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COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

SUPERIOR COURT DEPARTMENT  
CIVIL ACTION NO. 96-3991

A DOE, a Minor, B DOE,  
a Minor, and C DOE,  
a Minor, all by their  
Mother and Next Friend,  
JANE ROE, and JANE ROE  
Individually,  
Plaintiffs

COMPLAINT AND  
JURY TRIAL DEMAND

vs.

FATHER JOHN J. GROGHAN,  
A CATHOLIC PRIEST OF THE  
ARCHDIOCESE OF BOSTON  
A/K/A FATHER JACK  
GROGHAN, A CATHOLIC  
PRIEST OF THE ARCHDIOCESE  
OF BOSTON  
and DEFENDANT TWO,  
Defendants

A. PARTIES

1. Plaintiff A Doe, a minor, is an individual further identified in Plaintiff's Affidavit, filed herewith.
2. Plaintiff B Doe, a minor, is an individual further identified in Plaintiff's Affidavit, filed herewith.
3. Plaintiff C Doe, a minor, is an individual further identified in Plaintiff's Affidavit, filed herewith.
4. Plaintiff Jane Roe is an individual further identified in Plaintiff's Affidavit, filed herewith.
5. Plaintiff Jane Roe is the mother and next friend of Plaintiffs A Doe, B Doe, and C Doe, and brings this action on their behalf, as well as individually.

6. Defendant Father John J. Geoghan, a Catholic Priest of the Archdiocese of Boston a/k/a Father Jack Geoghan, a Catholic Priest of the Archdiocese of Boston (hereinafter referred to as "Defendant Father Geoghan") is an individual, age 65 or older, residing at Regina Cleri Residence for Priests, 60 Cardinal O'Connell Way, Boston, Suffolk County, Massachusetts. At all times material hereto, Defendant Father Geoghan was a Catholic Priest of the Archdiocese of Boston.

7. Defendant Two is an individual or individuals, the identity of whom are presently unknown to the Plaintiffs; therefore the Plaintiffs file the above-captioned action against Defendant Two by such fictitious name. The Plaintiffs will amend this Complaint to show the true name or names of Defendant Two when said name or names have been ascertained. The Plaintiffs allege that Defendant Two is responsible for the hiring, supervision, and/or retention of Defendant Father Geoghan.

#### B. STATEMENT OF FACTS

8. In or about February of 1992, Plaintiff Jane Roe sought the services of an adult male counselor to act as a "father figure" for her three children, Plaintiffs A Doe, B Doe, and C Doe, (hereinafter referred to as "the minor Plaintiffs") who are all male and who were then ages 10, 9, and 7. The minor Plaintiffs had had little contact with their father, and Plaintiff Jane Roe therefore felt they

needed guidance that could be provided by an adult male counselor.

9. Plaintiff Jane Roe knew of Defendant Father Geoghan because he counseled other children in her neighborhood; at all relevant times Plaintiff Jane Roe and her children did not attend the St. Julia Church of Weston, Massachusetts, with which Defendant Father Geoghan was affiliated.

10. In or about February of 1992, Defendant Father Geoghan agreed to provide counseling and otherwise render proper care to the minor Plaintiffs.

11. In or about February of 1992, Defendant Father Geoghan began meeting with, and providing counseling to, the minor Plaintiffs weekly at their residence at that time, which is further identified in Plaintiff's Affidavit, filed herewith.

12. From approximately February 1992 to approximately December 1994 Defendant Father Geoghan met with the minor Plaintiffs, at numerous times individually and at numerous times together.

13. For a period of over two and one half years between approximately March 1992 and approximately December 1994, Defendant Father Geoghan engaged in explicit sexual behavior and graphic sexual conversation with the minor Plaintiff or Plaintiffs present at each meeting.

14. From approximately March 1992 until approximately December 1994 Defendant Father Geoghan also engaged in

graphic sexual conversation with each minor Plaintiff over the telephone.

15. The relevant sexual behavior and sexual conversations in which Defendant Father Geoghan engaged in with the minor Plaintiffs during these meetings and telephone conversations during the two and one half year period include, but are not limited to, the following:

a. Repeated explicit sexual fondling and rubbing of the minor Plaintiffs' body parts;

b. Engaging in repeated graphic sexual conversations with the minor Plaintiffs about the minor Plaintiffs' body parts, the explicit sexual behavior of the minor Plaintiffs when being with or when seeing other individuals. Defendant Father Geoghan instructed the minor Plaintiffs not to tell their mother, namely, Plaintiff Jane Roe herein or anyone else about the explicit sexual activity and about the graphic sexual conversations. Defendant Father Geoghan instructed the children to keep said explicit sexual activity and graphic sexual conversations a secret (Defendant Father Geoghan has engaged in conversations with minor Plaintiff A Doe and minor Plaintiff B Doe about their having sexual activity or involvement with their mother, Plaintiff Jane Doe herein.); and

c. Repeated placing of the minor Plaintiffs on Defendant Father Geoghan's lap in order to obtain sexual gratification.

16. As a result of the explicit sexual activity and graphic sexual conversations by Defendant Father Geoghan with the minor Plaintiffs during the two and one half year period one, if not all, of the minor Plaintiffs have been caused to suffer ongoing and continuing injury, including but not limited to:

1. Loss of self-worth and trust;
2. Sadness and depression;
3. Anger and anxiety;
4. Constant fear and guilt;
5. Nightmares;
6. Sexual problems;

7. Problems at school;
8. Extreme worry and emotional distress;
9. A shattered family life; and
10. Fear of going into the bathroom alone and also fear of leaving the home.

17. In or about December of 1994 the minor Plaintiffs partially disclosed to their mother, Plaintiff Jane Roe, that Defendant Father Geoghan had been touching them and speaking with them in ways that made them feel uncomfortable.

18. As a result of her children's disclosure, Plaintiff Jane Roe immediately terminated the relationship between Defendant Father Geoghan and the minor Plaintiffs.

19. As a result of said explicit sexual activity and graphic sexual conversations by Defendant Father Geoghan, the minor Plaintiffs have refused to fully disclose in complete detail to what degree Defendant Father Geoghan did abuse the minor Plaintiffs emotionally and physically.

20. After Plaintiff Jane Roe reported to a representative of the Archdiocese of Boston the explicit sexual activity and graphic sexual conversations of Defendant Father Geoghan as described herein, the Archdiocese of Boston, on January 4, 1995, by letter, agreed to pay for the cost of counseling of the three minor Plaintiffs and of Plaintiff Jane Roe without admitting liability.

21. On or about December 19, 1995 the Waltham Police Department filed a Criminal Complaint against Defendant Father Geoghan on behalf of the minor Plaintiffs. The application for the Criminal Complaint remains pending until

December 19, 1996 subject to conditions of probation set for Defendant Father Geoghan. Said conditions include, but are not limited to, an evaluation of Defendant Father Geoghan, psychological testing of Defendant Father Geoghan at the Massachusetts General Hospital and Defendant Father Geoghan having no unsupervised contact with minors, at least up until December 19, 1996.

C. CLAIMS FOR RELIEF

Count I: A Doe v. Defendant Father Geoghan  
Negligent Counseling

22. Plaintiff A Doe repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in this Complaint.

23. During the period of time that Defendant Father Geoghan counseled Plaintiff A Doe, from approximately February 1992 to approximately December 1994, Defendant Father Geoghan had a duty of care in counseling Plaintiff A Doe.

24. Defendant Father Geoghan negligently breached such duty by failing to exercise ordinary care in his counseling of A Doe as follows:

a. Defendant Father Geoghan negligently and carelessly manipulated the emotions of Plaintiff A Doe in order to gain control over Plaintiff A Doe;

b. Defendant Father Geoghan mishandled the transference and counter-transference phenomena which arose out of the counseling sessions with A Doe;

c. Defendant Father Geoghan negligently and carelessly failed to counsel; or improperly counseled, Plaintiff A Doe, an individual who was vulnerable because he was a minor, beginning at age 10;

d. Defendant Father Geoghan negligently and carelessly engaged in counseling by allowing the counseling relationship to be used to engage in sexual behavior and sexual conversations with Plaintiff A Doe;

e. Defendant Father Geoghan negligently and carelessly induced and encouraged Plaintiff A Doe to engage in harmful activities;

f. Defendant Father Geoghan negligently and carelessly failed to observe boundaries between a counselor and an individual being counseled; and

g. Defendant Father Geoghan negligently undertook to treat Plaintiff A Doe, a male minor beginning at age 10, with a need for counseling by an adult male; however Defendant Father Geoghan lacked the capacity to treat Plaintiff A Doe and failed to refer Plaintiff A Doe to another more competent professional for proper counseling.

25. As a direct and proximate result of Defendant Father Geoghan's negligent conduct of a sexual nature, Plaintiff A Doe has suffered a total disruption in his life and continues to live in fear.

26. Furthermore, as a direct and proximate result of Defendant Father Geoghan's negligent conduct of a sexual nature, Plaintiff A Doe suffered and will continue to suffer

in the future: severe and permanent mental distress and emotional injuries; financial expenses for medical and therapeutic care and treatment; difficulties in school which will cause him long term lost earning capacity; as well as other damages.

Count II: A Doe v. Defendant Father Geoghan  
Breach of Fiduciary Duty

27. Plaintiff A Doe repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in this Complaint.

28. At all times material to this action, Plaintiff A Doe, an individual who was vulnerable because he was a minor, beginning at age 10, placed trust and confidence in Defendant Father Geoghan as Plaintiff A Doe's counselor.

29. As Plaintiff A Doe's counselor and fiduciary, Defendant Father Geoghan owed Plaintiff A Doe a duty of trust and loyalty.

30. By engaging in the egregious and explicit sexual behavior and sexual conversations described above, Defendant Father Geoghan breached his fiduciary duty owed to Plaintiff A Doe as follows:

a. Defendant Father Geoghan violated the trust and confidence reposed in him by Plaintiff A Doe;

b. Defendant Father Geoghan utilized his status and role as Plaintiff A Doe's counselor to obtain an unfair advantage over Plaintiff A Doe, whom he was counseling; and

c. Defendant Father Geoghan exercised undue influence and control over Plaintiff A Doe.

31. As a direct and proximate result of Defendant Father Geoghan's breach of his fiduciary duty, Plaintiff A Doe has suffered and continues to suffer severe and permanent mental distress and emotional injuries.

Count III: A Doe v. Defendant Father Geoghan  
Negligent Infliction of Emotional Distress

32. Plaintiff A Doe repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in this Complaint.

33. During the period of time that Defendant Father Geoghan counseled Plaintiff A Doe, from approximately February 1992 to approximately December 1994, Defendant Father Geoghan had a duty of care in counseling Plaintiff A Doe.

34. Defendant Father Geoghan negligently breached such duty by failing to exercise ordinary care in his counseling of Plaintiff A Doe, in that he engaged in reprehensible sexual behavior and sexual conversations with Plaintiff A Doe, as further discussed above.

35. As a direct and proximate result of Defendant Father Geoghan's negligent conduct, Plaintiff A Doe has suffered and continues to suffer severe and permanent mental distress and emotional injuries.

36. A reasonable person of A Doe's age would have suffered extreme emotional distress under these circumstances.

37. As a result of the mental distress and emotional injuries which Plaintiff A Doe suffers, Plaintiff A Doe washes his hands constantly, uses a whole roll of toilet paper, pushes and hits others, engages in inappropriate touching and self stimulating behavior, and has difficulty focusing his attention and following directions.

**Count IV: B Doe v. Defendant Father Geoghan  
Negligent Counseling**

38. Plaintiff B Doe repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in this Complaint.

39. During the period of time that Defendant Father Geoghan counseled Plaintiff B Doe, from approximately February 1992 to approximately December 1994, Defendant Father Geoghan had a duty of care in counseling Plaintiff B Doe.

40. Defendant Father Geoghan negligently breached such duty by failing to exercise ordinary care in his counseling of B Doe as follows:

a. Defendant Father Geoghan negligently and carelessly manipulated the emotions of Plaintiff B Doe in order to gain control over Plaintiff B Doe;

b. Defendant Father Geoghan mishandled the transference and counter-transference phenomena which arose out of the counseling sessions with B Doe;

c. Defendant Father Geoghan negligently and carelessly failed to counsel, or improperly counseled, Plaintiff B Doe, an individual who was vulnerable because he was a minor, beginning at age 9;

d. Defendant Father Geoghan negligently and carelessly engaged in counseling by allowing the counseling relationship to be used to engage in sexual behavior and sexual conversations with Plaintiff B Doe;

e. Defendant Father Geoghan negligently and carelessly induced and encouraged Plaintiff B Doe to engage in harmful activities;

f. Defendant Father Geoghan negligently and carelessly failed to observe boundaries between a counselor and an individual being counseled; and

g. Defendant Father Geoghan negligently undertook to treat Plaintiff B Doe, a male minor beginning at age 9, with a need for counseling by an adult male; however Defendant Father Geoghan lacked the capacity to treat Plaintiff B Doe and failed to refer Plaintiff B Doe to another more competent professional for proper counseling.

41. As a direct and proximate result of Defendant Father Geoghan's negligent conduct of a sexual nature, Plaintiff B Doe has suffered a total disruption in his life and continues to live in fear.

42. Furthermore, as a direct and proximate result of Defendant Father Geoghan's negligent conduct of a sexual nature, Plaintiff B Doe suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries; financial expenses for medical and therapeutic care and treatment; difficulties in school which will cause him long term lost earning capacity; as well as other damages.

**Count V: B Doe v. Defendant Father Geoghan  
Breach of Fiduciary Duty**

43. Plaintiff B Doe repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in this Complaint.

44. At all times material to this action, Plaintiff B Doe, an individual who was vulnerable because he was a minor, beginning at age 9, placed trust and confidence in Defendant Father Geoghan as Plaintiff B Doe's counselor.

45. As Plaintiff B's Doe's counselor and fiduciary, Defendant Father Geoghan owed Plaintiff B Doe a duty of trust and loyalty.

46. By engaging in the egregious and explicit sexual behavior and sexual conversations described above, Defendant Father Geoghan breached his fiduciary duty owed to Plaintiff B Doe as follows:

a. Defendant Father Geoghan violated the trust and confidence reposed in him by Plaintiff B Doe;

b. Defendant Father Geoghan utilized his status and role as Plaintiff B Doe's counselor to obtain an unfair advantage over Plaintiff B Doe, whom he was counseling; and

c. Defendant Father Geoghan exercised undue influence and control over Plaintiff B Doe.

47. As a direct and proximate result of Defendant Father Geoghan's breach of his fiduciary duty, Plaintiff B Doe has suffered and continues to suffer severe and permanent mental distress and emotional injuries.

**Count VI: B Doe v. Defendant Father Geoghan  
Negligent Infliction of Emotional Distress**

48. Plaintiff B Doe repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in this Complaint.

49. During the period of time that Defendant Geoghan counseled Plaintiff B Doe, Defendant Father Geoghan had a duty of care in counseling Plaintiff B Doe.

50. Defendant Father Geoghan negligently breached such duty by failing to exercise ordinary care in his counseling of Plaintiff B Doe, in that he engaged in reprehensible sexual behavior and sexual conversations with Plaintiff B Doe, as further discussed above.

51. As a direct and proximate result of Defendant Father Geoghan's negligent conduct, Plaintiff B Doe has suffered and continues to suffer severe and permanent mental distress and emotional injuries.

52. A reasonable person of B Doe's age would have suffered extreme emotional distress under these circumstances.

53. As a result of the mental distress and emotional injuries which Plaintiff B Doe suffers, Plaintiff B Doe has difficulty sleeping, is afraid to answer the telephone and leave his house, and is depressed, sad, angry, and anxious.

**Count VII: C Doe v. Defendant Father Geoghan  
Negligent Counseling**

54. Plaintiff C Doe repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in this Complaint.

55. During the period of time that Defendant Father Geoghan counseled Plaintiff C Doe, from approximately February 1992 to approximately December 1994, Defendant Father Geoghan had a duty of care in counseling Plaintiff C Doe.

56. Defendant Father Geoghan negligently breached such duty by failing to exercise ordinary care in his counseling of C Doe as follows:

a. Defendant Father Geoghan negligently and carelessly manipulated the emotions of Plaintiff C Doe in order to gain control over Plaintiff C Doe;

b. Defendant Father Geoghan mishandled the transference and counter-transference phenomena which arose out of the counseling sessions with C Doe;

c. Defendant Father Geoghan negligently and carelessly failed to counsel, or improperly counseled, Plaintiff C Doe, an individual who was vulnerable because he was a minor, beginning at age 7;

d. Defendant Father Geoghan negligently and carelessly engaged in counseling by allowing the counseling relationship to be used to engage in sexual behavior and sexual conversations with Plaintiff C Doe;

e. Defendant Father Geoghan negligently and carelessly induced and encouraged Plaintiff C Doe to engage in harmful activities;

f. Defendant Father Geoghan negligently and carelessly failed to observe boundaries between a counselor and an individual being counseled; and

g. Defendant Father Geoghan negligently undertook to treat Plaintiff C Doe, a male minor beginning at age 7, with a need for counseling by an adult male; however Defendant Father Geoghan lacked the capacity to treat Plaintiff C Doe and failed to refer Plaintiff C Doe to another more competent professional for proper counseling.

57. As a direct and proximate result of Defendant Father Geoghan's negligent conduct of a sexual nature, Plaintiff C Doe has suffered a total disruption in his life and continues to live in fear.

58. Furthermore, as a direct and proximate result of Defendant Father Geoghan's negligent conduct of a sexual nature, Plaintiff C Doe suffered and will continue to suffer

in the future: severe and permanent mental distress and emotional injuries; financial expenses for medical and therapeutic care and treatment; difficulties in school which will cause him long term lost earning capacity; as well as other damages.

Count VIII: C Doe v. Defendant Father Geoghan  
Breach of Fiduciary Duty

59. Plaintiff C Doe repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in this Complaint.

60. At all times material to this action, Plaintiff C Doe, an individual who was vulnerable because he was a minor, beginning at age 7, placed trust and confidence in Defendant Father Geoghan as Plaintiff C Doe's counselor.

61. As Plaintiff C Doe's counselor and fiduciary, Defendant Father Geoghan owed Plaintiff C Doe a duty of trust and loyalty.

62. By engaging in the egregious and explicit sexual behavior and sexual conversations described above, Defendant Father Geoghan breached his fiduciary duty owed to Plaintiff C Doe as follows:

a. Defendant Father Geoghan violated the trust and confidence reposed in him by Plaintiff C Doe;

b. Defendant Father Geoghan utilized his status and role as Plaintiff C Doe's counselor to obtain an unfair advantage over Plaintiff C Doe, whom he was counseling; and

c. Defendant Father Geoghan exercised undue influence and control over Plaintiff C Doe.

63. As a direct and proximate result of Defendant Father Geoghan's breach of his fiduciary duty, Plaintiff C Doe has suffered and continues to suffer severe and permanent mental distress and emotional injuries.

Count IX: C Doe v. Defendant Father Geoghan  
Negligent Infliction of Emotional Distress

64. Plaintiff C Doe repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in this Complaint.

65. During the period of time that Defendant Father Geoghan counseled Plaintiff C Doe, from approximately February 1992 to approximately December 1994, Defendant Father Geoghan had a duty of care in counseling Plaintiff C Doe.

66. Defendant Father Geoghan negligently breached such duty by failing to exercise ordinary care in his counseling of Plaintiff C Doe, in that he engaged in reprehensible sexual behavior and sexual conversations with Plaintiff C Doe, as further discussed above.

67. As a direct and proximate result of Defendant Father Geoghan's negligent conduct, Plaintiff C Doe has suffered and continues to suffer severe and permanent mental distress and emotional injuries.

68. A reasonable person of C Doe's age would have suffered extreme emotional distress under these circumstances.

69. As a result of the mental distress and emotional injuries which Plaintiff C Doe suffers, Plaintiff C Doe has frequent nightmares, is afraid that someone will try to break into his house, has fears of the bathroom, loses his temper frequently, is aggressive with his brothers, and is irritable, depressed, anxious, and angry.

**Count X: Jane Roe v. Defendant Father Geoghan  
Negligent Misrepresentation**

70. Plaintiff Jane Roe repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in this Complaint.

71. Defendant Father Geoghan misrepresented the nature of his relationship with, and his conduct toward, the minor Plaintiffs by misrepresenting to Plaintiff Jane Roe an atmosphere of counseling and concern for the minor Plaintiffs.

72. Had Plaintiff Jane Roe known the true nature of Defendant Father Geoghan's relationship with the minor Plaintiffs, i.e., that he was regularly engaging in reprehensible sexual behavior and sexual conversations with her young minor children, beginning at ages 10, 9, and 7, she would not have allowed Defendant Father Geoghan to meet with them.

73. At all times material to this action, Defendant Father Geoghan had a duty of care to Plaintiff Jane Roe to represent to her the true nature of his conduct with the minor Plaintiffs.

74. Defendant Father Geoghan negligently breached such duty by misrepresenting to Plaintiff Jane Roe the true nature of his conduct with the minor Plaintiffs.

75. Defendant Father Geoghan misrepresented the nature of his relationship with, and his conduct with, the minor Plaintiffs as a means of inducing Plaintiff Jane Roe to entrust the care of the minor Plaintiffs to him.

76. Plaintiff Jane Roe entrusted the care of her children to Defendant Father Geoghan relying upon his representations as aforesaid, which representations were in fact not true.

77. As a direct and proximate result of Defendant Father Geoghan's negligent conduct of a sexual nature, Plaintiff Jane Roe has suffered a total disruption in her life and continues to live in fear.

78. Furthermore, as a direct and proximate result of Defendant Father Geoghan's negligent conduct of a sexual nature, Plaintiff Jane Roe suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries; financial expenses for medical and therapeutic care and treatment; the disturbance of her relationship with her children, Plaintiffs A Doe, B Doe, and

C Doe; lost earning capacity and lost earnings; as well as other damages.

**Count XI: Jane Roe v. Defendant Father Geoghan  
Negligent Infliction of Emotional Distress**

79. Plaintiff Jane Roe repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in this Complaint.

80. During the period of time that Defendant Father Geoghan counseled Plaintiff Jane Roe's children, Plaintiffs A Doe, B Doe, and C Doe, from approximately February 1992 to approximately December 1994, Defendant Father Geoghan had a duty of care in counseling said minor Plaintiffs. In addition, during this period of time, Defendant Father Geoghan had a duty of care to Plaintiff Jane Roe to represent to her the true nature of his conduct with the minor Plaintiffs.

81. Defendant Father Geoghan negligently breached such duty of care by: 1) failing to exercise ordinary care in his counseling of the minor Plaintiffs in that he engaged in reprehensible sexual behavior and sexual conversations with the minor Plaintiffs, as further discussed above; and 2) misrepresenting to Plaintiff Jane Roe the true nature of his conduct with the minor plaintiffs.

82. As a direct and proximate result of defendant Father Geoghan's negligent conduct, plaintiff Jane Roe has suffered and continues to suffer severe and permanent mental distress and emotional injuries.

83. A reasonable person would have suffered extreme emotional distress under these circumstances.

84. As a result of the mental distress and emotional injuries which Plaintiff Jane Roe suffers, Plaintiff Jane Roe is extremely angry, has had suicidal ideations, and has anxiety attacks and nightmares.

**Count XII: Jane Roe v. Defendant Father Geoghan  
Loss of Consortium**

85. Plaintiff Jane Roe repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in this Complaint.

86. As a direct and proximate result of Defendant Father Geoghan's conduct as aforesaid, Plaintiff Jane Roe suffered the loss of care, comfort, services and consortium of her children, Plaintiffs A Doe, B Doe, and C Doe.

**Count XIII: Plaintiffs v. Defendant Two  
Negligent Hiring, Supervision and/or Retention**

87. The Plaintiffs repeat, reallege, and incorporate by reference herein each and every allegation heretofore pleaded in this Complaint.

88. At all relevant times to this action, the responsibilities of Defendant Two included the hiring, retention, and supervision of Defendant Father Geoghan.

89. At all relevant times to this action, Defendant Two knew or should have known that Defendant Father Geoghan would provide and was providing counseling to individuals, and, more specifically, was providing counseling to the minor Plaintiffs.

90. At all relevant times to this action, Defendant Two had a duty of care to properly hire, retain, and supervise priests of good reputation and character who would be asked to provide counseling for minors.

91. At all relevant times to this action, Defendant Two negligently breached said duty by hiring and retaining Defendant Father Geoghan, an individual whom Defendant Two knew or should have known was of bad character and reputation and unable to properly counsel minors. Defendant Two improperly and inadequately supervised Defendant Father Geoghan.

92. At all relevant times to this action, Defendant Two knew or should have known that his negligent conduct would result in severe mental and emotional suffering by the Plaintiffs.

93. As a direct and proximate result of Defendant Two's negligent conduct, the Plaintiffs have suffered and continue to suffer severe and permanent mental distress and emotional injuries.

WHEREFORE, the Plaintiffs respectfully demand judgment against the Defendants on each count in an amount to be determined by a jury, plus costs, interest, attorneys' fees, and such other and further relief as this Court deems just and equitable.

JURY TRIAL DEMANDED

PLAINTIFFS DEMAND A TRIAL BY JURY ON ALL COUNTS.

By Plaintiffs' Attorney,

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