

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

PB-12 DOE,

Plaintiff,

vs.

THE DIOCESE OF BUFFALO, N.Y., MOUNT
CARMEL ROMAN CATHOLIC CHURCH
SOCIETY OF SILVER CREEK, and MOUNT
CARMEL CATHOLIC SCHOOL,

Defendants.

AFFIDAVIT OF PB-12 DOE

I, PB-12 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 Monsignor Edmund J. O'Connor ("Msgr. O'Connor"), Sister Mary ("Sr. Mary"), and Sister Veronica ("Sr. Veronica"), employees of Defendants Mount Carmel Roman Catholic Church Society Of Silver Creek ("Mt. Carmel Church"), and Mount Carmel Catholic School ("Mt. Carmel School"), located in Buffalo, New York, Erie County.
5. Msgr. O'Connor was a Priest, Pastor, and Monsignor and Sister Mary and Sister Veronica were nuns and teachers at Mt. Carmel Church and School during this time.
6. The sexual abuse and sexual assaults occurred between third and eighth grade.
7. Msgr. O'Connor, Sr. Mary, Sr. Veronica sexually abused me numerous times on the premises of Mt. Carmel Church, school, and at other locations. The sexual abuse and assault

{00048498}

included multiple instances of unpermitted, forcible, harmful sexual contact with intimate parts of my body and theirs.

8. During the time Msgr. O'Connor, Sr. Mary, Sr. Veronica sexually abused me, I was a minor and they were adults.

9. This sexual abuse has had a pronounced, significant and permanent effect on my life, including but not limited to, emotional distress, suicidal thoughts, 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.

10. I am currently a resident of Erie County where Defendants also reside.

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

12. 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.

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

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

- 1) Permitting this action to proceed or continue with the anonymous caption above; and

{00048498}

- 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.

[REDACTED] Plaintiff

On the 11 day of January ~~2019~~²⁰²⁰ 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 PB-12 DOE, and he signed the within document in my presence.

Paul K. Barr
Notary Public

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

{00048498}