27-CV-16-1712

STATE OF MINNESOTA

COUNTY OF HENNEPIN

Doe 114,

Plaintiff,

V.

Jason McLean,

Defendant.

STATE OF MINNESOTA ) ) ss. COUNTY OF RAMSEY )

Laura Adams, being first duly sworn on oath, deposes and states as follows:

1. I make this Affidavit in support of my motion for prejudgment attachment of Defendant-Respondent's assets pending the final resolution of this case. I also make this Affidavit in support of Claimant Doe 76 in the matter *Doe 76 v. Children's Theatre Company and Jason McLean*, 27-CV-15-21165; Claimant Doe 114 in the matter *Doe 114 v. Jason McLean*, 27-CV-16-1712; and Claimant Doe 116 in the matter *Doe 116 v. Children's Theatre Company and Jason McLean*, 27-CV-16-144, pending the final resolution of these cases.

2. I filed and served a Complaint in my action in November of 2015. At the time, I knew that Respondent was an owner of the Varsity Theater located at 1308 Fourth Street Southeast, Minneapolis, Minnesota 55414, and the Loring Pasta Bar located at 325 14th Avenue Southeast, Minneapolis, Minnesota 55414. Does 76, 114, and 116 subsequently served and filed their Complaints.

3. In a July 10, 2017 letter to my counsel, Respondent stated he had sufficient funds to hire counsel. Attached hereto as Exhibit 1 is a true and correct copy of the letter.

4. I learned from an article published by City Pages on July 14, 2017 that Respondent sold his business, the Varsity Theater, for \$2.51 million. Attached hereto as Exhibit 2 is a true and correct copy of the article.

### DISTRICT COURT

FOURTH JUDICIAL DISTRICT

Case Type: Personal Injury

Court File No.: 27-CV-16-1712 Judge Frank J. Magill, Jr.

#### AFFIDAVIT OF LAURA ADAMS IN SUPPORT OF MOTION FOR PREJUDGMENT ATTACHMENT

5. I learned from an article published by City Pages on August 2, 2017 that Respondent entered into an agreement to sell his business, the Loring Pasta Bar, and the building where the Loring Pasta Bar was located, to three longtime managers for an undisclosed amount of money. Attached hereto as Exhibit 3 is a true and correct copy of the article.

6. Respondent sexually abused me in 1983 when I was a minor and student at the Children's Theatre Company.

7. On May 24, 2017, I provided sworn testimony about Respondent's sexual abuse of me.

8. I am aware that Does 76, 114, and 116 have also sued Respondent for sexually abusing them when they were minors, and I believe that each is able to testify under oath about being sexually abused by Respondent.

9. I believe in good faith that, based on my sworn testimony and the prospective testimony of Does 76, 114, and 116, there is a reasonable probability that I and they will succeed on the merits in our claims against the Respondent.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Laura Adams

Subscribed and sworn to before me this 2017.

Notary Public

mmmmmm My Commission Expires Jan 31, 2020 AAAAAN

July 10, 2017

Jeff Anderson & Associates PA 366 Jackson Street, Suite 100 St. Paul, MN 55101

Hello Jeff-

As I have previously asked, has the Children's Theatre made an offer to settle these cases? I haven't heard a peep from them.

In the meantime, I will update you as to my pickle.

I remain unable to respond at this time as I continue without legal representation as of this date. As you know from my earlier correspondence and my in-person visit to your office, I am not a lawyer and am unqualified to respond competently to these highly consequential proceedings.

However, GOOD NEWS!, I now have the funds necessary to hire an attorney.

I've begun the process to interview for a lawyer qualified to represent my interests in this complex litigation. I quickly i dentified someone that I believe has the credential necessary to handle my defense. We had an enjoyable conference and the attorney agreed to consider engaging as counsel, but requires that I present further information and documents for review prior to a decision on accepting the engagement. That requested information is being assembled this week while the prospective lawyer is in trial on another matter.

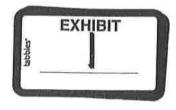
In the meantime I am networking further to Identify additional options should attorney "A" decline to accept my case.

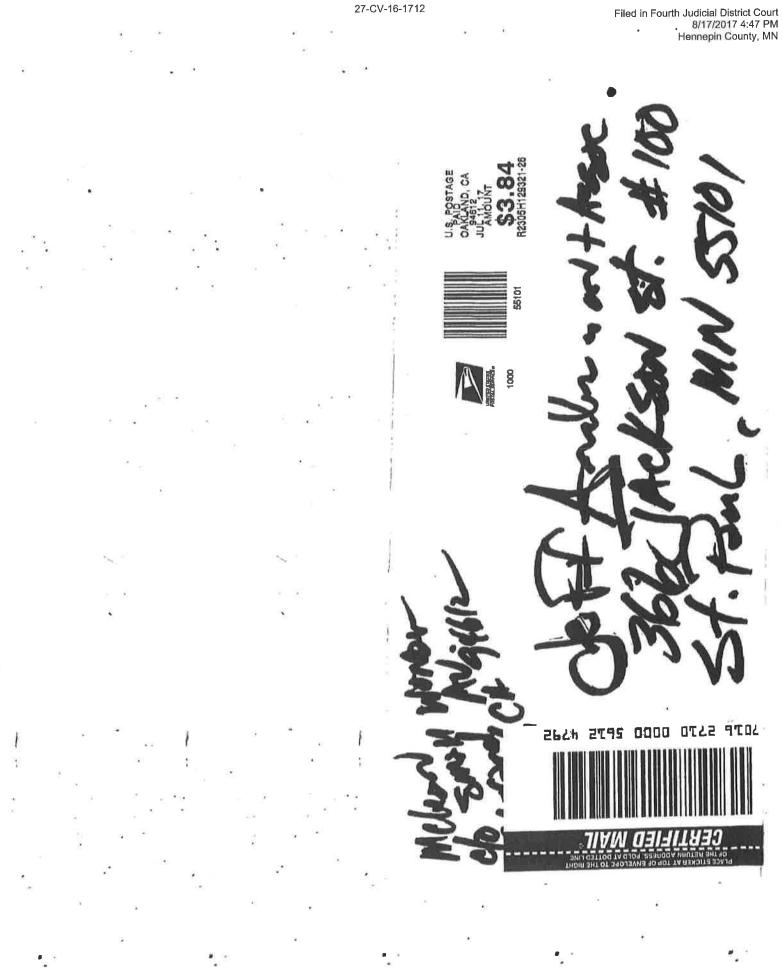
I feel confident that you can understand this small predicament, which I am also confident is soon to pass.

So, in the interests of clarity and good communication I am notifying you of this. Now that I have the funds necessary to hire legal counsel, I expect to confirm an engagement no later than August 15<sup>th</sup>. I feel confident that the timeline for depositions and discovery, etc. I proposed previously (October-December) can yet be accomplished and are within the parameters of Judge Magill's scheduling orders issued to us on June 8,2017. If counsel sees things differently you will be notified quickly.

Yours, ason Miclean

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## Embattled owner sells Varsity Theater; concerts to return

Friday, July 14, 2017 by Jay Boller In

Music



Time to put up the ol' SOLD sign, Varsity Theater. Jay Boller

Los Angeles real estate firm Downtown Properties has purchased Minneapolis' Varsity

Theater for \$2.51 million,

<u>the Minneapolis-St. Paul Business Journal reports</u>

(https://www.bizjournals.com/twincities/news/2017/07/11/l-a-firm-buys-dinkytownsvarsity-theater-will-bring.html)



Following some upgrades, the 962-capacity Dinkytown theater will resume hosting concerts and events, Dan Lee, senior vice president of investments at Downtown Properties, tells the Biz Journal.

"We're excited to bring the venue back to life," Lee said by email, adding that the Varsity will "hopefully" return by the end of the year. "The plan is to continue to operate it as one of the premier venues in the country." Embattled owner sells Minneapolis' Varsity Theater; concerts to return | City Pages

Downtown Properties operates hotels, resorts, apartment complexes, and commercial buildings around the country and in the U.K. Calls to Lee were not immediately returned.

The Varsity largely went dark in late 2016 as sex-abuse allegations mounted against its owner, Jason McLean.

McLean, 62, a former actor/teacher with the Children's Theatre Company Co., is alleged to have sexually abused five female students in the 1980s, according to civil lawsuits filed in 2015 and 2016 in Hennepin County District Court.

That bad PR proved poisonous for the Varsity. Citing charges against McLean, several high-profile touring acts

moved shows originally scheduled for the venue (http://www.citypages.com/music/only-act-on-varsity-theaters-2017-calendar-relocates-gig/417018673)

. The Varsity last promoted an event via social media eight months ago.

The legal process isn't going any smoother for McLean. He failed to appear for a deposition last January, according to court records.

"The bottom line is Jason McLean has gone on the legal lam," Jeff Anderson, the Minneapolis attorney representing McLean's alleged victims,

told City Pages in February

(http://www.citypages.com/music/varsity-theater-concert-calendar-empty-owner-accused-of-sex-crimes-on-the-legal-lam/411551425) . "We had served him with the subpoena and a notice of deposition, even though he's gone to some length to evade service of process, and us, for almost a year and a half."

The Varsity last issued an official statement in 2016.

"The Varsity has 60 employees who depend on their jobs for a living," senior manager Lynn Nyman said. "No one alleges the employees did anything wrong. They are the people who are most harmed by a boycott of the business."

McLean -- who also owns the nearby Loring Pasta Bar -- re-opened the 102-year-old Varsity Theater in 2005. He purchased the space for \$1.1 million in 2009, according to property records.

Hennepin County, MN

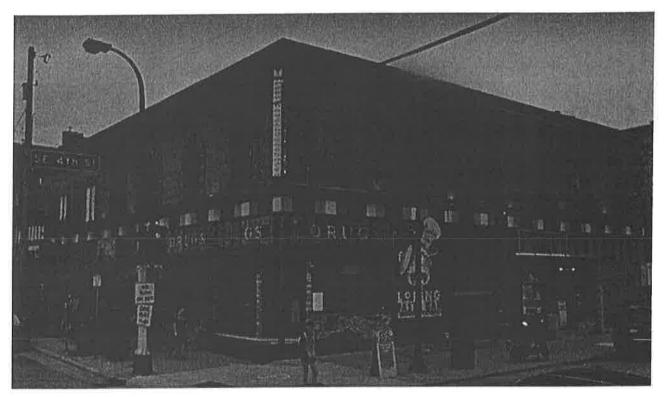
McLean could not be reached for comment; numerous calls and emails to Varsity

employees went un-returned throughout the year.

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# Loring Pasta Bar purchased by longtime managers; will relaunch as LRx

Wednesday, August 2, 2017 by Jay Boller in Food & Drink



The erstwhile Loring Pasta Bar Google

The Loring Pasta Bar will soon relaunch as

LRx: Loring & Pharmacy Bar (https://www.facebook.com/LRxBar/) in Minneapolis' Dinkytown neighborhood.

Three longtime Loring and Varsity Theater managers finalized a deal Monday to purchase the restaurant as well as the building, says Joe Henkin, who managed both businesses for 14 years. Henkin and his partners, Lynn Nyman and Joe Kennedy, plan to unveil their new venture on August 9.



Henkin would not comment on the purchase price or

## Monday's abrupt layoffs

(http://www.citypages.com/restaurants/it-doesnt-look-good-for-loring-pasta-bar/437932203)

He did, however, spill some details about LRx. The new ownership team is currently updating the restaurant's aesthetics and overhauling its menu; the well-established music and dance calendar will remain unchanged. A young Bob Dylan lived above the Loring back when it was Gray's Drugstore, hence LRx's pharmacological name.

"We're excited for the relaunch," Henkin says. "We just need to add some accents and perfect the menu."

Having sold the Varsity for \$2.51 million last month

(http://www.citypages.com/music/embattled-owner-sells-varsity-theater-concerts-to-return/433908043)

, Jason McLean -- the embattled former owner of the Loring and the Varsity -- has now completely divested from his businesses along the 1300 block of Fourth Street. McLean is alleged to have sexually abused five female students while he was an instructor with the Children's Theatre Company Co. in the 1980s, according to civil lawsuits filed in 2015 and 2016.

Bad PR stemming from those allegations

hurt business at the Loring and the Varsity

(http://www.citypages.com/music/varsity-theater-concert-calendar-empty-owner-accused-of-sex-crimes-on-the-legal-lam/411551425)

, the latter of which will soon resume regular concerts and events. It's likely no coincidence that

"staff owned and operated"

(https://www.facebook.com/LRxBar/photos/a.1936662406612159.1073741825.1936662326612167/1938260713118995/?type=1&theater) has prominent placement on new signage from LRx. Henkin says LRx and the Varsity will maintain tight working relationships when it comes to weddings and events.

Loring Pasta Bar originally opened in 2001; the Varsity Theater re-opened in 2005.

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