

<b>STATE OF MICHIGAN</b>	<b>SUMMONS</b>	<b>CASE NO.</b>
16th JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE		19- 5099 -CZ

**Court address** 40 N. Main, Mt. Clemens, MI **Court telephone no.**  
(586) 469-5150

Plaintiff's name(s), address(es), and telephone no(s).  
MICHELLE SCOTT, As Next Friend of JOHN DOE 1, a minor, MONIQUE ROBERTS, As Next Friend for JOHN DOE 2, a minor, and JOHN DOE 3, an adult.

v

Defendant's name(s), address(es), and telephone no(s).  
DEBORAH SIERADZKI, RAY SKOWRONSKI, ROBERT WICKMAN, DANIEL WISNIEWSKI, JOE WYSKIEL, NATE MOSS, BRENT WIDDOWS, MIKE WATSON, and CHRIS DEAN,  
14600 Common Rd,  
Warren, MI 48088

Plaintiff's attorney, bar no., address, and telephone no.  
Paul B. Addis (P61691)  
Shaun A. Kelley (P83704)  
MICHIGAN JUSTICE, PLLC  
18 First St.  
Mt. Clemens, MI 48043

**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

**Domestic Relations Case**

- There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. Attached is a completed case inventory (form MC 21) listing those cases.
- It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

**Civil Case**

- This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in  this court,  \_\_\_\_\_ Court, where

it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_.

The action  remains  is no longer pending.

Summons section completed by court clerk.

**SUMMONS**

**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party or **take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date July 16, 2016	Expiration date August 9, 2016	Court clerk <i>[Signature]</i>
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\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

**PROOF OF SERVICE**

**SUMMONS**  
Case No. 19- 1

TO PROCESS SERVER: You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

**CERTIFICATE / AFFIDAVIT OF SERVICE / NONSERVICE**

<input type="checkbox"/> <b>OFFICER CERTIFICATE</b> I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)	OR	<input type="checkbox"/> <b>AFFIDAVIT OF PROCESS SERVER</b> Being first duly sworn, I state that I am a legally competent adult who is not a party or an officer of a corporate party, and that: (notarization required)
--	----	---

- I served personally a copy of the summons and complaint.
- I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint, together with \_\_\_\_\_  
List all documents served with the summons and complaint

\_\_\_\_\_ on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

- I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee	Miles traveled	Fee	
\$		\$	
Incorrect address fee	Miles traveled	Fee	<b>TOTAL FEE</b>
\$		\$	\$

Signature \_\_\_\_\_

Name (type or print) \_\_\_\_\_

Title \_\_\_\_\_

Subscribed and sworn to before me on \_\_\_\_\_, \_\_\_\_\_ County, Michigan.  
Date

My commission expires: \_\_\_\_\_ Date Signature: \_\_\_\_\_  
Deputy court clerk/Notary public

Notary public, State of Michigan, County of \_\_\_\_\_

**ACKNOWLEDGMENT OF SERVICE**

I acknowledge that I have received service of the summons and complaint, together with \_\_\_\_\_  
Attachments

\_\_\_\_\_ on \_\_\_\_\_  
Day, date, time

Signature \_\_\_\_\_ on behalf of \_\_\_\_\_

Approved, SCAO

Original - Court  
1st copy - Defendant

2nd copy - Plaintiff  
3rd copy - Return

STATE OF MICHIGAN JUDICIAL DISTRICT 16th JUDICIAL CIRCUIT COUNTY PROBATE	<b>SUMMONS</b>	CASE NO. 19- 5099 -CZ
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Court address: 40 N. Main, Mt. Clemens, MI  
 Court telephone no.: (586) 469-5150

Plaintiff's name(s), address(es), and telephone no(s).  
 MICHELLE SCOTT, As Next Friend of JOHN DOE 1, a minor, MONIQUE ROBERTS, As Next Friend for JOHN DOE 2, a minor, and JOHN DOE 3, an adult.

Plaintiff's attorney, bar no., address, and telephone no.  
 Paul B. Addis (P61691)  
 Shaun A. Kelley (P83704)  
 MICHIGAN JUSTICE, PLLC  
 18 First St.  
 Mt. Clemens, MI 48043

v

Defendant's name(s), address(es), and telephone no(s).  
 DE LA SALLE COLLEGIATE, DE LA SALLE COLLEGIATE BOARD OF TRUSTEES, JOHN KNIGHT, RUSS AGOSTA, MICHAEL ANDREJKO, JACK BRUSEWITZ, PAT CAHILL, PATTY CAMPBELL, GREGORY DEMARS, LINDA FRASCHETTI, RICH GALVIN, ROMA HEANEY, JOSEPH JOZWIAK, MICHAEL KHOURY, TONY LAMERATO, DIANE PEKLO, ANTHONY RUBINO  
 14600 Common Rd,  
 Warren, MI 48088

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it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_.

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3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	DEC 16 2019	Expiration date	MARCH 01 2020	Court clerk	<i>[Signature]</i>
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Defendant's name	Complete address(es) of service	Day, date, time

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Defendant's name	Complete address(es) of service	Day, date, time

I declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee	Miles traveled	Fee	
\$		\$	
Incorrect address fee	Miles traveled	Fee	<b>TOTAL FEE</b>
\$		\$	\$

Signature \_\_\_\_\_  
 Name (type or print) \_\_\_\_\_  
 Title \_\_\_\_\_

Subscribed and sworn to before me on \_\_\_\_\_, \_\_\_\_\_ County, Michigan.  
Date

My commission expires: \_\_\_\_\_ Date      Signature: \_\_\_\_\_  
Deputy court clerk/Notary public

Notary public, State of Michigan, County of \_\_\_\_\_

**ACKNOWLEDGMENT OF SERVICE**

I acknowledge that I have received service of the summons and complaint, together with \_\_\_\_\_ Attachments

\_\_\_\_\_ on \_\_\_\_\_  
Day, date, time

Signature \_\_\_\_\_ on behalf of \_\_\_\_\_

STATE OF MICHIGAN  
MACOMB COUNTY CIRCUIT COURT

MICHELLE SCOTT, As Next Friend of  
JOHN DOE 1, a minor, MONIQUE  
ROBERTS, As Next Friend for JOHN DOE 2,  
a minor, and JOHN DOE 3, an adult,

Plaintiffs,

v

DE LA SALLE COLLEGIATE, a domestic  
nonprofit corporation, the DE LA SALLE  
COLLEGIATE BOARD OF TRUSTEES,  
JOHN KNIGHT, as President, individually,  
and in his official capacity, RUSS AGOSTA,  
MICHAEL ANDREJKO, JACK  
BRUSEWITZ, PAT CAHILL, PATTY  
CAMPBELL, GREGORY DEMARS, LINDA  
FRASCHETTI, RICH GALVIN, ROMA  
HEANEY, JOSEPH JOZWIAK, MICHAEL  
KHOURY, TONY LAMERATO, DIANE  
PEKLO, JOHN KNIGHT, ANTHONY  
RUBINO, DEBORAH SIERADZKI, RAY  
SKOWRONSKI, ROBERT WICKMAN,  
DANIEL WISNIEWSKI, and JOE  
WYSKIEL, as trustees, individually, and in  
their official capacities, NATE MOSS,  
BRENT WIDDOWS, MIKE WATSON, and  
CHRIS DEAN, individually, and in their  
official capacities,

Defendants.

Case No.: 19- 5099 -CZ

Hon.

KATHRYN A. VIVIANO

RECEIVED  
DEC 16 2019  
FRED MILLER  
Macomb County Clerk

---

ALBERT B. ADDIS (P31084)  
PAUL B. ADDIS (P61691)  
SHAUN A. KELLEY (P83704)  
MICHIGAN JUSTICE, PLLC  
Attorneys for Plaintiffs  
18 First St.  
Mt. Clemens, MI 48043  
(586) 221-4140  
[paddis@michiganjustice.com](mailto:paddis@michiganjustice.com)  
[skelley@michiganjustice.com](mailto:skelley@michiganjustice.com)

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COMPLAINT

NOW COMES the Plaintiffs, MICHELLE SCOTT, As Next Friend of JOHN DOE 1, a minor, MONIQUE ROBERTS, As Next Friend for JOHN DOE 2, a minor, and JOHN DOE 3, an adult, by and through their attorneys, MICHIGAN JUSTICE, PLLC, and for their Complaint against the Defendants, state as follows:

### COMMON ALLEGATIONS

1. Plaintiffs Michelle Scott and Monique Roberts are the court-appointed next friends of John Doe Plaintiffs 1 and 2.
2. At all material times, John Doe Plaintiffs were students attending De La Salle Collegiate, a private, nonprofit high school.
3. That on or about November 4, 2019, the John Doe Plaintiffs were prohibited<sup>1</sup> from attending school at De LA Salle Collegiate.
4. That at the time of suspension, the John Doe Plaintiffs' parents were told via telephone that their sons' names were "mentioned in an investigation."
5. That since that date, none of the parents have been given anything in writing or otherwise regarding the suspension.
6. That the three John Doe Plaintiffs have been out of school for 46 days.
7. That the three John Does are not Caucasian.
8. That two of the John Doe Plaintiffs are in jeopardy of not graduating due to the school's failure/delay to make a decision.

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<sup>1</sup> Though it was not known at the time, the prohibition now appears to be indefinite, yet the John Doe Plaintiffs have received no notice of, or justification for, any permanent expulsion or temporary suspension.

9. That during this 46-day suspension, Plaintiffs have been approached by De La Salle Collegiate administrators at the direction of its President, John Knight, and have been asked to implicate other students in order to get back into De La Salle Collegiate.

10. That the administration—at the direction of John Knight—went so far as to provide a list of ten players, all of whom are Caucasian, to parents of the John Doe Plaintiffs asking to confirm that the players are involved.

11. That all ten Caucasian students had been named in the investigation but were still in school and had not been suspended.<sup>2</sup>

12. That all Plaintiffs refused to be blackmailed into returning to school even though President John Knight and his administration would have allowed them back in school.

13. Because they did not agree to President Knight's demands to "turn over names", the Plaintiffs' families did agree to meet with an investigator hired by President Knight and the Board of Trustees in the hope that telling the truth to an "independent" investigator would clear their sons' names.

14. That after speaking with said investigator, Plaintiffs were informed that the investigator was no longer working on the case and that President Knight was taking over the investigation.

15. That President Knight informed all Plaintiffs that he wanted to meet with each of them to "get their side of the story."

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<sup>2</sup> This is not the first time that minorities have been suspended, expelled, or pressured to voluntarily withdraw from De La Salle in contrast to Caucasian students. In this instance, 13 students were initially implicated, and the only students who were suspended/expelled are minorities, while the remaining ten students who faced no discipline whatsoever are Caucasian.

16. That Plaintiffs were further informed that if they did not wish to meet with President Knight, that it would "make his decision much easier" as to whether the Plaintiffs could return to school.

17. That throughout the course of this suspension, President Knight has told Plaintiffs that he is the sole person to make all decisions regarding the John Doe Plaintiffs and their suspension or expulsion from school.

18. That President Knight has told others, including counsel for De La Salle Collegiate and the Board of Trustees, that it is, in fact, the Board of Christian Brothers that must make the decision on whether the John Doe Plaintiffs return to school.

19. That President Knight has conspired with the Board of Trustees to disseminate false information regarding the alleged "hazing" at De La Salle Collegiate and, specifically, the three John Doe Plaintiffs.

20. That as of the date this Complaint was filed, the John Doe Plaintiffs have not been charged with a crime.

21. That even though they have not been charged, President Knight and the De La Salle Board of Trustees continue to conspire to keep the three John Doe Plaintiffs from attending school and/or from graduating.

22. That the Defendants, through their actions in indefinitely prohibiting the John Doe Plaintiffs from returning to school, have insinuated that John Doe Plaintiffs have engaged in misconduct, which constitutes slanderous and libelous communication by the Defendants, and such information has been disseminated throughout the school and to the public at large.



### JURISDICTION AND VENUE

23. This Honorable Court has personal jurisdiction in this matter under MCL 600.711 concerning the corporate Defendants and MCL 600.705 with respect to the individual Defendants:

24. Subject matter jurisdiction exists pursuant to MCL 600.605 because the Plaintiffs seek equitable relief and the amount in controversy exceeds \$25,000.00.

25. Venue is proper in Macomb County Circuit Court pursuant to MCL 600.1629 because the injury occurred in Macomb County and the Defendants conduct business in Macomb County.

### COUNT I – BREACH OF IMPLIED CONTRACT

26. Plaintiffs hereby incorporate all preceding paragraphs herein.

27. An implied contract exists between the parties pursuant to the representations made in the De La Salle Collegiate Student Handbook (the “Handbook”) and by virtue of the parties’ conduct. *See, e.g. Williams v Litton Systems, Inc*, 433 Mich 755, 758; 449 NW2d 669 (1989) (holding that an implied contract existed “where parties assume obligations by their conduct.”) and *In re McKim Estate*, 238 Mich App 453, 457; 606 NW2d 30 (1999) (holding that “a contract implied in law is an obligation imposed by law to do justice even though it is clear that no promise was ever made or intended.”).

28. That the Defendants breached the contract by refusing to adhere to the parameters of the contract as established via their ongoing conduct with respect to the Plaintiffs, and by completely disregarding and failing to conform to the provisions of the Handbook regarding student discipline.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in their favor and against Defendants for any and all damages in the amount in excess of \$25,000.00,

along with costs, interest, fees, and any other equitable or legal relief to which he may be entitled under the law.

**COUNT II – DEFAMATION – SLANDER**

29. Plaintiffs hereby incorporate all preceding paragraphs herein.

30. The Defendants, via insinuation and through their conduct in indefinitely prohibiting John Doe Plaintiffs from attending the school, have disseminated information which implicated the Plaintiffs in the commission of misconduct.

31. The disseminated information is false.

32. Defendants' dissemination of false information was maliciously published to the public intentionally, negligently, with knowledge of the falsity of the school's conduct/communication, and/or with reckless disregard for the truth or falsity of such conduct and communication.

33. That Defendants' statements were slanderous as defined under MCL 600.2911 and the Michigan common law.

34. That oral publication of these statements has resulted in damage to Plaintiffs' reputation in the community, has deterred third persons from associating or dealing with Plaintiffs, has caused emotional distress, humiliation, mortification, embarrassment, anxiety, affected Plaintiffs' future academic prospects, and other damages that may arise during discovery.

35. That the Plaintiffs are not public figures at any level.

36. Defendants' conduct in this matter was willful, wanton, and grossly negligent as it was so reckless that it demonstrated a substantial lack of concern for Plaintiffs' physical and emotional wellbeing.

37. That Plaintiffs requested that Defendants retract these statements to avoid the necessity of this lawsuit, however, such request was totally and/or partially denied or ignored.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment against Defendants for all damages to which they may be entitled in excess of \$25,000; for attorney fees pursuant to MCL 600.2911; along with costs, interest, and any other equitable or legal relief to which they may be entitled under the law.

**COUNT III – DEFAMATION – LIBEL**

38. Plaintiffs hereby incorporate all preceding paragraphs herein.

39. The Defendants, via insinuation and through their conduct in indefinitely prohibiting John Doe Plaintiffs from attending the school, have disseminated information which implicated the Plaintiffs in the commission of misconduct.

40. That the disseminated information is false.

41. Defendants' statements were maliciously published to others intentionally, negligently, with knowledge of the falsity of the statements, and/or with reckless disregard for the truth or falsity of such statements.

42. That Defendants' written statements were libelous as defined under MCL 600.2911 and the Michigan common law.

43. That written publication of these statements has resulted in damage to Plaintiffs' reputation in the community, has deterred third persons from associating or dealing with Plaintiffs, has caused emotional distress, humiliation, mortification, embarrassment, anxiety, affected Plaintiffs' future academic prospects, and other damages that may arise during discovery.

44. That the Plaintiffs are not public figures at any level.

45. Defendants' conduct in this matter was willful, wanton, and grossly negligent as it was so reckless that it demonstrated a substantial lack of concern for Plaintiffs' physical and emotional wellbeing.

46. That Plaintiffs requested that Defendants retract these statements to avoid the necessity of this lawsuit, however, such request was totally and/or partially denied or ignored.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment against Defendants for all damages to which they may be entitled in excess of \$25,000, including exemplary and punitive damages according to MCL 600.2911(b); for attorney fees pursuant to MCL 600.2911; along with costs, interest, and any other equitable or legal relief to which they may be entitled under the law.

#### COUNT IV – FALSE LIGHT INVASION OF PRIVACY

47. Plaintiffs hereby incorporate all preceding paragraphs herein.

48. Defendants broadcast to the public in general, or to a large number of people, information that was unreasonable and highly objectionable by attributing to Plaintiffs characteristics, conduct, or beliefs that were false and placed Plaintiffs in a false position.

49. Defendants have knowledge or acted in reckless disregard to the falsity of the publicized matter and the false light in which Plaintiffs would be placed.

50. Consequently, Defendants have committed false-light invasion of privacy against Plaintiffs, causing damage to Plaintiffs.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in their favor and against Defendants for any and all damages in the amount in excess of \$25,000.00, along with costs, interest, fees, and any other equitable or legal relief to which he may be entitled under the law.

**COUNT V – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

51. Plaintiffs hereby incorporate all preceding paragraphs herein.

52. That Defendant's conduct as outlined above was extreme, outrageous, beyond all possible bounds of decency and of such character as not to be tolerated by a civilized society.

53. As the direct and proximate result of the outrageous conduct of Defendants, Plaintiffs suffered severe emotional distress.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in their favor and against Defendants for any and all damages in the amount in excess of \$25,000.00, along with costs, interest, fees, and any other equitable or legal relief to which he may be entitled under the law.

**COUNT VI –  
VIOLATION OF ELLIOTT-LARSEN CIVIL RIGHTS ACT**

54. Plaintiffs hereby incorporate all preceding paragraphs herein.

55. Defendant De La Salle Collegiate is an "educational institution" as defined in Michigan's Elliott-Larsen Civil Rights Act (the "Act") MCL 37.2301 *et seq.*

56. Defendant De La Salle Collegiate Board of Trustees, and the individually named defendants, are each a "person" as that term is defined in the Act and are agents of Defendant De La Salle Collegiate.

57. Defendants violated the Act and deprived John Doe Plaintiffs of their civil rights by, among other things, subjecting John Doe Plaintiffs, because of their race, to conduct and communication of a racial nature, which had the purpose and/or effect of denying them the full benefit of the educational program of De La Salle Collegiate, and full and equal access to the use and privileges of any and all educational opportunities contrary to MCL 37.2402.

58. As a direct and proximate result of Defendants' violation of the Act, Plaintiffs suffered damages as previously described in this Complaint.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in their favor and against Defendants for any and all damages in the amount in excess of \$25,000.00, along with costs, interest, fees, and any other equitable or legal relief to which he may be entitled under the law.

### COUNT VII - CIVIL EXTORTION

59. Plaintiffs hereby incorporate all preceding paragraphs herein.

60. Defendants have maliciously threatened the Plaintiffs, demanding they identify students in exchange for possible reinstatement to school (as laid out in detail in paragraphs 8-17), thereby intending to compel Plaintiffs to act or refrain from acting against their will, and alternatively, in exchange for Defendants refraining from accusing Defendants with a crime, contrary to MCL 750.213.<sup>3</sup>

61. Accordingly, Defendants have committed extortion with respect to the Plaintiffs, and Plaintiffs have suffered damages including, but not limited to, economic losses, injury to reputations, and lost opportunities.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in their favor and against Defendants for any and all damages in the amount in excess of \$25,000.00, along with costs, interest, fees, and any other equitable or legal relief to which he may be entitled under the law.

### COUNT VIII - CIVIL CONSPIRACY

62. Plaintiffs hereby incorporate all preceding paragraphs herein.

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<sup>3</sup> "Michigan law recognizes the cause of action." *Jersevic v Kuhl*,

63. Defendants illegally, maliciously, and wrongfully conspired with one another with the intent to, and for the illegal purpose of, breaching their duties to Plaintiffs, portraying them in a false light, intentionally inflicting emotional distress, violating their civil rights, defaming them, and for the illegal purpose of extorting and/or blackmailing Plaintiffs.

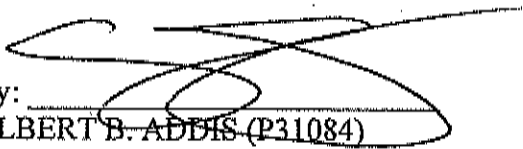
64. As a result of the conspiracy and Defendants' illegal, wrongful, and/or tortious acts, Plaintiffs have suffered economic losses as well as injury to reputations and lost opportunities.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment against Defendants for:

- a. All economic damages incurred due to their wrongful suspension/expulsion;
- b. Emotional distress damages;
- c. Exemplary and punitive damages pursuant to MCL 600.2911(b);
- d. An order of full reinstatement of the John Doe Plaintiffs to good standing at De La Salle Collegiate;
- e. Any other equitable and injunctive relief that the court deems appropriate.

Respectfully submitted,

MICHIGAN JUSTICE, PLLC

By:   
ALBERT B. ADDIS (P31084)  
PAUL B. ADDIS (P61691)  
SHAUN A. KELLEY (P83704)  
MICHIGAN JUSTICE, PLLC  
Attorneys for Plaintiffs  
18 First Street  
Mt. Clemens, MI 48043  
Phone: (586) 221-4100  
Fax: (586) 221-4140

Dated: December 16, 2019

STATE OF MICHIGAN  
MACOMB COUNTY CIRCUIT COURT

MICHELLE SCOTT, As Next Friend of  
JOHN DOE 1, a minor, MONIQUE  
ROBERTS, As Next Friend for JOHN DOE 2,  
a minor, and JOHN DOE 3, an adult,

Plaintiffs,

v

DE LA SALLE COLLEGIATE, a domestic  
nonprofit corporation, the DE LA SALLE  
COLLEGIATE BOARD OF TRUSTEES,  
JOHN KNIGHT, as President, individually,  
and in his official capacity, RUSS AGOSTA,  
MICHAEL ANDREJKO, JACK  
BRUSEWITZ, PAT CAHILL, PATTY  
CAMPBELL, GREGORY DEMARS, LINDA  
FRASCHETTI, RICH GALVIN, ROMA  
HEANEY, JOSEPH JOZWIAK, MICHAEL  
KHOURY, TONY LAMERATO, DIANE  
PEKLO, JOHN KNIGHT, ANTHONY  
RUBINO, DEBORAH SIERADZKI, RAY  
SKOWRONSKI, ROBERT WICKMAN,  
DANIEL WISNIEWSKI, and JOE  
WYSKIEL, as trustees, individually, and in  
their official capacities, NATE MOSS,  
BRENT WIDDOWS, MIKE WATSON, and  
CHRIS DEAN, individually, and in their  
official capacities,

Defendants.

---

ALBERT B. ADDIS (P31084)  
PAUL B. ADDIS (P61691)  
SHAUN A. KELLEY (P83704)  
MICHIGAN JUSTICE, PLLC  
Attorneys for Plaintiffs  
18 First St.  
Mt. Clemens, MI 48043  
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Case No.: 19- 5099-CZ

Hon.

KATHRYN A. VIVIANO

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FRED [unclear]  
Macomb County Clerk

**DEMAND FOR JURY TRIAL**



NOW COMES Plaintiffs, by and through their attorneys, Michigan Justice, PLLC, and hereby demands a trial by jury in this matter.

Respectfully submitted,

MICHIGAN JUSTICE, PLLC

By: 

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Dated: December 16, 2019