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JANE DOE SC,

Plaintiff,

-against-

**MARIANIST PROVINCE OF THE UNITED
STATES AND MARIANIST FAMILY
RETREAT CENTER, INC.**

Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: CAPE MAY COUNTY**

DOCKET NO.

CIVIL TORT ACTION

**COMPLAINT AND
DEMAND FOR JURY TRIAL**

Plaintiff, Jane Doe SC, by and through undersigned counsel, complaining of the Defendants, upon information and belief, alleges as follows:

PARTIES, JURISDICTION, AND VENUE

1. This Complaint arises from the repeated sexual abuse of Plaintiff Jane Doe SC by Fr. John J. Sheehan (hereinafter “Fr. Sheehan”) on or about or 1978 to 1979, when Plaintiff was approximately 11 to 12 years old. These incidents occurred while Plaintiff and other local girls attended Bible study classes hosted by Br. Al Koch and Fr. John Sheehan at Marianist Family Retreat Center in Cape May Point, New Jersey.

2. Plaintiff Jane Doe SC is an adult resident of the State of New Jersey and is otherwise sui juris. Given the nature of the allegations, Plaintiff has elected to proceed using the pseudonym Jane Doe SC in this matter because disclosure of Plaintiff’s identity would cause additional injury to the Plaintiff. Jane Doe SC’s identity has been or soon will be made known to Defendants under separate cover.

3. Defendant Marianist Province of the United States (hereinafter “Marianist Province”) is a Province of a Roman Catholic Religious Order and is an unincorporated nonprofit business entity licensed to and doing business in the State of New Jersey with a principal place of business at 4425 W. Pine Ave., St. Louis, Missouri 63108. Defendant Marianist Province of the United States is a successor nonprofit business entity to the unincorporated nonprofit business entities of the Marianist Province of New York and the Marianist Province of St. Louis. Hereafter, the term “Marianists” will be used to refer to the Defendant Marianist Province of the United States and its predecessors.

4. Defendant Marianist Family Retreat Center, Inc. (hereinafter “Marianist Family Center”) is a Roman Catholic retreat center that is owned and operated by the Marianists and an unincorporated New Jersey business entity with a principal place of business at 417 Yale Avenue, Cape May Point, New Jersey 08212.

5. At all times material, Fr. Sheehan was an ordained Roman Catholic Priest and a member of the Marianist Province. In 1974, Fr. Sheehan was assigned to the Defendant Marianist Family Center.

6. At all times material, Fr. Sheehan was approved to work as a priest within the Diocese of Camden, New Jersey by the Bishop of the Diocese of Camden and the Diocese of Camden had a duty to use reasonable care in its supervision and retention of Fr. Sheehan. The Diocese of Camden also had the duty to use reasonable care to protect the minor Plaintiff from foreseeable harm. The Diocese of Camden breached these duties and Plaintiff was injured as a result. The Diocese of Camden has filed for Chapter 11 Bankruptcy protection in the United States Bankruptcy Court for the District of New Jersey, Case No. 20-21257 (JNP). Accordingly, the

Diocese of Camden is not a named defendant and will not be further discussed in the current matter because to do so would violate the automatic stay.

7. Plaintiff brings this suit within the extended time period as provided for in N.J.S.A. 2A:14-2b.

8. Venue is proper in this Court because the acts and omissions giving rise to this Complaint occurred in Cape May County.

9. Jurisdiction is proper because the sexually abusive acts and related negligence occurred in Cape May County and the Defendant Marianist Family Center is domiciled in Cape May County.

BACKGROUND FACTS

10. On or about 1978 to 1979, the minor Plaintiff resided with her family in Cape May Point, New Jersey. At about this same time, Plaintiff's mother encouraged her to attend Fr. John Sheehan and Br. Al Koch's Bible study classes at Defendant Marianist Family Center along with the other local girls.

11. While Plaintiff attended Bible study classes at the Defendant Marianist Family Center, Defendants accepted custody of the 11 to 12-year-old Plaintiff, as her mother was not present to protect Plaintiff.

12. On or about 1978 to 1979, Plaintiff attended Bible study classes hosted by Fr. John Sheehan and Br. Al Koch at Defendant Marianist Family Center. During the Bible study classes, Fr. John Sheehan and Br. Al Koch instructed Plaintiff and the other local girls to lay on the floor with their eyes closed and try to meditate. During these meditation sessions, Fr. Sheehan tapped Plaintiff on the shoulder and communicated that she should leave the room with him quietly. Once alone, Fr. Sheehan, sexually abused Plaintiff by fondling Plaintiff under the guise of meditation-

massage, including touching Plaintiff's breasts, reaching into Plaintiff's pants, and digitally penetrating Plaintiff.

13. Fr. Sheehan sexually abused Plaintiff at Defendant Marianist Family Center on other occasions, including, but not limited to one occasion, during a winter storm when families, including Plaintiff's family, who lost power and heat, stayed overnight at the Center. On this occasion, Fr. Sheehan sexually abused Plaintiff by stopping Plaintiff in a stairwell, reaching under Plaintiff's shirt, and fondling Plaintiff's breasts.

14. At least one (1) other individual has alleged childhood sexual abuse by Fr. John Sheehan and Br. Al Koch in 1974 at Marianist Family Center in Cape May, New Jersey (See, *Jane Doe RP v. Marianist Province of the United States and Marianist Family Center*, Docket No. CPM-L-000004-21, Cape May Cty.).

15. At all times material, Fr. Sheehan was an ordained Roman Catholic Priest employed by and an agent of Defendant Marianist Province and the Defendant Marianist Family Center.

16. At all times material, Fr. Sheehan remained under the direct supervision of the Defendant Marianist Province, or its predecessors.

17. At all times material, Fr. Sheehan remained under the control of the Defendant Marianists Province, or its predecessors.

18. At all times relevant, Defendant Marianist Province of the United States was the legal owner, tenant and/or occupier of the Marianist Family Center.

19. By holding Fr. Sheehan out as safe to work with children, and by undertaking the custody, supervision of, and/or care of the minor Plaintiff, Defendants entered into a special relationship with the minor Plaintiff. As a result of Plaintiff being a minor, and by Defendants'

undertaking the care and guidance of the then vulnerable Plaintiff, Plaintiff was uniquely vulnerable, without her parents and incapable of self-protection.

20. Furthermore, Defendants, by holding themselves out as being able to provide a safe environment for children, solicited and/or accepted this position of empowerment. This empowerment prevented the Plaintiff from effectively protecting herself, and Defendants thus entered into a special relationship with Plaintiff. By holding themselves out as a safe, moral, and trusted institution to Plaintiff's parents, Defendants induced Plaintiff's parents to entrust their child to Defendants and thereby deprived Plaintiff of the protection of her family.

21. At all times material, Fr. Sheehan's sexual abuse of Plaintiff was foreseeable.

22. The Marianists had a number of priests and brothers who have been credibly accused of child sexual abuse.

23. Defendants allowed Fr. Sheehan to have unsupervised and unlimited access to the minor Plaintiff, at Marianist Family Center in Cape May Point, New Jersey, located at the time within the Marianist Province of the United States, or its predecessors.

24. Upon information and belief, before Plaintiff was sexually abused by Fr. Sheehan, Defendants had actual or constructive knowledge of material facts regarding Fr. Sheehan's sexual misconduct, impulses, and behavior.

25. Plaintiff was raised in a devout Roman Catholic family, regularly celebrated mass, received the sacraments, and participated in church-related activities. Plaintiff, therefore, developed great admiration, trust, reverence, and respect for the Roman Catholic Church and its agents, the Marianist Province of the United States and its agents, including Fr. Sheehan.

26. Defendants held Fr. Sheehan out as a qualified Roman Catholic priest, and undertook the education, religious instruction, and spiritual and emotional guidance of Plaintiff.

The Bishop exercised a direct role over Plaintiff. Accordingly, Plaintiff placed trust in Defendants so that Defendants and their agents gained superiority and influence over Plaintiff. Defendants entered into a special relationship with the Plaintiff and her family.

**COUNT 1 - NEGLIGENCE AGAINST THE DEFENDANTS MARIANISTS AND
MARIANIST FAMILY CENTER**

27. Plaintiff realleges, incorporates, and restates all previous paragraphs as if set forth fully herein.

28. At all material times, Defendants Marianist Province of the United States and Marianist Family Center, by and through their agents, managers, employees, and directors owed a duty to Plaintiff to use reasonable care to protect her safety, care, well-being and health while she was under the care, custody or in the presence of the Defendants. These duties include the use of reasonable care in the supervision of the minor Plaintiff while she was residing at the Defendant Marianist Family Center and while minor Plaintiff was interacting with Fr. Sheehan. These duties also encompassed the use of reasonable care in the retention and supervision of Fr. Sheehan and otherwise providing a safe environment for children.

29. Defendants owed Plaintiff a duty of reasonable care because it assumed duties owed to Plaintiff and had superior knowledge about the risk that Fr. Sheehan posed to Plaintiff, the risk of abuse in general in its programs, and/or the risks that their facilities posed to minor children. Defendants had the duty to protect the moral purity of Plaintiff and other Roman Catholic children within the Marianist Province of the United States.

30. Defendants owed Plaintiff a duty of reasonable care because they assumed that duty and because they solicited youth and parents for participation in its youth programs.

31. Defendants owed Plaintiff a duty of reasonable care because they undertook custody of minor children, including Plaintiff.

32. Defendants owed Plaintiff a duty of reasonable care because they promoted its facilities and programs as being safe for children.

33. Defendants owed Plaintiff a duty of reasonable care because they held out its agents including Fr. Sheehan as safe to work with children.

34. Defendants owed Plaintiff a duty of reasonable care because they encouraged parents and children to spend time with its agents; and/or encouraged its agents, including Fr. Sheehan, to spend time with, interact with, and recruit children.

35. Defendants had a duty to Plaintiff to protect her from harm because Defendants' actions created a foreseeable risk of harm to Plaintiff.

36. Defendants entered into a special relationship with Plaintiff when it accepted custody of the minor Plaintiff at the Defendant Family Center on or about 1978 to 1979, giving rise to the duty of the Defendants to protect the minor Plaintiff from foreseeable harm.

37. Defendants breached their duties to Plaintiff by failing to use reasonable care to protect her from sexual abuse by Fr. Sheehan.

38. Defendants breached their duties by exposing Plaintiff to pedophiles.

39. Defendants breached their duties by exposing Plaintiff to a priest and brother Defendants knew or should have known were pedophiles.

40. Defendants breached their duties by recruiting, hiring, and maintaining Fr. Sheehan in a position of authority over children.

41. Defendants breached their duties by exposing Fr. Sheehan to children.

42. Defendants breached their duties by leaving Fr. Sheehan alone with children unsupervised.

43. Defendants breached their duties by inducing Plaintiff and her parents to entrust Plaintiff to Fr. Sheehan.

44. Defendants breached their duties by failing to follow policies and procedures designed to prevent child sex abuse and/or failing to implement sufficient policies and procedures to prevent child sex abuse.

45. Defendants breached their duties by failing to take reasonable measures to make sure that policies and procedures to prevent child sex abuse were working.

46. Defendants breached their duties by failing to adequately inform families and children of the known risks of child sex abuse within the Marianist Province of the United States.

47. Defendants breached their duties by holding out their employees and agents, including Fr. Sheehan, as safe and wholesome for children to be with.

48. Defendants breached their duties by failing to investigate risks of child molestation.

49. Defendants breached their duties by failing to properly train the workers at institutions and programs within Defendants' geographical confines.

50. Defendants breached their duties by failing to have any outside agency test their safety procedures.

51. Defendants breached their duties by failing to protect the children in their programs from child sex abuse; failing to adhere to the applicable standard of care for child safety.

52. Defendants breached their duties by failing to investigate the amount and type of information necessary to represent the institutions, programs, and leaders and people as safe.

53. Defendants breached their duties by failing to respond to and/or investigate information of improper conduct of employee or agent with children, including Fr. Sheehan.

54. Defendants breached their duties by failing to properly train their employees to identify signs of child molestation by fellow employees.

55. Defendants breached their duty to use ordinary care in determining whether their facilities were safe and/or to determine whether they had sufficient information to represent their facilities as safe.

56. Defendants breached their duty of care by recruiting, hiring, and maintaining Fr. Sheehan at their facilities.

57. Defendants breached their duty of care by maintaining a dangerous condition on the premises of their facilities (i.e., a priest Defendants knew or should have known posed a risk of pedophilic harm to children).

58. Defendants breached their duty of care by holding out their facilities as a safe and moral place for children, which they were not.

59. Defendants breached their duty of care by failing to have sufficient policies and procedures to prevent abuse at their facilities.

60. Defendants breached their duty of care by failing to investigate risks at their facilities.

61. Defendants breached their duty of care by failing to properly train the workers at their facilities.

62. Defendants breached their duty of care by failing to investigate the amount and type of information necessary to represent their facilities as safe.

63. Defendants breached their duty of care by and failing to train their employees properly to identify signs of child molestation by fellow employees.

64. Defendants breached their duties to Plaintiff by holding out clergy members, including Fr. Sheehan, as safe, moral, and trustworthy people and by failing to warn Plaintiff and her family of the risk that Fr. Sheehan posed and the known risks of child sexual abuse by clerics in general.

65. Defendants also failed to warn Plaintiff about any of the knowledge that the Defendants had about child sex abuse perpetrated by clergy or Fr. Sheehan.

66. Defendants further breached their duties by hiding a pedophile and engaging in a cover-up of abuse perpetrated by Fr. Sheehan.

67. Defendants knew or should have known that some of the leaders and people working at Catholic institutions within the Marianist Province of the United States were not safe for children.

68. Defendants knew or should have known that they did not have sufficient information about whether or not their leaders and people working at Catholic institutions within the Marianist Province of the United States were safe around children.

69. Defendants knew or should have known that there was a risk of child sex abuse for children participating in Catholic programs and activities within the Marianist Province of the United States.

70. Defendants knew or should have known that they did not have sufficient information about whether or not there was a risk of child sex abuse for children participating in Catholic programs and activities within the Marianist Province of the United States.

71. Defendants knew or should have known that they had other agents who had sexually molested children. Defendants knew or should have known that child molesters have a

high rate of recidivism. Defendants knew or should have known that there was a specific danger of child sex abuse for children participating in Defendants' youth programs.

72. Defendants held their leaders and agents out as people of high morals, as possessing immense power, teaching families and children to obey these leaders and agents, teaching families and children to respect and revere these leaders and agents, soliciting youth and families to their programs, schools, marketing to youth and families, recruiting youth and families, and holding out the people that worked in the programs as safe for children/youth.

73. Defendants made negligent representations to Plaintiff and her family during each and every year of her minority. Plaintiff and/or her family relied upon these representations, which resulted in Plaintiff being put in a vulnerable situation with Fr. Sheehan who harmed her.

74. Fr. Sheehan engaged in unpermitted, harmful, and offensive sexual contact with the Plaintiff on the physical premises of and around Marianist Family Center. Fr. Sheehan sexually assaulted Plaintiff when Plaintiff was a minor.

75. Defendants allowed Fr. Sheehan to have unsupervised and unlimited access to young children at Marianist Family Center located at the time within the Marianist Province of the United States.

76. At all times material, Fr. Sheehan was on duty as a priest 24 hours per day, 7 days per week.

77. At all times material, Fr. Sheehan remained under the direct supervision, employ, and control of the Defendants Marianist Province and Marianist Family Center.

78. At all times material, Defendants had the right to control the means and manner of Fr. Sheehan's performance.

79. At all times material, Defendants paid Fr. Sheehan's salary.

80. At all times material, Defendants paid for Fr. Sheehan's health insurance and other benefits.

81. At all times material, Defendants furnished an office and other materials, supplies, and tools required for Fr. Sheehan to perform in his position as a priest.

82. At all times material, Defendants controlled the premises where Fr. Sheehan performed as a priest.

83. At all times material, Defendants had the power to terminate the employment of Fr. Sheehan.

84. Upon information and belief, before Plaintiff was sexually abused by Fr. Sheehan, Defendants had actual or constructive knowledge of material facts regarding Fr. Sheehan's sexual misconduct, impulses, and behavior, but failed to act on that knowledge and exposed Plaintiff as a child to Fr. Sheehan, thereby increasing the likelihood that Plaintiff would be harmed.

85. As a direct result of Defendants' negligence, breached duties, the sexual abuse, sexual exploitation, and Defendants' conduct, 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 and psychological injuries, was prevented and will continue to be prevented from performing her normal daily activities and obtaining the full enjoyment of life, has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling all to this Plaintiff's damage in excess of the jurisdiction of all lower courts.

COUNT 2 – RESPONDEAT SUPERIOR/VICARIOUS LIABILITY AGAINST THE DEFENDANTS MARIANISTS AND MARIANIST FAMILY CENTER

86. Plaintiff realleges, incorporates, and restates all previous paragraphs as if set forth

fully herein.

87. Among other duties, Defendants employed Fr. Sheehan to operate programs, including youth, altar boy and spiritual counseling programs at Marianist Family Center.

88. Defendants created a master-servant relationship with Fr. Sheehan, employing him to interact and supervise children participating in programs at Marianist Family Center.

89. The unwanted contact by Fr. Sheehan upon Plaintiff occurred during his regular working hours and at the place of his employment with Defendants while performing duties of a priest on behalf of his employers.

90. The sexual contact by Fr. Sheehan occurred in the course and scope of his employment with Defendants.

91. The sexual contact by Fr. Sheehan occurred when he purported to act on behalf of the Defendants, upon which the Plaintiff and her family relied.

92. The sexual contact by Fr. Sheehan was generally foreseeable to Defendants.

93. The sexual contact by Fr. Sheehan was closely connected to what he was employed to do as a priest with Defendants, and/or was otherwise naturally incidental to his job duties.

94. Fr. Sheehan's conduct was motivated, at least in part, by a desire to serve his employer's business interests or otherwise meet the objectives of his employment, however misguided.

95. Alternatively, Fr. Sheehan's conduct constituted an authorized, minor deviation from his employment that was authorized and/or ratified by Defendants.

96. As a direct and proximate result of Fr. Sheehan's conduct, Plaintiff has suffered damages for which his employer is now liable.

**COUNT 3 – NEGLIGENT RETENTION AND SUPERVISION AGAINST THE
DEFENDANTS MARIANISTS AND MARIANIST FAMILY CENTER**

97. Plaintiff realleges, incorporates, and restates all previous paragraphs as if set forth fully

herein.

98. Defendants had a duty to use reasonable care in supervising and retaining their employees.

99. Defendants had a duty to not retain an employee who was unfit for the position to which the employee was assigned.

100. Prior to the sexual misconduct perpetrated by Fr. Sheehan upon Plaintiff, Defendants Marianist Province and Marianist Family Center knew, or in the exercise of reasonable care, should have known, of the general problem of Catholic clergy engaging in sexual misconduct with children who were in Marianist Province and Marianist Family Center programs.

101. Prior to the sexual misconduct perpetrated by Fr. Sheehan upon Plaintiff, Defendants Marianist Province and Marianist Family Center knew, or in the exercise of reasonable care, should have known, that Fr. Sheehan was unfit for the duties assigned to him, that he did not exhibit appropriate behavior with children, and otherwise posed a risk of perpetrating unwanted sexual contact upon children.

102. Given actual or constructive knowledge of Fr. Sheehan's dangerous propensities specifically, the Defendants had a duty to act reasonably in all decisions relating to their supervision, and retention as employees.

103. Defendants failed to exercise reasonable care in one or more of their decisions to supervise and retain Fr. Sheehan and therefore exposed Plaintiff to an unreasonable risk of harm.

104. Defendants Marianist Province and Marianist Family Center affirmed and ratified Fr. Sheehan's misconduct with Plaintiff. Given the actual and constructive knowledge of the likelihood that Fr. Sheehan and/or other clergy would engage children in unwanted sexual contact, the unwanted sexual contact of Plaintiff was reasonably foreseeable to Defendants Marianist Province and Marianist Family Center.

105. Defendants Marianist Province and Marianist Family Center and their agents had superior knowledge of the likelihood that Fr. Sheehan would engage in unwanted sexual contact with children that they encountered in his position as a priest and had a duty to take precautions to lessen the risk that Plaintiff would be the victim of unwanted sexual contact.

106. At all relevant times, Defendants Marianist Province's and Marianist Family Center's acts and omissions created an environment which fostered unwanted sexual contact and exploitation against the people it had a duty to protect, including Plaintiff.

107. At all relevant times, Defendants had inadequate policies and procedures to protect children entrusted to their care and protection, including Plaintiff, which substantially contributed to the creation of a dangerous environment.

108. As a direct and proximate result of the negligence of Defendants, Plaintiff suffered severe and permanent psychological, emotional, and physical injuries, shame, humiliation and the inability to lead a normal life, and has incurred and/or will incur costs for treatment and will continue to do so in the future. These injuries are permanent and ongoing in nature.

**COUNT 4 – NEGLIGENCE/PREMISES LIABILITY AGAINST THE DEFENDANTS
MARIANISTS AND MARIANIST FAMILY CENTER**

109. Plaintiff realleges, incorporates, and restates all previous paragraphs as if set forth fully herein.

110. Plaintiff was a business invitee of Defendants when Fr. Sheehan engaged her in unwanted sexual contact.

111. Defendants owed Plaintiff a duty to protect her from dangerous conditions on their premises that they knew about, or in the exercise of reasonable care could have discovered.

112. Defendants owed Plaintiff a duty to provide a reasonably safe environment where

she would be free from the threat of unwanted sexual contact while on Defendants' premises.

113. Defendants owed Plaintiff a duty to take reasonable precautions to ensure her safety while on the premises of Defendants.

114. Prior to the sexual misconduct perpetrated by Fr. Sheehan and upon Plaintiff, Defendants knew, or in the exercise of reasonable care, should have known, of the general problem of priests and other clergy engaging in sexual misconduct with children.

115. Prior to the sexual misconduct perpetrated by Fr. Sheehan upon Plaintiff, Defendants knew, or in the exercise of reasonable care, should have known, that Fr. Sheehan was unfit for the intimate duties assigned to them, that they did not exhibit appropriate behavior with children, and otherwise posed a risk of perpetrating unwanted sexual contact upon children.

116. Defendants breached the duty owed to Plaintiff by failing to make the premises reasonably safe for Plaintiff despite what they knew or should have known about the existence of a potential threat of harm to Plaintiff on their premises.

117. Defendants breached the duty they owed to Plaintiff by failing to warn Plaintiff of the dangers and risks involved in participating in programs at Marianist Family Center given their superior knowledge of the potential risk of harm to Plaintiff.

118. At all relevant times, Defendants had inadequate policies and procedures to protect children entrusted to their care and protection, including Plaintiff, which substantially contributed to the creation of a dangerous environment.

119. As a direct and proximate result of the negligence of Defendants, Plaintiff suffered severe and permanent psychological, emotional and physical injuries, shame, humiliation and the inability to lead a normal life, and has incurred and/or will incur costs for treatment and will continue to do so in the future. These injuries are permanent and ongoing in nature.

DEMAND FOR COMPLIANCE WITH RULES 1:5-1(a) and 4:17(c)

PLEASE TAKE NOTICE that the undersigned attorney, counsel for the plaintiff, hereby demands, pursuant to the provisions of Rules 1:5-1(a) and 4:17-4(a), that each party serving pleadings or interrogatories and receiving responses there to shall serve copies of all such pleadings, interrogatories, and responses there to upon the undersigned, and further

PLEASE TAKE NOTICE that this is a continuing demand.

NOTICE OF OTHER ACTIONS

Pursuant to the provisions of Rule 4:5-1, I certify as follows:

- a. The matter in controversy is neither the subject of any other action pending in any other court nor of a pending arbitration proceeding.
- b. It is not anticipated that the matter in controversy will become the subject of any other action pending in any other court or of a pending arbitration proceeding.
- c. All parties who should have been joined in this action have been so joined. I hereby certify that the foregoing statements I have made are true. I am aware that if any of the statements I have made or willfully false, I am subject to punishment.

DESIGNATION OF TRIAL ATTORNEY

PLEASE TAKE NOTICE that pursuant to the provisions of Rules Governing the Courts of the State of New Jersey, Patrick Noaker is hereby designated as the attorney who will try this case.

DEMAND FOR TRIAL BY JURY

PLEASE TAKE NOTICE that plaintiff demands a trial by jury of 12 to all issues pursuant to the Rules of this Court.

WHEREFORE, Plaintiff demands judgment against the Defendants for a sum in excess of the jurisdictional limits of all lower courts on each and every Cause of Action stated above, together with the costs and disbursements and other expenses necessary in this action.

Dated: June 4, 2021

Respectfully,



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