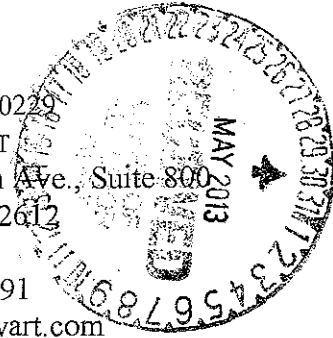


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8 Attorneys for Plaintiff

9 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
10 **IN AND FOR THE COUNTY OF COCONINO**

11 JOHN M.H. DOE, a single man,
12
13 Plaintiff,

Case No.: 11-02013-00341

COMPLAINT

14 v.

15 THE ROMAN CATHOLIC CHURCH
16 OF THE DIOCESE OF GALLUP, a
17 corporation sole; FATHER RAUL
18 SANCHEZ, a single man; JOHN DOE
19 1-100; JANE DOE 1-100; and Black &
20 White Corporations 1-100,
21 Defendants.

22 Plaintiff, for his complaint, states and alleges the following:

23 **JURISDICTION**

- 24 1. Plaintiff, John M.H. Doe, is a resident of Navajo County, Arizona. The acts,
25 events, and or omissions occurred in Arizona. The cause of action arose in
26 Navajo County, Coconino County, and Maricopa County, Arizona.
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2. Defendant The Roman Catholic Church of the Diocese of Gallup (Gallup) is a corporation sole. The presiding Bishops of the Diocese of Gallup during the relevant times at issue in this Complaint were Bishop Bernard T. Espelage (1940-1969), Bishop Jerome J. Hastrich (1969 – 1990), Bishop Donald Edmond Pelotte (1990 – 2008), and Bishop James S. Wall (2009 – present). Bishop Wall is presently governing Bishop of the Diocese of Gallup.
3. The Diocese of Gallup is incorporated in the State of New Mexico and has its principle place of business in Gallup, New Mexico. The territory of the Diocese of Gallup encompasses 55,000 square miles including the Northeastern portion of Arizona. At the time of the alleged acts or omission, the Diocese of Gallup included portions of North Central Arizona. The Diocese of Gallup was canonically erected on December 16, 1939.
4. Defendant Gallup, acting through its priests, Bishops, Archbishops, employees, and agents of any kind caused acts, events, or omissions to occur in Navajo County, Coconino County, Maricopa County, Arizona out of which these claims arise.
5. The Diocese of Gallup owns, operates, and controls priests and parishes in Coconino County, Arizona.
6. The Madre de Dios Church and Parish located in Winslow, Arizona is owned, operated, and controlled by the Diocese of Gallup.
7. Defendant Father Raul Sanchez was ordained a Roman Catholic priest in December 1974. He was incardinated in the Diocese of Gallup by Bishop Jerome J. Hastrich.
8. At all times alleged, Defendant Father Sanchez was a Roman Catholic priest who caused acts, events, or omissions to occur in Navajo County, Coconino County and or Maricopa County, Arizona out of which these claims arise. At

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all times alleged, Defendant Sanchez were employed by and were the actual or apparent agents of Defendant Diocese of Gallup.

9. Defendant Fr. Sanchez were under the supervision, employ, or control of Defendant Gallup when they committed the wrongful acts, events, and omission alleged.

10. At all times alleged, Defendants Gallup and Sanchez, their priests, Bishops, Archbishops, employees and agents were acting within their course and scope of employment or alternatively, acting within their actual or apparent authority. The wrongful acts, events, or omissions committed by Defendants Gallup, Hageman, Sanchez and by those priests, Bishops, Archbishops, employees and agents who acted individually and in conspiracy with the others to hide and cover up Hageman's and Sanchez' history, pattern, and propensity to sexually abuse Catholic children were done within the course and scope of their authority with their employing entities, or incidental to that authority and were acquiesced in, affirmed, and ratified by those entities.

11. Plaintiff is informed and believes, and on that basis alleges, that at all times mentioned herein, there existed a unity of interest and ownership among Defendants and each of them, such that any individuality and separateness between Defendants, and each of them, ceased to exist. Defendants, and each of them, were the successors-in-interest and / or alter egos of the other Defendants, and each of them, in that they purchased, controlled, dominated and operated each other without any separate identity, observation of formalities, or other manner of division. To continue maintaining the façade of a separate and individual existence between and among Defendants, and each of them, would serve to perpetuate a fraud and an injustice.

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12. Defendants JOHN DOE 1-100, JANE DOE 1-100, and BLACK AND WHITE CORPORATIONS 1-100, are fictitious names designating an individual or individuals or legal entities not yet identified who have acted in concert with the named Defendants either as principals, agents, or co-participants whose true names Plaintiffs may insert when identified.
13. Plaintiff is informed and believes, and on that basis alleges, that at all times alleged herein, Defendants and each of them and JOHN DOES 1-100, JANE DOES 1-100, and BLACK and WHITE CORPORATIONS 1-100, inclusive, were the agents, representatives and or employees of each and every other Defendant. IN do the things hereinafter alleged, Defendants, and each of them, JOHN DOES 1-100, JANE DOES 1-100, and BLACK and WHITE CORPORATIONS 1-100, inclusive, were acting within the course and scope of said alternative personality, capacity, indemnity, agency, representation and or employment and were within their actual or apparent authority.
14. Plaintiff is informed and believes, and on that basis alleges, that all times mention herein, Defendants, and each of them, JOHN DOES 1-100, JANE DOES 1-100, and BLACK and WHITE CORPORATIONS 1-100, inclusive, were the trustees, partners, servants, agents, joint venturers, shareholders, contractors, and or employees of each and every other Defendant, and the acts and omissions alleged were done by them, acting individually, through such capacity and with the scope of their authority, and with the permission and consent of each and every other Defendant and that said conduct was thereafter ratified by each and every other Defendant, and that each of them is jointly and severally liable to Plaintiff.

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GENERAL ALLEGATIONS

Defendant Gallup moved Defendant Father Raul Sanchez out of the diocese after receiving reports of sexual misconduct.

15. Plaintiff incorporates all other paragraphs.
16. Father Clement Hageman, a Roman Catholic priest with a known history of clergy sexual abuse, died on July 2, 1975 while serving at Madre de Dios Catholic Church in Winslow, Arizona.
17. After Father Clement Hageman's death, Defendant Gallup, through its bishop, priest, and agents of any kind assigned Father Raul Sanchez to Madre de Dios Catholic Church in Winslow, Arizona.
18. Defendant Father Sanchez was ordained a Roman Catholic priest in December 1974. He was incardinated in the Diocese of Gallup by Bishop Jerome J. Hastrich.
19. Plaintiff is informed and believes, and on that basis alleges, that Defendant Gallup received complaints of sexual misconduct by Father Sanchez toward minor boys and or girls.
20. Defendant Gallup acting through its bishop, priests, administrators, and agents of any kind, assigned Father Raul Sanchez to the Casa Santa Maria Via Dell'Umilta in Rome, Italy from 1977 to 1979.
21. From 1980 through 1986, Defendant Gallup, acting through its bishop, priests, administrators, and agents of any kind, appointed Father Raul Sanchez Chancellor of the Diocese of Gallup.
22. Starting in 1987 to the present, Father Raul Sanchez was listed in the Official Catholic Directory as on duty out of the Diocese. Defendant Gallup allowed Father Sanchez to be assigned to and work at various U.S. Airforce Bases throughout the United States including but not limited to Davis-Monthan Air

1 Force Base in Arizona.

2 23. Defendant Gallup knew or should have known that Father Raul Sanchez
3 sexually abused Catholic children and or engaged in sexual misconduct.

4 24. Currently, Defendant Gallup does not know Father Sanchez' whereabouts.

5 25. Defendants Diocese of Gallup and Sanchez through its bishop, priests, and
6 agents of any kind, knew or should have known that Father Sanchez would
7 have contact with Catholic children while assigned to Catholic Churches
8 throughout Arizona.
9

10 **Father Raul Sanchez sexually abused John M.H. Doe**

11 **When he was a young boy living in rural Arizona**

12 26. Plaintiff incorporates all other paragraphs.

13 27. To cope with the trauma of sexual abuse John M.H. Doe involuntarily and
14 unconsciously blocked the memories of sexual abuse from his mind.

15 28. John M.H. Doe began to recover some of the memories of sexual abuse by
16 Father Sanchez in the summer of 2011.

17 29. In approximately 1972 through 1977 John M.H. Doe participated in the
18 Catholic tradition of serving as an altar boy at Madre de Dios Catholic
19 churches. Father Raul Sanchez provided religious instruction to the altar
20 boys, including Plaintiff.
21

22 30. As an altar boy, Father Sanchez gave John M.H. Doe special benefits. John
23 M.H. Doe was invited to Father Sanchez's living quarters where he was
24 allowed to drink wine and eat the host.

25 31. Father Raul Sanchez gave the altar boys, including Plaintiff, special attention
26 and treatment. Father Sanchez took Plaintiff and other altar boys on special
27 trips including trips to go camping, fishing, swimming at lakes in Northern
28 Arizona, and trips to Phoenix, Arizona.

1 32. Father Sanchez sexually abused John M.H. Doe when he was an altar boy at
2 Madre de Dios Catholic Church. The sexual abuse included, but was not
3 limited to, touching, masturbation, digital penetration, and oral sex.
4

5 **Defendants Gallup & Sanchez**

6 **covered up and fraudulently concealed**

7 **Sanchez' history and propensity of sexual abuse**

8 33. Plaintiff incorporates all other paragraphs.

9 34. Defendants Gallup and Sanchez, through its priests, Bishops, Archbishops,
10 employees, or agents of any kind knew or should have known that Sanchez
11 sexually abused young boys. Defendants Gallup and Sanchez also knew or
12 should have known of Fr. Sanchez' propensity to sexually abuse children.

13 35. Defendants Gallup and Sanchez did not disclose or report the sexual abuse.
14 Instead, acting individually and in concert with each other and other priests,
15 bishops, dioceses, and archdioceses, and co-conspirators, Defendants kept the
16 news of Sanchez' sexual misconduct from the church members, including
17 Plaintiff and his family.

18 36. Defendants Gallup and Sanchez, their priests, Bishops, Archbishops, and
19 agents of any kind followed the orders, commandments, directives, policies,
20 or procedures of the Roman Catholic Church mandated by the priests,
21 Bishops, Archbishops, Cardinals, Vatican, the Holy See, the Holy Office, and
22 the Holy Father requiring that all matters and details regarding clergy sexual
23 abuse be kept absolutely secret. The secrets of priest sexual abuse were
24 commonly regarded as a secret of the Holy Office.
25

26 37. Defendants Gallup and Sanchez, their priests, Bishops, Archbishops, and
27 agents of any kind also followed the orders, commandments, directives,
28 policies, or procedures of the Roman Catholic Church mandated by the

1 Vatican, the Holy See, the Holy Office, Bishops, Archbishops, Cardinals and
2 the Holy Father allowing a priest accused of sexual abuse to be transferred to
3 a new assignment without ever disclosing the priest's history of sexual abuse.

- 4 38. Defendants Gallup and Sanchez acted individually and in concert with one
5 another and others including but not limited to other priests, bishops,
6 archbishops, diocese, and archdiocese to engage in a pattern and practice of
7 protecting priests who sexually abused parishioners and children by ratifying,
8 concealing, failing to report, or failing to investigate clergy sexual abuse,
9 molestation, and or sexual misconduct.

10
11 **Defendants are estopped from alleging the statute of limitations as a defense**
12 **because they fraudulently concealed Fr. Sanchez' sexual abuse of Catholic**
13 **children and his propensity to sexually abuse Catholic Children.**

- 14 39. Plaintiff incorporates all other paragraphs.

- 15 40. Like the pattern and practice of moving pedophile priests from one parish to
16 another without informing anyone of the priest's sexual abuse of Catholic
17 children, Defendant Gallup re-assigned Father Raul Sanchez to positions
18 outside the Diocese of Gallup to avoid scandal and news of his sexual
19 misconduct.

- 20
21 41. Defendants Gallup and Sanchez did not reveal to the congregation of faithful
22 Catholics, including Plaintiff and his family Father Sanchez sexually abused
23 Catholic children.

- 24 42. Defendants Gallup and Sanchez knew or should have known that Father
25 Sanchez sexually abused Catholic children while serving in the Diocese of
26 Gallup.

- 27 43. In keeping with the orders, commandments, directives, policies, or procedures
28 of the Roman Catholic Church mandated by the priests, Bishops,

1 Archbishops, Cardinals, Vatican, the Holy See, the Holy Office, and the Holy
2 Father requiring that all matters and details regarding clergy sexual abuse be
3 kept absolutely secret, Defendants Gallup and Sanchez individual and in
4 conspiracy with each other and other priest, bishops, archbishops, diocese,
5 and agents of any kind, did not reveal to the congregation of faithful
6 Catholics in the Diocese of Gallup and its parishes, including Plaintiff and his
7 family, that Father Sanchez sexually abused Catholic children.
8

9 44. Defendants are equitably estopped from alleging the statute of limitations as a
10 defense in this case because of the inequitable conduct of Defendants,
11 because of their attempts to fraudulently conceal the abuse and breaches of
12 fiduciary duties.

13 45. All Defendants, with their pattern and practice of ignoring, covering up, and
14 or fraudulently concealing Father Sanchez' sexual abuse of John M.H. Doe
15 and other Catholic children, demonstrated deliberate indifference, conscious
16 disregard, and reckless disregard to John M.H. Doe's mental and physical
17 well-being.

18 46. Defendants' pattern and practice of ignoring, covering up, and fraudulently
19 concealing repeated and frequent sexual abuse perpetrated by Father Sanchez,
20 and other clergy was done pursuant to the Catholic Church's official and
21 unofficial policies and practices.
22

23 47. The allegations set forth in the General Allegations render the Defendants
24 liable for Father Raul Sanchez' sexual abuse of John M.H. Doe and other
25 children because such abuse was and should have been foreseeable and
26 reasonable precautionary measures would have prevented sexual abuse by
27 Father Sanchez, and other clergy within the purview and/or control of
28 Defendants.

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COUNT I

SEXUAL ASSAULT / SEXUAL ABUSE / MOLESTATION

(A.R.S. § 13-1406 and the common law)

(Father Raul Sanchez)

- 48. Plaintiff incorporates all other paragraphs.
- 49. Defendants Father Sanchez intentionally, knowingly, recklessly, or negligently engaged in sexual conduct with John M.H. Doe without his consent and when he was a minor incapable of consenting to such sexual conduct.
- 50. As a direct and proximate cause of Defendant Father Sanchez' wrongful acts Plaintiff suffered and will continue to suffer in the future great pain of mind and body, shock, emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, anger, rage, frustration, loss of enjoyment of life, loss of consortium, loss of love and affection, sexual dysfunction, past and future medical expenses for psychological treatment, therapy, and counseling.
- 51. The allegations set forth in this Count constitute traditional negligence and negligence per se for violation of A.R.S. § 13-3623 and other relevant statutes and laws, including the common law, enacted for the protection of a specific class of persons of which John C.V. Doe is a member.

COUNT II

BREACH OF FIDUCIARY DUTY

(All Defendants)

- 52. Plaintiff incorporates all other paragraphs.
- 53. Defendants' relationship with Plaintiff John M.H. Doe was one of spiritual guide, counselor, and shepherd. As a fiduciary to Plaintiff, Defendants owed a duty to investigate, obtain, and disclose sexual misconduct, sexual assault,

1 sexual abuse, molestation, sexual propensities, and other inappropriate acts of
2 its priests, including Defendant Father Raul Sanchez. As fiduciary, counselor
3 and spiritual guide, Defendants owed Plaintiff a duty to work solely for his
4 benefit.

5
6 54. Defendants breached their fiduciary duties owed to Plaintiff.

7 55. As a direct and proximate cause of Defendants' breach Plaintiff suffered and
8 will continue to suffer in the future great pain of mind and body, shock,
9 emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
10 anger, rage, frustration, loss of enjoyment of life, loss of consortium, loss of
11 love and affection, sexual dysfunction, past and future medical expenses for
12 psychological treatment, therapy, and counseling.

13 **COUNT III**

14 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

15 **(All Defendants)**

16 56. Plaintiff incorporates all other paragraphs.

17 57. Defendants' wrongful conduct, including sexual abuse, conspiracy to conceal
18 sexual abuse, failure to report Sanchez' sexual abuse of children,
19 acquiescence, affirmance, and ratification of Sanchez's sexual abuse
20 exceeded the bounds of decency and were extreme and outrageous causing
21 Plaintiff to suffer severe emotional and psychological distress.

22 58. As a direct and proximate cause of Defendants' wrongful conduct Plaintiff
23 suffered and will continue to suffer in the future great pain of mind and body,
24 shock, emotional distress, embarrassment, loss of self-esteem, disgrace,
25 humiliation, anger, rage, frustration, loss of enjoyment of life, loss of
26 consortium, loss of love and affection, sexual dysfunction, past and future
27 medical expenses for psychological treatment, therapy, and counseling.
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COUNT IV
INTENTIONAL / NEGLIGENT MISREPRESENTATION
(All Defendants)

- 59. Plaintiff incorporates all other paragraphs.
- 60. Defendants Gallup have a duty to provide true, accurate, and or complete information to prevent a substantial and foreseeable risk of injury to young Catholic children, including Plaintiff.
- 61. Instead of reporting and disclosing the incidents of sexual abuse, Sanchez' history of sexual abuse, or Sanchez' propensity to sexually abuse Catholic children, Defendants breached their duties to Plaintiff by providing vague, incomplete, and inconsistent information regarding and Sanchez' ability to serve as a Roman Catholic priests.
- 62. As a direct and proximate cause of Defendants' breach Plaintiff suffered and will continue to suffer in the future great pain of mind and body, shock, emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, anger, rage, frustration, loss of enjoyment of life, loss of consortium, loss of love and affection, sexual dysfunction, past and future medical expenses for psychological treatment, therapy, and counseling.

COUNT V
NEGLIGENT SUPERVISION / RETENTION
(Defendants Gallup)

- 63. Plaintiff incorporates all other paragraphs.
- 64. Defendant Gallup had a duty to hire, fire, train, retain, supervise, and or counsel employees or priests who had the knowledge, education, training, physical, psychological, and spiritual ability to serve as Roman Catholic Priests.

- 1 65. Defendant Diocese of Gallup knew or should have known that Defendant
2 Sanchez sexually abused children and or engaged in sexual misconduct.
3
4 66. Defendants, individually and in concert with the others, breached their duties
5 to Plaintiff.
6
7 67. As a direct and proximate cause of Defendants' breach Plaintiff suffered and
8 will continue to suffer in the future great pain of mind and body, shock,
9 emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
10 anger, rage, frustration, loss of enjoyment of life, loss of consortium, loss of
11 love and affection, sexual dysfunction, past and future medical expenses for
12 psychological treatment, therapy, and counseling.

13 **COUNT VI**
14 **ENDANGERMENT**
15 **(All Defendants)**

- 16 68. Plaintiff incorporates all other paragraphs.
17
18 69. Defendants have a duty to protect children from foreseeable and unjustifiable
19 risks of harm.
20
21 70. Defendants knew or should have known Father Raul Sanchez sexually abused
22 children or otherwise engaged in sexual misconduct.
23
24 71. Defendants, individually and or in agreement with each other, assigned a
25 string of pedophile priests over the course of more than 30 years to the
26 Catholic Church in Winslow, Arizona. Those pedophile priests include, but
27 are not limited to Father Clement Hageman, Father Raul Sanchez, Father John
28 T. Sullivan, Father Samuel Wilson, Father John Boland, and Father James
Burns.
72. Father Sanchez posed a substantial risk of significant physical and
psychological injury to Catholic children, including Plaintiff.
73. Defendants, individually and in concert with the each other, recklessly

1 endangered the health and well being of Catholic children, including Plaintiff
2 by exposing them to Father Sanchez who was a substantial risk of significant
3 physical and mental injury to young Catholic children including Plaintiff.
4

5 74. Defendants, individually and in concert with each other, recklessly
6 endangered the health and well being of Catholic children, including Plaintiff,
7 by employing and engaging in pattern and practice, customs and traditions, of
8 ignoring, covering up, and or fraudulently concealing clergy sexual abuse.

9 75. As a direct and proximate cause of Defendants' reckless endangerment,
10 Plaintiff suffered and will continue to suffer in the future great pain of mind
11 and body, shock, emotional distress, embarrassment, loss of self-esteem,
12 disgrace, humiliation, anger, rage, frustration, loss of enjoyment of life, loss
13 of consortium, loss of love and affection, sexual dysfunction, past and future
14 medical expenses for psychological treatment, therapy, and counseling.

15 **COUNT VII**

16 **CHILD ABUSE**

17 **(A.R.S. § 13-3623 and the common law)**

18 **(All Defendants)**

19 76. Plaintiff incorporates all other paragraphs.

20 77. Father Sanchez had the care and custody of John M.H. Doe both because he
21 was a parishioner and because he attended training for and acted as an altar
22 boy under the care, custody, and control of Father Sanchez.

23 78. Defendants Gallup and Sanchez had the care and custody of John M.H. Doe
24 both because they assigned and/or permitted Father Sanchez to serve in
25 Winslow, Arizona and because of their pattern, practice, custom, and tradition
26 of training altar boys and permitting/requiring these boys to serve as altar
27 boys in churches under their care, custody, and control.

28 79. Gallup and Sanchez had the care and custody of John M.H. Doe through
traditional agency law.

1 80. Under circumstances likely to produce serious and significant physical and
2 psychological injury and while John M.H. Doe was under the care and
3 custody of all Defendants, Defendants and each of them caused, permitted,
4 allowed, and/or established patterns, practices, customs, and traditions that
5 placed John M.H. Doe in a situation in which his person, physical health, and
6 mental/emotional health were endangered.
7

8 81. Defendants, and each of them, intentionally, recklessly and or negligently
9 endangered and sexually abused Plaintiff.

10 82. As a direct and proximate cause of Defendants' sexual abuse of Plaintiff,
11 Plaintiff suffered and will continue to suffer in the future great pain of mind
12 and body, shock, emotional distress, embarrassment, loss of self-esteem,
13 disgrace, humiliation, anger, rage, frustration, loss of enjoyment of life, loss
14 of consortium, loss of love and affection, sexual dysfunction, past and future
15 medical expenses for psychological treatment, therapy, and counseling.
16

17 **COUNT VIII**
18 **ASSAULT AND BATTERY**
19 **(A.R.S. §§ 13-1204, 13-1203, and the common law)**
20 **(All Defendants)**

21 83. Plaintiff incorporates all other paragraphs.

22 84. At all times relevant to this complaint, Father Sanchez were over the age of
23 18 and John M.H. Doe was under the age of 15.

24 85. Father Sanchez intentionally, knowingly and/or recklessly caused serious
25 physical and mental/emotional injury to Plaintiff.

26 86. Father Sanchez intentionally, knowingly, recklessly and/or negligently placed
27 Plaintiff in reasonable apprehension of imminent physical injury.

28 87. Father Sanchez intentionally, knowingly, recklessly and/or negligently
touched Plaintiff with the intent to injure, insult or provoke.

1 88. The allegations set forth in this Count constitute negligence and negligence
2 per se for violation of A.R.S. §§ 13-1204, 13-1203 and other relevant statutes
3 and laws, including the common law, enacted for the protection of a specific
4 class of persons of which Plaintiff is a member.

5
6 89. As a direct and proximate cause of Defendants' abuse of Plaintiff, Plaintiff
7 suffered and will continue to suffer in the future great pain of mind and body,
8 shock, emotional distress, embarrassment, loss of self-esteem, disgrace,
9 humiliation, anger, rage, frustration, loss of enjoyment of life, loss of
10 consortium, loss of love and affection, sexual dysfunction, past and future
11 medical expenses for psychological treatment, therapy, and counseling.

12 **PRAYER FOR RELIEF**

13 90. Plaintiff requests judgment in favor of Plaintiff and against Defendants as
14 follows to:

- 15
16 a. For Plaintiff's general and special damages in an amount to
17 be proven at trial by jury;
18
19 b. For Plaintiff's incurred costs together with interest at the
20 highest lawful rate on the total amount of all sums awarded
21 from the date of judgment until paid;
22
23 c. For the fair and reasonable monetary value of Plaintiff's past,
24 present, and future pain and suffering in an amount to be
25 proven at trial by jury;
26
27 d. For the medical expenses incurred up to the date of trial and
28 any additional expenses necessary for future medical care and
treatment;
e. For punitive damages or exemplary damages to be set by a
jury in an amount sufficient to punish Defendants for their


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outrageous conduct and to make an example out of them so
that others do not engage in similar conduct in the future;

f. For such other and further relief as this Court may deem just and
proper.

DATED this 28th day of May, 2013.

MONTOYA, JIMENEZ & PASTOR, P.A.

By 
Robert E. Pastor
Attorneys for Plaintiff