

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

CC 1 DOE

SUMMONS

[REDACTED]
Hamburg, New York 14075,

Index No.

Plaintiff,

v.

GATEWAY LONGVIEW, INC.
6350 Main Street
Williamsville, New York 14221,

Defendant.

TO THE ABOVE-NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED AND REQUIRED to serve upon Plaintiff's attorneys, at the address stated below, a written Answer to the attached Complaint.

If this Summons is served upon you within the State of New York by personal service, you must respond within twenty (20) days after service, not counting the day of service. If this Summons is not personally delivered to you within the State of New York, you must respond within thirty (30) days after service is completed, as provided by law.

If you do not respond to the attached Complaint within the applicable time limitation stated above, a Judgment will be entered against you by default for the relief demanded in the Complaint without further notice to you.

This action is brought within the County of Erie and the State of New York because of Plaintiff's residence.

DATED: Buffalo, New York
October 17, 2019



ALISON H. HASELEY, ESQ.
COLLINS & COLLINS ATTORNEYS, LLC
Attorneys for Plaintiff
267 North Street
Buffalo, New York 14201
(716) 885-9700

Collins & Collins
ATTORNEYS, LLC

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

CC 1 DOE,

Plaintiff,

COMPLAINT

GATEWAY LONGVIEW, INC.

Index No:

Defendant.

Plaintiff, CC 1 DOE, by and through her attorneys, Collins & Collins Attorneys, LLC, for her complaint in this action hereby alleges:

1. At all times herein mentioned, plaintiff, CC 1 DOE, resided in Erie County.

2. The defendant, GATEWAY LONGVIEW, INC. is a domestic not-for-profit corporation formed and existing under the laws of the State of New York

3. The GATEWAY LONGVIEW, INC., at all times herein mentioned, was the owner and operator of a residential treatment facility for minors.

4. The plaintiff, CC 1 DOE, was an infant under the care and custody of the defendant, GATEWAY LONGVIEW, INC., during a period of time from 1988-1989.

5. While under the residential care and custody of the defendant, GATEWAY LONGVIEW, INC., the plaintiff, CC 1 DOE, was subjected to sexual abuse.

6. While under the residential care and custody of the defendant, GATEWAY LONGVIEW, INC., plaintiff, CC 1 DOE, was woken in the middle of the night by an individual believed to be an employee or contractor of the defendant, who was standing over CC 1 DOE, partially nude, and attempting to force CC 1 DOE to perform oral sex on him.

Collins & Collins
ATTORNEYS, LLC

a. 267 North Street, Buffalo, New York 14201 □ p. 716 885 9700

7. Due to the negligence of the defendant, GATEWAY LONGVIEW, INC., and its agents, servants, employees, and/or assigns, the plaintiff has sustained profound mental and emotional injuries.

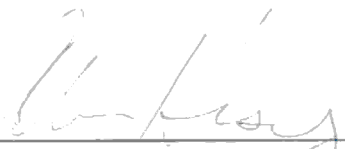
8. The aforesaid abuse was caused as a result of the negligence of the defendant, GATEWAY LONGVIEW, INC., which includes but is not limited to, vicarious responsibility for its employees, negligent supervision of said employees and the treatment program itself, negligent hiring and retention of employees to work at its treatment facility, failing to provide a safe environment for its residents, and failing to report incidents of abuse.

9. As a result of the foregoing, the plaintiff, CC 1 DOE, has been damaged in an amount in excess of the jurisdictional limits of all lower Courts in which this action may otherwise have been brought.

10. This action falls within an exception set forth in CPLR § 1602

WHEREFORE, plaintiff hereby demands judgment against the defendant, GATEWAY LONGVIEW, INC., in an amount to be determined by a jury upon a trial of this action, plus the costs and disbursements.

DATED: Buffalo, New York
October 17, 2019


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