

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

BL I DOE,

Plaintiff,

AFFIDAVIT OF PLAINTIFF


v.

Index No.:

FATHER BERNARD SPLAWSKI
THE DIOCESE OF BUFFALO, N.Y.,
BISHOP TIMON – ST. JUDE HIGH SCHOOL,
f/k/a BISHOP TIMON HIGH SCHOOL,
FRANCISCAN FRIARS – HOLY NAME PROVINCE

Defendants.

STATE OF NEW YORK)
COUNTY OF ERIE) ss:

 being duly sworn, deposes and states:

1. I am the Plaintiff herein and, am fully familiar with the facts and circumstances as well as the pleadings and proceedings in this matter.
2. I submit this Affidavit in further support of my application for an Order directing Plaintiff to proceed under and be referred to in all papers by the pseudonym "BL I DOE".
3. I was sexually abused as a student at Bishop Timon – St. Jude High School began when I was 15 years old by Father Bernard Splawski ("SPLAWSKI"), and seek damages for physical and emotional injuries.
4. I do not desire to publicly disclose my identity as a victim of child sexual abuse because this matter is highly sensitive, and I have already experienced significant pain, shock, shame, and embarrassment due to the mental impact of the abuse, and I fear retaliation by others for my disclosure.

5. The abuse I endured included SPLAWSKI taking inappropriate pictures of me that lead to him fondling my genitals and performing oral sex on me. The abuse began during biology class in 1969 and escalated on a fieldtrip to Virginia in July of 1970. The abuse ended when I left the school after 12th grade.

6. I never told anyone about the abuse. My trust in adults was ruined and I felt embarrassed, bitter and betrayed.

7. The first time I ever spoke to anyone about this since it occurred is when I told my attorney Michael P. Caffery. It was very difficult for me to come forward, but it has been affecting me for years. I have been on anxiety and depression medications for at least 10 years and am fearful that a public disclosure would cause me further emotional trauma.

8. My family does not know about the abuse I endured as a child. I have a wife and two grown children. I do not want them having to hear our family name associated with child sex abuse, and I don't want my wife to question my past. This is a private and sensitive matter that I wish to keep that way. To this day my attorney is the only person that knows of the abuse.

9. I have thoroughly reviewed my attorney's affirmation in support of the relief requested and find same to be true and accurate. I hereby join on my attorney's requests for relief.

110 No previous application has been made for the relief requested herein.

WHEREFORE, for the foregoing reasons, it is respectfully requested that Plaintiffs Order to Show Case be granted in its entirety, together with such other and further relief as the Court deems just and proper.



Sworn before me this 04 day of February 2020.

Marilyn E. McCormick
Notary Public

MARILYN E. McCORMICK
Notary Public, State of New York
Qualified in Erie County
My Commission Expires 08/25/23