools in Defendant Archdiocese since ordination in approximately 1960 including, but not limited to:

- a. Holy Rosary in Bronx;
- b. St. Joseph in Millbrook;
- c. Our Lady of Lourdes High School in Poughkeepsie;
- d. Regina Coeli in Hyde Park-on-the-Hudson;
- e. St. Mary in Newburgh;
- f. St. Paul in Staatsburg;
- g. Mount St. Alphonsus in Esopus;
- h. Sacred Heart in Newburgh; and
- i. St. Joseph in Middletown.

17. Plaintiff Cassinelli is the widow of Timothy Murphy.

18. Murphy came into contact with Fr. Timone as an agent and representative of Defendant Archdiocese at St. Joseph in Millbrook, New York.

19. From approximately 1966 to 1970, when Murphy was approximately 13 to 16 years old, Fr. Timone engaged in unpermitted sexual contact with Murphy.

20. Fr. Timone sexually abused Murphy and other minor parishioners on public property, including at Bish Bash State Park.

21. In approximately 2003, Murphy reported the sexual abuse by Fr. Timone to Defendant Archdiocese.

22. On information and belief, during approximately the same timeframe, Defendant Archdiocese received at least one other report of sexual abuse of a minor by Fr. Timone.

23. Defendant Archdiocese briefly suspended Fr. Timone while the allegations were internally investigated before returning him to work.

24. Murphy, after many years of suffering, died by suicide on January 8, 2015.

25. In November 2016, Murphy, through his former attorney, received an invitation to participate in Defendant Archdiocese's Independent Reconciliation and Conciliation Program (hereinafter "IRCP").

26. Defendant Archdiocese's IRCP offered compensation to survivors of sexual abuse by clergy. In exchange, survivors forfeited the right to sue Defendant Archdiocese in the future for the same conduct.

27. Plaintiff Cassinelli, as the sole heir of Murphy, submitted a claim for compensation in the IRCP on January 19, 2017 and accepted a settlement offer on May 24, 2017. In connection with this settlement, Plaintiff Cassinelli signed a release whereby she released all claims arising from the underlying acts of sexual abuse of Murphy by Fr. Timone. The claims brought herein by Plaintiff Cassinelli do not relate to the underlying acts of sexual abuse by any individual priest, but

to Defendant Archdiocese's defective and harmful policy of handling allegations of child sexual abuse in secret.

28. Defendant Archdiocese's IRCP awarded at least one other settlement to a survivor of sexual abuse by Fr. Timone.

29. Despite knowledge of at least two reports of sexual abuse by Fr. Timone in 2017, Defendant Archdiocese continued Fr. Timone in his assignment at St. Joseph in Middletown, NY.

30. Defendant Archdiocese's decision to allow Fr. Timone to remain at St. Joseph's in Middletown after making settlements in the IRCP is contrary to its stated policy of removing priests while an investigation is ongoing.

31. On December 4, 2018, more than a year and a half after settlements were made in Defendant Archdiocese's IRCP, Defendant Archdiocese certified that Fr. Timone was fit to work in the Diocese of San Diego.

32. In a December 4, 2018 letter, Defendant Archdiocese falsely stated, without qualification, that Fr. Timone had "[n]ever been accused of any act of sexual abuse or sexual misconduct involving a minor;" not "[m]anifested [] behavioral problems in the past that would indicate he might deal with people, including minors in an inappropriate manner;" and "[n]ever been suspended or otherwise canonically disciplined." See Exhibit A.

33. Indeed, at the time it authored this letter, Defendant Archdiocese knew that Fr. Timone had been accused of sexual abuse of *at least* two minors.

34. Additionally, by making settlements in the IRCP in 2017, Defendant Archdiocese knew or should have known that Fr. Timone had manifested behavioral problems in the past that indicated his unfitness to work with minors.

35. Further, Fr. Timone had been suspended from ministry in 2002 when Murphy and one other survivor separately reported to Defendant Archdiocese that they were sexually abused by Fr. Timone.

36. As a result of Defendant Archdiocese's certification, Fr. Timone continued to work in the Diocese of San Diego until December 20, 2018.

37. On December 20, 2018, the New York Times published an article entitled "The Church Settled Sexual Abuse Cases Against This Priest. Why Is He Still Saying Mass?" The article discussed Fr. Timone's sexual abuse of minors and the payments made in Defendant Archdiocese's IRCP. The New York Times reported that Fr. Timone was still working in New York at St. Joseph's in Middletown, and in California at Church of the Nativity in Rancho Santa Fe, John Paul the Great University in Escondido, and for Courage, a Catholic ministry program that counsels people with same-sex attractions.

38. John Paul the Great University claims to have learned about Fr. Timone's history of sexual abuse of minors from the December 20, 2018 New York Times article.

39. On the same day, John Paul the Great University issued a statement declaring that Fr. Timone will no longer be serving there.

40. Similarly, following the New York Times publication, Defendant Archdiocese stated that Fr. Timone would be removed from ministry while it weighed his permanent removal.

41. On information and belief, Fr. Timone remains temporarily suspended and Defendant Archdiocese has not taken action to permanently remove him from Defendant Archdiocese.

B. Monsignor John Paddack

42. On information and belief, Msgr. Paddack served at parishes and schools in Defendant Archdiocese since ordination in approximately 1984 including, but not limited to:

- a. Incarnation in New York;
- b. Cardinal Hayes High School in New York;
- c. St. Joseph by the Sea High School in Staten Island;
- d. Monsignor Farrell High School in Staten Island; and
- e. Church of Notre Dame in New York.

43. Plaintiff Caramanno was raised in a devout Roman Catholic family and attended St. Joseph by the Sea High School in Staten Island, NY.

44. Plaintiff Caramanno and his family came into contact with Msgr. Paddack as an agent and representative of Defendant Archdiocese.

45. Plaintiff Caramanno attended and participated in youth activities and church activities at St. Joseph by the Sea. In accord with the teachings, directives, and influence of Defendant Archdiocese, Plaintiff Caramanno developed great admiration, trust, reverence, and respect for the Roman Catholic Church, including Defendant Archdiocese and its agents, including Msgr. Paddack.

46. During and through these activities, Plaintiff Caramanno, as a minor and vulnerable child, was dependent on Defendant Archdiocese and Msgr. Paddack.

47. Defendant Archdiocese had custody of Plaintiff Caramanno and accepted entrustment of Plaintiff Caramanno and had responsibility for Plaintiff Caramanno and authority over him.

48. From approximately 2001 to 2002, when Plaintiff Caramanno was approximately 16 to 17 years old, Msgr. Paddack engaged in unpermitted sexual contact with Plaintiff Caramanno.

49. In approximately 2014, Defendant Archdiocese received a report that Msgr. Paddack sexually abused a minor at Cardinal Hayes High School in approximately 1994.

50. Despite this report, Defendant Archdiocese continued Msgr. Paddack in his assignment at the Church of Notre Dame, stating that the allegations were “not substantiated” by Defendant Archdiocese.

51. Defendant Archdiocese did not release any information regarding its attempts to investigate or substantiate the allegations.

52. In addition to Plaintiff Caramanno, at least six other individuals have reported to Defendant Archdiocese that they were sexually abused as minors by Msgr. Paddack.

53. As a result, in July 2019, Msgr. Paddack decided to step away from his role as Pastor of the Church of Notre Dame while the allegations are reviewed by Defendant Archdiocese.

54. Defendant Archdiocese has taken no action to restrict or prevent Msgr. Paddack from having access to children.

C. The Archdiocese’s Practices and Policies Relating to Child Sexual Abuse Endanger the Safety of a Considerable Number of Persons

55. By allowing Fr. Timone and Msgr. Paddack to remain in their assignments with unfettered access to children for years, Defendant Archdiocese affirmatively or implicitly represents to minor children, their families, and members of the general public that clerics working in Defendant Archdiocese, including Fr. Timone and Msgr. Paddack, do not pose a risk, are safe to work with children, and/or do not have a history of sexually assaulting children.

56. Defendant Archdiocese knew or should have known that employing child molesters and giving them unchecked access to children and the public at large is an extremely risky practice and is likely to expose the public to the threat of criminal activity.

57. Defendant Archdiocese has affirmatively concealed Fr. Timone's and Msgr. Paddack's histories of sexual abuse from the public.

58. Defendant Archdiocese has failed to warn the public of the risk posed by Fr. Timone's and Msgr. Paddack's access to children.

59. By placing Fr. Timone and Msgr. Paddack in positions of trust and authority, Defendant Archdiocese exposes the public, including Plaintiffs, to the risk of sexual abuse.

60. Sexual abuse, by its very nature, is an act that is committed in secret and, as a result, if the public is unaware of the potential that it will encounter a child molester, the public cannot take steps to protect itself from potential criminal activity.

61. By maintaining Fr. Timone and Msgr. Paddack in positions of trust and authority with ready access to children, Defendant Archdiocese has introduced the threat of criminal conduct into the public sphere.

62. In so doing, Defendant Archdiocese creates the opportunity and forum for Fr. Timone and Msgr. Paddack to commit criminal acts against members of the public, thus impairing the public health, welfare, and safety.

63. The public has an inherent right to be free from activities that pose a risk to health, welfare, and safety.

64. Parents have an inherent right to protect their children from harm and to have access to information that allow them to do so.

65. Defendant Archdiocese has a duty to refrain from taking actions that it knows or should know exposes the public to impairment of its health, welfare, and safety, including introducing the threat of criminal activity into the public sphere.

66. Despite this duty, Defendant Archdiocese has, for many decades, adopted a policy and practice of covering up criminal activity committed by clerics within Archdiocese. This practice continues to the present day.

67. Defendant Archdiocese's failure to disclose the identities, histories, and information about sexually abusive clerics is unreasonable and knowingly or recklessly creates or maintains a condition which endangers the health, safety, and welfare of a considerable number of members of the public, including Plaintiffs.

68. In September 2018, Cardinal Dolan announced that Defendant Archdiocese hired former federal judge, Barbara Jones, to review how the Archdiocese handles cases of sexual abuse of minors and sexual harassment of adults. Defendant Archdiocese has not made public any findings of the review.

69. On April 26, 2019, Cardinal Dolan published a list of 120 clergy accused of sexual abuse of minors or who were the subject of a claim made to the Archdiocese's IRCP ("Archdiocese List").

70. The Archdiocese List included Fr. Timone in the category of archdiocesan clergy awaiting final canonical or archdiocesan disposition of allegations against them. The Archdiocese List did not include Msgr. Paddock.

71. In his April 26, 2019 letter accompanying the Archdiocese List, Cardinal Dolan publicly represented that no clergy known to have sexually abused a minor was in ministry, stating: "Please be assured there is not a single priest or deacon of the Archdiocese of New York against

whom there has been a credible and substantiated claim of abuse against a minor currently in ministry.”

72. Notably, at the time of Cardinal Dolan’s statement, Msgr. Paddock remained in ministry despite Defendant Archdiocese’s knowledge of multiple reports of sexual abuse of minors by Msgr. Paddock.

73. Defendant Archdiocese expressed its intention to update the Archdiocese List as additional information was discovered or additional allegations determined to be credible.

74. Defendant Archdiocese acknowledged that the Archdiocese List does not include priests belonging to religious orders or institutes nor extern priests who were ordained in other dioceses but may have worked in the Archdiocese of New York.

75. Defendant Archdiocese continues to conceal important information about the priests on the Archdiocese List and the names and information about accused priests not on the Archdiocese List, thus continuing to expose an unknowing public to the threat of criminal activity.

76. As a result, children are at risk of being sexually assaulted, not only at parishes within the Archdiocese, but on public property, wherever Defendant’s priests gain access to children. Further, the public is placed under the mistaken belief that Defendant Archdiocese does not have undisclosed knowledge of clergy who present a danger to children.

77. On information and belief, Defendant Archdiocese has failed to report multiple allegations of sexual abuse of children by its agents to the proper civil authorities. As a result, children are at risk of being sexually assaulted.

78. New York Social Services Law Section 413 (“NYSSL § 413”) provides that various categories of adults in positions of trust and/or authority must report conditions which constitute abuse and/or maltreatment of a child. On information and belief, one or more members of

Defendant Archdiocese are or were mandatory reporters under NYSSL § 413. On information and belief, Defendant Archdiocese failed to report the conditions and abuse of Plaintiff Caramanno, Murphy, and other minor parishioners, in direct violation of their obligation pursuant to NYSSL § 413. Pursuant to NYSSL § 420(2), any person, official, or institution required to report a case suspected child abuse who knowingly and willfully fails to do so shall be civilly liable for the damages proximately caused by such failure.

79. Defendant Archdiocese also failed in its legal duty to refrain from exposing the public to dangerous conditions or criminal activity. Here, Defendant Archdiocese exposed children to conduct considered criminal under Penal Law Article 130. Defendant Archdiocese additionally has a common law obligation to warn the public of a hazard that its own actions and policies have created.

80. Defendant Archdiocese has a statutory duty pursuant to Penal Law Article 115 and Penal Law 260.10(1) too refrain from providing sexually abusive individuals with the means or opportunity to engage in felonious conduct that is likely to be injurious to the physical, mental, or moral welfare of a child.

81. Defendant Archdiocese's policy of handling allegations of child sex abuse by its agents, including Fr. Timone and Msgr. Paddack, in secrecy and pervasive cover-up scheme perpetuated by Defendant's transfer of its accused priests from parish to parish is in direct contravention of New York state laws, including NYSSL § 413.

82. As a direct result of Defendant's conduct described herein, each Plaintiff has suffered, and will continue to suffer, great pain of mind and body, severe and permanent emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, humiliation, physical, personal and psychological injuries.

83. Each Plaintiff was prevented, and will continue to be prevented, from performing normal daily activities and obtaining the full enjoyment of life; and/or has incurred and will continue to incur expenses for psychological treatment, therapy, and counseling, and, on information and belief has and/or will incur loss of income and/or loss of earning capacity.

COUNT I: NUISANCE
SUSAN CASSINELLI V. ARCHDIOCESE OF NEW YORK

Plaintiff Cassinelli incorporates all consistent paragraphs of this Complaint as if fully set forth under this Count.

84. Defendant Archdiocese's actions and omissions since May 24, 2017, as described above, have interrupted or interfered with the health, safety, and welfare of the general public.

85. Since May 24, 2017, Defendant Archdiocese has created and exposed the public to unsafe conditions continuously and on an ongoing basis until the present day.

86. As a direct and proximate result of the Defendant Archdiocese's conduct since May 24, 2017, Plaintiff Cassinelli has suffered special and individualized harm separate and distinct from the harm suffered by the public at large.

87. The harm suffered by Plaintiff Cassinelli is the exact type of harm that one would expect to result from the Defendant Archdiocese's acts and omissions.

88. Since May 24, 2017, Defendant Archdiocese has conspired and continues to conspire and engage in efforts to: 1) conceal from the general public the sexual assaults committed by, and the identities, histories, and pedophilic/ephebophilic tendencies of Fr. Timone and the Archdiocese's other accused priests; and/or 2) fail to report to and/or conceal from proper civil authorities sexual assaults committed by Fr. Timone and the Archdiocese's other agents against minor children; and/or 3) attack the credibility of victims of the Archdiocese's agents; and/or 4) protect the Archdiocese's agents from criminal prosecution for their sexual assaults and abuse

against children; 5) allow known child molesters access to minors and vulnerable children; and/or 6) allow known child molesters to live freely in the community without informing the public.

89. As a result, Defendant Archdiocese has introduced the threat of criminal activity into the public sphere and has thereby impaired the public's health, safety, and welfare.

90. The conduct of Defendant Archdiocese since May 24, 2017 was specially injurious to Plaintiff Cassinelli's health, safety, and welfare as the widow of a survivor who was sexually abused as a minor by one of the Archdiocese's agents, Fr. Timone.

91. The conduct of Defendant Archdiocese since May 24, 2017 was further specially injurious to Plaintiff Cassinelli's health, safety, and welfare in that when Plaintiff discovered Defendant Archdiocese's conduct in allowing Fr. Timone to have unfettered access to children and certifying his fitness to work with children in California, Plaintiff Cassinelli experienced mental, emotional, and/or physical distress.

92. Plaintiff Cassinelli has suffered and/or continues to suffer special, particular, and peculiar psychological and emotional harm and/or peculiar pecuniary harm, different in kind from the general public, after learning of Defendant Archdiocese's conduct since May 24, 2017.

93. Plaintiff Cassinelli's injuries are also particular to her and different from certain members of the public who have not been overtly harmed by the nuisance. People who have not been harmed by the nuisance include those who have not suffered any injury at all, those who are unaware of the nuisance, those who do not believe Defendant Archdiocese's conduct occurred, and those who think that any such conduct only occurred decades ago.

94. As a result of the above-described conduct since May 24, 2017, Plaintiff Cassinelli has suffered the injuries and damages described herein.

COUNT II: NUISANCE
JOSEPH CARAMANNO V. ARCHDIOCESE OF NEW YORK

Plaintiff Caramanno incorporates all consistent paragraphs of this Complaint as if fully set forth under this Count.

95. Defendant Archdiocese's actions and omissions, as described above, have interrupted or interfered with the health, safety, and welfare of the general public.

96. Defendant Archdiocese has created and exposed the public to these unsafe conditions continuously and on an ongoing basis since at least the time that Plaintiff Caramanno was sexually abused and has continued to expose the public to that unabated threat until the present day.

97. As a direct and proximate result of the Defendant Archdiocese's conduct, Plaintiff Caramanno has suffered special and individualized harms separate and distinct from the harms suffered by the public at large.

98. The harm suffered by the Plaintiff Caramanno is the exact type of harm that one would expect to result from Defendant Archdiocese's acts and omissions.

99. Defendant Archdiocese continues to conspire and engage and/or has conspired and engaged in efforts to: 1) conceal from the general public the sexual assaults committed by, the identities, histories, and pedophilic/ephebophilic tendencies of Msgr. Paddock and the Archdiocese's other accused priests; and/or 2) fail to report to and/or conceal from proper civil authorities sexual assaults and abuse committed by Msgr. Paddock and the Archdiocese's other agents against minor children; and/or 3) attack the credibility of victims of the Archdiocese's agents; and/or 4) protect the Archdiocese's agents from criminal prosecution for their sexual assaults and abuse against children; 5) allow known child molesters access to minors and

vulnerable children; and/or 6) allow known child molesters to live freely in the community without informing the public.

100. As a result, Defendant Archdiocese has introduced the threat of criminal activity into the public sphere and has thereby impaired the public's health, safety, and welfare.

101. The conduct of Defendant Archdiocese was specially injurious to Plaintiff Caramanno's health, safety and welfare as because Plaintiff Caramanno was sexually assaulted by Defendant Diocese's agent, Msgr. Paddack.

102. The conduct of Defendant Archdiocese was further specially injurious to Plaintiff Caramanno's health, safety, and welfare in that when Plaintiff Caramanno discovered Defendant Archdiocese's conduct, Plaintiff Caramanno experienced mental, emotional, and/or physical distress that he had been the victim of Defendant Archdiocese's conduct.

103. Plaintiff Caramanno has suffered and/or continues to suffer special, particular, and peculiar psychological and emotional harm and/or peculiar pecuniary harm, different in kind from the general public, after learning of Defendant Archdiocese's conduct.

104. Plaintiff Caramanno's injuries are also particular to him and different from certain members of the public who have not been overtly harmed by the nuisance. People who have not been harmed by the nuisance include those who have not suffered any injury at all, those who are unaware of the nuisance, those who do not believe that the conduct of Defendant Archdiocese ever occurred, and those who think that any such conduct only occurred decades ago.

105. As a result of the above-described conduct, Plaintiff has suffered the injuries and damages described herein.

PRAYER FOR RELIEF

Based on the foregoing causes of action, Plaintiffs pray judgment against Defendant in an amount to exceed the minimum required jurisdiction of this Court to be determined at trial, plus costs, disbursements, reasonable attorneys' fees, interest, and such other relief that the Court deems just and equitable.

To abate the continuing nuisance, Plaintiffs further request an order requiring that Defendant Archdiocese publicly release the names of all agents, including religious and extern priests and brothers, accused of sexual abuse of minors, each agent's history of abuse, each such agent's pattern of grooming and sexual behavior, and his last known address. This includes the release of Defendant Archdiocese's documents on the agents.

Plaintiffs also request an order requiring that Defendant Archdiocese discontinue its current practice and policy of handling allegations of child sexual abuse by its agents secretly, and requiring that Defendant work with civil authorities to create, implement, and follow a policy for dealing with sexually abusive clergy that will better protect children and the general public from further harm.

DEMAND IS HEREBY MADE FOR A TRIAL BY JURY.

Dated: July 15, 2019

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