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STATE OF NORTH CAROLINA
COUNTY OF [REDACTED]

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

JOHN DOE a minor, by and through his
Guardian Ad Litem [REDACTED],
and [REDACTED] and
[REDACTED] individually,

Plaintiffs,

v.

[REDACTED], [REDACTED],
all individually and in
their official capacity,

[REDACTED], and

_____, dba, _____

Defendants.

COMPLAINT
(Jury Trial Demanded)

COMES NOW the minor Plaintiff, JOHN DOE by and through the undersigned and his
Guardian Ad Litem, [REDACTED] and [REDACTED] and [REDACTED] for their
Complaint, alleges the following based upon their personal knowledge of the acts and based upon
information and belief as to all matters, including, *inter alia*, an investigation conducted by and
through their attorneys:



JURISDICTION AND VENUE

1. Under N.C.G.S. § 7A-243, this Court has subject matter jurisdiction over this matter because the amount in controversy exceeds twenty-five thousand dollars (\$25,000).

2. Under N.C.G.S. § 1-75.4(1), this Court has personal jurisdiction over Defendants because, upon information and belief, Defendants are located in the State of North Carolina.

3. Venue is proper because of the alleged acts or omissions reflected below, which gave rise to this cause of action, having occurred within [REDACTED] County, North Carolina.

PARTIES

4. The Plaintiff, John Doe, a minor child, by and through his natural guardians, [REDACTED] and [REDACTED], resides at [REDACTED], North Carolina [REDACTED] in [REDACTED] County. The Plaintiff, John Doe having date of birth [REDACTED] [REDACTED] is still a [REDACTED].

5. The Plaintiff, [REDACTED] (“Mr. [REDACTED]”) is a citizen and resident of [REDACTED]. Mr. [REDACTED] is the duly-appointed Guardian Ad Litem for his son John Doe for the prosecution of this action.

6. The Plaintiff, [REDACTED] (“Ms. [REDACTED]”) is a citizen and resident of [REDACTED].

7. Plaintiffs [REDACTED] and [REDACTED] are married and the legal parents of the Plaintiff, John Doe.

8. Upon information and belief, Defendant [REDACTED] (“[REDACTED]”) was at all relevant times an adult citizen of the United States, who was employed as a teacher by [REDACTED].

9. Upon information and belief, Defendant [REDACTED] ("[REDACTED]") was at all relevant times an adult citizen of the United States, who was employed as a teacher by [REDACTED]

10. Upon information and belief, Defendant [REDACTED] ("[REDACTED]") was at all relevant times an adult citizen of the United States, and the principal and owner of [REDACTED]

11. Upon information and belief, Defendant [REDACTED] ("[REDACTED]") was at all relevant times an adult citizen of the United States, and the Director of [REDACTED] resigned from [REDACTED] on [REDACTED], soon after John Doe's [REDACTED]

12. Upon information and belief, Defendant [REDACTED] ("[REDACTED]") was at all relevant times an adult citizen of the United States and is the current Director of [REDACTED]

13. Upon information and belief, Defendant [REDACTED] ("[REDACTED]") was at all relevant times an adult citizen of the United States, and the regional director of curriculum and training at [REDACTED]. [REDACTED]'s current position required her to support teachers through training, mentoring, and professional development.

14. Upon information and belief, Defendant [REDACTED] ("[REDACTED]") was at all relevant times an adult citizen of the United States, and the regional director of operations at [REDACTED]

15. Upon information and belief, Defendant [REDACTED] ("[REDACTED]") is at all relevant times a facility having [REDACTED], providing [REDACTED] services for children in [REDACTED]

16. Upon information and belief, Defendant [REDACTED] (“[REDACTED]”) doing business as [REDACTED] School is at all relevant times the operator of [REDACTED]

17. Various unknown John Does and John Doe, whose names are not specifically known at this time.

FACTUAL ALLEGATIONS

18. The Plaintiff John Doe was born on [REDACTED] and was at all relevant times a citizen and resident of the State of North Carolina, County of [REDACTED]

PRE-INJURY

19. On [REDACTED], around [REDACTED] Mr. [REDACTED] dropped John Doe at [REDACTED] before heading to his office in [REDACTED], North Carolina

20. [REDACTED] (“[REDACTED]”) was the original primary teacher overseeing John Doe’s classroom in the [REDACTED] school year, while [REDACTED] and [REDACTED] were the secondary teachers.

21. Usually, [REDACTED] and [REDACTED] were the two main teachers overseeing John Doe’s classroom.

22. But on [REDACTED], [REDACTED] was the second teacher along with [REDACTED] in John Doe’s classroom as [REDACTED] had to visit [REDACTED] for something related to [REDACTED].

JOHN DOE’S FIRST INJURY AND SUFFERING

23. On [REDACTED], at [REDACTED], John Doe had an innocent desire for his teacher to [REDACTED]

24. But in response to John Doe’s desire, [REDACTED] [REDACTED] [REDACTED] and pulled him [REDACTED] causing pain to his left arm.

25. [REDACTED]'s negligent, conscious, and reckless conduct caused John Doe to fall to the ground.

26. Despite John Doe's fall, he was ignored by the two teachers present in the classroom, namely [REDACTED], and [REDACTED], and he was lying on the ground [REDACTED] until [REDACTED] unsuccessfully tried to get him to stand up.

27. As John Doe was [REDACTED] for a reason unknown at that time, [REDACTED] took him to the school nurse.

28. The school nurse, [REDACTED], called John Doe's mother, Ms. [REDACTED] at [REDACTED] and informed her that John Doe is not [REDACTED] not walking.

29. Ms. [REDACTED] immediately called the pediatrician for an appointment for John Doe.

30. Upon arrival at [REDACTED] Ms. [REDACTED] found John Doe [REDACTED] to be rushed to the pediatric emergency room in a [REDACTED] ("[REDACTED]") ambulance. Ms. [REDACTED] joined him in the ambulance.

31. John Doe was initially presented to his pediatrician's office [REDACTED]

32. After John Doe was evaluated by the pediatrician and [REDACTED] was found, he was referred to [REDACTED] Hospital for further evaluation with the emergency department.

33. [REDACTED] was called after [REDACTED] of John Doe's injury at [REDACTED]

34. Ms. [REDACTED] spoke with [REDACTED] regarding [REDACTED] incident. [REDACTED] informed Ms. [REDACTED] that she viewed a video of the time John Doe was in the classroom on [REDACTED], and that

[REDACTED] grabbed John Doe and [REDACTED]. She also informed Ms. [REDACTED] that the video was [REDACTED].

35. [REDACTED] reported John Doe with a [REDACTED] from [REDACTED].

36. The doctor diagnosed John Doe with a [REDACTED] from a [REDACTED].

37. At all times relevant, John Doe was noted to have pain with any movement of his [REDACTED].

38. John Doe was prepared for X-rays and over the last two (2) hours, he was under medication such as [REDACTED], and [REDACTED].

39. The initial feedback after the X-ray was that John Doe would require [REDACTED].

40. The same day John Doe was taken to surgery at [REDACTED] Hospital and thereafter was transferred to [REDACTED] floor room [REDACTED].

41. At his early stage of life, John Doe was required [REDACTED] to set his broken [REDACTED].

42. By evening, John Doe was taken to an orthopedic operating room and was separated from his parents.

43. John Doe was put under general anesthesia and was in a [REDACTED] covering his [REDACTED] which went above his [REDACTED] across his [REDACTED].

44. John Doe's [REDACTED] as he could not walk or crawl, contrary to a [REDACTED] who would enjoy exploring his surroundings.

45. Due to this injury, at his early stage of life, John Doe was limited to express his needs with his very limited vocabulary.

46. At all the relevant times, John Doe was treated by several medical providers including [REDACTED], [REDACTED], [REDACTED], [REDACTED], etc.

47. After this incident, John Doe required 1:1 care for two months and additional care and attention than before.

48. On [REDACTED], John Doe rejoined his classroom at [REDACTED].

49. After the removal of the [REDACTED] John Doe was limited in outdoor activities for an additional two months.

50. Due to this injury, John Doe lost his appetite, sleep, and feeling of safety and his parents become over-protective.

51. At all times relevant, John Doe required 24/7 care, and [REDACTED] was his primary caregiver.

52. At all times relevant, [REDACTED] knew or should have known that her conduct of negligence or child malpractice may cause grave and severe injuries to John Doe or any other such toddler at [REDACTED]

53. Upon information and belief, [REDACTED] was terminated from her employment at [REDACTED] on the same day.

54. At all times relevant to John Doe's [REDACTED], [REDACTED] was the Director of [REDACTED]

JOHN DOE'S SECOND INJURY AND SUFFERING

55. Nearly one month of John Doe's return to [REDACTED] after his [REDACTED] on [REDACTED], his [REDACTED] in a cabinet at [REDACTED]

56. At all times relevant, [REDACTED] was present in John Doe's classroom and was supervising the class that day.

57. The second injury occurred when John Doe was near [REDACTED]
[REDACTED] John Doe's [REDACTED] because another kid closed it.

58. Although the incident occurred in [REDACTED]'s presence, she simply ignored it. Her response to John Doe's [REDACTED] injury was contrary to the standard of care required by a teacher of a [REDACTED]

59. After this [REDACTED] injury, John Doe's [REDACTED] showed limited movement and appeared red and swollen.

60. The second incident again resulted in a repeated sequence of hospital events, including X-ray procedures for John Doe.

61. Upon diagnosis at [REDACTED], John Doe found to have a broken [REDACTED].

62. [REDACTED] knew or should have known that her conduct of negligence or child malpractice may cause grave and severe injuries to John Doe or any other such toddler at [REDACTED]

63. Consequently, upon Mr. and Ms. [REDACTED]'s demand, [REDACTED] was restaffed to various classrooms in the [REDACTED] wing (older children) and was on an [REDACTED]. (A copy of [REDACTED], is attached hereto as Exhibit A and incorporated herein by reference).

64. Upon information and belief, [REDACTED] is still employed at [REDACTED] and was awarded as the "Teacher [REDACTED] in [REDACTED]. (A copy of which is attached hereto as Exhibit B and incorporated herein by reference).

65. At all times relevant to John Doe's [REDACTED] injury, [REDACTED] is the Director of [REDACTED]

66. At all times relevant, Defendants were aware and had acknowledged that this was the second instance where [REDACTED]'s response to John Doe's injury was inappropriate and substandard to [REDACTED]'s expectations.

REPLACEMENT/REASSIGNMENT OF [REDACTED] TEACHER'S

67. Subsequent to all these events or incidents at [REDACTED] Defendants placed [REDACTED] ("[REDACTED]") as the primary teacher to oversee John Doe's classroom for the [REDACTED] school year.

68. Not long into the school year, Defendants placed [REDACTED] on leave and informed all parents/guardians of [REDACTED] children that [REDACTED]'s leave will remain in effect until the investigation is resolved. No information was given to the parents as to the reason for the leave. (A copy of [REDACTED]'s email dated [REDACTED], to Parents/Guardians is attached hereto as Exhibit C and incorporated herein by reference).

69. Following the state investigation regarding the unknown matter, Defendants replaced [REDACTED] with [REDACTED] ("[REDACTED]") in the [REDACTED] with John Doe. (A copy of [REDACTED]'s email dated [REDACTED] to [REDACTED] is attached hereto as Exhibit D and incorporated herein by reference).

70. As of the date of this Complaint, [REDACTED]'s website shows [REDACTED] as an [REDACTED] Teacher at [REDACTED]

71. Currently, Ms. [REDACTED] Ms. [REDACTED] Ms. [REDACTED] and [REDACTED] are the [REDACTED] teachers overseeing John Doe's classroom at [REDACTED] (A copy of [REDACTED]'s email dated [REDACTED] to [REDACTED] is attached hereto as Exhibit E and incorporated herein by reference).

MENTAL HEALTH OF [REDACTED]

72. At all times relevant, Ms. [REDACTED] was eight (8) weeks pregnant at the time of injury to John Doe.

73. As a result of the Defendants' conduct, Ms. [REDACTED] developed health problems.

74. Ms. [REDACTED] suffered from anxiety, depression, trauma, and extreme physical and emotional distress during pregnancy after John Doe's injury.

75. Subsequently, Ms. [REDACTED] was diagnosed with Post Traumatic Stress Disorder (PTSD).

76. She was prescribed [REDACTED] by Dr. [REDACTED], MD to help her with anxiety, depression, PTSD, sleep, and fixation on the trauma during pregnancy.

77. Ms. [REDACTED] continued to visit [REDACTED], a mental therapist to assist her emotionally, trauma therapy, EMDR, and bilateral stimulation after John Doe's injury.

78. Mr. [REDACTED] was unable to understand and tackle Ms. [REDACTED]'s emotions, resulting in marital problems between them.

79. At all times relevant, both Mr. and Ms. [REDACTED] had to take leave from their office to take care of John Doe, causing loss of earnings resulting in economic damages.

80. The emotional strain caused by the situation was the most trying and has proven to be long-lasting.

81. As a direct and proximate result of Defendants' negligent acts, the Plaintiffs have suffered and will continue to suffer economic damages in a full amount to be proved at trial.

82. Defendants should have complied with the standard of care required under the law of the State related to child health, safety, and welfare.

83. [REDACTED] and [REDACTED] should have known that their employees had a practice of handling the toddler or child in [REDACTED] roughly and using corporal punishment as a form to discipline the children therein.

OTHER VIOLATIONS BY [REDACTED] AND [REDACTED]

84. Even after these violations, [REDACTED] and [REDACTED] continued to violate the childcare requirements related to the care and treatment of children at their facility. (A copy of the Division of Child Development's investigation is attached hereto as Exhibit F and incorporated herein by reference).

85. On [REDACTED], a three-year-old child was disciplined by being [REDACTED] [REDACTED] while having a diaper changed by a staff member, causing injury to the child's [REDACTED]. And the same staff member pushed the children down to sit in a rough manner.

86. A staff member was reportedly speaking to a group of three-year-old children in a [REDACTED] on more than one occasion and pulled toys away from the same group of children in a [REDACTED].

87. Within 90 days of employment, neither [REDACTED] nor the staff completed the *Recognizing and Responding to Suspicions of Child Maltreatment* training.

88. Although [REDACTED] completed a similar training within the time frame, it was not an approved training.

89. Upon information and belief, in the past three years, the Division of Child Development has issued one or more Administrative Actions for [REDACTED] and [REDACTED].



FIRST CAUSE OF ACTION
(Negligence)

90. Plaintiffs repeat and incorporate by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

91. [REDACTED] and [REDACTED] owed John Doe a duty of care and not to cause him physical impairment or emotional distress.

92. John Doe sustained a [REDACTED] due to the gross or wanton negligent conduct of [REDACTED] and [REDACTED] respectively.

93. Both [REDACTED] also owed John Doe a duty of care and not to cause him physical impairment or emotional distress.

94. Both [REDACTED] were negligent to ensure that their employees complied with the policies and procedures mandated to the facility under the State of North Carolina.

95. [REDACTED]'s willful or wanton conduct shows that they condoned the negligent and inappropriate acts of their employees.

96. The conduct of the Defendants as described above was willful or wanton, in reckless or heedless disregard for the rights and safety of John Doe, and constitutes gross negligence.

97. Defendants' breached their duty of care by way of their conduct as alleged herein.

98. Defendants in their individual and official capacities, committed negligent actions and negligent failures to act, as set forth hereinabove, and those acts proximately cause emotional and financial injuries to Plaintiffs.

99. As a proximate result of the Defendants' negligence, John Doe incurred compensatory and punitive damages, including medical expenses and extreme emotional distress as a result of such negligence in failing to protect and safeguard him from any physical and emotional injuries, and will continue to incur such damages in the future.

SECOND CAUSE OF ACTION
(Negligence Per Se)

100. Plaintiffs repeat and incorporate by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

101. At all relevant times, Defendants owed a duty to comply with applicable statutes, regulations, and rules related to child health, safety, and welfare in the State of North Carolina.

102. [REDACTED]'s conduct of [REDACTED] John Doe's [REDACTED] [REDACTED] is a violation of N.C. Gen. Stat. § 110-91(10) and Child Care Rule 10A N.C. Admin. Code 9.1803(a)(1).

103. [REDACTED]'s conduct of ignoring the [REDACTED] while John Doe and other children were near the [REDACTED] second injury is a violation of N.C. Gen. Stat. § 110-91(10).

104. [REDACTED] breached this statutory duty when she [REDACTED] John Doe by the [REDACTED] causing John Doe to [REDACTED] of the [REDACTED]

105. [REDACTED] being a childcare facility and a [REDACTED] school, under N.C. Gen. Stat. § 110-91, [REDACTED] should comply with all State and federal laws and local ordinances related to child health, safety, and welfare.

106. Under N.C. Gen. Stat. § 110-105.6, due to this child maltreatment in [REDACTED], both [REDACTED] have violated North Carolina licensure standards and licensure laws.

107. Both [REDACTED], were negligent per se, in that they violated the mandatory compliance regarding child health, safety, and welfare in the State of North Carolina.



108. The conduct of the Defendants as described above was willful or wanton, in reckless or heedless disregard for the rights and safety of John Doe and constitutes gross negligence.

109. As a result of such negligence per se, Plaintiffs have incurred compensatory and punitive damages, including medical expenses and extreme emotional distress as a result of such John Doe's injuries, and believes that John Doe may incur damages in the future for the cost of future care, in amounts according to proof at trial.

THIRD CAUSE OF ACTION
(Negligent Infliction of Emotional Distress)

110. Plaintiffs repeat and incorporate by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

111. Defendants owed the Plaintiffs a duty of care not to cause him emotional distress.

112. Defendants breached their duty of care by their conduct as alleged herein.

113. The conduct of the Defendants as described above constitutes negligent infliction of emotional distress.

114. As a proximate result of Defendants' extreme and outrageous acts, Plaintiffs suffered emotional distress, humiliation, and embarrassment.

115. As a direct and proximate result of the conduct of the Defendants as described above, the Plaintiffs have suffered extreme emotional anguish and mental anguish, and are entitled to compensatory and punitive damages, including medical expenses and extreme emotional distress as a result of such John Doe's injuries, and believes that John Doe may incur damages in the future for the cost of future care, in amounts according to proof at trial.

FOURTH CAUSE OF ACTION
(Gross Negligence)

116. Plaintiffs repeat and incorporate by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

117. Even after John Doe's [REDACTED], Defendants acted with conscious or reckless disregard for the rights and safety of the children at their facility.

118. One month back after a [REDACTED], John Doe broke his [REDACTED] in the same classroom at [REDACTED]

119. Defendants continued to be grossly negligent in handling and nurturing children with reasonable care in their facility.

120. The conduct of the Defendants as described above was willful or wanton, in reckless or heedless disregard for the rights and safety of John Doe and constitutes gross negligence.

121. As a direct and proximate result of the conduct of the Defendants as described above, John Doe has sustained severe physical injuries, requiring medical care and treatment, and has suffered severe mental and physical pain and suffering, loss of enjoyment of life, and other losses which shall be proved at the trial of this action, including but not limited to claims for ongoing medical treatment expenses, compensatory and punitive damages on behalf of John Doe and his parents, in an amount to be determined by a jury in the of this action.

FIFTH CAUSE OF ACTION

Negligent Hiring and Retention as to [REDACTED]

122. Plaintiffs repeat and incorporate by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

123. Both [REDACTED] had a duty to hire employees and supervisors who were competent and who would otherwise perform their job functions in a reasonably safe manner.

124. Both [REDACTED] were negligent in hiring [REDACTED] who was reported to be educated in an unrelated field. While [REDACTED] was employed at [REDACTED] she was continuing her education and taking Early Childhood classes with [REDACTED]

125. [REDACTED] had a mandatory duty of care to hire properly, train, retain, supervise, and discipline its employees to avoid unreasonable harm to the children at its facility.

126. Both [REDACTED] knew or should have known that the previous negligent acts of their employees at [REDACTED], including [REDACTED] and [REDACTED] from which their incompetency may be inferred.

127. With deliberate indifference, [REDACTED] failed to take necessary and adequate measures to prevent injury to John Doe.

128. [REDACTED] breached a duty of care to Plaintiffs and failed to adequately train employees to treat and attend to each child in a nurturing and appropriate manner.

129. Although [REDACTED] was terminated from the employment at [REDACTED], retention of [REDACTED], despite her negligent behavior by both [REDACTED] is inappropriate.

130. Both [REDACTED] were negligent in that they hired, retained, and otherwise employed individuals who were untrained, incompetent, unsafe, careless, reckless, and who otherwise acted in an unreasonable and unsafe manner in the performance of their job functions, including but not limited to properly nurturing children.

131. As a direct and proximate result of the conduct of the Defendants as described above, the Plaintiffs have suffered extreme emotional anguish and mental anguish, and are entitled to compensatory and punitive damages, including medical expenses and extreme emotional distress as a result of such John Doe's injuries, and believes that John Doe may incur damages in the future for the cost of future care, in amounts according to proof at trial.

SIXTH CAUSE OF ACTION

(Negligent Training/Supervision as to [REDACTED])

132. Plaintiffs repeat and incorporate by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

133. At all the relevant times, [REDACTED] was employed with [REDACTED] and was under the direction, supervision, and control of both [REDACTED] either directly or through its agents.

134. At all times relevant to this litigation, [REDACTED] is employed with [REDACTED] and is still under the direction, supervision, and control of both [REDACTED] either directly or through its agents.

135. [REDACTED] failed to appropriately train and supervise the teachers at the [REDACTED], including [REDACTED] on child nurturing and handling.

136. [REDACTED] failed to appropriately supervise the teachers at the [REDACTED], including [REDACTED] on child nurturing and handling

137. Both [REDACTED] had a duty to train their employees, including [REDACTED] regarding the proper standard of care to be taken while attending any child in a nurturing and keeping with the child's developmental needs.

138. [REDACTED] was negligent as it failed to properly train, inform, monitor, and supervise the activities of their employees at the above-listed event.

139. [REDACTED] was negligent as it failed to properly train, inform, monitor, and supervise the activities of the employees at [REDACTED]

140. At all times material, [REDACTED] either directly or through its agents negligently supervised the employees at [REDACTED], when they knew or should have known

that a failure to implement appropriate techniques to handle, discipline, and care or treatment of children could result in injury or even death.

141. Despite this knowledge, the [REDACTED] failed to exercise reasonable care in training and supervising their employees at the above-listed event.

142. As a direct and proximate result of both [REDACTED]'s negligent training and supervision of its employees, agents, or servants, John Doe sustained a [REDACTED]

143. As a direct and proximate result of the conduct of the Defendants as described above, the Plaintiffs have suffered extreme emotional anguish and mental anguish, and are entitled to compensatory and punitive damages, including medical expenses and extreme emotional distress as a result of such John Doe's injuries, and believes that John Doe may incur damages in the future for the cost of future care, in amounts according to proof at trial.

SEVENTH CAUSE OF ACTION
(Respondent Superior as to [REDACTED])

144. Plaintiffs repeat and incorporate by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

145. An employer is responsible for harm caused by the wrongful or negligent conduct of its employees while acting within the scope of their employment.

146. [REDACTED]'s job of nurturing the toddlers is expressly authorized by [REDACTED] and reasonably foreseeable in light of the [REDACTED]'s business.

147. John Doe sustained a [REDACTED] due to the negligent and rough handling by [REDACTED] while acting within the scope of her employment with [REDACTED] operated by [REDACTED]

148. Likewise, John Doe sustained a [REDACTED] due to the negligence and lack of responsiveness by [REDACTED] while acting within the scope of her employment with [REDACTED], operated by [REDACTED]

149. At all times relevant, [REDACTED] were acting in furtherance of [REDACTED]'s business because nurturing the toddlers is reasonably related to the kinds of tasks that [REDACTED] were employed to perform for their employer, [REDACTED] and [REDACTED]

150. As a direct and proximate result of the aforesaid acts and omissions of the Defendants, John Doe has suffered severe injuries causing [REDACTED]

151. As a direct and proximate result of the aforesaid acts and omissions of the Defendants, John Doe has required medical treatment and needs additional care.

152. The acts and omissions of Defendants, and each of them, caused John Doe to suffer harm and injury, economic damages, for the cost of medical, and Plaintiffs are informed and believes that John Doe may incur damages in the future for the cost of future care, in amounts according to proof at trial.

153. As a direct and proximate result of the conduct of the Defendants as described above, the Plaintiffs have suffered extreme emotional anguish and mental anguish, and are entitled to compensatory and punitive damages, including medical expenses and extreme emotional distress as a result of such John Doe's injuries, and believes that John Doe may incur damages in the future for the cost of future care, in amounts according to proof at trial.

DEMAND FOR JURY TRIAL

Plaintiff requests a jury trial of all claims and matters set forth herein.

PRAYER FOR RELIEF

For the foregoing reasons, Plaintiffs, individually and in their representative capacity as



uardians ad Litem of John Doe, respectfully prays that this Honorable Court grants the following equitable and legal relief:

1. Compensatory, consequential, and punitive damages in an amount to be determined by a jury in the trial of this action, but in any event, more than the sum of [REDACTED]
2. The costs of this action, including reasonable attorney fees and interest as provided by law;
3. Punitive damages, according to proof;
4. Trial by jury; and
5. For such other, further, and different relief as the court may deem just and proper.

This ____ the day of

By:

Attorneys for Plaintiffs