

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

PSAS 03 DOE,

SUMMONS

Plaintiff,

v.

Plaintiff designates Erie
County as the place of trial.
the basis of the venue Plaintiff's
residence.

THE CATHOLIC DIOCESE OF BUFFALO
795 Main Street
Buffalo, New York 14203,

Index No.:

St. PATRICK ROMAN CATHOLIC CHURCH
189 Main Street
Randolph, New York 14772,

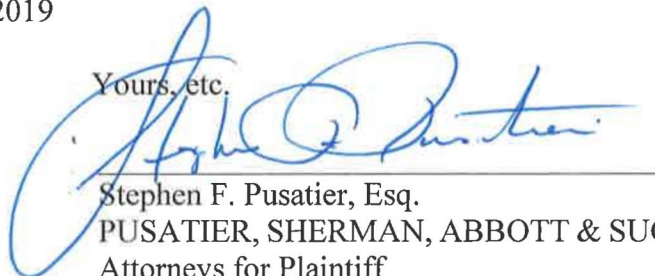
Defendants.

TO THE ABOVE NAMED DEFENDANTS

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your answer on the Plaintiff's attorneys within 20 days after the service of this Summons and Complaint, exclusive of the day of service (or within 30 days after the service is complete if this Summons and Complaint are not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

DATED: Kenmore, New York
December 23, 2019

Yours, etc.



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STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

PSAS 03 DOE,

Plaintiff,

COMPLAINT

v.

Index No.

THE CATHOLIC DIOCESE OF BUFFALO
795 Main Street
Buffalo, New York 14203,

St. PATRICK ROMAN CATHOLIC CHURCH
189 Main Street
Randolph, New York 14772,

Defendants.

Plaintiff, by and through her attorneys, Pusatier, Sherman, Abbott & Sugarman LLP, for her Complaint states as follows:

1. That at all times hereinafter mentioned, the Plaintiff was a resident of the County of Erie and State of New York.

2. Plaintiff brings this action under the New York State Child Victims Act. Plaintiff brings this action under a pseudonym to protect her privacy necessary due to the intense reporting by the media. Plaintiff will disclose her identity to the Defendants in a confidential supplemental disclosure.

3. At all times hereinafter mentioned, The Catholic Diocese of Buffalo was and continues to conduct business in the State of New York with its principal place of business at 795 Main Street, Buffalo, New York 14203.

4. The Catholic Diocese of Buffalo is a corporation duly organized and existing pursuant to the laws of the State of New York.

5. The Defendant, St. Patrick Roman Catholic Church, was and continues to conduct business in the State of New York with its principal place of business at 189 Main Street, Randolph, New York 14772.

6. At all times hereinafter mentioned, St. Patrick Roman Catholic Church was and continues to be a parish under the supervision, direction and control of the Catholic Diocese of Buffalo.

7. At all times hereinafter mentioned, Father Joseph P. Friel was a Roman Catholic Priest employed by the Catholic Diocese of Buffalo and St. Patrick Roman Catholic Church.

8. The Catholic Diocese of Buffalo employed Father Joseph P. Friel in a position where he worked with, and around, Catholic children at St. Patrick Roman Catholic Church.

9. Plaintiff was a minor child taken religious instruction at St. Patrick Roman Catholic Church.

10. Father Joseph P. Friel at St. Patrick Roman Catholic Church sexually abused and assaulted the Plaintiff who was a minor at the time.

11. Father Joseph P. Friel threatened the minor Plaintiff not to tell anyone about the sexual abuse and assault and if she did "the devil would get her".

12. The Catholic Diocese of Buffalo and St. Patrick Roman Catholic Church knew or should have known that Father Joseph P. Friel was a danger to minor children before he had sexually abused and assaulted the infant Plaintiff.

13. The Defendants were negligent by failing to protect the minor children at St. Patrick Roman Catholic Church, by permitted Father Joseph P. Friel to work at St. Patrick Roman Catholic Church, by failing to supervise Father Joseph P. Friel, by failing to investigate his activities around

minors and by allowing him to continue to work for the Catholic Diocese of Buffalo when they knew or should have known that he was a danger to the children of the Catholic Diocese of Buffalo.

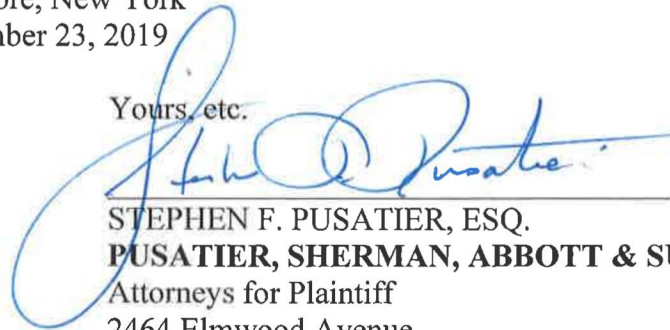
14. As a result of the negligence of the Defendants, the Plaintiff sustained physical, emotional and psychological injuries.

15. The amount of damages sought in this action exceeds the jurisdictional limits of all Courts lower than the New York State Supreme Court.

WHEREFORE, Plaintiff prays for a money judgment against the Defendants.

DATED: Kenmore, New York
December 23, 2019

Yours, etc.



STEPHEN F. PUSATIER, ESQ.

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