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SPOTLIGHT M.A. DOE

Plaintiff

v.

ROMAN CATHOLIC ARCHDIOCESE OF
NEWARK;
ST. JOSEPH OF THE PALISADES PARISH;
ST. JOSEPH OF THE PALISADES CHURCH;
WEST NEW YORK SCHOOL DISTRICT;
MEMORIAL HIGH SCHOOL;
ALBERT SOSA;
DEFENDANT DOE 1-10;
DEFENDANT DOE INSTITUTION 1-10

Defendants

NEW JERSEY SUPERIOR COURT
LAW DIVISION
ESSEX COUNTY

DOCKET NO.: ESX-L-

CIVIL ACTION

**COMPLAINT; DEMAND FOR JURY TRIAL;
DESIGNATION OF TRIAL COUNSEL;
CERTIFICATION PURSUANT TO R. 4:5-1**

Plaintiff, Spotlight M.A. Doe (hereinafter also referred to as “M.A. Doe” and/or “M.A.” and/or “Plaintiff”), residing at [REDACTED] Toms River, NJ 08753 by way of Complaint against the defendants, Roman Catholic Archdiocese of Newark (hereinafter also referred to as “the Archdiocese of Newark” and/or “the Archdiocese,”), St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District (hereinafter also referred to as “School District”), Memorial High School, Albert Sosa (hereinafter also referred to as “Albert Sosa” and/or “Deacon Sosa”), Defendant Doe 1-10, and Defendant Doe Institution 1-10, say as follows:

PARTIES AND VENUE

1. Plaintiff, Spotlight M.A. Doe is currently a citizen and resident of New Jersey, residing at [REDACTED] Toms River, NJ 08753.
2. At the time of his abuse, plaintiff was a minor and a resident of or near West New York, New Jersey, and the sexual abuse took place in and/or near West New York, New Jersey.
3. Defendant, Archdiocese of Newark (“the Archdiocese”) is a religious organization serving approximately 1.3 million Catholics in Bergen, Essex, Hudson, and Union Counties. The Archdiocese has 219 parishes, 112 elementary schools, and 36 high schools. The Catholic Archdiocese of Newark’s organization headquarters is located at 171 Clifton Avenue, Newark, New Jersey 07104.
4. Defendant, St. Joseph of the Palisades Parish, was and is a Roman Catholic Parish and religious organization located at 6401 Palisade Avenue, West New York, New Jersey.
5. Defendant, St. Joseph of the Palisades Parish was and is a part of the Archdiocese of Newark.
6. St. Joseph of the Palisades Church was and is a Roman Catholic Church and religious organization located at 6401 Palisade Avenue, West New York, New Jersey.
7. Defendant, St. Joseph of the Palisades Church was and is a part of the Archdiocese of Newark.
8. Defendant, West New York School District (also referred herein as the “School District”) was and is a public school district under the supervision of the New Jersey Schools Development Authority with a headquarters located at 6028 Broadway Avenue, West New York, NJ 07093. The School District, *inter alia*, supervises, controls, regulates, governs and/or implements policies and procedures for public schools within the School District, including but not limited to Memorial High School.
9. Defendant, Memorial High School was and is a public high school under the supervision of the School, located at 5501 Park Avenue, West New York, NJ 07093, and is deemed a place of public accommodation as defined by N.J.S.A. 10:5-5(1).

10. At all times material hereto, defendant, Albert Sosa was a counselor and/or teacher at Memorial High School within the West New York School District.

11. At all times material hereto, defendant, Albert Sosa was and/or is a Roman Catholic deacon and/or clergy.

12. Deacon Sosa served at various parishes in the Archdiocese of Newark, including, but not limited to, defendants, St. Joseph of the Palisades Parish and St. Joseph of the Palisades Church.

13. Deacon Sosa was a deacon for defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish and St. Joseph of the Palisades Church.

14. At all times material hereto, Deacon Albert Sosa was a resident of New Jersey living in or about the area of West New York, Essex County, New Jersey.

15. Upon information and belief, Albert Sosa is currently a resident of Florida, residing at 11214 Crystal Glen Boulevard, Unit 1, Orlando FL 32837.

16. Individual defendants in the above caption case identified as Defendant Doe 1-10 (said names being fictitious, and hereinafter referred to as “Defendant Doe”), were, at all relevant times, employees and/or agents of the Defendants, Archdiocese of Newark, and/or St. Joseph of the Palisades Parish, and/or St. Joseph of the Palisades Church, and/or West New York School District, and/or Memorial High School, involved in the operation of the Parish(s) and/or schools, and/or the Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, and the hiring, admitting, assigning, retaining, and supervising of counselors, teachers, deacons and/or clergy, including Albert Sosa. The identification of these individuals is not known by the plaintiff at this time in the absence of discovery. Plaintiff reserves the right to substitute the name(s) for those agents designated as Defendant Doe when and if such information becomes available.

17. Institutional/corporate defendants in the above caption case identified as Defendant Doe Institution 1-10 (said names being fictitious, and hereinafter referred to as “Defendant Doe Institution”) were, at all relevant times, incorporated and/or established associations, corporations, institutions, entities,

facilities, or other religious establishments that employed, hired, certified, assigned, retained, supervised, managed, oversaw, directed, administrated, and/or otherwise controlled one or more of the defendants at or during all relevant times. These Defendant Doe Institutions were/are vicariously and derivatively liable for the negligent conduct of the aforementioned defendants under the theories of respondeat superior, master-servant, agency, and/or right of control.

18. Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, and St. Joseph of the Palisades Church, Defendant Doe 1-10, and Defendant Doe Institution 1-10, were empowered by the Archdiocese to supervise and control all deacons and/or clergy within the Archdiocese, including Defendant, Albert Sosa.

19. Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, Defendant Doe 1-10, and Defendant Doe Institution 1-10, had/has access to and knowledge of information regarding the sexual misconduct of deacons and/or clergy, including knowledge of the widespread pedophilia and/or sexually abusive conduct of seminarians, deacons, and/or clergy within the Archdiocese, including defendant, Albert Sosa.

20. At all times material hereto, defendants, West New York School District and Memorial High School, had and have the authority to supervise and control all teachers, counselors, volunteers, staff and/or employees within the School District and school, including Albert Sosa, and were responsible for promulgation and enforcement of all policies, customs and practices for the schools and school district.

21. As recognized by the United States Department of Education in a July 1, 1998 press release, "Schools owe students a safe environment that is conducive to learning and that affords children equal educational opportunity regardless of sex."

22. Albert Sosa had a widespread reputation among students, teachers, staff, and/or administrators at defendants, School District and Memorial High School for inappropriately touching minor male students.

23. At all relevant times, defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, and Defendant Doe Institution 1-10 in this action were acting by and through themselves in their individual capacities, and/or additionally by and through their actual and/or ostensible agents, servants, employees, which include entities and/or individuals over whom they had control or right of control.

24. At all times material hereto, defendant, Albert Sosa, was acting as a teacher, counselor, seminarian, deacon, clergy, employee, agent, servant, representative and/or ostensible agent ordained, hired, certified, assigned, retained, supervised, managed, overseen, directed, administrated, and/or otherwise controlled by and for one or more of the Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, Defendant Doe Institution 1-10, and was engaged to perform services for the Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, Defendant Doe Institution 1-10, and was subject to the Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, and Defendant Doe Institution 1-10's oversight, supervision, management, direction, control, ostensible control, and/or right to control the physical conduct required to perform such services.

25. The defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, and Defendant Doe Institution 1-10, were the principals of Albert Sosa, and the defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, and Defendant Doe Institution 1-10, acted only through the natural persons who were its counselors, teachers, deacons, clergy, employees, agents, servants, representatives, and/or ostensible agents ordained, hired, certified, assigned, retained,

supervised, managed, overseen, directed, administrated, and/or otherwise controlled by and for said defendants.

26. Defendant, Albert Sosa acted as the teacher, counselor, deacon, clergy, employee, agent, servant, representative, and/or ostensible agent of the defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, and Defendant Doe Institution 1-10, acted negligently while in the scope of his duties or authority, such that the negligence as a matter of law charged to the principal, here the defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, and Defendant Doe Institution 1-10.

27. At all times material hereto, the defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, Defendant Doe Institution 1-10, are deemed negligent for the wrongdoing to the same extent as the counselor, teacher, priest, deacon, clergy, employee, agent, servant, representative, and/or ostensible agent, Albert Sosa.

28. Defendants, West New York School District, Memorial High, Defendant Doe 1-10, and Defendant Doe Institution 1-10 through their actions and inactions described herein, and through a pattern of deliberate and/or reckless indifference, created and permitted a severe, pervasive, and persistently sexually hostile environment, in violation of New Jersey's Law Against Discrimination ("LAD").

29. The indifference of defendants, West New York School District and Memorial High School, to the risks posed by defendant, Albert Sosa, and its affirmative acts created and/or permitted the opportunity for Albert Sosa to commit sexual abuses/assaults of plaintiff, which resulted in a sexually hostile educational environment.

30. Venue is properly laid in the Superior Court of Essex County, New Jersey pursuant to R.4:3-2(a) and/or (b).

FACTUAL SUMMARY

31. At all times material hereto, Plaintiff, Spotlight M.A. Doe (DOB: 11/27/1972) was a minor, at or about the age of fifteen (15) in approximately 1987-1988.

32. At all times material hereto, M.A. was a parishioner and received communion and sacrament of confirmation at St. Joseph of the Palisades Parish and St. Joseph of the Palisades Church.

33. At all times material hereto, M.A. and his family were members of St. Joseph of the Palisades Parish and St. Joseph of the Palisades Church, and he and his family were religiously, culturally, and socially involved with and integrated in the activities and teaching of the St. Joseph of the Palisades Church.

34. At all times material hereto, defendant, Albert Sosa was a deacon and/or clergy at St. Joseph of the Palisades Parish and St. Joseph of the Palisades Church.

35. Defendant, Albert Sosa, as a deacon and clergy affiliated with St. Joseph of the Palisades Parish and St. Joseph of the Palisades Church, was perceived by M.A. as a spiritual and religious mentor, as well as an important and powerful person within the community.

36. At all times material hereto, Albert Sosa was also a counselor and/or teacher at Memorial High School, a public school under the supervision of defendant, West New York School District. In this capacity, defendant, Albert Sosa, was perceived by M.A. as a respected counselor and academic mentor, requiring respect from students, such as M.A.

37. In or around the autumn of 1988, at about the age of fifteen (15), M.A. was a football athlete for the Memorial High School football team.

38. After a football game that autumn, M.A. and two of his male friends were invited to and visited Albert Sosa's apartment so they could drink alcohol.

39. At the time, Albert Sosa lived alone in an apartment near 66th Street and Boulevard East in West New York, New Jersey.

40. This particular evening was the first time M.A. had ever visited Albert Sosa's apartment.

41. At all times material hereto, Albert Sosa plied M.A. with alcohol to the point M.A. became intoxicated and passed out on Albert Sosa's couch.

42. M.A. was awakened by Albert Sosa rubbing M.A.'s feet and slowly moving up M.A.'s legs and body.

43. M.A. noticed that his friends were gone and he was alone with Albert Sosa.

44. Albert Sosa instructed M.A. to inhale a substance, which M.A. later learned was the chemical psychoactive inhalant drug amyl nitrite (also known as "RUSH").

45. The abuse quickly escalated and Albert Sosa removed M.A.'s pants, climbed on top of M.A. and began performing oral sex on M.A.

46. The sexual abuse escalated further and Albert Sosa anally sodomized M.A.

47. Thereafter, on several occasions, Albert Sosa sexually abused M.A. at Memorial High School.

48. Customarily, Albert Sosa would aggressively grab M.A. by the back of the neck in the school hallway and call M.A. to the guidance counselor's office where Albert Sosa would kiss and perform oral sex on M.A. and force M.A. to reciprocate oral sex on Albert Sosa.

49. M.A. distinctly recalls witnessing Albert Sosa grab other male students by back of the neck in the hallway and escorting them to his office. He presumes that Albert Sosa sexually abused those students as well.

50. As a result of the sexual abuse by Albert Sosa, M.A. quit school during his freshman year at Memorial High School.

51. The next calendar year, M.A. attended Englewood High School nearby to escape the sexual abuse by Albert Sosa. Despite transferring to a different high school, Albert Sosa would still drive by the area of Englewood High School, solicit M.A. in the neighborhood, pressure and persuade M.A. to enter his car, transport M.A. to his apartment, ply M.A. with drugs and/or alcohol, and then sexually abuse M.A.

52. M.A. transferred back to Memorial High School his junior year, and Albert Sosa continued his sexual abuse of M.A. in the guidance counselor's office at Memorial High School and his apartment.

53. Defendant, Albert Sosa's sexual abuse of M.A. quickly increased in frequency and intensity over a six (6) year period which included, but was not limited to, anal sex, forced reciprocal oral sex, inappropriately fondling, groping, and touching – all of which was facilitated by Deacon Sosa plying M.A. with alcohol and/or drugs.

54. As a result of the sexual abuse by Albert Sosa, M.A. dropped out of Memorial High School his junior year and never returned to high school.

55. Although the actual sexual abuse only occurred exclusively during and in the context of school activities, namely and most frequently in Albert Sosa's guidance counselor office and residence, efforts to pressure, solicit and persuade M.A. to partake in such sexually abusive activities also occurred repeatedly at St. Joseph of the Palisades Parish and St. Joseph of the Palisades Church where M.A. was a parishioner and where Albert Sosa served as a deacon and/or clergy. Consequently, on virtually a daily basis, M.A. was constantly compelled to confront and entertain the solicitations and sexual advances of Albert Sosa while attending St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, and Memorial High School.

56. It is further believed that Plaintiff was abused in additional ways and/or on additional occasions, but has emotionally suppressed partially and/or in whole these additional details and/or episodes of abuse.

57. Defendant, Albert Sosa, engaged in a calculated series of manipulation and grooming of Plaintiff during Plaintiff's time as a student and parishioner as described above.

58. Defendant, Albert Sosa, sexually abused and molested Plaintiff, M.A., while he was a minor during the period described above.

59. The sexual abuses of Albert Sosa of M.A. over this six (6) year period of time, both as a clergy and as a school counselor, were the first sexual experiences of M.A.'s life.

60. During his tenure as a counselor, teacher, deacon, clergy, employee, agent, servant, representative and/or ostensible agent ordained, hired, certified, assigned, retained, supervised, managed, overseen, directed, administrated, and/or otherwise controlled by and for one or more of the defendants, West New York School District, Memorial High School, Archdiocese of Newark, St. Joseph of the Palisades Parish, and St. Joseph of the Palisades Church, Defendant Doe 1-10, and Defendant Doe Institution 1-10, Albert Sosa, was a serial molester and sexual abuser of children, including Plaintiff, Spotlight M.A. Doe.

61. Defendant, Albert Sosa, committed his acts of abuse and molestation against plaintiff, M.A. in and around West New York, New Jersey.

62. At all material times hereto, defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, and Defendant Doe Institution1-10, knew or should have known that Albert Sosa sexually abused children and/or was not fit to serve as a counselor, teacher, deacon, clergy, employee, agent, servant, representative and/or ostensible agent.

63. At all material times hereto, defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, and Defendant Doe Institution1-10, knew or should have known that Albert Sosa had been and/or was/were abusing Plaintiff and/or other children at West New York School District, Memorial High School, Archdiocese of Newark, St. Joseph of the Palisades Parish, and St. Joseph of the Palisades Church, and other locations visited by and/or related to school, church and/or religious activities, events, and/or duties.

64. At all material times hereto, Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, and Defendant Doe Institution1-10, took no action and/or or failed to timely and adequately take action to warn or otherwise protect children of the Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial

High School, Defendant Doe 1-10, Defendant Doe Institution1-10, including Plaintiff, from defendant, Albert Sosa.

65. At all times material hereto, as a result of the sexual abuse by Albert Deacon Sosa, M.A. felt enormous shame, humiliation, embarrassment, and self-loathing, and has suffered from nightmares about the abuse and incontinence.

66. At all times material hereto, as a result of the sexual abuse by Albert Sosa, Spotlight M.A. Doe has suffered from extreme difficulty navigating intimate relationships, and he has experienced and/or continues to experience bouts of anger, difficulties when involved in relationships with others, and drug and/or alcohol abuse.

67. As a result of the sexual abuse set forth above, Plaintiff suffered great, permanent harm, including, but not limited to, the following: severe emotional distress, extreme trauma, depression, anxiety, post-traumatic stress disorder, humiliation, embarrassment, fear, shame, emotional dissociation, and/or loss of self-esteem and self-worth, all of which has and/or will continue to require counseling, therapy, and/or other treatment.

68. Also, as a result of the sexual abuse set forth above and its consequential trauma and harm, Plaintiff has suffered a severe impairment and disruption of his enjoyment of life, intimacy with loved ones, sexuality, and/or belief structure, including, but not limited to, the impairment and disruption of his relationship with members of his family, friends, acquaintances, and/or others.

69. Also, as a result of the sexual abuse set forth above and its consequential trauma and harm, the plaintiff suffered from destructive and dysfunctional behaviors, including, but not limited to, drug and /or alcohol addictions (i.e. alcohol and/or drugs) and/or other mental health issues, all of which have required and/or will require counseling, therapy, and/or other treatment.

70. Also, as a result of the sexual abuse set forth above and its consequential trauma and harm, the plaintiff has incurred significant past loss of wages and future loss of earning capacity to his permanent detriment.

71. Plaintiff's youth, religious beliefs, and religious upbringing, together with the power imbalance and authoritative inequity between the plaintiff and defendants, created a culture and social dynamic that weakened Plaintiff's ability to resist Deacon Sosa and/or other defendants, especially given the cultural religious status with which and pedestal upon which defendant, Deacon Sosa and/or other defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, and St. Joseph of the Palisades Church, Defendant Doe 1-10, and Defendant Doe Institution1-10, were self-appointed, assumed and held as a priest, deacon, clergy, community leaders, and/or religious institution, including the claimed and purported moral authority and superiority exerted and associated with that status.

72. The sexual abuse set forth above and its consequential trauma and harm, in turn, caused Plaintiff to suppress and/or emotionally dissociate his feelings about his traumatic experience(s), thereby exacerbating its devastating psychological, physical, and social consequences.

73. Plaintiff was not fully aware of the causal relationship between the sexual abuse set forth above, and its consequential trauma and harm, until recently, and continues to endure and/or discover trauma and harm relative to the sexual abuse at the present time, which inflictions of trauma and harm shall and will continue in the future.

74. Other victims' declarations and/or revelations of their experiences with sexual abuse and corresponding damages caused by such abuse prompted Plaintiff to realize he is not alone, and to acknowledge, address, and/or discover the connection between his abuse and his corresponding emotional distress, social dysfunction and/or other damages and to speak out concerning same.

75. Now, in conformity with N.J. Stat. Section 2A:14-2a, Statute of Limitations for Action at Law resulting from Certain Sexual Crimes [*Effective December 1, 2019*], Plaintiff brings the within action for damages.

76. As alleged in greater detail herein above and/or below, all of Plaintiff's harm and damages were caused by the culpable acts and/or omissions of defendants.

77. As set forth more fully herein, the negligence, gross negligence, recklessness, and/or punitive behavior of the defendants, jointly and severally, was a direct and proximate cause of harm and damages to Plaintiff.

78. Plaintiff's injuries and/or damages were caused solely by the negligence, gross negligence, recklessness, and/or punitive behavior of the defendants, as set forth more fully herein, and were not caused or contributed thereto by any negligence, gross negligence, recklessness and/or punitive behavior on the part of the plaintiff.

COUNT I – NEGLIGENCE

Plaintiff, Spotlight M.A. Doe

v.

**Defendants, Archdiocese of Newark,
St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church,
West New York School District, Memorial High School, Albert Sosa,
Defendant Doe 1-10, and Defendant Doe Institutions 1-10**

79. The previous paragraphs set forth above are incorporated herein by reference.

80. The recklessness, negligence and/or carelessness of Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, Defendant Doe Institution 1-10, by and through their actual or apparent counselors, teachers, deacons, clergy, employees, agents, servants, representatives, and/or ostensible agents ordained, hired, certified, assigned, retained, supervised, managed, overseen, directed, administrated, and/or otherwise controlled by and for said defendants, consisted of, among other things, the following:

- a. Failing to properly screen counselors, teachers, deacons, clergy, employees, agents, servants, representatives, and ostensible agents adequately before placing them in close contact with children;
- b. Failure to properly investigate complaints of sexual abuse, inappropriate behavior and/or other abusive behavior;
- c. Providing abusive deacons and/or clergy with “cover” and/or rationalizations for inappropriate/abusive misconduct by applying euphemistic and false designations to and/or contrived and imagined explanations for their conduct and/or the reasons for transfers among parishes;

- d. Minimizing, ignoring or excusing inappropriate or questionable behavior and/or misconduct by counselors, teachers, deacons, clergy, employees, agents, servants, representatives, and ostensible agents over a period of months, years and/or decades;
- e. Failure to properly and/or adequately warn parents, children, parishioners, community members, and/or the public at large, including, but not limited to, plaintiff and similarly situated children, and their parents and/or family members, regarding the inappropriate behavior and/or misconduct of Albert Sosa other defendants, and/or other abusive counselors, teachers, deacons, clergy, employees, agents, servants, representatives, and/or ostensible agents, despite knowledge of the dangers they presented and the harmful and complicit culture and environment created by such failures to warn;
- f. Assigning priests, deacons, clergy, employees, agents, servants, representatives, and/or ostensible agents known to have engaged in questionable and/or inappropriate behavior or misconduct and/or known to be pedophiles and/or sexual predators, including but not limited to, Albert Sosa and/or other defendants, to a position within the church where said individual(s) had/have regular contact with children;
- g. Failure to report criminal activity, including child abuse, to appropriate law enforcement agencies;
- h. Negligent failure to provide a safe environment and protective culture to children and parishioners within schools, administrative offices, school recreation grounds, churches, sacristies, rectories, and/or other external locations operated, visited, and/or owned by defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10;
- i. Failure to implement and maintain proper and effective policies and procedures to prevent sexual abuse of and/or other abusive behavior toward children;
- j. Negligently maintaining custody, supervision and protection of children placed in their care by virtue of their authority and solicitation of minors to participate in other youth programs and/or activities;
- k. Failure to properly train counselors, teachers, deacons, clergy, employees, agents, servants, representatives, and/or ostensible agents to identify signs of child molestation or inappropriate sexually related behavior to children by fellow employees, associates, and/or individuals within its control, oversight, supervision, and/or ostensible control;
- l. Negligent reliance on persons who claimed they could treat child molesters and/or sexually abusive individuals;
- m. Negligent retention of and/or failure to terminate Albert Sosa other defendants, and/or other sexually inappropriate and/or abusive individuals from or associated with the West New York School District, Memorial High School, Archdiocese, Church, Ministry, and/or Religious Order, promoting a culture and environment of complicity, denial and deception regarding child abuse within the West New York School District, Memorial High School, Archdiocese, Church, Ministry, and/or Religious Order;

- n. Failure to exercise due care under the relevant circumstances;
- o. Recklessly, negligently and/or carelessly failing to observe, manage, direct, oversee, and supervise the relationship between Plaintiff, Spotlight M.A. Doe and Albert Sosa;
- p. Recklessly, negligently and/or carelessly failing to have proper and effective policies and procedures to require adequate observation, management, oversight, and supervision of the relationship between Spotlight M.A. Doe and Albert Sosa and/or other defendants;
- q. Recklessly, negligently and/or carelessly failing to recognize Albert Sosa's conduct and behavior prior to the events in question and/or as described herein as creating a risk of sexual abuse toward children, including, but not limited to, Spotlight M.A. Doe;
- r. Recklessly, negligently and/or carelessly failing to have proper policies and procedures to require adequate observation, management, oversight, and supervision of Spotlight M.A. Doe and Albert Sosa and/or other defendants;
- s. Failing to investigate complaints that Albert Sosa was/were behaving inappropriately and/or touching children inappropriately, including, but not limited to, Spotlight M.A. Doe;
- t. Recklessly, negligently and/or carelessly failing to identify Albert Sosa as a sexual abuser;
- u. Recklessly, negligently and/or carelessly failing to investigate behavior of Albert Sosa that put the defendants on notice and/or should have placed defendants on notice that Albert Sosa was and/or might have been a potential pedophile and/or sexual predator;
- v. Recklessly, negligently and/or carelessly failing to identify Albert Sosa was a potential pedophile and/or sexual predator;
- w. Failure to use due care under the circumstances; and/or
- x. Negligence as may be proven from facts now exclusively in the possession of defendants, which may be ascertained after the filing of this Complaint.

81. Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, Defendant Doe Institution 1-10, were negligent under the facts as detailed within this Complaint in that these defendants failed to use that degree of care, precaution and vigilance which a reasonably prudent person or entity would use under the same or similar circumstances, including, but not limited to, the negligent affirmative acts detailed in this complaint which a reasonably prudent person or entity would

not have done, and also the negligent omission or failure to act and/or take precautions as detailed in this complaint which a reasonably prudent person or entity would have done or taken under these circumstances.

82. Defendant, Albert Sosa's actions as described herein are evidence of negligence per se in that these actions violated a provision of New Jersey Statute, known as the Child Sexual Abuse Act ("CSAA"), N.J.S.A. 2a:61b-1, et al., which statute sets up a standard of conduct that Albert Sosa violated per se.

83. Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, Defendant Doe Institution 1-10, are vicariously liable for both the negligent and intentional acts of Albert Sosa, their employee, under the CSAA, which recognizes the vulnerability of children and demonstrates a legislative intent to protect said children from victimization, and imposes responsibility upon those individuals and institutions in the best position to know of and stop the abuse to said children, such as the defendants herein.

WHEREFORE, Plaintiff, Spotlight M.A. Doe, demands judgment against defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, jointly and severally, in an amount in excess of Fifty Million Dollars (\$50,000,000.00), exclusive of prejudgment interest, costs and damages for pre-judgment delay, and such other legal and equitable relief as the Court deems appropriate.

COUNT II – NEGLIGENT SUPERVISION

Plaintiff, Spotlight M.A. Doe

v.

**Defendants, Archdiocese of Newark,
St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church,
West New York School District, Memorial High School, Albert Sosa,
Defendant Doe 1-10, and Defendant Doe Institutions 1-10**

84. The previous paragraphs set forth above are incorporated herein by reference.

85. Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, Defendant Doe Institution 1-10, knew or should have known of the need to properly and effectively observe, manage, direct, oversee, and/or supervise seminarians, counselor, teachers, deacons, clergy, employees, agents, servants, representatives, and/or ostensible agents in their relationships with young children.

86. Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, knew or should have known of the particular risk posed by Albert Sosa based on, among other things, his inappropriate and/or questionable conduct, his history of sexually abusing children, and/or his behavior indicative of an intent to isolate, groom, and/or facilitate sexually contacting and/or abusing a young minor child, including Albert Sosa's abuse of plaintiff with anal sex, forced reciprocal oral sex, inappropriately fondling, groping, and touching, and plying M.A. with alcohol and/or drugs.

87. Defendant, Albert Sosa's sexual abuse of plaintiff gradually increased in frequency and intensity over time and included, but was not limited to, anal sex, oral sex, inappropriately fondling, groping, and touching, and plying M.A. with alcohol and/or drugs.

88. The negligence, carelessness, and/or recklessness of Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, Defendant Doe Institution 1-10, for the conduct of their actual or apparent, counselors, teachers, seminarians, deacons, clergy, employees, agents, servants,

representatives, and/or ostensible agents, in the ordaining, hiring, certifying, assigning, observation, retaining, supervision, management, oversight, direction, administration, and/or otherwise control of Albert Sosa consists of one or more of the following:

- a. Negligent ordaining, hiring, certifying, assigning, observation, retaining, supervision, management, oversight, direction, administration, and/or otherwise control of counselors, teachers, deacons and/or clergy in the employ of the West New York School District, Memorial High School, Archdiocese, Church, Ministry, and/or Religious Order;
- b. Failing to use due care in ordaining, hiring, certifying, assigning, observation, retaining, supervision, management, oversight, direction, administration, and/or otherwise control of Albert Sosa and Albert Sosa's relationship with plaintiff, Spotlight M.A. Doe; and
- c. Failing to investigate and supervise Albert Sosa and his relationship with Spotlight M.A. Doe.

WHEREFORE, Plaintiff, Spotlight M.A. Doe, demands judgment against defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, jointly and severally, in an amount in excess of Fifty Million Dollars (\$50,000,000.00), exclusive of prejudgment interest, costs and damages for pre-judgment delay, and such other legal and equitable relief as the Court deems appropriate.

COUNT III – NEGLIGENT HIRING AND RETENTION

Plaintiff, Spotlight M.A. Doe

v.

**Defendants, Archdiocese of Newark,
St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church,
West New York School District, Memorial High School, Albert Sosa,
Defendant Doe 1-10, and Defendant Doe Institutions 1-10**

89. The previous paragraphs set forth above are incorporated herein by reference.

90. Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, Defendant Doe Institution 1-10, knew and/or should have known prior to and/or contemporaneous with the relevant time frame during which Spotlight M.A. Doe was sexually abused by Albert Sosa that

plaintiff and other young children affiliated and/or associated with its church were vulnerable to and potential victims of sexual abuse.

91. Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, Defendant Doe Institution 1-10, also knew and/or should have known prior to and/or contemporaneous with the relevant time frame during which Spotlight M.A. Doe was sexually abused by Albert Sosa that the access to vulnerable youths, together with the trust and authority placed in counselors, teachers, and/or clergy, makes the priesthood an enticing vocation to pedophiles, sexual predators, and/or others seeking to abuse and exploit children.

92. Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, Defendant Doe Institution 1-10, owed a duty to exercise reasonable care in the ordaining, hiring, certifying, assignment, control, selection and/or retention of counselors, teachers, seminarians, deacons, clergy, employees, agents, servants, representatives, and/or ostensible agents, situated in and/or located at the Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, and St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, Defendant Doe Institution 1-10, and specifically a duty to be on high look out for possible pedophiles, sexual predators, and others seeking to abuse and exploit children.

93. Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Defendant Doe 1-10, and Defendant Doe Institution 1-10, failed to exercise reasonable care in the ordaining, hiring, certifying, assignment, control, selection and/or retention of Albert Sosa as a counselor, teacher, seminarian, deacon, clergy, employee, agent, servant, representative, and/or ostensible agent, among other things, the following:

- a. Failing to conduct a thorough and proper background check of Albert Sosa;
- b. Failing to thoroughly and reasonably investigate Albert Sosa's sexual history;

- c. Failing to learn of or investigate Albert Sosa's history of sexual impropriety with young boys and his proclivity to sexual assault young boys;
- d. Failing to conduct a thorough and proper interview with Albert Sosa;
- e. Failing to investigate whether Albert Sosa had any inappropriate sexual interest in young boys;
- f. Failing to use due care in the selection of Albert Sosa as an deacon and/or clergy ministering and rendering clerical services, and interacting with children; and,
- g. Failing to use due care in the retention of Albert Sosa as a counselor, teacher, deacon and/or clergy teaching, ministering and/or providing counseling service to young vulnerable children;
- h. Recklessly, negligently and/or carelessly failing to adequately check Albert Sosa's background; and
- i. Recklessly, negligently and/or carelessly failing to have policies and procedures in place to screen counselors, teachers, deacons and/or clergy for the possibility of being sexual predators.

WHEREFORE, Plaintiff, Spotlight M.A. Doe, demands judgment against defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, jointly and severally, in an amount in excess of Fifty Million Dollars (\$50,000,000.00), exclusive of prejudgment interest, costs and damages for pre-judgment delay, and such other legal and equitable relief as the Court deems appropriate.

COUNT IV – GROSS NEGLIGENCE

Plaintiff, Spotlight M.A. Doe

v.

**Defendants, Archdiocese of Newark,
St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church,
West New York School District, Memorial High School, Albert Sosa,
Defendant Doe 1-10, and Defendant Doe Institutions 1-10**

94. The previous paragraphs set forth above are incorporated herein by reference.

95. Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, were grossly negligent under the facts as detailed within this Complaint in that these defendants acted or failed to act: with complete disregard of the rights, safety, and well-being of others; in a palpably unreasonable manner; in an outlandish fashion; and/or failed to exercise slight care or diligence under these circumstances.

WHEREFORE, Plaintiff, Spotlight M.A. Doe, demands judgment against defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, jointly and severally, in an amount in excess of Fifty Million Dollars (\$50,000,000.00), exclusive of prejudgment interest, costs and damages for pre-judgment delay, and such other legal and equitable relief as the Court deems appropriate.

COUNT V – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Plaintiff, Spotlight M.A. Doe

v.

**Defendants, Archdiocese of Newark,
St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church,
West New York School District, Memorial High School, Albert Sosa,
Defendant Doe 1-10, and Defendant Doe Institutions 1-10**

96. The previous paragraphs set forth above are incorporated herein by reference.

97. The actions and/or inactions of Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, jointly, severally, and/or through the conduct of Albert Sosa intentionally inflicted emotional distress upon plaintiff in that Albert Sosa acted intentionally, willfully, and/or recklessly, in that his actions were intended to cause, or done with deliberate disregard to a high degree of probability that such behavior would cause emotional distress.

98. The actions and/or inactions of Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, jointly, severally, and/or through the conduct of Albert Sosa, against plaintiff were extreme and outrageous; so outrageous in character and so extreme in degree as to go beyond all possible bounds of decency and are regarded as atrocious and utterly intolerable in our civilized community.

99. The actions and/or inactions of Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, jointly, severally, and/or through the conduct of Albert Sosa, was the direct and/or proximate cause of emotional distress to the plaintiff, which was so severe that no reasonable person could be expected to endure such distress.

100. The conduct of Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, jointly, severally, and/or through the conduct of Albert Sosa, was sufficiently severe to cause genuine and substantial emotional distress and/or mental harm to the average person, including the plaintiff.

101. Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, are vicariously liable for the damages caused by Albert Sosa's intentional infliction of emotional distress upon the plaintiff.

WHEREFORE, Plaintiff, Spotlight M.A. Doe, demands judgment against defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, jointly and severally, in an amount in excess of Fifty Million Dollars (\$50,000,000.00), exclusive of prejudgment interest, costs and damages for pre-judgment delay, and such other legal and equitable relief as the Court deems appropriate.

COUNT VI – BREACH OF FIDUCIARY DUTY

Plaintiff, Spotlight M.A. Doe

v.

**Defendants, Archdiocese of Newark,
St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church,
West New York School District, Memorial High School, Albert Sosa,
Defendant Doe 1-10, and Defendant Doe Institutions 1-10**

102. The previous paragraphs set forth above are incorporated herein by reference.

103. By virtue of their status as clergy, religious, education and/or adult authorities, Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, bore a fiduciary relationship to plaintiff and other children and persons within and/or affiliated, employed, and/or near the business.

104. Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, had fiduciary duties to avoid harming children and to protect them from harm at the hands of counselors, teachers, seminarians, deacons, clergy, employees, agents, servants, representatives, and/or ostensible agents ordained, hired, certified, assigned, retained, supervised, managed, overseen, directed, administrated, and/or otherwise controlled by and for said defendants.

105. Defendants breached their fiduciary duties by acting or failing to act in accordance with their fiduciary duties and/or as alleged in this Complaint.

106. Plaintiff suffered the above-averred harms and damages as a result of Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, breach of their fiduciary duty.

WHEREFORE, Plaintiff, Spotlight M.A. Doe, demands judgment against defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, jointly and severally, in an amount in excess of Fifty Million Dollars (\$50,000,000.00), exclusive of prejudgment interest, costs and damages for pre-judgment delay, and such other legal and equitable relief as the Court deems appropriate.

COUNT VII – LAW AGAINST DISCRIMINATION, VIOLATION OF N.J.S.A. SECTION 10:5-1 et seq. SEXUALLY HOSTILE ENVIRONMENT AND DISCRIMINATION

Plaintiff, Spotlight M.A. Doe

v.

**Defendants, West New York School District,
Memorial High School, Albert Sosa,**

Defendant Doe 1-10, and Defendant Doe Institutions 1-10

107. The previous paragraphs set forth above are incorporated herein by reference.

108. Despite defendants, West New York School District, Memorial High School, Defendant Doe 1-10, and/or Defendant Doe Institution 1-10, actual and/or constructive knowledge of Albert Sosa’s sexually inappropriate and harassing conduct, defendants, West New York School District, Memorial High School, Defendant Doe 1-10, and/or Defendant Doe Institution 1-10, failed to reasonably protect plaintiff, Spotlight M.A. Doe, against harassing conduct on the basis of his sex, male, and permitted a hostile education environment.

109. These defendants violated New Jersey’s Law Against Discrimination (“LAD”), contained within N.J.S.A. Section 10:5-1 et seq., and such failures created an intimidating, offensive or hostile educational environment for Plaintiff, Spotlight M.A. Doe and discriminated against plaintiff based upon his sex, male, and his age, minor.

110. Defendants, West New York School District, Memorial High School, Defendant Doe 1-10, and/or Defendant Doe Institution 1-10, are vicariously liable for the actions and/or inactions of its supervisory employees.

111. Defendants, West New York School District, Memorial High School, Defendant Doe 1-10, and/or Defendant Doe Institution 1-10, knew, or should have known, of the past lewd conduct and/or sexual abuse committed by Albert Sosa and failed to take effective remedial measures to end his offensive conduct.

112. The harassing conduct would not have occurred, but for the plaintiff’s gender, male, and/or age, minor, which is/are a protected category under New Jersey’s Law Against Discrimination.

113. The sexual harassment created or permitted by these defendants of Plaintiff was so severe such that any reasonable person would believe that the conditions of education were altered and that the educational environment was intimidating, hostile, offensive or abusive.

114. As a direct and proximate result of the breaches and failures by these defendants, plaintiff was caused to suffer bodily injury, emotional distress/injury, injuries which are likely to be permanent in nature and denial of the full education he was entitled to receive.

115. In the alternative, defendants, West New York School District, Memorial High School Defendant Doe 1-10, and/or Defendant Doe Institution 1-10, defendants, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, and/or Defendant Doe Institution 1-10, are liable for damages caused to Plaintiff for the reasons outlined through this Complaint and within this Court and such violations caused Plaintiff's injuries and damages.

116. As a direct and proximate result of defendants' conduct described herein, plaintiff, Spotlight M.A. Doe, was caused to suffer emotional and physical injuries and symptoms as described in this Complaint, and has incurred and/or will likely incur future expenses for medical and psychological treatment.

WHEREFORE, Plaintiff, Spotlight M.A. Doe demands judgment against defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, jointly and severally, in an amount in excess of Fifty Million Dollars (\$50,000,000.00), exclusive of prejudgment interest, costs and damages for pre-judgment delay, attorney's fees, and such other legal and equitable relief as the Court deems appropriate.

COUNT VIII – ASSAULT AND BATTERY

Plaintiff, Spotlight M.A. Doe

v.

Defendant, Albert Sosa

117. The previous paragraphs set forth above are incorporated herein by reference.

118. Defendant, Albert Sosa, sexually assaulted plaintiff, Spotlight M.A. Doe, for which claims of assault are brought.

119. Defendant, Albert Sosa performed sexual acts and sexual harassment acts upon plaintiff, Spotlight M.A. Doe, without his consent and/or without his consent as he was a minor, and/or he was incapable of consenting has a minor.

120. Defendant, Albert Sosa unlawfully touched plaintiff, Spotlight M.A. Doe without his consent for which claims for battery are brought.

121. As a direct and proximate result of defendants' conduct described herein, plaintiff, Spotlight M.A. Doe, was caused to suffer emotional and physical injuries and symptoms as described in this Complaint, and has incurred and/or will likely incur future expenses for medical and psychological treatment.

122. For these actions, plaintiff seeks damages, including punitive damages, from these defendants to the extent allowed by New Jersey law.

WHEREFORE, Plaintiff, Spotlight M.A. Doe demands judgment against defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, jointly and severally, in an amount in excess of Fifty Million Dollars (\$50,000,000.00), exclusive of prejudgment interest, costs and damages for pre-judgment delay, attorney's fees, and such other legal and equitable relief as the Court deems appropriate.

COUNT IX – PUNITIVE DAMAGES

Plaintiff, Spotlight M.A. Doe

v.

**Defendants, Archdiocese of Newark,
St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church,
West New York School District, Memorial High School, Albert Sosa,
Defendant Doe 1-10, and Defendant Doe Institutions 1-10**

123. The previous paragraphs set forth above are incorporated herein by reference.

124. The aforesaid acts of Defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe Institution 1-10, were committed in outrageous and wanton and willful disregard for the safety, protection, and well-being of minors, including the plaintiff, warranting the imposition of punitive damages.

WHEREFORE, Plaintiff, Spotlight M.A. Doe, demands judgment against defendants, Archdiocese of Newark, St. Joseph of the Palisades Parish, St. Joseph of the Palisades Church, West New York School District, Memorial High School, Albert Sosa, Defendant Doe 1-10, Defendant Doe Institution 1-10, jointly and severally, in an amount in excess of Fifty Million Dollars (\$50,000,000.00), exclusive of prejudgment interest, costs and damages for pre-judgment delay, and such other legal and equitable relief as the Court deems appropriate.

LEVY, BALDANTE, FINNEY, & RUBENSTEIN, P.C.

By: /s/ John W. Baldante
John W. Baldante, Esquire
Attorney for Plaintiff, Spotlight M.A. Doe

DATED: February 24, 2021

JURY TRIAL

PLEASE TAKE NOTICE that plaintiff, Spotlight M.A. Doe, demands a trial by jury on all issues raised herein.

LEVY, BALDANTE, FINNEY, & RUBENSTEIN, P.C.

By: /s/ John W. Baldante
John W. Baldante, Esquire
Attorney for Plaintiff, Spotlight M.A. Doe

DATED: February 24, 2021

DESIGNATION OF TRIAL COUNSEL

PLEASE BE NOTIFIED that pursuant to Rule 4:25-4, John W. Baldante, Esquire is hereby designated as trial counsel in the aforementioned litigation on behalf of the law firm of Levy, Baldante, Finney, & Rubenstein, P.C.

LEVY, BALDANTE, FINNEY, & RUBENSTEIN, P.C.

By: /s/ John W. Baldante
John W. Baldante, Esquire
Attorney for Plaintiff, Spotlight M.A. Doe

DATED: February 24, 2021

