

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ERIE**

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| <p>PB-11,</p> <p style="text-align: center;">Plaintiff,</p> <p>vs.</p> <p>THE DIOCESE OF BUFFALO, N.Y., HOLY<br/>NAME OF JESUS CHURCH and HOLY NAME<br/>OF JESUS CATHOLIC SCHOOL,</p> <p style="text-align: center;">Defendants.</p> |
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Index No.

**AFFIDAVIT OF PB-11 DOE**

I, PB-11 DOE, being duly sworn, hereby declare and say:

1. I am the Plaintiff in the above referenced matter.
2. I currently reside in Erie County, New York.
3. I make this affidavit in support of the within application to maintain my anonymous identity in this matter.
4. I was the victim of a prolonged course of sexual abuse and sexual assault by Fr. Edward J. Walker, an employee of Defendants Diocese of Buffalo, N.Y., Holy Name Of Jesus Church, and Holy Name Of Jesus Catholic School, located in Buffalo, New York, Erie County.
5. The sexual abuse and sexual assaults occurred from approximately twelve (12) to eighteen (18) years old.
6. Fr. Coppola sexually groomed and/or abused me on the premises of Holy Name of Jesus Church and School, as well as other locations. The sexual abuse and assault included multiple instances of unpermitted, forcible, harmful touching of intimate parts of my body.
7. During the time Fr. Coppola sexually abused me, I was a minor and he was an adult.

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8. This sexual abuse has had a pronounced, significant and permanent effect on my life, including but not limited to, emotional distress, depression, anxiety, feelings of worthlessness, and many other psychological damages, painful feelings, emotions, nightmares, flashbacks, as well as physical manifestations of these problems. Due to the horrific, sensitive, deeply personal and intimate nature of the facts and allegations of sexual abuse and assault in this case, I respectfully request that my identity be kept anonymous and that I continued to be identified by my initials only.

9. I have not sought public attention regarding this matter and my identity has remained anonymous.

10. I currently reside in Erie County where Defendants also reside.

11. Should my identity be revealed to the public, in the community in which I live, I will likely immediately suffer personal and/or economic hardship, backlash from the community, irreparable injury, loss, and damage. Further, doing so will almost certainly exacerbate the very injuries I am suing for, including emotional distress, depression, anxiety, shame, and other psychological injuries.

12. There is no prejudice to Defendants in maintaining the anonymous caption.

13. Therefore, I respectfully request that an order be entered:

- 1) Permitting this action to proceed or continue with the anonymous caption above; and
- 2) Granting a Preliminary Injunction to preserve the anonymous name of Plaintiff in this action; and
- 3) Granting a Temporary Restraining Order (TRO) prohibiting the divulging of the identity of the anonymous Plaintiff in this action; and
- 4) Granting such other and further relief as this Court deems just and proper.

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Plaintiff

On the <sup>2020</sup>13 day of ~~January 2019~~ before me came the individual known to me by his full name but identified in this affidavit as Plaintiff in this action by his pseudonym ~~BB-12~~ Doe, and he signed the within document in my presence.

PB-11

PKB  
Notary Public

**PAUL K. BARR**  
Notary Public, State of New York  
Qualified in Niagara County  
My Commission Expires Feb. 20, 2022

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