

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARTMENT  
OF THE TRIAL COURT  
CIVIL ACTION NO.

93-4571

[REDACTED], )  
 Plaintiff )  
 vs. )  
 the ROMAN CATHOLIC )  
 ARCHBISHOP OF )  
 BOSTON, A )  
 CORPORATION SOLE, )  
 the BOYS SCOUTS OF )  
 AMERICA, INC. AND )  
 WILLIAM REYNOLDS )  
 Defendants )

COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is an action for damages brought by the Plaintiff against the Defendants for injuries caused to him as a result of being sexually abused by Father John Cotter and by the Defendant William Reynolds when he was a minor child.

II. PARTIES

2. The Plaintiff [REDACTED] is an individual residing at [REDACTED] He is presently 31 years old.

3. The Defendant the Roman Catholic Archbishop of Boston, A Corporation Sole (hereinafter "The Archbishop") is a Massachusetts Corporation established under ch. 506 of the Acts

of 1987 having its usual place of business at 2121 Commonwealth Avenue, Brighton, MA, Suffolk County, Massachusetts.

4. The Defendant Boy Scouts of America, Inc. (hereinafter "Boy Scouts") is a Massachusetts Corporation having its usual place of business at 891 Centre St. Boston, MA. Suffolk County, Massachusetts.

5. The Defendant William Reynolds is an individual residing at Potomac Ave. in West Roxbury, Massachusetts.

### III. STATEMENT OF FACTS

6. Beginning approximately in 1968 and continuing into approximately 1975, Father John Cotter, an employee of The Archbishop, repeatedly sexually abused the Plaintiff [REDACTED], when he was between the ages of approximately 7 and 14 years old.

7. The repeated acts of sexual abuse occurred on the premises of the Archbishop at St. Theresa's Church and Rectory located in West Roxbury, Massachusetts and other places.

8. Beginning approximately in 1969 and continuing into approximately 1976, William Reynolds, an employee of the Boy Scouts, repeatedly sexually abused the Plaintiff [REDACTED], when he was between the ages of approximately 8 and 15 years old.

9. The repeated acts of sexual abuse occurred on camping trips in the Blue Hills, Needham, and Long Island in Massachusetts and in New Hampshire.

I. CLAIMS FOR RELIEF

COUNT 1

(Respondeat Superior Against  
The Roman Catholic Archbishop of Boston)

10. The Plaintiff [REDACTED] repeats and realleges paragraphs 1 through 10 as if fully set forth herein.

11. The repeated unlawful sexual contacts described above were committed while Father John Cotter was an employee of the Defendant Roman Catholic Archbishop of Boston and occurred at the premises of his employment.

12. The Defendant Roman Catholic Archbishop of Boston is responsible for each of the acts of sexual battery committed by Father John Cotter.

13. As a direct and proximate result of the acts of Father John Cotter, employee of the Defendant Roman Catholic Archbishop of Boston, the Plaintiff, Robert Costello has suffered and continues to suffer mental distress and emotional harm and other consequential damages.

COUNT II

(Respondeat Superior Against  
The Boys Scouts of America, Inc.)

14. The Plaintiff [REDACTED] repeats and realleges paragraphs 1 through 10 as if fully set forth herein.

15. The repeated unlawful sexual contacts described above were committed while William Reynolds was an employee of the Boys Scouts of America, Inc.

16. The Defendant Boys Scouts of America, Inc. is responsible for each of the acts of sexual battery committed by William Reynolds.

17. As a direct and proximate result of the acts of William Reynolds, employee of the Boys Scouts of America, Inc., the Plaintiff, [REDACTED] has suffered and continues to suffer mental distress and emotional harm and other consequential damages.

COUNT III

(Intentional or Reckless Infliction  
of Emotional Distress against William Reynolds)

18. The Plaintiff [REDACTED] repeats and realleges paragraphs 1 through 17 as if fully set forth herein.

19. During the period of time that the Defendant William Reynolds had a duty to refrain from unlawful sexual contact with the Plaintiff [REDACTED] and was in breach of that duty as alleged above, the Defendant either intended to

inflict emotional distress, or knew, or should have known, that emotional distress was a likely result of his conduct.

20. The conduct of the Defendant William Reynolds was extreme and outrageous, without any mitigation, excuse or justification and beyond all possible bounds of decency.

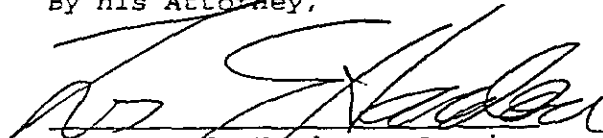
21. As a direct and proximate result of the the Defendant William Reynolds, the Plaintiff [REDACTED] has suffered and continues to suffer mental distress and emotional harm and other consequential damages.

WHEREFORE, the Plaintiff [REDACTED] request that this Court enter judgment against the Defendants on each count for damages plus interest, costs and attorneys' fees for injuries caused to the Plaintiff by the Defendants' conduct, and for such other relief as this Court deems just and proper.

PLAINTIFF DEMANDS A TRIAL BY JURY

Respectfully Submitted,

[REDACTED]  
By his Attorney,

  
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Dated: July 30, 1993

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