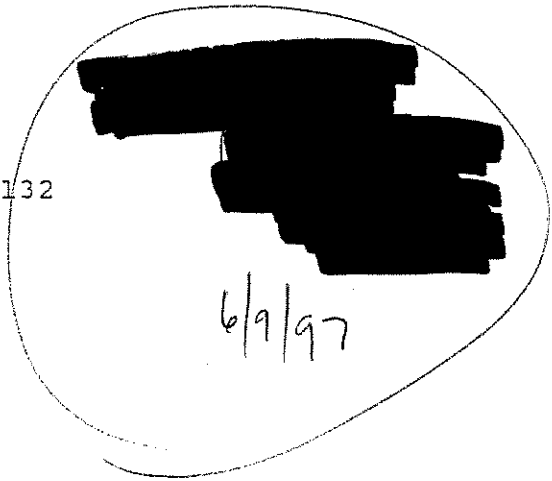


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5 Attorneys for Plaintiffs

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF ORANGE

11 MATHEW H. and ) CASE NO.  
12 ANISSA H., )  
13 Plaintiffs, ) COMPLAINT FOR PERSONAL  
14 v. ) INJURIES AND DAMAGES  
15 DEFENDANTS UNNAMED PURSUANT ) 1. NEGLIGENCE  
16 TO CALIFORNIA CODE OF CIVIL ) 2. NEGLIGENT INFLECTION OF  
17 PROCEDURE, Section 340.1, and ) EMOTIONAL DISTRESS  
18 DOES 1 through 150, ) 3. ASSAULT AND BATTERY  
19 inclusive and each of them, )  
20 Defendants. ) 4. FALSE IMPRISONMENT  
21 ) 5. INTENTIONAL INFLECTION  
22 ) OF EMOTIONAL DISTRESS  
23 ) 6. FRAUD  
24 ) 7. NEGLIGENT MISREPRESENTATION  
25 ) 8. STATUTORY VIOLATIONS  
26 ) 9. LOSS OF CONSORTIUM  
27 (Filed Concurrently With  
28 Certificates of Merit of  
Werner R. Meissner  
and J. Alan Elliott, Ph.D.)

27 COMES NOW, Plaintiff, MATHEW H., who hereby alleges against  
28 all Defendants, and each of them, as follows:

1                   FOR A FIRST, SEPARATE AND DISTINCT CAUSE OF ACTION

2                   FOR NEGLIGENCE AGAINST ALL DEFENDANTS,

3                   AND EACH OF THEM, PLAINTIFF ALLEGES AS FOLLOWS:

4                   1. Plaintiff, MATHEW H., is, and at all times mentioned  
5 herein was, a resident of the County of Orange, State of California.

6                   2. Pursuant to California Code of Civil Procedure, Section  
7 340.1(g), this Complaint for Personal Injuries and Damages and the  
8 Certificates of Merit filed concurrently herewith will not name the  
9 defendants herein until Court approval to name said defendants is  
10 granted. After said Court approval has been granted, Plaintiff will  
11 amend his Complaint to add the true names and capacities of each  
12 defendant herein. For the purposes of this Complaint, all defendants  
13 not named herein due to the provisions of California Code of Civil  
14 Procedure, Section 340.1(g), will hereinafter be referred to  
15 individually and collectively as "UNNAMED DEFENDANTS".

16                   3. Plaintiff is informed and believes and thereon alleges,  
17 that UNNAMED DEFENDANTS and DOES 1 through 100, inclusive, and each  
18 of them, are, and at all times mentioned herein were, corporations,  
19 partnerships, joint venturers or other business entities, associations  
20 or church organizations, units, divisions, branches, or subsidiaries  
21 thereof, having their principal places of business in the County of  
22 Orange, and/or County of Los Angeles, State of California. The  
23 majority of the intentional, negligent and careless acts and  
24 occurrences, as alleged herein, as against said Defendants, giving  
25 rise to the causes of action herein, occurred at or about the premises  
26 commonly known as UNNAMED DEFENDANT, located at 171 North Bradford  
27 Street, in the City of Placentia, County of Orange, State of  
28 California, the premises commonly known as UNNAMED DEFENDANT, located

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1 at or about 1100 South Center Street, in the City of Santa Ana, County  
2 of Orange, State of California, the premises commonly known as UNNAMED  
3 DEFENDANT, located at or about 585 South Walnut, City of Brea, County  
4 of Orange, State of California, the premises commonly known as UNNAMED  
5 DEFENDANT, located at or about 900 W. La Habra Boulevard, City of La  
6 Habra, County of Orange, State of California and the premises commonly  
7 known as UNNAMED DEFENDANT, located at or about 1450 East La Palma  
8 Avenue, City of Anaheim, County of Orange, State of California, and  
9 the premises commonly known as UNNAMED DEFENDANTS, located at or about  
10 2811 East Villa Real Drive, City of Orange, State of California,  
11 and/or some other locations within the County of Orange and elsewhere,  
12 including, but not limited to movie theatres, drive-ins, restaurants  
13 and motels.

14           4. Plaintiff is ignorant of the true names and capacities  
15 of Defendants sued herein as DOES 1 through 150, inclusive, and each  
16 of them, and, therefore, sues said Defendants by such fictitious  
17 names. Plaintiff will amend this Complaint to allege their true names  
18 and capacities when ascertained. Plaintiff is informed and believes,  
19 and thereon alleges, that each said fictitiously named Defendant is  
20 negligently, carelessly, intentionally, or otherwise, responsible, in  
21 some manner for his injuries as alleged herein, and that the injuries  
22 and damages sustained by Plaintiff as more particularly set forth  
23 herein, were directly and proximately caused by said wrongful conduct.

24           5. All Defendants, and each of them, at all times mentioned  
25 herein, were the principals, agents, employers, employees, co-  
26 employees, supervisors, servants, co-servants, partners, associates,  
27 joint venturers, co-participants, co-conspirators, principals and/or  
28

1 representatives of each of their co-Defendants and, in doing the  
2 things herein described, were acting within the course and scope of  
3 such relationship and each such act or omission was with the  
4 authority, permission, consent, knowledge and/or ratification of each  
5 said co-Defendant, who are thereby vicariously, and otherwise,  
6 responsible for same.

7           6. Plaintiff is informed and believes, and thereon alleges,  
8 that at all times mentioned herein, that UNNAMED DEFENDANTS and DOES  
9 1 through 150, inclusive, and each of them, were Fathers, Pastors,  
10 Bishops, Archbishops, Teachers, Administrators and/or other church  
11 authorities at UNNAMED DEFENDANTS, and DOES 51 through 100, inclusive,  
12 and each of them, which were branches of, or otherwise affiliated  
13 with, the UNNAMED DEFENDANTS, and DOES 100 through 150, inclusive, and  
14 each of them, and performed sermons, instructed students, oversaw and  
15 managed the youth groups, altar boys, and house boys, Christian  
16 education, acted as counselors and performed various other duties at  
17 said parishes, schools, and other locations, and oversaw, directed,  
18 disciplined, hired, retained and/or fired all school and church  
19 personnel, all within the course and scope of the authority and/or  
20 employment with said Dioceses, churches, schools and/or parish, with  
21 the knowledge, and permission, consent, authority and/or ratification  
22 of each of their employers, principals and/or superiors.

23           7. Plaintiff is informed and believes, and thereon alleges,  
24 that UNNAMED DEFENDANTS and DOES 1 through 150, inclusive, and each  
25 of them, were the owners, operators, licensors, licensees, lessors,  
26 lessees, principals, employers, employees, overseers, or otherwise in  
27 control and supervision of the premises commonly known as UNNAMED  
28

1 DEFENDANTS as well as all church, religious, educational and other  
2 activities, events, and occurrences at said location.

3 8. From approximately, but not limited to, 1974 up through  
4 and including, but not limited to, approximately 1980, UNNAMED  
5 DEFENDANT and DOES 1 through 50, inclusive, and each of them,  
6 negligently, carelessly, willfully, wantonly, maliciously, with a  
7 conscious disregard for the well-being of others and otherwise, under  
8 the cloak of their authority, confidence, trust, faith, hierarchical,  
9 and special relationship with Plaintiff, and otherwise, either  
10 directly or as a co-participant, co-conspirator, aider, abettor,  
11 enabler, assistant, partner, overseer, or otherwise, committed acts  
12 of sexual abuse, molestation, and other wrongful acts, upon Plaintiff  
13 in violation of California Penal Code, Section 285, 266(j), 286,  
14 288(a)(b) and (c), and 289(H) (I) and (J), 311.1, 311.3 and 647.6 as  
15 well as other laws of the State of California proscribing said  
16 conduct, and continued to perform said acts and conduct, causing  
17 Plaintiff to suffer great physical, mental and emotional injury as  
18 more particularly set forth and alleged herein.

19 9. At all times material herein, Plaintiff was a student at  
20 UNNAMED DEFENDANTS and DOES 50 through 100, inclusive, and each of  
21 them, and an altar boy, parishioner and/or house boy in the rectory  
22 and/or a member of the parishes and congregations at UNNAMED  
23 DEFENDANTS and DOES 100 through 150, inclusive, and each of them, and  
24 a member of the Catholic Church as governed and operated by UNNAMED  
25 DEFENDANTS and DOES 50 through 150, inclusive, and each of them, and  
26 was an invited visitor, patron, parishioner, or other guest, member  
27 and/or invitee of UNNAMED DEFENDANTS at UNNAMED DEFENDANTS and/or

1 other locations all owned, operated, directed, supervised and/or  
2 otherwise controlled by UNNAMED DEFENDANTS. As such, all Defendants,  
3 and each of them, had acquired a special relationship to Plaintiff as  
4 an active member of their parish, church and/or school, and receiving  
5 special education and training in the Catholic religion. All  
6 Defendants, and each of them, were in a position to educate, advise,  
7 discipline, supervise, protect, influence and control Plaintiff. As  
8 such, all Defendants, and each of them, had a duty to protect, keep  
9 safe from harm, care for, supervise, warn and advise him in a  
10 reasonably prudent manner, as well as a duty not to violate his civil  
11 rights by performing, or allowing to be performed, any illegal,  
12 immoral, or sexual acts against him, including, but not limited to,  
13 acts of sexual abuse. Said Defendants, and each of them, had a  
14 further duty to reasonably employ only qualified people and take  
15 affirmative steps to supervise, investigate, monitor, report, warn,  
16 ascertain, uncover and terminate any such wrongful and illegal acts  
17 and activities involving any employees, including UNNAMED DEFENDANTS  
18 and DOES 1 through 50, and each of them, such as those acts set forth  
19 and alleged herein.

20           10. At all times material herein, UNNAMED DEFENDANTS and  
21 DOES 51 through 200, inclusive, and each of them, had a duty to  
22 diligently, reasonably and carefully investigate and screen all  
23 applicants, future employees and actual employees to ensure that said  
24 individuals were not child molesters, perverts, sex offenders and/or  
25 otherwise dangerous or potentially dangerous to children, and to  
26 carefully hire, engage, retain, associate, supervisor, employ, train,  
27 investigate, reprimand, treat, refer, counsel, discharge, report,

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1 warn, and otherwise be responsible for, priests, teachers, principals,  
2 administrators and other church and school authorities as they  
3 performed their functions within the church and church schools,  
4 including their duties as priests, teachers, administrators,  
5 counselors and principals at UNNAMED DEFENDANTS and DOES 51 through  
6 100, inclusive, and each of them, particularly as it pertains to  
7 contact with students and members of the parish, congregation and  
8 public, such as Plaintiff herein. At all times relevant herein,  
9 Defendants, and each of them, represented, advertised, maintained and  
10 advised that UNNAMED DEFENDANTS and DOES 1 through 200, inclusive, and  
11 each of them, are represented by and through the actions of, the  
12 priests employed by them, and the actions of these priests represent  
13 the actions, opinions, beliefs, faith, tactics and position, in sum  
14 and substance, of all Defendants herein.

15           11. At all times relevant herein, UNNAMED DEFENDANTS and  
16 DOES 1 through 200, inclusive, and each of them, negligently,  
17 carelessly, willfully, intentionally, and otherwise, under the cloak  
18 of their authority, disciplinary position, confidence, trust, faith,  
19 and special relationship with Plaintiff, and with the knowledge and  
20 notice of said priests, principals, teachers, administrators, adults  
21 and church authorities wrongful conduct, propensities and illegal and  
22 harmful acts as alleged herein, did so willfully and intentionally  
23 take affirmative actions to provide UNNAMED DEFENDANTS and DOES 1  
24 through 50, inclusive, children to molest, alcoholic beverages with  
25 which to intoxicate, anesthetize and seduce children and a place to  
26 molest children so as to cause, aid and abet, advise, encourage,  
27 allow, assist, arrange, conspire and act in concert, through their

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1 activities, inaction, silence and agreements, among other actions, to  
2 violate California Penal Code, Sections 285, 266(j), 286, 288(a)(b)  
3 and (c), and 289 (H)(I) and (J), 311.1, 311.3 and 647.6 as well as  
4 other laws of the State of California by being an active co-  
5 conspirator, aider, abettor and co-participant in the molestation and  
6 sexual assault of Plaintiff herein described and alleged.

7           12. At all times material herein, all Defendants, and each  
8 of them, negligently, carelessly, willfully, intentionally and  
9 otherwise wrongfully carried out their respective aforementioned  
10 duties to Plaintiff, causing serious injuries and damages to Plaintiff  
11 as more particularly set forth and alleged herein.

12           13. At all times material herein, all Defendants, and each  
13 of them, engaged in a pattern of practice, intentional and willful  
14 misconduct whereby they would actively recruit young male parishioners  
15 such as Plaintiff herein, and otherwise pressure young male  
16 parishioners such as Plaintiff herein, to act as house boys, altar  
17 boys and to be the defacto servants of Catholic Priests, including,  
18 UNNAMED DEFENDANTS and DOES 1 through 50, inclusive, and each of them,  
19 and all Defendants, and each of them, and thereafter negligently,  
20 carelessly, willfully, intentionally or otherwise wrongfully, cared  
21 for, taught, advised, disciplined, chaperoned, supervised, treated,  
22 protected, educated, trained, brainwashed, and otherwise controlled  
23 Plaintiff, so that Plaintiff's person was secluded away from people  
24 who would protect him from Defendants, and each of them, and that  
25 Plaintiff's person was violated as a result of illegal and immoral  
26 acts including, but not limited to, sexual abuse and molestation being  
27 performed on him by all Defendants, inclusive, and each of them, so

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1 as to cause serious and permanent physical, mental and emotional  
2 injuries to Plaintiff as more particularly set forth and alleged  
3 herein.

4           14. At all times material herein, UNNAMED DEFENDANTS and  
5 DOES 1 through 150, inclusive, and each of them, negligently and  
6 carelessly hired, engaged, retained, associated, supervised, employed,  
7 trained, investigated, reprimanded, treated, referred, counseled,  
8 discharged, and were otherwise responsible for priests and other  
9 church authorities such as UNNAMED DEFENDANT and DOES 1 through 50,  
10 inclusive, and each of them, and retained said priests or other church  
11 figures, despite the fact that they were placed on notice of said  
12 priests' and church authorities' wrongful conduct, propensities, and  
13 the resulting reasonably foreseeable injury to persons lawfully  
14 situated such as Plaintiff herein on more than one occasion by, at  
15 minimum, a school teacher, a priest at the parish, another altar boy  
16 and other reliable, reputable and verifiable sources.

17           15. At all times material herein, UNNAMED DEFENDANTS and  
18 DOES 1 through 150, inclusive, and each of them, knew, or should have  
19 known that UNNAMED DEFENDANT and DOES 1 through 50, inclusive, and  
20 each of them, were suffering from mental, emotional or physical  
21 injury, disability, or other illness, whereby it was, or should have  
22 been, foreseeable that he/they was/were engaging, or would engage, in  
23 immoral, illegal and unprivileged acts and activities, including, but  
24 not limited to, acts of sexual abuse, with Plaintiff under the cloak  
25 of his/their authority, confidence and trust, bestowed upon him/them  
26 by, and through, the church. Despite such knowledge and duty to  
27 investigate, control, counsel, advise, reprimand, discharge, report,

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1 warn, and take other appropriate actions with respect to UNNAMED  
2 DEFENDANT and DOES 1 through 50, inclusive, and each of them, said  
3 Defendants negligently and carelessly failed to take any appropriate  
4 action to protect and insure the safety of persons lawfully situated  
5 such as Plaintiff herein including, but not limited to, reporting said  
6 Defendants to the appropriate authorities, warning Plaintiff and other  
7 members of the public or persons affiliated or associated with the  
8 congregation of said dangerous and illegal propensities, or undertake  
9 any other appropriate action such as, but not limited to, removing  
10 UNNAMED DEFENDANT, and DOES 1 through 50, from their position of  
11 authority and contact with minors, which would have prevented the acts  
12 alleged herein from being committed upon Plaintiff resulting in  
13 serious injury and damages as more particularly set forth and alleged  
14 herein.

15           16. As a further direct, legal and proximate result of said  
16 negligence, carelessness and other wrongful acts of said Defendants,  
17 and each of them, Plaintiff continued to be so injured and damaged and  
18 was not afforded the opportunity to obtain rehabilitation, counseling  
19 and other appropriate treatment for his physical, mental, emotional,  
20 and other injuries, within a reasonable time after Defendants'  
21 wrongful conduct, acts, actions and omissions against him, thereby  
22 causing further injuries and damages to him as more particularly set  
23 forth and alleged herein.

24           17. As a result of the nature of Defendants' and each of  
25 their, wrongful conduct, and of the injuries and damages sustained as  
26 alleged herein by Plaintiff, said wrongful conduct of said Defendants,  
27 and each of them, was reasonably psychologically repressed by

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1 Plaintiff, thereby causing him to forget and suppress from his memory  
2 such wrongful conduct, including, but not limited to, acts of sexual  
3 abuse and molestation and other physical, emotional, mental and  
4 related abuse and injury. Plaintiff did not discover, and reasonably  
5 could not have discovered, that his mental and psychological injuries  
6 or illnesses occurring after the age of majority were caused by said  
7 wrongful conduct including, but not limited to, the aforementioned  
8 sexual abuse and molestation occurring during his minority, as well  
9 as any other injuries alleged herein, until approximately June 19,  
10 1994, at which time said knowledge first began to surface and  
11 continues to presently surface to Plaintiff.

12           18. As a direct, legal and proximate result of said conduct  
13 of Defendants, and each of them, Plaintiff sustained personal injuries  
14 which have caused, and will continue to cause, permanent physical,  
15 emotional and mental pain, discomfort, disability and suffering, all  
16 to his general damage in an amount believed to be in excess of the  
17 minimum jurisdiction of this court, according to proof.

18           19. As a further direct, legal and proximate result of said  
19 wrongful acts of Defendants, and each of them, Plaintiff was required  
20 to, and did, expend money and incur obligations for medical,  
21 psychiatric, psychological and other health care services,  
22 hospitalization, medicine and medical supplies, therapy,  
23 rehabilitation, and other services, and will in the future be  
24 compelled to incur additional obligations for same. Plaintiff does  
25 not know the reasonable value of said obligations at this time, but  
26 prays that same may be inserted herein when ascertained or upon  
27 proof thereof.

28

1           20. As a further direct, legal and proximate result of  
2 Defendants', and each of their, wrongful conduct, Plaintiff has been  
3 deprived of earnings and earning capacity, and will in the future be  
4 so deprived. Plaintiff does not know the reasonable value of same at  
5 this time but prays that same be inserted herein when ascertained or  
6 upon proof thereof.

7           21. Pursuant to the provisions of California Code of Civil  
8 Procedure, Section 340.1 , Plaintiff will make an Ex Parte Application  
9 to this Court for an Order permitting Plaintiff to file a First  
10 Amended Complaint specifically naming each defendant who is  
11 responsible for Plaintiff's injuries and damages.

12  
13           FOR A SECOND, SEPARATE AND DISTINCT CAUSE OF ACTION

14                   FOR NEGLIGENT INFLICTION OF EMOTIONAL

15                   DISTRESS AGAINST ALL DEFENDANTS, AND EACH OF THEM.

16                   PLAINTIFF ALLEGES AS FOLLOWS:

17           22. Plaintiff hereby refers to, repeats, and reallege each  
18 and every paragraph contained in the First Cause of Action, and each  
19 and every allegation contained therein, and incorporates same by this  
20 reference, as though fully set forth at this point.

21           23. As alleged herein UNNAMED DEFENDANT and DOES 1 through  
22 50, inclusive and each of them, did so unlawfully touch, sexually  
23 molest and abuse Plaintiff, or wrongfully allow, assist, or  
24 participate in, Plaintiff being so unlawfully touched, sexually  
25 molested and abused, as alleged herein and otherwise abusing and  
26 causing physical and mental abuse as alleged herein thereby causing  
27 Plaintiff to suffer severe and extreme emotional and mental distress.

1           24. At all times relevant herein, as alleged herein,  
2 Defendants, and each of them, knew, or should have known, of the  
3 aforementioned acts of sexual molestation and abuse of Plaintiff by  
4 UNNAMED DEFENDANT, and DOES 1 through 50, inclusive, and each of them,  
5 or otherwise knew, or should have known, that their failure to  
6 exercise reasonable conduct and due care in the carrying out of their  
7 duties to Plaintiff, as aforescribed and alleged herein, and that  
8 acting so negligently, carelessly and otherwise wrongfully, would  
9 cause severe mental anguish, emotional and physical distress and  
10 profound shock to Plaintiff's nervous system, but nevertheless  
11 negligently, carelessly, recklessly and otherwise recruited young boys  
12 to act as altar boys, house boys and de facto servants for Catholic  
13 priests as herein described and alleged.

14           25. As a further direct, legal and proximate result of said  
15 wrongful acts of Defendants, and each of them, as specifically alleged  
16 herein, Plaintiff has suffered, and continues to suffer, severe mental  
17 anguish, emotional and physical distress, and profound shock to his  
18 nervous system, resulting in the injuries and damages set forth  
19 herein.

20           FOR A THIRD, SEPARATE AND DISTINCT CAUSE OF ACTION

21           FOR ASSAULT AND BATTERY AGAINST ALL DEFENDANTS,

22           AND EACH OF THEM, PLAINTIFF ALLEGES AS FOLLOWS:

23           26. Plaintiff hereby refers to, repeats and realleges each  
24 and every paragraph contained in the First and Second Causes of  
25 Action, and each every allegation contained therein, and incorporates  
26 same by this reference, as though fully set forth at this point.

27           27. UNNAMED DEFENDANT and DOES 1 through 50, inclusive, and  
28

1 each of them, verbally, physically, or otherwise threatened,  
2 intimidated, coerced, deceived, or otherwise wrongfully communicated  
3 or conveyed to Plaintiff that said Defendants, and each of them, would  
4 unlawfully, in a harmful and offensive manner, touch and perform  
5 illegal acts upon Plaintiff including, but not limited to, acts of  
6 sexual molestation and sexual abuse, with the intent and ability of  
7 carrying out said acts. As a result thereof, Plaintiff justifiably  
8 feared for his life, health, strength, physical and emotional  
9 condition, and well-being.

10           28. UNNAMED DEFENDANT and DOES 1 through 50, inclusive, and  
11 each of them, then proceeded without consent to unlawfully touch,  
12 sexually molest and abuse Plaintiff, and otherwise physically and  
13 mentally abuse and cause serious injury and harm to Plaintiff as  
14 alleged herein, and thereafter continued to do so, causing Plaintiff  
15 to suffer great physical and emotional injury, as more particularly  
16 set forth herein.

17           29. Plaintiff is informed and believes and thereon alleges  
18 that at all relevant times herein, UNNAMED DEFENDANTS and DOES 1  
19 through 150, inclusive, and each of them, and the Defendants agents  
20 herein knew, or should have known, of the herein above alleged acts  
21 of assault and battery, including, but not limited to, sexual  
22 molestation and abuse committed on Plaintiff, and the intent and/or  
23 of the propensity of UNNAMED DEFENDANT, and DOES 1 through 50,  
24 inclusive, and each of them, to commit the acts of sexual molestation  
25 and sexual abuse against Plaintiff including, but not limited, to  
26 those acts alleged herein, and that UNNAMED DEFENDANTS and DOES 1  
27 through 50, inclusive, and each of them, were not qualified, competent

1 nor capable of being a child care custodian, priest, advisor or  
2 authority figure placed in contact with children, thereby creating an  
3 undue risk of harm to children similarly situated as Plaintiff herein,  
4 which was, or should have been, reasonably foreseeable to all  
5 Defendants, and each of them, particularly since they had or should  
6 have had, specific knowledge that UNNAMED DEFENDANTS were sexually  
7 molesting and abusing other similarly situated children. On more than  
8 one occasion, said Defendants were specifically informed of said  
9 Defendant's wrongful conduct by a school teacher at Immaculate Heart  
10 of Mary School, a priest, another altar boy, and other reliable,  
11 reputable and verifiable sources. Yet, with full knowledge of those  
12 acts and in a conscious disregard for the rights of Plaintiff, said  
13 Defendants permitted, adopted, ratified and otherwise approved those  
14 acts which were committed in the course and scope of UNNAMED  
15 DEFENDANTS' employment with Defendants herein and each of them, and  
16 Defendants' agents herein. In addition, UNNAMED DEFENDANTS and DOES  
17 1 through 150, inclusive, and each of them, and their agents, had no  
18 reliable, significant or meaningful policy or practice and otherwise  
19 failed and/or refused to properly investigate and report complaints  
20 about the conduct of the clergy or take appropriate action to protect  
21 the well-being of its parishioners and others, including Plaintiff.  
22 Thereafter, UNNAMED DEFENDANT, and DOES 1 through 50, inclusive, and  
23 each of them, continued to provide the ways and means to commit such  
24 wrongful and egregious acts and conduct, thereby becoming  
25 perpetrators, cohorts, co-conspirators, aiders, abettors and co-  
26 participants in such wrongful acts and conduct, by recruiting young  
27 boys to act as altar boys, house boys and defacto servants and placing

28