

**SUMMONS  
(CITACION JUDICIAL)**

**NOTICE TO DEFENDANT:  
(AVISO AL DEMANDADO):**

**CALIFORNIA CATHOLIC CONFERENCE AKA THE CALIFORNIA  
CATHOLIC CONFERENCE "ADDT'L PARTIES ATTACHMENT"**

**YOU ARE BEING SUED BY PLAINTIFF:  
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

**THOMAS EMENS**

FOR COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)  
**CONFORMED COPY  
ORIGINAL FILED**  
Superior Court of California  
County of Los Angeles  
**OCT 02 2018**  
Sherril R. Carter, Executive Officer/Clerk  
By: Giannetta Robinson, Deputy

**NOTICE!** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito llene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:  
(El nombre y dirección de la corte es): **SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES  
111 N. HILL STREET, LOS ANGELES, CA 90012**

CASE NUMBER:  
(Número de Caso) **BC 7 23 9 0 8**

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:  
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):  
**Michael Finnegan/Michael Reek, 12100 Wilshire Boulevard, 8th Floor, Los Angeles, CA 90025 310-357-2425**

DATE: **OCT 02 2018**  
(Fecha)

Clerk, by  
(Secretario)

Deputy  
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)) **Giannetta Robinson**



**NOTICE TO THE PERSON SERVED: You are served**

- as an individual defendant.
- as the person sued under the fictitious name of (specify):
- on behalf of (specify):
 

under: <input type="checkbox"/> CCP 416.10 (corporation)	<input type="checkbox"/> CCP 416.60 (minor)
<input type="checkbox"/> CCP 416.20 (defunct corporation)	<input type="checkbox"/> CCP 416.70 (conservatee)
<input type="checkbox"/> CCP 416.40 (association or partnership)	<input type="checkbox"/> CCP 416.90 (authorized person)
<input type="checkbox"/> other (specify):	
- by personal delivery on (date):

SHORT TITLE: THOMAS EMES V. CALIFORNIA CATHOLIC CONFERENCE	CASE NUMBER:
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## INSTRUCTIONS FOR USE

- This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
- If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

List additional parties (Check only one box. Use a separate page for each type of party.):

Plaintiff
  Defendant
  Cross-Complainant
  Cross-Defendant

CALIFORNIA CATHOLIC CONFERENCE A/K/A THE CALIFORNIA CATHOLIC CONFERENCE, INC. A/K/A CALIFORNIA CATHOLIC CONFERENCE OF BISHOPS, ARCHDIOCESE OF LOS ANGELES A/K/A THE ROMAN CATHOLIC ARCHBISHOP OF LOS ANGELES, DIOCESE OF SACRAMENTO A/K/A THE ROMAN CATHOLIC BISHOP OF SACRAMENTO, DIOCESE OF SANTA ROSA A/K/A THE ROMAN CATHOLIC BISHOP OF SANTA ROSA, ARCHDIOCESE OF SAN FRANCISCO A/K/A THE ROMAN CATHOLIC BISHOP OF SAN FRANCISCO, DIOCESE OF OAKLAND A/K/A THE ROMAN CATHOLIC BISHOP OF OAKLAND, DIOCESE OF SAN JOSE A/K/A THE ROMAN CATHOLIC BISHOP OF SAN JOSE, DIOCESE OF MONTEREY A/K/A THE ROMAN CATHOLIC BISHOP OF MONTEREY, CALIFORNIA A/K/A THE DIOCESE OF MONTEREY IN CALIFORNIA, DIOCESE OF ORANGE A/K/A THE ROMAN CATHOLIC BISHOP OF ORANGE, DIOCESE OF SAN BERNARDINO A/K/A THE ROMAN CATHOLIC BISHOP OF SAN BERNARDINO, AND THE DIOCESE OF SAN DIEGO A/K/A THE ROMAN CATHOLIC BISHOP OF SAN DIEGO, DIOCESE OF FRESNO A/K/A THE ROMAN CATHOLIC BISHOP OF FRESNO, AND THE CATHOLIC BISHOP OF CHICAGO, A CORPORATION SOLE A/K/A THE ARCHDIOCESE OF CHICAGO, AND DEES 2-100.

1 Michael G. Finnegan, State Bar No. 241091  
mike@andersonadvocates.com  
2 Michael Reck, State Bar No. 209895  
mreck@andersonadvocates.com  
3 JEFF ANDERSON & ASSOCIATES  
12100 Wilshire Blvd., 8<sup>th</sup> Floor  
4 Los Angeles, California 90025  
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Superior Court of California  
County of Los Angeles

OCT 02 2010

Shorri R. Carter, Executive Officer/Clerk  
By: Charletta Robinson, Deputy

6 Attorneys for Plaintiff THOMAS EMENS

7  
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF LOS ANGELES

10 BC 7 23 9 00

11 THOMAS EMENS )

Case No.:

12 Plaintiff, )

COMPLAINT FOR:

13 vs. )

- 14 ) 1. CIVIL CONSPIRACY
- 15 ) 2. PUBLIC NUISANCE
- 16 ) 3. PRIVATE NUISANCE

17 CALIFORNIA CATHOLIC CONFERENCE )  
18 A/K/A THE CALIFORNIA CATHOLIC )  
19 CONFERENCE, INC. A/K/A CALIFORNIA )  
20 CATHOLIC CONFERENCE OF BISHOPS, )  
21 ARCHDIOCESE OF LOS ANGELES A/K/A )  
22 THE ROMAN CATHOLIC ARCHBISHOP )  
23 OF LOS ANGELES, DIOCESE OF )  
24 SACRAMENTO A/K/A THE ROMAN )  
25 CATHOLIC BISHOP OF SACRAMENTO, )  
26 DIOCESE OF SANTA ROSA A/K/A THE )  
27 ROMAN CATHOLIC BISHOP OF SANTA )  
28 ROSA, ARCHDIOCESE OF SAN FRANCISCO )  
A/K/A THE ROMAN CATHOLIC BISHOP OF )  
SAN FRANCISCO, DIOCESE OF OAKLAND )  
A/K/A THE ROMAN CATHOLIC BISHOP OF )  
OAKLAND, DIOCESE OF SAN JOSE A/K/A )  
THE ROMAN CATHOLIC BISHOP OF SAN )  
JOSE, DIOCESE OF MONTEREY A/K/A THE )  
ROMAN CATHOLIC BISHOP OF )  
MONTEREY, CALIFORNIA A/K/A THE )  
DIOCESE OF MONTEREY IN CALIFORNIA, )  
DIOCESE OF ORANGE A/K/A THE ROMAN )  
CATHOLIC BISHOP OF ORANGE, DIOCESE )  
OF SAN BERNARDINO A/K/A THE ROMAN )  
CATHOLIC BISHOP OF SAN BERNARDINO, )  
AND THE DIOCESE OF SAN DIEGO A/K/A )  
THE ROMAN CATHOLIC BISHOP OF SAN )  
DIEGO, DIOCESE OF FRESNO A/K/A THE )  
ROMAN CATHOLIC BISHOP OF FRESNO. )

1 AND THE CATHOLIC BISHOP OF CHICAGO, )  
A CORPORATION SOLE A/K/A THE )  
2 ARCHDIOCESE OF CHICAGO, and DOES 1- )  
100. )

3 )  
4 Defendant(s). )

5 ) DEMAND FOR JURY TRIAL  
6 )  
7 )  
8 )

9 Based upon information and belief available to Plaintiff at the time of the filing of this  
10 Complaint, Plaintiff makes the following allegations:

11 **PARTIES**

12 1. Plaintiff Thomas Emens (hereinafter "Plaintiff") is an adult male resident of the State  
13 of California.

14 2. At all times herein mentioned Plaintiff is and at all times mentioned herein  
15 mentioned was an individual residing in the County of Ventura, State of California.

16 3. Plaintiff is informed and believes and thereon alleges that at all times material  
17 hereto, Defendant California Catholic Conference a/k/a the California Catholic Conference, Inc.  
18 a/k/a California Catholic Conference of Bishops (hereinafter "California Catholic Conference") was  
19 and continues to be an organization or entity which includes, but is not limited to, civil corporations,  
20 decision making entities, officials and employees authorized to conduct business and conducting  
21 business in the State of California with its principal place of business at 1119 K Street, 2<sup>nd</sup> Floor,  
22 Sacramento, California. The California Catholic Conference was created in approximately 1971.  
23 Later, Defendant California Catholic Conference created a corporation called the California  
24 Catholic Conference to conduct some of its affairs. The California Catholic Conference represents  
25 California bishops and archbishops and their dioceses. The California Catholic Conference  
26 functions as a business by engaging in activities promoting, advancing and furthering the policies,  
27 practices and interests of Catholic institutions in California. The executive leadership of the  
28 California Catholic Conference includes Bishop Jaime Soto, the Bishop of the Diocese of

1 Sacramento, Bishop Robert McElroy, the Bishop of the Diocese of San Diego, and Bishop Kevin  
2 Vann, the Bishop of the Diocese of Orange. The California Catholic Conference coordinates its  
3 efforts in conjunction with each Diocese in California.

4 4. Plaintiff is informed and believes and thereon alleges that at all times material  
5 hereto Defendant Archdiocese of Los Angeles a/k/a the Roman Catholic Archbishop of Los  
6 Angeles (hereinafter "LA Archdiocese") was and continues to be an organization or entity which  
7 includes, but is not limited to, civil corporations, decision making entities, officials, and employees,  
8 authorized to conduct business and conducting business in the State of California with its principal  
9 place of business at 3424 Wilshire Boulevard, Los Angeles, California. The LA Archdiocese was  
10 created in approximately 1840. Later the Archdiocese created a corporation called the LA  
11 Archdiocese to conduct some of its affairs. The LA Archdiocese operates its affairs as both a  
12 corporate entity and as an organization named the Archdiocese of Los Angeles, with the Archbishop  
13 as the top official. Both of these entities and all other corporations and entities controlled by the  
14 Archbishop are included in this Complaint as being the LA Archdiocese. The Archbishop is the top  
15 official of the Archdiocese and is given authority over all matters within the LA Archdiocese as a  
16 result of his position. The Archdiocese functions as a business by engaging in numerous revenue  
17 producing activities and soliciting money from its members in exchange for its services. The LA  
18 Archdiocese has several programs which seek out the participation of children in the Archdiocese's  
19 activities. The LA Archdiocese, through its officials, has control over those activities involving  
20 children. The LA Archdiocese has the power to appoint, supervise, monitor and fire each person  
21 working with children within the Archdiocese of Los Angeles.

22 5. Plaintiff is informed and believes and thereon alleges that at all times material hereto  
23 Defendant Diocese of Sacramento a/k/a the Roman Catholic Bishop of Sacramento (hereinafter  
24 "Sacramento Diocese") was and continues to be an organization or entity which includes, but is not  
25 limited to, civil corporations, decision making entities, officials, and employees, authorized to  
26 conduct business and conducting business in the State of California with its principal place of  
27 business at 2110 Broadway, Sacramento, California. The Sacramento Diocese was created in  
28 approximately 1886. Later the Diocese created a corporation called the Sacramento Diocese to

1 conduct some of its affairs. The Sacramento Diocese operates its affairs as both a corporate entity  
2 and as an organization named the Diocese of Sacramento, with the Bishop as the top official. Both  
3 of these entities and all other corporations and entities controlled by the Bishop are included in this  
4 Complaint as being the Sacramento Diocese. The Bishop is the top official of the Diocese and is  
5 given authority over all matters within the Sacramento Diocese as a result of his position. The  
6 Diocese functions as a business by engaging in numerous revenue producing activities and  
7 soliciting money from its members in exchange for its services. The Sacramento Diocese has  
8 several programs which seek out the participation of children in the Diocese's activities. The  
9 Sacramento Diocese, through its officials, has control over those activities involving children. The  
10 Sacramento Diocese has the power to appoint, supervise, monitor and fire each person working with  
11 children within the Diocese of Sacramento.

12         6. Plaintiff is informed and believes and thereon alleges that at all times material hereto  
13 Defendant Diocese of Santa Rosa a/k/a the Roman Catholic Bishop of Santa Rosa (hereinafter  
14 "Santa Rosa Diocese") was and continues to be an organization or entity which includes, but is not  
15 limited to, civil corporations, decision making entities, officials, and employees, authorized to  
16 conduct business and conducting business in the State of California with its principal place of  
17 business at 985 Airway Court, Santa Rosa, California. The Santa Rosa Diocese was created in  
18 approximately 1962. Later the Diocese created a corporation called the Santa Rosa Diocese to  
19 conduct some of its affairs. The Santa Rosa Diocese operates its affairs as both a corporate entity  
20 and as an organization named the Diocese of Santa Rosa, with the Bishop as the top official. Both  
21 of these entities and all other corporations and entities controlled by the Bishop are included in this  
22 Complaint as being the Santa Rosa Diocese. The Bishop is the top official of the Diocese and is  
23 given authority over all matters within the Santa Rosa Diocese as a result of his position. The  
24 Diocese functions as a business by engaging in numerous revenue producing activities and  
25 soliciting money from its members in exchange for its services. The Santa Rosa Diocese has several  
26 programs which seek out the participation of children in the Diocese's activities. The Santa Rosa  
27 Diocese, through its officials, has control over those activities involving children. The Santa Rosa  
28

1 Diocese has the power to appoint, supervise, monitor and fire each person working with children  
2 within the Diocese of Santa Rosa.

3           7. Plaintiff is informed and believes and thereon alleges that at all times material hereto  
4 Defendant Archdiocese of San Francisco a/k/a the Roman Catholic Archbishop of San Francisco  
5 (hereinafter “San Francisco Archdiocese”) was and continues to be an organization or entity which  
6 includes, but is not limited to, civil corporations, decision making entities, officials, and employees,  
7 authorized to conduct business and conducting business in the State of California with its principal  
8 place of business at One Peter Yorke Way, San Francisco, California. The San Francisco  
9 Archdiocese was created in approximately 1853. Later the Archdiocese created a corporation called  
10 the San Francisco Archdiocese to conduct some of its affairs. The San Francisco Archdiocese  
11 operates its affairs as both a corporate entity and as an organization named the Archdiocese of San  
12 Francisco, with the Archbishop as the top official. Both of these entities and all other corporations  
13 and entities controlled by the Archbishop are included in this Complaint as being the San Francisco  
14 Archdiocese. The Archbishop is the top official of the Archdiocese and is given authority over all  
15 matters within the San Francisco Archdiocese as a result of his position. The Archdiocese functions  
16 as a business by engaging in numerous revenue producing activities and soliciting money from its  
17 members in exchange for its services. The San Francisco Archdiocese has several programs which  
18 seek out the participation of children in the Archdiocese’s activities. The San Francisco  
19 Archdiocese, through its officials, has control over those activities involving children. The San  
20 Francisco Archdiocese has the power to appoint, supervise, monitor and fire each person working  
21 with children within the Archdiocese of San Francisco.

22           8. Plaintiff is informed and believes and thereon alleges that at all times material hereto  
23 Defendant Diocese of Oakland a/k/a the Roman Catholic Bishop of Oakland (hereinafter “Oakland  
24 Diocese”) was and continues to be an organization or entity which includes, but is not limited to,  
25 civil corporations, decision making entities, officials, and employees, authorized to conduct  
26 business and conducting business in the State of California with its principal place of business at  
27 2121 Harrison Street, Suite 100, Oakland, California. The Oakland Diocese was created in  
28 approximately 1962. Later the Diocese created a corporation called the Oakland Diocese to conduct

1 some of its affairs. The Oakland Diocese operates its affairs as both a corporate entity and as an  
2 organization named the Diocese of Oakland, with the Bishop as the top official. Both of these  
3 entities and all other corporations and entities controlled by the Bishop are included in this  
4 Complaint as being the Oakland Diocese. The Bishop is the top official of the Diocese and is given  
5 authority over all matters within the Oakland Diocese as a result of his position. The Diocese  
6 functions as a business by engaging in numerous revenue producing activities and soliciting money  
7 from its members in exchange for its services. The Oakland Diocese has several programs which  
8 seek out the participation of children in the Diocese's activities. The Oakland Diocese, through its  
9 officials, has control over those activities involving children. The Oakland Diocese has the power to  
10 appoint, supervise, monitor and fire each person working with children within the Diocese of  
11 Oakland.

12         9. Plaintiff is informed and believes and thereon alleges that at all times material hereto  
13 Defendant Diocese of San Jose a/k/a the Roman Catholic Bishop of San Jose (hereinafter "San Jose  
14 Diocese") was and continues to be an organization or entity which includes, but is not limited to,  
15 civil corporations, decision making entities, officials, and employees, authorized to conduct  
16 business and conducting business in the State of California with its principal place of business at  
17 1150 North First Street, Suite 100, San Jose, California. The San Jose Diocese was created in  
18 approximately 1981. Later the Diocese created a corporation called the San Jose Diocese to conduct  
19 some of its affairs. The San Jose Diocese operates its affairs as both a corporate entity and as an  
20 organization named the Diocese of San Jose, with the Bishop as the top official. Both of these  
21 entities and all other corporations and entities controlled by the Bishop are included in this  
22 Complaint as being the San Jose Diocese. The Bishop is the top official of the Diocese and is given  
23 authority over all matters within the San Jose Diocese as a result of his position. The Diocese  
24 functions as a business by engaging in numerous revenue producing activities and soliciting money  
25 from its members in exchange for its services. The San Jose Diocese has several programs which  
26 seek out the participation of children in the Diocese's activities. The San Jose Diocese, through its  
27 officials, has control over those activities involving children. The San Jose Diocese has the power to  
28



1 appoint, supervise, monitor and fire each person working with children within the Diocese of San  
2 Jose.

3 10. Plaintiff is informed and believes and thereon alleges that at all times material hereto  
4 Defendant Diocese of Monterey a/k/a the Roman Catholic Bishop of Monterey, California a/k/a the  
5 Diocese of Monterey in California (hereinafter "Monterey Diocese") was and continues to be an  
6 organization or entity which includes, but is not limited to, civil corporations, decision making  
7 entities, officials, and employees, authorized to conduct business and conducting business in the  
8 State of California with its principal place of business at 425 Church Street, Monterey, California.  
9 The Monterey Diocese was created in approximately 1967. Later the Diocese created a corporation  
10 called the Monterey Diocese to conduct some of its affairs. The Monterey Diocese operates its  
11 affairs as both a corporate entity and as an organization named the Diocese of Monterey, with the  
12 Bishop as the top official. Both of these entities and all other corporations and entities controlled by  
13 the Bishop are included in this Complaint as being the Monterey Diocese. The Bishop is the top  
14 official of the Diocese and is given authority over all matters within the Monterey Diocese as a  
15 result of his position. The Diocese functions as a business by engaging in numerous revenue  
16 producing activities and soliciting money from its members in exchange for its services. The  
17 Monterey Diocese has several programs which seek out the participation of children in the  
18 Diocese's activities. The Monterey Diocese, through its officials, has control over those activities  
19 involving children. The Monterey Diocese has the power to appoint, supervise, monitor and fire  
20 each person working with children within the Diocese of Monterey.

21 11. Plaintiff is informed and believes and thereon alleges that at all times material hereto  
22 Defendant Diocese of Orange a/k/a the Roman Catholic Bishop of Orange (hereinafter "Orange  
23 Diocese") was and continues to be an organization or entity which includes, but is not limited to,  
24 civil corporations, decision making entities, officials, and employees, authorized to conduct  
25 business and conducting business in the State of California with its principal place of business at  
26 13280 Chapman Avenue, Garden Grove, California. The Orange Diocese was created in  
27 approximately 1976. Later the Diocese created a corporation called the Orange Diocese to conduct  
28 some of its affairs. The Orange Diocese operates its affairs as both a corporate entity and as an

1 organization named the Diocese of Orange, with the Bishop as the top official. Both of these entities  
2 and all other corporations and entities controlled by the Bishop are included in this Complaint as  
3 being the Orange Diocese. The Bishop is the top official of the Diocese and is given authority over  
4 all matters within the Orange Diocese as a result of his position. The Diocese functions as a  
5 business by engaging in numerous revenue producing activities and soliciting money from its  
6 members in exchange for its services. The Orange Diocese has several programs which seek out the  
7 participation of children in the Diocese's activities. The Orange Diocese, through its officials, has  
8 control over those activities involving children. The Orange Diocese has the power to appoint,  
9 supervise, monitor and fire each person working with children within the Diocese of Orange.

10       12. Plaintiff is informed and believes and thereon alleges that at all times material hereto  
11 Defendant Diocese of San Bernardino a/k/a the Roman Catholic Bishop of San Bernardino  
12 (hereinafter "San Bernardino Diocese") was and continues to be an organization or entity which  
13 includes, but is not limited to, civil corporations, decision making entities, officials, and employees,  
14 authorized to conduct business and conducting business in the State of California with its principal  
15 place of business at 1201 East Highland Avenue, San Bernardino, California. The San Bernardino  
16 Diocese was created in approximately 1978. Later the Diocese created a corporation called the San  
17 Bernardino Diocese to conduct some of its affairs. The San Bernardino Diocese operates its affairs  
18 as both a corporate entity and as an organization named the Diocese of San Bernardino, with the  
19 Bishop as the top official. Both of these entities and all other corporations and entities controlled by  
20 the Bishop are included in this Complaint as being the San Bernardino Diocese. The Bishop is the  
21 top official of the Diocese and is given authority over all matters within the San Bernardino Diocese  
22 as a result of his position. The Diocese functions as a business by engaging in numerous revenue  
23 producing activities and soliciting money from its members in exchange for its services. The San  
24 Bernardino Diocese has several programs which seek out the participation of children in the  
25 Diocese's activities. The San Bernardino Diocese, through its officials, has control over those  
26 activities involving children. The San Bernardino Diocese has the power to appoint, supervise,  
27 monitor and fire each person working with children within the Diocese of San Bernardino.

28

1           13. Plaintiff is informed and believes and thereon alleges that at all times material hereto  
2 Defendant Diocese of San Diego a/k/a the Roman Catholic Bishop of San Diego (hereinafter “San  
3 Diego Diocese”) was and continues to be an organization or entity which includes, but is not limited  
4 to, civil corporations, decision making entities, officials, and employees, authorized to conduct  
5 business and conducting business in the State of California with its principal place of business at  
6 3888 Paducah Drive, San Diego, California. The San Diego Diocese was created in approximately  
7 1936. Later the Diocese created a corporation called the San Diego Diocese to conduct some of its  
8 affairs. The San Diego Diocese operates its affairs as both a corporate entity and as an organization  
9 named the Diocese of San Diego, with the Bishop as the top official. Both of these entities and all  
10 other corporations and entities controlled by the Bishop are included in this Complaint as being the  
11 San Diego Diocese. The Bishop is the top official of the Diocese and is given authority over all  
12 matters within the San Diego Diocese as a result of his position. The Diocese functions as a  
13 business by engaging in numerous revenue producing activities and soliciting money from its  
14 members in exchange for its services. The San Diego Diocese has several programs which seek out  
15 the participation of children in the Diocese’s activities. The San Diego Diocese, through its  
16 officials, has control over those activities involving children. The San Diego Diocese has the power  
17 to appoint, supervise, monitor and fire each person working with children within the Diocese of San  
18 Diego.

19           14. Plaintiff is informed and believes and thereon alleges that at all times material hereto  
20 Defendant Diocese of Fresno a/k/a the Roman Catholic Bishop of Fresno (hereinafter “Fresno  
21 Diocese”) was and continues to be an organization or entity which includes, but is not limited to,  
22 civil corporations, decision making entities, officials, and employees, authorized to conduct  
23 business and conducting business in the State of California with its principal place of business at  
24 1550 North Fresno Street, Fresno, California. The Fresno Diocese was created in approximately  
25 1967. Later the Diocese created a corporation called the Fresno Diocese to conduct some of its  
26 affairs. The Fresno Diocese operates its affairs as both a corporate entity and as an organization  
27 named the Diocese of Fresno, with the Bishop as the top official. Both of these entities and all other  
28 corporations and entities controlled by the Bishop are included in this Complaint as being the

1 Fresno Diocese. The Bishop is the top official of the Diocese and is given authority over all matters  
2 within the Fresno Diocese as a result of his position. The Diocese functions as a business by  
3 engaging in numerous revenue producing activities and soliciting money from its members in  
4 exchange for its services. The Fresno Diocese has several programs which seek out the participation  
5 of children in the Diocese's activities. The Fresno Diocese, through its officials, has control over  
6 those activities involving children. The Fresno Diocese has the power to appoint, supervise, monitor  
7 and fire each person working with children within the Diocese of Fresno.

8 15. Defendants California Catholic Conference, Los Angeles Archdiocese, Sacramento  
9 Diocese, Santa Rosa Diocese, San Francisco Archdiocese, Oakland Diocese, San Bernardino  
10 Diocese, Monterey Diocese, San Jose Diocese and Fresno Diocese are hereinafter collectively  
11 referred to as California Defendants.

12 16. Plaintiff is informed and believes and thereon alleges that at all times material hereto  
13 Defendant the Catholic Bishop of Chicago, a corporation sole, a/k/a the Archdiocese of Chicago  
14 (hereinafter "Chicago Archdiocese") was and continues to be an organization or entity which  
15 includes, but is not limited to, civil corporations, decision making entities, officials, and employees,  
16 authorized to conduct business and conducting business in the State of Illinois with its principal  
17 place of business in Cook County, Illinois. The Chicago Archdiocese was created in approximately  
18 1843. Later the Chicago Archdiocese created a corporation called the Roman Catholic Bishop of  
19 Chicago to conduct some of its affairs. The Chicago Archdiocese operates its affairs as both a  
20 corporate entity and as an organization named the Archdiocese of Chicago, with the Archbishop as  
21 the top official. Both of these entities and all other corporations and entities controlled by the  
22 Archbishop are included in this Complaint as being the Archdiocese of Chicago. The Archbishop is  
23 the top official of the Archdiocese and is given authority over all matters within the Chicago  
24 Archdiocese as a result of his position. The Archdiocese functions as a business by engaging in  
25 numerous revenue producing activities and soliciting money from its members in exchange for its  
26 services. The Chicago Archdiocese has several programs which seek out the participation of  
27 children in the Archdiocese's activities. The Chicago Archdiocese, through its officials, has control  
28

1 over those activities involving children. The Chicago Archdiocese has the power to appoint,  
2 supervise, monitor and fire each person working with children within the Chicago Archdiocese.

3 17. Jurisdiction and venue lie appropriately before this Court because of the geographic  
4 location of where the cause of action arose. Specifically Msgr. Mohan was granted faculties by the  
5 Archdiocese of Los Angeles when he transferred from the Archdiocese of Chicago. The Diocese of  
6 Orange was created thereafter and Msgr. Mohan remained in the Diocese of Orange where his  
7 faculties were continued. Decisions made by the Archdiocese of Los Angeles and all Defendants are  
8 part of a cohesive and coordinated plan such that this Court is appropriate and proper.

9 18. Plaintiff is informed and believes and thereon alleges that the true names and  
10 capacities of Defendants referred to herein as DOES 1 through 100, inclusive and each of them, are  
11 currently unknown to Plaintiff. Plaintiff is further informed and believes and thereon alleges that  
12 DOES 1 through 100 are in some way responsible for the damages incurred. Plaintiff will amend  
13 this Complaint to allege the true names and capacities of DOES 1 through 100 once ascertained by  
14 Plaintiff.

15 19. California Defendants, Chicago Archdiocese, and DOES 1 through 100 are  
16 collectively referred to hereinafter as Defendants.

17 20. Plaintiff is informed and believes and thereon alleges that at all matters each of the  
18 Defendants were the co-conspirators, employees, agents, ostensible agents, managing agents,  
19 servants, owners, joint venturers, managers, directors, officers, representatives, alter egos, partners,  
20 general partners, trustees, co-trustees, co-venturers, and/or employees of the other defendants, and  
21 in doing the things herein alleges were acting within the course and scope of their co-conspiracy,  
22 employment, agency, ownership, joint venture, management or their status as an officer, director, or  
23 managing agent of Defendants. Each of the Defendants' actions, omissions, and conduct were  
24 known to, authorized and ratified by Defendants. Plaintiff is informed and believes and thereon  
25 alleges that all the acts, omissions, and/or conduct by the Defendants, which was outside the scope  
26 of their authority, was known to, authorized and ratified by the Defendants.

27 **FACTS**

1           21. From approximately 1978 to 1980, when Plaintiff (hereinafter “Emens”) was  
2 approximately 10 to 12 years old, Monsignor Thomas Joseph Mohan (hereinafter “Msgr. Mohan”)  
3 engaged in unpermitted sexual contact with Plaintiff.

4           22. Msgr. Mohan was ordained a priest of Defendant Archdiocese of Chicago in  
5 approximately 1935.

6           23. Msgr. Mohan was employed at various parishes in the Archdiocese of Chicago from  
7 approximately 1938 to 1972.

8           24. In approximately 1972, Msgr. Mohan was transferred to St. Anthony Claret Parish in  
9 Anaheim in Defendant Los Angeles Archdiocese.

10          25. St. Anthony Claret Parish later became part of Defendant Orange Diocese.

11          26. Msgr. Mohan remained in residence at St. Anthony Claret from approximately 1973  
12 to 1989 during which time Msgr. Mohan sexually assaulted Plaintiff.

13          27. Plaintiff was raised to trust, revere and respect the Roman Catholic Church,  
14 including Defendants and their agents, including Msgr. Mohan. Plaintiff and his family came in  
15 contact with Msgr. Mohan as an agent and representative of Defendants.

16          28. The true nature of Msgr. Mohan as a sexually abusive priest has not been disclosed  
17 publically by Defendants.

18          29. Defendants have failed and continue to fail to report known and/or suspected sexual  
19 abuse of children by their agents to the police and law enforcement.

20          30. Defendants have maintained and continue to maintain sexually abusive priests in  
21 employment despite knowledge or suspicions of child sex abuse.

22          31. Defendants hold their leaders and agents out as people of high morals, as possessing  
23 immense power, teaching families and children to obey these leaders and agents, teaching families  
24 and children to respect and revere these leaders and agents, soliciting youth and families to their  
25 programs, marketing to youth and families, recruiting youth and families, and holding out the  
26 people that work in their programs as safe.

27          32. As a result, Defendants’ leaders and agents have occupied positions of great trust,  
28 respect and allegiance among members of the general public, including Plaintiff.

1           33.     Since 1971, Defendant California Catholic Conference has assembled the Bishops of  
2 the Dioceses in California in coordinating, creating, deciding and disseminating the policies,  
3 practices and agendas to be implemented in each Diocese in California.

4           34.     Defendant California Catholic Conference functions as a convener for the bishops of  
5 each Diocese in California to discuss and respond collectively as a governing body over Catholic  
6 institutions and issues in California.

7           35.     Defendant California Catholic Conference, on behalf of each California Diocese, has  
8 made representations about the safety of programs in Catholic institutions in California.

9           36.     Defendant California Catholic Conference has repeatedly pledged to restore trust for  
10 victims of sexual abuse through accountability and justice. These pledges are inconsistent with  
11 California Defendants' policies, practices and actions demonstrating secrecy and concealment of  
12 information about priests who have sexually assaulted children in California.

13          37.     Defendants have fraudulently represented and continue to fraudulently represent to  
14 the public, including Plaintiff, that 1) there is no danger of child sex abuse at its facilities and in its  
15 programs; 2) they respond to allegations of sexual abuse promptly and effectively; 3) they cooperate  
16 with civil authorities; 4) they discipline offenders and/or 5) they provide a means of accountability  
17 to ensure the problem of clerical sex abuse is effectively dealt with.

18          38.     Defendants have also fraudulently represented and continue to fraudulently represent  
19 to the public that any sexual misconduct by its agents is a problem of the past and that its programs  
20 and schools do not currently pose any risk to children.

21          39.     Each Defendant has repeatedly and fraudulently represented that it will take action to  
22 prevent sexual abuse while simultaneously concealing information about its knowledge of sexual  
23 abuse of minors from law enforcement and the general public.

24          40.     Defendants have a duty to refrain from taking actions that it knows or should know  
25 interrupt or interfere with the health, safety, and welfare of the general public.

26          41.     Despite this duty, Defendants have, for decades, and continue to adopt, policies and  
27 practices of covering up criminal activity committed by its agents. These practices continues to the  
28 present day.

1           42. Defendants' practices have endangered numerous children in the past and these  
2 practices will continue to put children at risk in the future.

3           43. Defendants owe a duty to warn all children and their parents that come into contact  
4 with its agents or former agents of allegations of sexual misconduct by the agents and former agents  
5 because these children and their parents hold many of these agents and former agents in esteemed  
6 positions, believe in the infallibility of Defendants' agents, and the trustworthiness of Defendants,  
7 all of which gives them virtually unlimited access to children.

8           44. In 2004, Defendant Los Angeles Archdiocese publicly admitted that it knew of 244  
9 priests who worked in the Archdiocese who were accused of sexually molesting minors. At that  
10 time, the Archdiocese released a list of 211 named clerics accused in the Los Angeles Archdiocese.  
11 Defendant Archdiocese of Los Angeles later removed the list on its website, replacing it with a list  
12 and documents regarding 122 clerics who were named as abusers in a prior lawsuit. Defendant Los  
13 Angeles Archdiocese continues to conceal important information about the priests on the lists and  
14 the names and information about accused priests not on the lists. Additional information has also  
15 not been disclosed about the credibly accused priests' pattern of grooming and sexual abuse. As a  
16 result, children are at risk of being sexually assaulted.

17           45. In 2004, Defendant Sacramento Diocese publicly admitted that it knew of 21 priests  
18 who worked in the Diocese since 1950 who were accused of child sex abuse. Defendant Sacramento  
19 Diocese has never publicly released those names. Defendant Sacramento Diocese continues to  
20 conceal the identities, names and information about priests accused of sexual abuse of minors. As a  
21 result, children are at risk of being sexually assaulted.

22           46. In 2003, Defendant Santa Rosa Diocese publicly admitted that it knew of 16 priests  
23 who worked in the Diocese since 1962 who had been involved in sexual misconduct with minors.  
24 Defendant Santa Rosa Diocese has never publicly released those names. Defendant Santa Rosa  
25 Diocese continues to conceal the identities, names and information about priests accused of sexual  
26 abuse of minors. As a result, children are at risk of being sexually assaulted.

27           47. In 2004, Defendant San Francisco Archdiocese publicly admitted that it knew of 51  
28 priests who worked in the Diocese since 1950 who were credibly accused of sexually molesting



1 minors. Defendant San Francisco Archdiocese also publicly admitted that it knew of an additional 5  
2 priests who had been accused of sexually molesting minors. Defendant San Francisco Archdiocese  
3 continues to conceal the identities, names and information about priests accused of sexual abuse of  
4 minors. As a result, children are at risk of being sexually assaulted.

5 48. In 2004, Defendant Oakland Diocese publicly admitted that it knew of 29 priests  
6 who worked in the Diocese since 1950 who were accused of sexual misconduct with minors.  
7 Defendant Oakland Diocese has never publicly released those names. Defendant Oakland Diocese  
8 continues to conceal the identities, names and information about priests accused of sexual abuse of  
9 minors. As a result, children are at risk of being sexually assaulted.

10 49. In 2004, Defendant San Jose Diocese publicly admitted that it knew of 6 priests who  
11 worked in the Diocese since 1981 who were accused of sexual abuse of minors. Defendant San Jose  
12 Diocese has never publicly released those names. Defendant San Jose Diocese continues to conceal  
13 the identities, names and information about priests accused of sexual abuse of minors. As a result,  
14 children are at risk of being sexually assaulted.

15 50. In 2018, Defendant San Jose Diocese publicly stated that it would release names of  
16 priests accused of abusing minors and self-investigate its response to reports of abuse.

17 51. In 2004, Defendant Monterey Diocese publicly admitted that it knew of 17 clerics  
18 who worked in the Diocese who were accused of sexual abuse of minors. Defendant Monterey  
19 Diocese released a partial list of its clerics accused of sexual abuse of minors which is no longer  
20 available on its website. Defendant Monterey Diocese continues to conceal important information  
21 about the priests on its list and the names and information about accused priests not on its list.  
22 Additional information has also not been disclosed about the credibly accused priests' pattern of  
23 grooming and sexual abuse. As a result, children are at risk of being sexually assaulted.

24 52. In 2004, Defendant Orange Diocese publicly admitted that it knew of 16 priests with  
25 were accused of sexual abuse of minors. Since then, the identities of 15 of the 16 priests were  
26 revealed during litigation. Defendant Orange Diocese continues to conceal important information  
27 about priests on its list and the names and information about accused priests not on its list.  
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1 Additional information has also not been disclosed about the credibly accused priests' pattern of  
2 grooming and sexual abuse. As a result, children are at risk of being sexually assaulted.

3 53. In 2004, Defendant San Bernardino Diocese publicly admitted that it knew of 13  
4 priests since 1978 who were accused of sexual abuse of minors. Defendant San Bernardino Diocese  
5 has never publicly released those names. Defendant San Bernardino Diocese continues to conceal  
6 the identities and information about priests accused of sexual abuse of minors. As a result, children  
7 are at risk of being sexually assaulted.

8 54. In 2018, Defendant San Diego Diocese publicly admitted that it knew of 51 priests  
9 who worked in the San Diego Diocese since 1950 who had been credibly accused of sexually  
10 molesting minors. Defendant San Diego Diocese continues to conceal important information about  
11 the priests on that list and the names and information about accused priests not on the list.  
12 Information has not been disclosed about the credibly accused priests' pattern of grooming and  
13 sexual abuse. As a result, children are at risk of being sexually molested.

14 55. In 2004, Defendant Fresno Diocese publicly admitted that it knew of 8 reports of  
15 priest sexual abuse between 1950 and 2002. Defendant Fresno Diocese has never publicly released  
16 those names. Defendant Fresno Diocese continues to conceal the identities and information about  
17 priests accused of sexual abuse of minors. As a result, children are at risk of being sexually abused.

18 56. In 2004, Defendant Chicago Archdiocese publicly admitted that there were 55 clerics  
19 of the Archdiocese who had allegations of sexually molesting minors substantiated against them  
20 since 1950. In 2014, Defendant Chicago Archdiocese added 10 more clerics to its list. Defendant  
21 Chicago Archdiocese has released some of the documents pertaining to 30 of the 65 listed clerics  
22 that expose the histories, patterns and practices used to molest minors, and the Archdiocese's  
23 knowledge of the clerics' dangerous tendencies. Defendant Chicago Archdiocese continues to  
24 conceal important information about the priests on its list and the names and information about  
25 accused priests not on its list. Additional information has also not been disclosed about the credibly  
26 accused priests' pattern of grooming and sexual abuse. As a result, children are at risk of being  
27 sexually assaulted.

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1           57.    On approximately November 30, 2017, Plaintiff wrote to Cardinal Blaise Cupich, the  
2 Archbishop of Defendant Chicago Archdiocese requesting that Defendant Chicago Archdiocese  
3 identify and investigate Msgr. Mohan's sexual abuse of children. Plaintiff did not receive timely a  
4 response to his letter.

5           58.    On approximately August 27, 2018, Cardinal Cupich made public statements that  
6 were dismissive of the sexual abuse of children by priests, demonstrating indifference to the current  
7 peril of sexual abuse of children.

8           59.    On approximately September 26, 2018, Cardinal Cupich published an op-ed in the  
9 Chicago Tribune newspaper about Defendant Chicago Archdiocese's response to sexual abuse in  
10 the Catholic Church. Archbishop Cupich publicly apologized for his earlier comments minimizing  
11 the prevalence of sexual abuse by priests. Archbishop Cupich represented that it would continue the  
12 practices it has in the past. Defendant Chicago Archdiocese's practices continue to put children at  
13 risk of being sexually assaulted.

14           60.    Upon information and belief, prior to and since Defendants' disclosures, Defendants  
15 failed to report multiple allegations of sexual abuse of children by its agents to the proper civil  
16 authorities. As a result, children are at risk of being sexually assaulted.

17           61.    Further, the public is under the mistaken belief that Defendants do not have  
18 undisclosed knowledge of clerics who present a danger to children.

19           62.    As a direct result of Defendants' conduct described herein, Plaintiff has suffered and  
20 will continue to suffer, great pain of mind and body, severe and permanent emotional distress,  
21 physical manifestations of emotional distress, embarrassment, loss of self-esteem, humiliation,  
22 physical, personal and psychological injuries. Plaintiff was prevented and will continue to be  
23 prevented from performing normal daily activities and obtaining the full enjoyment of life; and/or  
24 has incurred and will continue to incur expenses for psychological treatment, therapy and  
25 counseling and, on information and belief, has and/or will incur loss of income and/or loss of  
26 earning capacity.

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**FIRST CAUSE OF ACTION**  
**CIVIL CONSPIRACY**

**(As Against All Named-Defendants and All Doe Defendants)**

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Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this Court.

63. Each and every Defendant named in this action participated in the acts and omissions complained of and then entered into a civil conspiracy to conceal the true nature of sexual abuse of minors in the Dioceses across California.

64. Each and every Defendant took part in or helped conceal the improper and illegal activities taking place within the Dioceses in California.

65. Each and every Defendant entered into a civil conspiracy and concerted action to pursue the common purpose of 1) concealing the sexual assaults of, the identities and patterns of its agents; 2) concealing sexual assaults and abuse committed by its agents from proper civil authorities; 3) attacking credibility of victims of Defendants' agents; 4) protecting Defendants' agents from criminal prosecution for sexual assaults and abuse against children; 5) allowing known child molesters to live freely in the community without informing the public; 6) after receiving reports or notice of misconduct by clerics transferring them to new locations without warning parishioners or the public of the threat posed by such sexual abusers; 7) making affirmative representations regarding Defendants' agents' fitness for employment in positions that include working with children, while failing to disclose negative information regarding sexual misconduct by clerics; and 8) concealing Defendants' actions and their agents' actions from survivors of past abuse causing separate current harm.

66. As a result of the above-described conduct, Plaintiff has suffered the injuries and damages described herein.

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1 molested children live, so as to substantially and unreasonably interfere with the comfortable  
2 enjoyment of life. Each Defendant's failure to report multiple allegations of sexual assault and  
3 abuse of children to proper authorities, as well as its failure to inform the public about sexual abuse,  
4 or priests accused of sexual abuse of minors has prevented the public from knowing of a real  
5 danger, and has thereby substantially and unreasonably interfered with the comfortable enjoyment  
6 of life by a considerable number of persons by allowing child molesters to avoid prosecution and  
7 remain living freely in unsuspecting communities and working with and around children and also  
8 caused harm to abuse survivors. These child molesters, known to each Defendant but not to the  
9 public, pose a threat of additional abuse to a considerable number of members of the public.

10 71. The negligence and/or deception and concealment by each Defendant was and is  
11 injurious to the health of and/or indecent or offenses to the senses of and/or an obstruction to the  
12 free use of property by entire communities, neighborhoods, and/or the general public including but  
13 not limited to residents who live in communities where each Defendant's accused molesters live in  
14 that many in the general public cannot trust Defendants to warn parents of the presence of the  
15 current and/or former accused molesters, nor to identify their current and/or former accused  
16 molesters, nor to disclose said credibly accused molesters' and other accused molesters' assignment  
17 histories, nor to disclose their patterns of conduct in grooming and sexually assaulting children, nor  
18 to disclose Defendants own actions and roles in the cover up and sexual abuse of children, all of  
19 which create an impairment of the safety of children in the neighborhoods in California and Illinois  
20 where each Defendant conducted, and continues to conduct, its business.

21 72. The negligence and/or deception and concealment by Defendants was specially  
22 injurious to Plaintiff's health and/or Plaintiff's personal enjoyment of life.

23 73. The negligence and/or deception and concealment by Defendants also was specially  
24 injurious to Plaintiff's health and/or Plaintiff's personal enjoyment of life in that when Plaintiff  
25 discovered the negligence and/or deception and concealment of Defendants, Plaintiff experienced  
26 mental, emotional and/or physical distress that Plaintiff had been the victim of Defendants'  
27 negligence and/or deception and concealment.

28 74. Plaintiff has suffered and/or continues to suffer special, particular, and peculiar

1 psychological and emotional harm and/or peculiar pecuniary harm, different in kind from the  
2 general public, after learning of Defendants' concealment of names and information about priests  
3 accused of sexually molesting minors and as a result of the dangerous condition maintained and/or  
4 permitted by Defendants, which continues as long as decisions are made and actions are taken to  
5 keep the information about the abuse and/or the accused priests concealed. As a result of the  
6 negligence and/or deception and concealment, Plaintiff has suffered and continues to suffer lessened  
7 enjoyment of life, and/or impaired health, and/or emotional distress, and/or physical symptoms of  
8 emotional distress and/or pecuniary loss including medical expenses and/or wage loss.

9 75. Plaintiff's injuries are also particular to Plaintiff and different from certain members  
10 of the public who have not been harmed by the nuisance. People who have not been harmed by the  
11 nuisance include those who have not suffered any injury at all, those who are unaware of the  
12 nuisance, those who do not believe that Defendants ever concealed anything about child sex abuse,  
13 and those who think that any concealment only occurred decades ago.

14 76. The continuing public nuisance created by Defendants was, and continues to be, the  
15 proximate cause of Plaintiff's special injuries and damages as alleged.

16 77. The harm suffered by Plaintiff is the exact type of harm that one would expect from  
17 Defendants' acts and omissions.

18 78. In committing the aforementioned acts and omissions, Defendants acted negligently  
19 and recklessly and/or intentionally, maliciously and with conscious disregard for Plaintiff's rights.

20 79. As a result of the above-described conduct, Plaintiff has suffered the injuries and  
21 damages described herein.

22 **THIRD CAUSE OF ACTION**  
23 **PRIVATE NUISANCE (CAL. CIV. CODE §§ 3479 AND 3481)**  
24 **(As Against All Named-Defendants and All Doe Defendants)**

25 Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under  
26 this Court.

27 80. Defendants continue to conspire and engage and/or have conspired and engaged in  
28 efforts to: 1) conceal from the general public the sexual assaults committed by, the identities of, and  
the pedophilic/ephebophilic tendencies of accused priests; and/or 2) conceal from proper civil

1 authorities sexual assaults and abuse committed by Defendants' agents against minor children;  
2 and/or 3) attack the credibility of victims of Defendants' agents; and/or 4) protect Defendants'  
3 agents from criminal prosecution for their sexual assaults and abuse against children; and/or 5)  
4 allow known child molesters to live freely in the community without informing the public; and/or 6)  
5 after receiving reports or notice of misconduct by clerics, transfer them to new parishes without any  
6 warning to parishioners of the threat posed by such clerics, in violation of law; 8) make affirmative  
7 representations regarding Defendants' pedophilic and/or ephebophilic agents' fitness for  
8 employment, in positions that include working with children, while failing to disclose negative  
9 information regarding sexual misconduct by such clerics; and/or 9) concealing Defendants' actions  
10 and their agents' actions from survivors of past abuse causing separate current harm.

11       81. The negligence and/or deception and concealment by Defendants was and is  
12 injurious to the health and/or indecent or offensive to the senses of and/or an obstruction to the free  
13 use of property of residents and other members of the general public who live in communities  
14 where Defendants' accused molesters live. It was and is indecent and offensive to the senses, so as  
15 to interfere with the general public's comfortable enjoyment of life in that many in the general  
16 public cannot trust Defendants to warn parents of the presence of the current and/or former accused  
17 molesters, nor to identify their current and/or former accused molesters, nor to disclose said  
18 credibly accused molesters' and other accused molesters' assignment histories, nor to disclose their  
19 patterns of conduct in grooming and sexually assaulting children, all of which create an impairment  
20 of the safety of children in the neighborhoods in California and Illinois where Defendants  
21 conducted, and continues to conduct, its business.

22       82. The negligence and/or deception and concealment by Defendants was injurious to  
23 Plaintiff's health and/or Plaintiff's personal enjoyment of life.

24       83. The negligence and/or deception and concealment by Defendants also was injurious  
25 to Plaintiff's health and/or personal enjoyment of life in that when Plaintiff discovered the  
26 negligence and/or deception and concealment of Defendants, Plaintiff experienced mental,  
27 emotional, and/or physical distress that Plaintiff had been the victim of the Defendants' negligence  
28 and/or deception and concealment.





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**DEMAND FOR TRIAL**

Plaintiff hereby demands a trial by jury in this matter.

DATED: October 1, 2018

**JEFF ANDERSON & ASSOCIATES**



\_\_\_\_\_  
MICHAEL G. FINNEGAN  
MICHAEL RECK  
Attorneys for Plaintiff, THOMAS  
EMENS

<b>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):</b> MICHAEL G. FINNEGAN, ISBN: 241091/MICHAEL RECK, ISBN 209895 JEFF ANDERSON & ASSOCIATES, PA 12100 WILSHIRE BLVD., 8th FLOOR, LOS ANGELES, CA 90025 TELEPHONE NO: 310-357-2425 FAX NO: 651-297-6543 ATTORNEY FOR (Name): <b>PLAINTIFF THOMAS EMENS</b>		<b>FOR COURT USE ONLY</b>  UNPROCESSED COPY ORIGINAL FILED Superior Court of California County of Los Angeles  <b>OCT 03 2018</b>  Sherri R. Carter, Executive Director, Clerk By: Glorieta Robinson, Deputy
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF</b> STREET ADDRESS: <b>111 N. HILL STREET</b> MAILING ADDRESS: <b>SAME</b> CITY AND ZIP CODE: <b>LOS ANGELES, CA 90012</b> BRANCH NAME: <b>CENTRAL</b>		<b>CASE NUMBER:</b> <div style="font-size: 24px; font-weight: bold; border: 1px solid black; padding: 2px; display: inline-block;">BC 7 23 9 08</div>
<b>CASE NAME:</b> <b>THOMAS EMENS V. CALIFORNIA CATHOLIC CONFERENCE</b>		<b>JUDGE:</b> <b>DEPT:</b>
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> <b>Unlimited (Amount demanded exceeds \$25,000)</b>	<input type="checkbox"/> <b>Limited (Amount demanded is \$25,000 or less)</b>	<b>Complex Case Designation</b> <input type="checkbox"/> <b>Counter</b> <input type="checkbox"/> <b>Joinder</b> Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

Items 1-8 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

<b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46)  <b>Other PI/PD/W/D (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/W/D (23)  <b>Non-PI/PD/W/D (Other) Tort</b> <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (18) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input checked="" type="checkbox"/> Other non-PI/PD/W/D tort (35)  <b>Employment</b> <input type="checkbox"/> Wrongful termination (38) <input type="checkbox"/> Other employment (15)	<b>Contract</b> <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37)  <b>Real Property</b> <input type="checkbox"/> Eminent domain/expropriation condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (20)  <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (36)  <b>Judicial Review</b> <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	<b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b> <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)  <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20)  <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42)  <b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |
3. Remedies sought (check all that apply): a.  monetary    b.  nonmonetary; declaratory or injunctive relief    c.  punitive
4. Number of causes of action (specify):
5. This case  is  is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: **OCTOBER 2, 2018**  
**MICHAEL RECK**

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)



**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

## INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

**To Plaintiffs and Others Filing First Papers.** If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

**To Parties in Rule 3.740 Collections Cases.** A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

**To Parties in Complex Cases.** In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

## CASE TYPES AND EXAMPLES

**Auto Tort**

Auto (22)—Personal Injury/Property Damage/Wrongful Death  
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

**Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort**

Asbestos (04)  
Asbestos Property Damage  
Asbestos Personal Injury/Wrongful Death  
Product Liability (*not asbestos or toxic/environmental*) (24)  
Medical Malpractice (45)  
Medical Malpractice—Physicians & Surgeons  
Other Professional Health Care Malpractice  
Other PI/PD/WD (23)  
Premises Liability (e.g., slip and fall)  
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)  
Intentional Infliction of Emotional Distress  
Negligent Infliction of Emotional Distress  
Other PI/PD/WD

**Non-PI/PD/WD (Other) Tort**

Business Tort/Unfair Business Practice (07)  
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)  
Defamation (e.g., slander, libel) (13)  
Fraud (16)  
Intellectual Property (19)  
Professional Negligence (25)  
Legal Malpractice  
Other Professional Malpractice (*not medical or legal*)  
Other Non-PI/PD/WD Tort (35)

**Employment**

Wrongful Termination (36)  
Other Employment (15)

**Contract**

Breach of Contract/Warranty (06)  
Breach of Rental/Lease  
Contract (*not unlawful detainer or wrongful eviction*)  
Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)  
Negligent Breach of Contract/Warranty  
Other Breach of Contract/Warranty  
Collections (e.g., money owed, open book accounts) (09)  
Collection Case—Seller Plaintiff  
Other Promissory Note/Collections Case  
Insurance Coverage (*not provisionally complex*) (18)  
Auto Subrogation  
Other Coverage  
Other Contract (37)  
Contractual Fraud  
Other Contract Dispute

**Real Property**

Eminent Domain/Inverse Condemnation (14)  
Wrongful Eviction (33)  
Other Real Property (e.g., quiet title) (26)  
Writ of Possession of Real Property  
Mortgage Foreclosure  
Quiet Title  
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

**Unlawful Detainer**

Commercial (31)  
Residential (32)  
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

**Judicial Review**

Asset Forfeiture (05)  
Petition Re: Arbitration Award (11)  
Writ of Mandate (02)  
Writ—Administrative Mandamus  
Writ—Mandamus on Limited Court Case Matter  
Writ—Other Limited Court Case Review  
Other Judicial Review (39)  
Review of Health Officer Order  
Notice of Appeal—Labor  
Commissioner Appeals

**Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)**

Antitrust/Trade Regulation (03)  
Construction Defect (10)  
Claims Involving Mass Tort (40)  
Securities Litigation (28)  
Environmental/Toxic Tort (30)  
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

**Enforcement of Judgment**

Enforcement of Judgment (20)  
Abstract of Judgment (Out of County)  
Confession of Judgment (*non-domestic relations*)  
Sister State Judgment  
Administrative Agency Award (*not unpaid taxes*)  
Petition/Certification of Entry of Judgment on Unpaid Taxes  
Other Enforcement of Judgment Case

**Miscellaneous Civil Complaint**

RICO (27)  
Other Complaint (*not specified above*) (42)  
Declaratory Relief Only  
Injunctive Relief Only (*non-harassment*)  
Mechanics Lien  
Other Commercial Complaint Case (*non-tort/non-complex*)  
Other Civil Complaint (*non-tort/non-complex*)

**Miscellaneous Civil Petition**

Partnership and Corporate Governance (21)  
Other Petition (*not specified above*) (43)  
Civil Harassment  
Workplace Violence  
Elder/Dependent Adult Abuse  
Election Contest  
Petition for Name Change  
Petition for Relief From Late Claim  
Other Civil Petition

**CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION  
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.

**Step 1:** After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

**Step 2:** In Column B, check the box for the type of action that best describes the nature of the case.

**Step 3:** In Column C, circle the number which explains the reason for the court filing location you have chosen.

**Applicable Reasons for Choosing Court Filing Location (Column C)**

1. Class actions must be filed in the Stanley Mosk Courthouse, Central District.
2. Permissive filing in central district.
3. Location where cause of action arose.
4. Mandatory personal injury filing in North District.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle.
7. Location where petitioner resides.
8. Location wherein defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office.
11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury).

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1, 4, 11
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death - Uninsured Motorist	1, 4, 11
Other Personal Injury/ Property Damage/ Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage	1, 11
		<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	1, 11
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1, 4, 11
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11
Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1, 4, 11	
	<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1, 4, 11	
	<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1, 4, 11	
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11	

SHORT TITLE: THOMAS EMES V. CALIFORNIA CATHOLIC CONFERENCE	CASE NUMBER
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	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Non-Personal Injury/Property Damage/Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1, 2, 3
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1, 2, 3
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1, 2, 3
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3 1, 2, 3
	Other (35)	<input checked="" type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
Employment	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
	Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1, 2, 3 10
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2, 5 2, 5 1, 2, 5 1, 2, 5
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case <input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11 5, 11 5, 6, 11
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1, 2, 5, 8
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 5 1, 2, 3, 5 1, 2, 3, 8, 9
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels _____	2, 6
Real Property	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6 2, 6 2, 6
	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
Unlawful Detainer	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
<b>Judicial Review</b>	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 6
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2, 5
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2, 8 2 2
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2, 8
<b>Provisionally Complex Litigation</b>	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1, 2, 8
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1, 2, 3
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1, 2, 8
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1, 2, 8
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1, 2, 3, 8
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1, 2, 5, 8
<b>Enforcement of Judgment</b>	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment	2, 5, 11
		<input type="checkbox"/> A6160 Abstract of Judgment	2, 6
		<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2, 9
		<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2, 8
		<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2, 8
		<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2, 8, 9
<b>Miscellaneous Civil Complaints</b>	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1, 2, 8
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	1, 2, 8
		<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2, 8
		<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1, 2, 8
	<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1, 2, 8	
<b>Miscellaneous Civil Petitions</b>	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2, 8
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment	2, 3, 9
		<input type="checkbox"/> A6123 Workplace Harassment	2, 3, 9
		<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2, 3, 9
		<input type="checkbox"/> A6190 Election Contest	2
		<input type="checkbox"/> A6110 Petition for Change of Name/Change of Gender	2, 7
<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2, 3, 8		
	<input type="checkbox"/> A6100 Other Civil Petition	2, 9	

SHORT TITLE: <b>THOMAS EMES V. CALIFORNIA CATHOLIC CONFERENCE</b>	CASE NUMBER
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**Step 4: Statement of Reason and Address:** Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.			ADDRESS: <b>3424 Wilshire Boulevard</b>
CITY: <b>Los Angeles</b>	STATE: <b>CA</b>	ZIP CODE: <b>90010</b>	

**Step 5: Certification of Assignment:** I certify that this case is properly filed in the CENTRAL District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: 10/2/18.

  
 \_\_\_\_\_  
 (SIGNATURE OF ATTORNEY/FILING PARTY)

**PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:**

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.



<b>SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES</b>	Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: 111 North Hill Street, Los Angeles, CA 90012	<p style="font-size: x-large; transform: rotate(-15deg);">CONFORMED COPY ORIGINAL FILED Superior Court of California County of Los Angeles</p> <p style="font-size: x-large; transform: rotate(-15deg);">OCT 02 2018</p> <p style="font-size: large; transform: rotate(-15deg);">Sherri R. Carter, Executive Officer/Clerk Glorietta Robinson, Deputy</p>
<b>NOTICE OF CASE ASSIGNMENT UNLIMITED CIVIL CASE - IC</b>	
Your case is assigned for all purposes to the judicial officer indicated below.	CASE NUMBER <b>BC 723908</b>

**THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT**

	ASSIGNED JUDGE	DEPT	ROOM		ASSIGNED JUDGE	DEPT	ROOM
	Hon. Debra K. Weintraub	1	534		Hon. Randolph Hammock	47	507
	Hon. Barbara A. Meiers	12	636		Hon. Elizabeth Allen White	48	506
	Hon. Terry A. Green	14	300		Hon. Deirdre Hill	49	509
	Hon. Richard Fruin	15	307		Hon. Teresa A. Beaudet	50	508
	Hon. Lia Martin	16	306		Hon. Dennis J. Landin	51	511
	Hon. Richard E. Rico	17	309		Hon. Susan Bryant-Deason	52	510
	Hon. Stephanie Bowick	19	311		Hon. Robert Broadbelt	53	513
	Hon. Dalila Corral Lyons	20	310		Hon. Ernest M. Hiroshige	54	512
	Hon. Patricia Nieto	24	314		Hon. Malcolm H. Mackey	55	515
	Hon. Yvette M. Palazuelos	28	318		Hon. Holly J. Fujie	56	514
	Hon. Barbara Schepher	30	400		Hon. Steven J. Kleifield	57	517
	Hon. Samantha Jessner	31	407		Hon. John P. Doyle	58	516
	Hon. Daniel S. Murphy	32	406		Hon. Gregory Keosian	61	732
	Hon. Michael P. Linfield	34	408		Hon. Michael L. Stern	62	600
	Hon. Gregory Alarcon	36	410		Hon. Mark McConny	68	617
	Hon. David S. Cunningham	37	413		Hon. William F. Fahey	69	621
	Hon. Maureen Duffy-Lewis	38	412		Hon. Monica Bachner	71	729
	Hon. Elizabeth Feffer	39	415		Hon. Ruth Ann Kwan	72	731
	Hon. David Sotelo	40	414		Hon. Rafael Ongkeko	73	733
	Hon. Holly E. Kendig	42	416		Hon. Michelle Williams Court	74	735
	Hon. Mel Red Recana	45	529		Hon. Robert S. Draper	78	730

Given to the Plaintiff/Cross-Complainant/Attorney of Record

SHERRI R. CARTER, Executive Officer/Clerk of Court

on OCT 02 2018  
(Date)

By G. ROBINSON, Deputy Clerk