

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED: —  
TORT — MOTOR VEHICLE TORT — CONTRACT —  
EQUITABLE RELIEF — OTHER

COMMONWEALTH OF MASSACHUSETTS

SUPERIOR COURT  
DEPARTMENT  
OF THE  
TRIAL COURT  
CIVIL ACTION

MIDDLESEX ..... , ss  
[seal]

No. [REDACTED]

[REDACTED] ..... , Plaintiff(x)

The Catholic Archdiocese  
of Boston  
..... , Defendant(s) et al

SUMMONS

To the above-named Defendant: The Catholic Archdiocese of Boston  
You are hereby summoned and required to serve upon Sumner D. Goldberg .....  
..... plaintiff's attorney, whose address is 59 Temple Place  
Boston, MA 02111 ..... , an answer to the complaint which is herewith  
served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you  
fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also  
required to file your answer to the complaint in the office of the Clerk of this court at Cambridge .....  
..... either before service upon plaintiff's attorney or within a  
reasonable time thereafter.

Unless otherwise provided by Rule 13(a), your answer must state as a counterclaim any claim which you may  
have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's  
claim or you will thereafter be barred from making such claim in any other action.

Suzanne V. DeVecchio  
Witness, [REDACTED], Esquire, at Boston .....  
the 26th ..... day of February .....  
....., in the year of our Lord 2001.....

A true copy Attest: Edward J. Tobin [Signature] Edward J. Sullivan [Signature]  
3-19-01 Deputy Sheriff Suffolk County Clerk

- NOTES.  
1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure.  
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used  
for each defendant, each should be addressed to the particular defendant.

he complaint, but if you claim to have a defense, either you or  
- herein and also file the original in the Clerk's Office.  
NOTICE TO DEFENDANT — You need not appear personally in court to  
your attorney must serve a copy of your written answer within 20 days as

## COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX SS.

SUPERIOR COURT

[REDACTED]  
PlaintiffCOMPLAINT

VS.

AUSTIN PREPARATORY SCHOOL,  
THE CATHOLIC ARCHDIOCESE  
OF THE CITY OF BOSTON,  
DefendantsPARTIES

1. Plaintiff, [REDACTED] resides in Derry, State of New Hampshire.
2. Defendant, Austin Preparatory School is a Private Catholic School located in Reading, MA and organized as a Corporation under the laws of this Commonwealth.
3. Defendant, The Catholic Archdiocese of Boston is a Catholic religious organization with Offices in Boston.

STATEMENT OF FACTS

4. Plaintiff says that when he was a minor and approximately 12 years of age he was residing with his Parents in Tewksbury, Massachusetts and in attendance at Tewksbury Junior High School.
5. Plaintiff says that at said time his Brother, [REDACTED] was in attendance at the Austin Preparatory School in which the Plaintiff, and the [REDACTED] Family became friendly with a certain Priest who was in attendance as a teacher at the Austin Preparatory School. The said Priest was a Fr. Robert Turnbull a/k/a John Turnbull.
6. Plaintiff says that the said Fr. Turnbull undertook a scheme to befriend the Plaintiff, his Brother [REDACTED] and their Parents and in which the said Fr. Turnbull was thereby invited to the [REDACTED] Family home in Tewksbury for dinners and would be

allowed by the Plaintiff's Parents, when they were away, to stay at their home with the Plaintiff and his Brother.

7. Plaintiff says that after a period of time the said Fr. Turnbull made sexual advances to both the Plaintiff and his Brother, [REDACTED]

8. Plaintiff says that the said Fr. Turnbull did thereon continue his sexual advances only upon the Plaintiff and in which these sexual advances were made not only at the Austin Preparatory School but also at a certain Tennis Club known as the North Meadow Tennis Club, and also at a log cabin at Lake Winnepesaukee, N.H. in which the said Fr. Turnbull persuaded the Plaintiff's Parents to allow him to take the Plaintiff on vacation with him to New Hampshire.

9. Plaintiff says that sexual abuse was committed upon him by Fr. Turnbull and involved all forms of sexual abuse; that the Plaintiff, as a minor, and being intimidated by this Priest became extremely troubled over the abuse committed upon him and told the Priest that he did not desire to participate in this sexual activity; that it was wrong, and he did not like doing it.

10. Plaintiff says that Fr. Turnbull responded to him that: "No one could ever know about this and he would deny doing anything to the Plaintiff and that they would both be in deep trouble if the Plaintiff told anybody."

11. Plaintiff further says that sometime in the year of 1981 and without any notice the said Fr. Turnbull came to the Plaintiff's Parents home in the late afternoon of a certain day; informed the Parents that he had been transferred to Florida. The Plaintiff is informed, believes and therefore avers that Fr. Turnbull then left his position at Austin Preparatory School and went to the State of Florida.

12. Plaintiff says it was not until 1999 that he realized and understood the relationship perpetrated upon him by this Priest; the effect that it has had upon his life; and that since 1999 he has been subject to psychological and psychiatric treatment

including medicinal treatment.

13. Plaintiff has been victimized by the acts of this pedophile Priest; that as a result the Plaintiff is emotionally disturbed; that his emotional disturbance has effected his physical condition as well as his relationship with his Wife and other persons.

14. Plaintiff is informed, believes and therefore avers that the Defendant, Austin Preparatory School, Its agents, servants and Attorneys knew and had knowledge of the actions and conduct of this pedophile Priest or should have known, but did fail and neglect to protect the children and others from this Priest until such time that the circumstances reached such serious concerns that it was then determined and concluded to have the Priest leave the Commonwealth forthwith by the means of a transfer to another position in the State of Florida.

15. Plaintiff says that the Archdiocese of the City of Boston had as a member of Its Priesthood, during the years of 1978 to and including 1981, a certain Priest, Fr. Robert Turnbull who was assigned as a teacher at the Austin Preparatory School in which the duties of the said Fr. Turnbull, among other matters involved as a Priest, were to teach Catholic students at the School.

16. Plaintiff says that the said Catholic Archdiocese, Its Agents, servants and Attorneys well knew and had knowledge of the acts and conduct of this pedophile Priest, or should have known but did fail and neglect to remove the said Priest from the Austin Preparatory School; did fail and neglect to undertake such action in order to control of this Priest as well as to protect children and others from this Priest.

17. Plaintiff further says that when circumstances arose with the sexual abuses so committed by Fr. Turnbull, having reached a peak in approximately 1981 that the said Archdiocese with the said Co-defendant, Austin Preparatory School by their agents and servants did thereby effect a transfer of the said Fr. Turnbull from the Commonwealth of Massachusetts to the State of Florida.

18. Plaintiff says that the sexual abuse was committed upon him for approximately 3 years; that he was victimized as a minor child, and with the failure of the Defendants, as so named herein, to protect him from the pedophile activity of this Priest; that the Plaintiff is emotionally disturbed including its physical effect upon him; that the sexual abuse committed upon him will have a lasting effect upon his life in which there is a requirement for medical and psychiatric treatment including expenses for treatment, disbursements and costs all arising from the abuse committed upon him as so described.

COUNT I

Plaintiff repeats and avers Paragraphs 1 to and including Paragraph 18 of this Complaint.

WHEREFORE, Plaintiff demands Judgment as against the Defendant, Austin Preparatory School for such damages as the Plaintiff has sustained together with interest and costs.

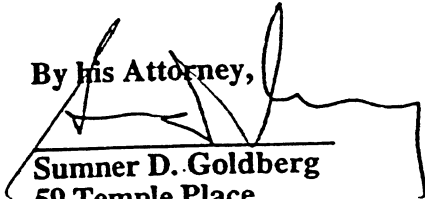
COUNT II

Plaintiff repeats and avers Paragraphs 1 to and including Paragraph 18 of this Complaint.

WHEREFORE, Plaintiff demands Judgment as against the Defendant, the Catholic Archdiocese of Boston for such damages as the Plaintiff has sustained together with interest and costs.

And the Plaintiff claims a Trial by Jury.

By his Attorney,

  
Sumner D. Goldberg  
59 Temple Place  
Boston, MA 02111  
(617)227-6226

Dated: 12/24/07

