

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

SUMMONS

-----X
STEPHEN MEADE

Plaintiff(s) designate
NEW YORK County as the
place of trial.

Plaintiff,

The basis of the venue is
Defendant Place of Business

-against-

Defendant Place of Business
1011 First Avenue
New York, NY 10022

ARCHDIOCESE OF NEW YORK , REGIS HIGH
SCHOOL, THE USA EAST PROVINCE OF THE
SOCIETY OF JESUS, INC., and JESUIT CONFERENCE
OF CANADA AND THE UNITED STATES

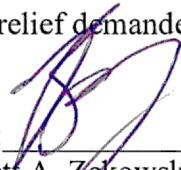
Index No.:
Date Summons &
Complaint Filed:

Defendants.

-----X
To the above named Defendant(s)

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorney(s) within twenty days after the services of this summons exclusive of the day of service, where service is made by delivery upon you personally within the state, or within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Port Washington, NY
July 27, 2021

By: 
Brett A. Zekowski
Parker Waichman LLP
Office & Post Office Address:
6 Harbor Park Drive
Port Washington, NY 11050
(516) 466-6500
Our File # 0031631

TO: Archdiocese of New York
1011 First Avenue
New York, NY 10022

Regis High School
55 East 84th Street
New York, NY 10028

The USA East Province of the Society of Jesus, Inc.
39 East 83rd Street
New York, NY 10028

Jesuit Conference of Canada and the United States
1016 16th Street NW, Ste 400
Washington, DC 20036

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
STEPHEN MEADE

Plaintiff(s),

-against-

ARCHDIOCESE OF NEW YORK , REGIS HIGH SCHOOL,
THE USA EAST PROVINCE OF THE SOCIETY OF JESUS,
INC. AND JESUIT CONFERENCE OF CANADA AND THE
UNITED STATES

Defendant(s).

VERIFIED COMPLAINT

Index No.:
Jury Trial Demanded

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BACKGROUND

In September 1980, Father Robert E. Voelkle sexually abused the then 16 year old plaintiff in his house. Defendants ARCHDIOCESE OF NEW YORK, REGIS HIGH SCHOOL, THE USA EAST PROVINCE OF THE SOCIETY OF JESUS, INC., AND JESUIT CONFERENCE OF CANADA AND THE UNITED STATES was generally negligent in connection with this abuse, including, without limitation, by having negligently hired and retained Father Robert E. Voelkle and giving him unsupervised access to children, including Plaintiff. This lawsuit arises out of Plaintiff's significant damages from that sexual abuse, as described below. Plaintiff, by and through Plaintiff's attorneys, states and alleges, on personal knowledge as to himself and on information as to all other matters as follows:

PARTIES

1. At the time of the commencement of this action plaintiff, Stephen Meade, was a resident of the County of Queens, State of New York.
2. At the time of the incident(s) giving rise to this complaint, plaintiff was a resident

of the County of Queens, State of New York.

3. This action is timely pursuant to New York Child Victims Act, CPLR 214-g. The conduct at issue constituted a sexual offense against a minor in violation of at least one section within Article 130 and/or §263.05 of the New York Penal Law, or a predecessor statute that prohibited such conduct at the time of the act, and resulted in physical, psychological, and emotional injuries. A civil cause of action was previously time-barred, but was revived by the terms of the Child Victims Act, CPLR §214-g.

4. At all material times, Plaintiff was a minor under 18 years of age when the sexual abuse occurred.

5. At all times herein mentioned, defendant Archdiocese of New York was a religious corporation organized pursuant to the Religious Corporations Law, with its principal office at 1011 First Avenue, New York, NY 10022 in New York County, New York.

6. At all times herein mentioned, defendant Regis High School was a religious corporation organized pursuant to the Religious Corporations Law with its principal office at 55 E. 84th Street, New York, NY 10028.

7. At all times herein mentioned, defendant The USA East Province of The Society of Jesus, Inc., was a religious corporation organized pursuant to the Religious Corporations Law with its principal office at 39 East 83rd Street, New York, NY 10028.

8. At all times herein mentioned, defendant The USA East Province of The Society of Jesus, Inc., was a foreign not-for-profit corporation authorized to do business in the State of New York.

9. At all times herein mentioned, defendant Jesuit Conference of Canada and The United States was a religious corporation organized pursuant to the Religious Corporations Law with its principal office at 1016 16th Street NW, Suite 400, Washington, DC 20036.

10. At all times herein mentioned, Regis High School was a Roman Catholic School within and under the authority of Archdiocese of New York.

11. At all times herein mentioned, Regis High School was a Roman Catholic School within and under the authority of The USA East Province of the Society of Jesus.

12. At all times herein mentioned, Regis High School was a Roman Catholic School within and under the authority of Jesuit Conference of Canada and the United States.

13. At all times herein mentioned Archdiocese of New York oversaw, managed, controlled, directed and operated Regis High School.

14. At all times herein mentioned The USA East Province of the Society of Jesus oversaw, managed, controlled, directed and operated Regis High School.

15. At all times herein mentioned Jesuit Conference of Canada and the United States oversaw, managed, controlled, directed and operated Regis High School.

16. At all times herein mentioned Archdiocese of New York managed, supervised and controlled those who were employed or otherwise worked for Regis High School including, but not limited to priests, nuns and other personnel and volunteers, both while they were on premises and engaged in off-premises activities related to their employment with Regis High School.

17. At all times herein mentioned The USA East Province of the Society of Jesus Inc., managed, supervised and controlled those who were employed or otherwise worked for Regis High School, including, but not limited to priests, nuns and other personnel and volunteers, both while they were on premises and engaged in off-premises activities related to their employment with Regis High School.

18. At all times herein mentioned Jesuit Conference of Canada and The United States managed, supervised and controlled those who were employed or otherwise worked for Regis High School, including, but not limited to priests, nuns and other personnel and volunteers, both while

they were on premises and engaged in off-premises activities related to their employment with Archdiocese of New York

19. At all times herein mentioned and relevant to the allegations set forth herein Father Robert E. Voelkle was a priest assigned as by Defendant Archdiocese of New York to Regis High School.

20. At all times herein mentioned and relevant to the allegations set forth herein Father Robert E. Voelkle was a priest at Archdiocese of New York.

21. At all times herein mentioned and relevant to the allegations set forth herein Father Robert E. Voelkle was a priest at Regis High School.

22. At all times herein mentioned and relevant to the allegations set forth herein Father Robert E. Voelkle was a priest with The USA East Province of the Society of Jesus, Inc.

23. At all times herein mentioned and relevant to the allegations set forth herein Father Robert E. Voelkle was a priest with Jesuit conference of Canada and The United States.

24. At all times herein mentioned, Father Robert E. Voelkle was employed by Archdiocese of New York.

25. At all times herein mentioned, Father Robert E. Voelkle was employed by the Regis High School.

26. At all times herein mentioned, Father Robert E. Voelkle was employed by The USA East Province of the Society of Jesus, Inc.

27. At all times herein mentioned, Father Robert E. Voelkle was employed by the Jesuit conference of Canada and The United States.

28. Through his position with defendants, Father Robert E. Voelkle, was put in direct contact with Plaintiff, Stephen Meade, then an infant.

29. In September 1980, Father Robert E. Voelkle sexually abused the plaintiff.

30. At all times herein mentioned, Father Robert E. Voelkle was under the management, supervision, employ, direction and/or control of Defendants Archdiocese Of New York , Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States.

31. Defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States knew and/or reasonably should have known and/or knowingly condoned and/or covered up, the inappropriate and unlawful sexual activities of Archdiocese of New York who sexually abused the Plaintiff Stephen Meade while Plaintiff Stephen Meade was an infant.

32. Defendants, Archdiocese of New York had the responsibility to manage, supervise, control and/or direct priests assigned to Regis High School.

33. Defendants, The USA East Province of the Society of Jesus, Inc., had the responsibility to manage, supervise, control and/or direct priests assigned to Regis High School.

34. Defendants, Jesuit Conference of Canada and the United States had the responsibility to manage, supervise, control and/or direct priests assigned to Regis High School

35. At all relevant times, Archdiocese of New York, Regis High School, The USA East Province of the Society of Jesus, Inc., and Jesuit Conference of Canada and the United States had a duty not to aid pedophiles such as Father Robert E. Voelkle by assigning, maintaining and/or appointing he/she to positions in which he/she would have access to minors.

36. At all relevant times, Father Robert E. Voelkle used his position as a priest to entice, take control of Stephen Meade and sexually assault, sexually abuse or have sexual contact with Stephen Meade while plaintiff was a minor.

37. In 1979, Father Robert E. Voelkle was a priest, assigned by Defendant Archdiocese of New York to Regis High School.

38. In 1979, Father Robert E. Voelkle was a priest, assigned by Defendant The USA East Province of The Society of Jesus, Inc., to Regis High School.

39. In 1979, Father Robert E. Voelkle was a priest, assigned by Defendant Jesuit conference of Canada and the United States to Regis High School

40. Through his positions at, within or for the other defendants, Father Robert E. Voelkle were put in direct contact with infant plaintiff.

41. Father Robert E. Voelkle used his encounter with plaintiff, gained through his position at Archdiocese of New York which granted him access to defendants' youngest parishioners, to sexually assault, sexually abuse and/or have sexual contact with plaintiff in violation of the laws of the State of New York.

42. Defendants, individually, jointly and/or severally, violated various New York statutes, including, but not limited to N.Y. Soc. Serv. Law §§413 and 420, which require school officials and teachers to report suspected cases of child abuse and impose liability for failure to report.

43. Plaintiff suffered physical and psychological injuries and damages as a result of his childhood sexual abuse by Father Robert E. Voelkle.

44. As a direct result of defendants' conduct, Plaintiff suffered and will continue to suffer great pain of body and mind, severe and permanent emotional distress and physical manifestations of emotional distress. As a result of his childhood sexual abuse, plaintiff has been prevented from obtaining the full enjoyment of life, has incurred and will continue to incur expenses for medical and psychological treatment, therapy and counseling and has incurred and will continue to incur loss of income and/or loss of earning capacity.

45. Because of his childhood sexual abuse, Plaintiff Stephen Meade is unable to fully describe all of the details of that abuse and the extent of the harm that he suffered as a result.

**AS AND FOR A FIRST CAUSE OF ACTION
NEGLIGENT HIRING, RETENTION, SUPERVISION AND/OR DIRECTION**

46. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 45 as if fully set forth herein.

47. The sexual abuse of children by adults, including priests and teachers, is foreseeable.

48. Defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States at all relevant times represented and held out to the public that Regis High School to be safe places for learning and participating in youth activities.

49. At all relevant times, defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States were each under an express and/or implied duty to protect and care for plaintiff, Stephen Meade.

50. Defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States negligently hired, retained, directed and supervised Father Robert E. Voelkle because they knew or should have known that Father Robert E. Voelkle posed a threat of sexual abuse of children such as plaintiff.

51. Defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States knew or should have known that Father Robert E. Voelkle had a propensity to engage in the conduct which caused plaintiff's injuries prior to or about the time of the occurrence of these injuries.

52. Defendants Archdiocese Of New York, Regis High School, The USA East Province

Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States owed a duty of care to all minors, including plaintiff, who were likely to come under the influence or supervision of Father Robert E. Voelkle in their role as teacher, priest, counselor, trustee, director, officer, employee, agent, servant and/or volunteer to ensure that Archdiocese of New York did not use their assigned positions to injure minors by sexual assault, sexual abuse or sexual contact with minors.

53. Father Robert E. Voelkle sexually assaulted, sexually abused and/or had sexual contact with plaintiff Stephen Meade.

54. Defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States k were put on notice of Father Robert E. Voelkle's improper and inappropriate actions toward minors.

55. Defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States were negligent in failing to properly supervise Father Robert E. Voelkle.

56. Defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States were negligent in failing to properly manage Father Robert E. Voelkle.

57. Defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States were negligent in failing to properly control Father Robert E. Voelkle.

58. At all relevant times, defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States were willful, wanton, malicious, reckless and/or outrageous in their disregard for the rights and safety of plaintiff.

59. As a direct and proximate result of defendants' above-described omissions, plaintiff has suffered and will continue to suffer the injuries described herein.

60. By reason of the foregoing, the Defendants are liable to plaintiff jointly, severally and/or in the alternative, for compensatory damages and punitive damages, together with costs and interest in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A SECOND CAUSE OF ACTION
NEGLIGENCE/GROSS NEGLIGENCE**

61. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 49 as if fully set forth herein.

62. Defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States knew or negligently failed to know that Father Robert E. Voelkle posed a threat of sexual abuse to children.

63. The acts of Father Robert E. Voelkle as described above, were undertaken, enabled by, and/or during the course of their respective employment, assignment, appointment and/or agency with defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States.

64. Defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States:

- a. gave improper or ambiguous orders or failed to make proper regulations, and/or employed improper persons in work involving risk of harm to others;
- b. failed to adequately supervise the activities of Father Robert E. Voelkle;
- c. failed to adequately supervise and safeguard minors attending Father Robert E. Voelkle;

- d. permitted and/or intentionally failed and/or neglected to prevent negligent or tortious conduct by persons, whether or not their servants, agents or employees, upon premises under their control; and
- e. allowed the acts of omission and/or commission of any or all of the allegations set forth in this Complaint to occur.

65. At all relevant times Father Robert E. Voelkle was under the supervision, employ, direction and/or control of defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States.

66. At all relevant times, defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States were wanton, willful, malicious, reckless and outrageous in their disregard for the rights and safety of plaintiff, which conduct was equivalent to criminal conduct.

67. As a direct and/or indirect result of said conduct, Plaintiff has suffered injuries and damages as described herein.

68. By reason of the foregoing, defendants jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together with interest and costs in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**THIRD CAUSE OF ACTION
BREACH OF FIDUCIARY DUTY**

69. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 68 as if fully set forth herein.

70. At all relevant times, there existed a fiduciary relationship of trust, confidence, and

reliance between plaintiff, on the one hand. and defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States, on the other, based upon the entrustment of plaintiff, while he was a minor child, to the care and supervision of the defendants and each of them, as a parishioner, worshiper, invitee, attendee or guest at Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States and as an, invitee, attendee or guest at Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States. The entrustment of the plaintiff to the care and supervision of the defendants and each of them, while plaintiff was a minor child, required the defendants to assume a fiduciary role and to act in the best interests of the plaintiff and to protect him while he was a minor and vulnerable child.

71. Pursuant to their fiduciary relationship with Plaintiff, defendants were entrusted with the well-being, care and safety of Plaintiff.

72. Pursuant to their fiduciary relationship with Plaintiff, defendants assumed a duty to act in the best interests of Plaintiff.

73. Defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States breached their fiduciary duties to plaintiff.

74. At all relevant times, the actions and/or inactions of Father Robert E. Voelkle were willful, malicious, wanton, reckless and outrageous in his disregard for the rights and safety of plaintiff.

75. As a direct result of defendants' conduct, plaintiff has suffered injuries and damages described herein.

76. By reason of the foregoing, Defendants, jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together with interest and costs in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**FOURTH CAUSE OF ACTION
BREACH OF NON-DELEGABLE DUTY**

77. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 76 as of fully set forth herein.

78. When he was a minor, plaintiff Stephen Meade was placed in the care of defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States for the purposes of providing plaintiff with a safe environment in which to participate in youth activities. There was thus created a non-delegable duty of trust between plaintiff and defendants.

79. Plaintiff Stephen Meade was a vulnerable child when placed in the care of defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States.

80. Defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States, and each of them, were in the best position to prevent plaintiff from being abused and/or to have learned of the repeated abuse by defendant Archdiocese of New York and to have stopped it.

81. As evidenced by the fact that plaintiff Stephen Meade was sexually abused as a minor child entrusted to the care of the defendants, these defendants breached their non-delegable duty to plaintiff.

82. At all relevant times, Father Robert E. Voelkle was under the supervision,

employment, direction and/or control of defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States.

83. As a result of the sexually abusive conduct of Father Robert E. Voelkle, plaintiff Stephen Meade suffered the injuries and damages described herein, the full extent of which is unknown at present.

84. By reason of the foregoing, defendants jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together with interest and costs in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**FIFTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

85. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 84 above as if set forth at length herein.

86. As described above, defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States acted in a negligent and/or grossly negligent manner.

87. The actions of defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States, endangered plaintiff's safety and caused him to fear for his own safety.

88. As a direct and proximate result of the actions of defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States, which included, but were not limited to, negligent and/or grossly negligent conduct, plaintiff suffered severe injuries and damages as described

herein, including, but not limited to, mental and emotional distress.

89. By reason of the foregoing, Defendants, jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together with costs and interest in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**SIXTH CAUSE OF ACTION
BREACH OF STATUTORY DUTY PURSUANT TO NEW YORK
SOCIAL SERVICES LAW §§ 413, 420 TO REPORT ABUSE**

90. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 89 as if fully set forth herein.

91. Pursuant to N.Y. Social Services Law §§413, 420, defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States, had a statutory duty to report the reasonable suspicion of abuse of children in their care.

92. Defendants Archdiocese Of New York, Regis High School, The USA East Province Of The Society Of Jesus, Inc. And Jesuit Conference Of Canada And The United States breached that duty by knowingly and willfully failing to report reasonable suspicion of abuse by Father Robert E. Voelkle of children in their care.

93. As a direct and/or indirect result of said conduct, plaintiff has suffered injuries and damages as described above.

94. By reason of the foregoing, defendants jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and punitive damages, together with costs and interest in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, plaintiff demands judgment against defendants on each cause of action as follows:

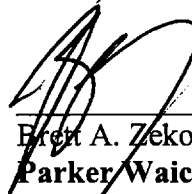
- A. Awarding compensatory damages in an amount to be proven at trial, but in any event in an amount that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction;
- B. Awarding punitive damages to the extent permitted by law;
- C. Awarding prejudgment interest to the extent permitted by law;
- D. Awarding costs and fees of this action, including attorneys' fees, to the extent permitted by law;
- E. Awarding such other and further relief as to this Court may seem just and proper.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

Dated: Port Washington, New York
July 27, 2021

Yours, etc.



Brett A. Zekowski
Parker Waichman LLP
Attorneys for Plaintiff(s)
Office & Post Office Address
6 Harbor Park Drive
Port Washington, NY 11050
516-466-6500
Our File # 0031631

Index No.

SUPREME COURT OF THE STATE OF NEW YORK
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STEPHEN MEADE

Plaintiff(s),

-against-

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SOCIETY OF JESUS, INC. AND JESUIT CONFERENCE OF CANADA AND THE UNITED
STATES

Defendant(s).

SUMMONS and VERIFIED COMPLAINT

Certification per 22NYCRR §130-1.1a


Brett A. Zekowski
Parker Waichman LLP
Attorneys for Plaintiff(s)
6 Harbor Park Drive
Port Washington, NY 11050
(516) 466-6500

To:
Attorney(s) for

Service of a copy of the within is hereby admitted.

Dated:
Attorney(s) for

PLEASE TAKE NOTICE

NOTICE OF

ENTRY that the within is a (certified) true copy of a entered in the office of the Clerk of the within named
Court on 2021 .

NOTICE that an Order of which the within is a true copy will be presented to the Hon. , one of the
OF

SETTLEMENT judges of the within named Court, at ,
, on
2021, at M.

Dated: Port Washington, New York
July 27, 2021

Parker Waichman LLP
Attorneys for Plaintiff(s)