

STATE OF MINNESOTA  
COUNTY OF RAMSEY

DISTRICT COURT  
SECOND JUDICIAL DISTRICT

Case Type: Personal Injury

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Doe 20,

Court File No.:

Plaintiff,

v.

**SUMMONS**

Fr. Michael Jerome Keating,

Defendant.

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THIS SUMMONS IS DIRECTED TO THE DEFENDANT ABOVE NAMED.

**1. YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this Summons.

**2. YOU MUST REPLY WITHIN 20 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this Summons a **written response** called an Answer within 20 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at Jeff Anderson & Associates, P.A., 366 Jackson Street, Suite 100, St. Paul, MN 55101.

**3. YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

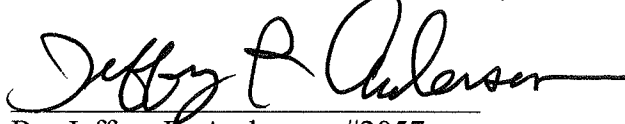
**4. YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not Answer within 20 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond. A default judgment can then be entered against you for the relief requested in the Complaint.

**5. LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. **Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.**

**6. ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

Dated: 10/11/13

JEFF ANDERSON & ASSOCIATES, P.A.



By: Jeffrey R. Anderson, #2057  
 Michael G. Finnegan, #033649X  
 Attorneys for Plaintiff  
 366 Jackson Street, Suite 100  
 St. Paul, MN 55101  
 (651) 227-9990

STATE OF MINNESOTA  
 COUNTY OF RAMSEY

DISTRICT COURT  
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Doe 20,

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Plaintiff,

v.

**COMPLAINT**

Fr. Michael Jerome Keating,

Defendant.

---

Plaintiff, for her cause of action against Defendant, alleges that:

**PARTIES**

1. Plaintiff Doe 20 (hereinafter "Plaintiff") is an adult female resident of Minnesota. The identity of Plaintiff has been disclosed under separate cover to Defendant. Plaintiff was a minor at the time of all sexual abuse and all sexual exploitation alleged herein.

2. At all times material, Defendant Fr. Michael Jerome Keating (hereinafter "Keating") was an adult male resident of the State of Minnesota.

**FACTS**

3. In approximately 1997 to 2000, Keating engaged in multiple instances of unpermitted, harmful, and offensive sexual contact with Plaintiff, while she was a minor.

4. Upon information and belief, Keating was a seminarian in St. Paul, Minnesota during the instances of sexual contact with Plaintiff.

5. Upon information and belief, Keating was ordained a priest of the Archdiocese of St. Paul and Minneapolis on May 25, 2002.

6. Upon information and belief, Keating worked as a priest at St. John the Baptist in

New Brighton, Minnesota from 2003 to 2005.

7. Plaintiff reported the abuse to Archdiocesan officials including Archbishop Harry Flynn, then Vicar General Rev. Kevin McDonough, then Chancellor of Civil Affairs Andrew Eisenzimmer, Greta Sawyer and the Clergy Review Board in 2006.

8. Upon information and belief, Keating joined the faculty at the University of St. Thomas in St. Paul, Minnesota in 2006 where he is currently tenured.

9. As a direct result of the sexual abuse, Plaintiff has suffered and will continue to suffer great pain of mind and body, severe and permanent 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.

**COUNT I: DEFENDANT KEATING -  
SEXUAL BATTERY**

10. Plaintiff incorporates all paragraphs of this Complaint as if fully set forth under this count and further alleges:

11. In and around 1997 to 2000, Keating inflicted unpermitted, harmful, and offensive sexual contact upon the person of Plaintiff.

12. Plaintiff did not consent to the harmful bodily contact.

13. As a direct result of Keating's harmful sexual conduct, Plaintiff has suffered and continues to suffer from the injuries alleged herein.

**PRAYER FOR RELIEF**

14. Plaintiff demands judgment against Defendant in an amount in excess of \$50,000.00, plus costs, disbursements, reasonable attorney's fees, interest, and such other and

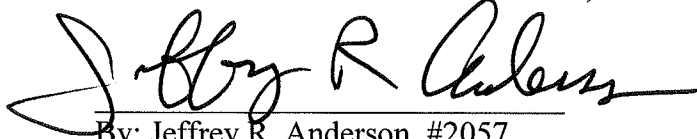
further relief as the court deems just and equitable.

DEMAND IS HEREBY MADE FOR A TRIAL BY JURY.

Dated:

10/17/13

JEFF ANDERSON & ASSOCIATES, P.A.



By: Jeffrey R. Anderson, #2057  
Michael G. Finnegan, #033649X  
366 Jackson Street, Suite 100  
St. Paul, MN 55101  
(651) 227-9990

Attorneys for Plaintiff

**ACKNOWLEDGMENT**

The undersigned hereby acknowledges that sanctions, including costs, disbursements, and reasonable attorney fees may be awarded pursuant to Minn. Stat. § 549.211 to the party against whom the allegations in this pleading are asserted.

