

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

SUPERIOR COURT DEPARTMENT  
C. A. No. 05-0006 (F)

JOHN DOE Nos. 30 - 68 and MARY ROE Nos. 6 - 8, )  
Plaintiffs )

v. )

JURY TRIAL

THE ROMAN CATHOLIC ARCHBISHOP OF BOSTON, )  
A CORPORATION SOLE, BERNARD F. LAW, JOHN B. )  
McCORMACK, ROBERT J. BANKS, THOMAS V. DAILY, )  
JAMES PORTER, PAUL R. SHANLEY, ANTHONY J. )  
LAURANO, PAUL J. MAHAN, BERNARD J. LANE, )  
VICTOR C. LaVOIE, ROBERT GRAY, ROBERT F. DALY, )  
D-1, )  
McQUADE, D-2, )  
THOMAS M. CURRAN, D-3, )  
FIDELIS )  
DEBERARDINIS, THOMAS REICHARD, PROVINCE OF )  
THE IMMACULATE CONCEPTION, ORDER OF FRIARS )  
MINOR, PROVINCE OF ST. CARL BORROMEO, )  
CONGREGATION OF ST. CHARLES MISSIONARIES, )  
CENTRAL CATHOLIC HIGH SCHOOL OF LAWRENCE, )  
INC., THE MARIST BROTHERS OF MASSACHUSETTS, )  
ORDER OF ST. AUGUSTINE, PROVINCE OF ST. )  
THOMAS OF VILLANOVA, CARDINAL CUSHING )  
CENTERS, INC., BIG BROTHERS BIG SISTERS OF )  
MASSACHUSETTS BAY, INC., XAVERIAN BROTHERS )  
MASSACHUSETTS, INC., and MICHAEL MOE Nos. 1 - 10, )  
Defendants )

DEMANDED

2007 DEC 31 AM 11:35  
MICHAEL JOSEPH LORSON  
CLERK/MAGISTRATE

**AMENDED COMPLAINT**

**INTRODUCTION**

1. This is an action in which the plaintiffs seek compensation for personal injuries and damages suffered by them when they were each sexually abused and assaulted by a Roman Catholic Priest, or other employee of the Archdiocese of Boston, which abuse and assaults occurred because of the negligent supervision of the PERPETRATORS by the supervisory defendants, which resulted from a course of

conduct by said supervisory defendants, for a period of over fifty years, in which they: (a) failed to respond to complaints of sexual abuse; (b) protected the perpetrators at the expense of the victims; and (c) actively sought to cover up the evidence of such abuse.

## **PARTIES**

2. The plaintiffs are individuals who bring this action in the names JOHN DOE and MARY ROE. Each is identified in separate Affidavits which will be served upon the defendants.
3. Defendant THE ROMAN CATHOLIC ARCHBISHOP OF BOSTON, A CORPORATION SOLE ("ARCHBISHOP"), is a corporation duly organized under c. 506 of the Acts of 1897 of the laws of the Commonwealth of Massachusetts, with an usual place of business at 2121 Commonwealth Avenue, in the Brighton section of Boston, Suffolk County, Massachusetts.
4. Defendant BERNARD F. LAW ("LAW") is an individual residing in Rome, Italy.
5. Defendant JOHN B. McCORMACK ("McCORMACK") is an individual residing in Manchester, New Hampshire.
6. Defendant ROBERT J. BANKS ("BANKS") is an individual residing in Green Bay, Wisconsin.
7. Defendant THOMAS V. DAILY ("DAILY") is an individual residing in Brooklyn, New York.
8. Defendant JAMES PORTER ("PORTER") is an inmate in the Massachusetts Correctional system.
9. Defendant PAUL R. SHANLEY ("SHANLEY") is an individual residing in Cambridge,

Massachusetts.

10. Defendant ANTHONY J. LAURANO ("LAURANO") is an individual residing at 58 Manomet Avenue, Hull, Norfolk County, Massachusetts.
11. Defendant PAUL J. MAHAN ("MAHAN") is an individual residing in Arlington, Virginia.
12. Defendant BERNARD J. LANE ("LANE") is an individual residing in Barnstead, New Hampshire.
13. Defendant VICTOR C. LaVOIE ("LaVOIE") is an individual residing at 50 Ridge Street, Winchester, Middlesex County, Massachusetts.
14. Defendant ROBERT GRAY ("GRAY") is an individual residing in Hanover, Plymouth County, Massachusetts.
15. Defendant ROBERT F. DALY ("DALY") is an individual residing in Plymouth, Plymouth County, Massachusetts.
16. Defendant [REDACTED] D-1 [REDACTED] is an individual residing at [REDACTED] Avenue, [REDACTED], Somerville, Middlesex County, Massachusetts.
17. Defendant PATRICK J. TAGUE ("TAGUE") is an individual residing at 97 Foster Avenue, Marshfield, Plymouth County, Massachusetts.
18. Defendant RICHARD E. McQUADE ("McQUADE") is an individual residing at 2121 Commonwealth Avenue, Boston, Suffolk County, Massachusetts.
19. Defendant [REDACTED] D-2 [REDACTED] is an individual residing at [REDACTED] [REDACTED], Watertown, Middlesex County, Massachusetts.
20. Defendant JEFFREY FAHEY ("FAHEY") is an individual residing in Derry, New Hampshire.

21. ✓ Defendant THOMAS M. CURRAN ("CURRAN") is an individual residing at 210 Lake Street, Arlington, Middlesex County, Massachusetts.
22. ✓ Defendant [REDACTED] D-3 ([REDACTED] D-3) is an individual residing at [REDACTED], [REDACTED], Plymouth County, Massachusetts.
23. Defendant FIDELIS DEBERARDINIS ("DEBERARDINIS") is an individual residing at MCI Cedar Junction, Walpole, Norfolk County, Massachusetts.
24. Defendant THOMAS REICHARD ("REICHARD") is an individual residing in Auburn, Maine.
25. Defendant PROVINCE OF THE IMMACULATE CONCEPTION, ORDER OF FRIARS MINOR ("FRANCISCANS"), is a corporation duly organized under the laws of the State of New York, with an usual place of business at 125 Thompson Street, New York, New York.
26. Defendant PROVINCE OF ST. CARL BORROMEO, CONGREGATION OF ST. CHARLES MISSIONARIES ("SCALABRINIANS"), is a corporation duly organized under the laws of the State of New York, with an usual place of business at 209 Flagg Place, Staten Island, New York.
27. Defendant CENTRAL CATHOLIC HIGH SCHOOL OF LAWRENCE, INC. ("CENTRAL CATHOLIC"), is a corporation duly organized under the laws of the Commonwealth of Massachusetts, with an usual place of business at 99 Auburn Street, Lawrence, Essex County, Massachusetts.
28. Defendant THE MARIST BROTHERS OF MASSACHUSETTS ("MARISTS"), is a corporation duly organized under the laws of the Commonwealth of Massachusetts, with an usual place of business at 99 Auburn Street, Lawrence, Essex County,

Massachusetts.

29. Defendant ORDER OF ST. AUGUSTINE, PROVINCE OF ST. THOMAS OF VILLANOVA ("AUGUSTINIANS"), is a corporation duly organized under the laws of the Commonwealth of Pennsylvania, with an usual place of business in Villanova, Pennsylvania.

30. Defendant CARDINAL CUSHING CENTERS, INC. ("CARDINAL CUSHING"), is a corporation duly organized under the laws of the Commonwealth of Massachusetts, with an usual place of business at 405 Washington Street, Hanover, Plymouth County, Massachusetts.

31. Defendant BIG BROTHERS BIG SISTERS OF MASSACHUSETTS BAY, INC. ("BIG BROTHERS"), is a corporation duly organized under the laws of the Commonwealth of Massachusetts, with an usual place of business at 75 Federal Street, Boston, Suffolk County, Massachusetts.

32. Defendant XAVERIAN BROTHERS MASSACHUSETTS, INC. ("XAVERIANS"), is a corporation duly organized under the laws of the Commonwealth of Massachusetts, with an usual place of business at 143 Summer Street, Danvers, Essex County, Massachusetts.

33. Defendants MICHAEL MOE Nos. 1-10 are individuals who took part in the conspiracy to hide the instances of abuse alleged whose names are presently unknown to the plaintiffs.

#### FACTS COMMON TO ALL COUNTS

34. At all times relevant to this action, defendant ARCHBISHOP controlled and directed the hiring, training, supervision and retention of clergy and lay personnel in the

Archdiocese of Boston.

35. At all times relevant to this action, defendants LAW, McCORMACK, BANKS and DAILY were duly ordained Roman Catholic Priests who, as Bishops or administrators (“BISHOPS”), controlled the operations of defendant ARCHBISHOP.
36. At all times relevant to this action, defendants PORTER, SHANLEY, LAURANO, MAHAN, LANE, LaVOIE, DALY, [REDACTED D-1], TAGUE, McQUADE, [REDACTED D-2], CURRAN and [REDACTED D-3], along with certain deceased individuals who are named hereafter (“PERPETRATORS”), were duly ordained Roman Catholic Priests, assigned by defendant ARCHBISHOP and/or defendant BISHOPS to various parishes in the Archdiocese, for the purpose of performing the functions of a clergyman.
37. At all times relevant to this action, defendants GRAY and FAHEY, along with Lawrence Guerin, who is now deceased (also “PERPETRATORS”), were lay employees under the supervision and control of defendant ARCHBISHOP and/or defendant BISHOPS.
38. Other PERPETRATORS were members of religious Orders, or employees of corporations, which functioned within the Archdiocese of Boston, who gained access to plaintiffs because that relationship.
39. Defendants FRANCISCANS, SCALABRINIANS, CENTRAL CATHOLIC, MARISTS, AUGUSTINIANS, CARDINAL CUSHING, BIG BROTHERS and XAVERIANS (“INSTITUTIONAL DEFENDANTS”) either required the permission of defendant ARCHBISHOP to operate in the Archdiocese of Boston, or were engaged in a relationship with the Archdiocese which provided the PERPETRATORS with access

to the plaintiffs, and the opportunity to abuse them.

40. For at least the past fifty years, and continuing to the present time, defendant ARCHBISHOP, along with others, has engaged in a conspiracy to conceal criminal acts of sexual abuse which were committed by individuals whom it recruited, hired, trained, supervised and retained as clergymen and lay employees in the Archdiocese of Boston.
41. At times relevant to this action, defendant BISHOPS, and defendants MICHAEL MOE Nos. 1 - 10, engaged in said conspiracy with defendant ARCHBISHOP.
42. For at least the past fifty years, and continuing to the present time, plaintiffs JOHN DOE Nos. 30 - 68 and MARY ROE Nos. 6 - 8, as well as many other persons, both known and unknown to them, were sexually abused, assaulted and raped, because of said conspiracy.
43. Plaintiff JOHN DOE No. 30 was sexually abused by defendant JAMES PORTER at St. Margaret's, Saugus, during the year 1951.
44. Plaintiff MARY ROE No. 6 was sexually abused by Alphonse Jansonis, a Roman Catholic Priest who is now deceased, at Holy Redeemer, East Boston, during the years 1951 - 1957.
45. Plaintiff MARY ROE No. 7 was sexually abused by defendant PAUL R. SHANLEY at St. Patrick's, Stoneham, during the years 1963 - 1964.
46. Plaintiff JOHN DOE No. 31 was sexually abused by Leo Dwyer, a Roman Catholic Priest who is now deceased, at St. Mary's, Hull, during the years 1964 - 1970.
47. Plaintiff JOHN DOE No. 32 was sexually abused by defendant Joseph Birmingham, a Roman Catholic Priest who is now deceased, at St. Michael's, Lowell, during the

year 1967.

48. Plaintiff JOHN DOE No. 33 was sexually abused by defendant JOHN LAURANO at Sacred Heart, Roslindale, during the year 1968.
49. Plaintiff JOHN DOE No. 34 was sexually abused by defendant PAUL J. MAHAN, at St. Ann's, Dorchester, during the years 1968 - 1970.
50. Plaintiff JOHN DOE No. 35 was sexually abused by defendant FIDELIS DEBERARDINIS at Our Lady's, East Boston, during the years 1968 - 1970.
51. Plaintiff JOHN DOE No. 36 was sexually abused by Leo Dwyer, a Roman Catholic Priest who is now deceased, at St. Mary's, Hull, during the years 1970 - 1976.
52. Plaintiff JOHN DOE No. 37 was sexually abused by Leo Dwyer, a Roman Catholic Priest who is now deceased, at St. Mary's, Hull, during the years 1970 - 1976.
53. Plaintiff JOHN DOE No. 38 was sexually abused by Leo Dwyer, a Roman Catholic Priest who is now deceased, at St. Mary's, Hull, during the years 1970 - 1976.
54. Plaintiff JOHN DOE No. 39 was sexually abused by defendant BERNARD LANE, at A.C.I.D., Malden, during the year 1971.
55. Plaintiff JOHN DOE No. 40 was sexually abused by Lawrence Guerin, a lay employee who is now deceased, at St. Jude's, Waltham, during the years 1971 - 1972.
56. Plaintiff JOHN DOE No. 41 was sexually abused by defendant VICTOR C. LaVOIE, at St. Thomas, Bridgewater, during the years 1971 - 1974.
57. Plaintiff JOHN DOE No. 42 was sexually abused by Charles Dewey, a Roman Catholic Priest who is now deceased, at St. Mary's, Dedham, during the years 1971 - 1975.



58. Plaintiff JOHN DOE No. 43 was sexually abused by defendant BERNARD LANE, at A.C.I.D., Malden, during the year 1971.
59. Plaintiff JOHN DOE No. 44 was sexually abused by defendant ROBERT GRAY, an employee of defendants CARDINAL CUSHING and BIG BROTHERS, at Cardinal Cushing School, Hanover, during the year 1972, and by defendant THOMAS REICHARD.
60. Plaintiff JOHN DOE No. 45 was sexually abused by defendant ROBERT F. DALY, at St. Patrick's, Brockton, during the years 1972 - 1982.
61. Plaintiff JOHN DOE No. 46 was sexually abused by defendant [REDACTED] D-1, at [REDACTED], during the years [REDACTED].
62. Plaintiff JOHN DOE No. 47 was sexually abused by defendant PATRICK TAGUE, at Hyde Park House, Boston, during the years 1973 - 1974.
63. Plaintiff JOHN DOE No. 48 was sexually abused by Benedict Mawn, a Roman Catholic Priest who is now deceased, at St. Gabriel's, Brighton, during the year 1976.
64. Plaintiff JOHN DOE No. 49 was sexually abused by defendant RICHARD E. McQUADE, at St. Mark's Dorchester, during the years 1977 - 1978.
65. Plaintiff JOHN DOE No. 50 was sexually abused by William H. Morgan, a Roman Catholic Priest who is now deceased, at St. John's, Winthrop, during the years 1982 - 1986.
66. Plaintiff JOHN DOE No. 51 was sexually abused by defendant [REDACTED] D-2, [REDACTED] at [REDACTED], during the years [REDACTED].
67. Plaintiff JOHN DOE No. 52 was sexually abused by defendant JEFFREY FAHEY,

- at Blessed Sacrament, Saugus, during the years 1991 - 1992.
68. Plaintiff JOHN DOE No. 53 was sexually abused by defendant ANTHONY LAURANO at St. Mary's Parish in North Plymouth, during the years 1990 - 1991.
  69. Plaintiff JOHN DOE No. 54 was sexually abused by defendant ANTHONY LAURANO at Sacred Heart Parish in Roslindale, during the years 1969 - 1971.
  70. Plaintiff JOHN DOE No. 55 was sexually abused by defendant ANTHONY LAURANO at Sacred Heart Parish in Roslindale, during the years 1968 - 1972.
  71. Plaintiff JOHN DOE No. 56 was sexually abused by defendant ANTHONY LAURANO at St. Mary's Parish in North Plymouth, during the years 1991 - 1992.
  72. Plaintiff JOHN DOE No. 57 was sexually abused by Leo V. Dwyer at St. James Parish, Haverhill, during the years 1951 - 1955.
  73. Plaintiff JOHN DOE No. 58 was sexually abused by Robert L. Ryer at Blessed Sacrament Parish, Jamaica Plain, during the years 1950 - 1954.
  74. Plaintiff JOHN DOE No. 59 was sexually abused by defendant THOMAS M. CURRAN at St. Mary's Parish, Cambridge, during the years 1970 - 1973.
  75. Plaintiff JOHN DOE No. 60 was sexually abused by defendant FIDELIS DEBERARDINIS, a member of defendant FRANCISCANS, at Our Lady of Mt. Carmel Parish, East Boston, during the years 1969 - 1970.
  76. Plaintiff JOHN DOE No. 61 was sexually abused by Septimo Basso, a member of defendant SCALABRINIANS, at St. Lazarus Parish, East Boston, during the years 1960 - 1961.
  77. Plaintiff JOHN DOE No. 62 was sexually abused by Joseph Birmingham at St. James Parish, Salem, during the years 1965 - 1969.

78. Plaintiff JOHN DOE No. 63 was sexually abused by defendant [REDACTED] D-3 at [REDACTED], [REDACTED], during the years 1988 - 1989.
79. Plaintiff JOHN DOE No. 64 was sexually abused by Joseph P. Reilly at St. Malachy's Parish, Burlington, during the years 1976 - 1978.
80. Plaintiff JOHN DOE No. 65 was sexually abused by Brother Albert, a member of defendant MARISTS and a teacher at defendant CENTRAL CATHOLIC, at Central Catholic High School, Lawrence, during the years 1969 - 1971.
81. Plaintiff JOHN DOE No. 66 was sexually abused by Brother Edward Michael, a member of defendant MARISTS and a teacher at defendant CENTRAL CATHOLIC, at Central Catholic High School, Lawrence, during the years 1967 - 1968.
82. Plaintiff JOHN DOE No. 67 was sexually abused by Brother Leonard Xavier, a member of defendant MARISTS and a teacher at defendant CENTRAL CATHOLIC, at Central Catholic High School, Lawrence, during the years 1967 - 1968.
83. Plaintiff JOHN DOE No. 68 was sexually abused by Brother Cuthbert, a member of defendant XAVERIANS, at Mission High School, Boston, during the years 1956 - 1957.
84. Plaintiff MARY ROE No. 8 was sexually abused by John Gallagher, a member of defendant AUGUSTINIANS, at St. Mary's Parish, Lawrence, during the years 1972 - 1978.
85. During the same time period, plaintiffs are reliably informed and believe that in excess of five hundred other individuals have been sexually abused by Roman Catholic Priests, and lay persons, in the employ of the Archdiocese of Boston, including the defendant PERPETRATORS, other deceased priests and lay

employees who are named in this action, as well as other unnamed priests, all of whom were assigned to the Archdiocese of Boston and under the supervision of defendant ARCHBISHOP, defendant BISHOPS, INSTITUTIONAL DEFENDANTS and defendants MICHAEL MOE Nos. 1 - 10.

86. Defendants, by their respective acts, both negligent and intentional, have inflicted severe emotional distress upon the plaintiffs.
87. Each one of the plaintiffs, until recently, has been unable to remember and/or to understand the damage which the several defendants have inflicted upon them.
88. As a result of the acts of the several defendants, plaintiffs have been required to undergo psychological treatment and therapy, and will continue to require this treatment and therapy in the future.
89. Plaintiffs are informed and believe that defendant PERPETRATORS, and other deceased priests, brothers and lay employees who are named in this action, committed numerous sexual assaults on members of the parishes in the Archdiocese, under their care and supervision, and were open and notorious pedophiles.
90. Defendant ARCHBISHOP, defendant BISHOPS, INSTITUTIONAL DEFENDANTS and defendants MICHAEL MOE Nos. 1 - 10 all knew, or in the exercise of reasonable care should have known, of the prior and on-going sexual assaults by defendant PERPETRATORS, and other deceased priests, brothers and lay employees who are named in this action.
91. Defendant ARCHBISHOP, defendant BISHOPS, INSTITUTIONAL DEFENDANTS and defendants MICHAEL MOE Nos. 1 - 10 knew, or in the exercise of reasonable

care should have known, that the defendant PERPETRATORS, and other deceased priests, brothers and lay employees who are named in this action, were not fit persons to be placed in charge of the supervision of young males and females.

92. Defendant ARCHBISHOP, defendant BISHOPS, INSTITUTIONAL DEFENDANTS and defendants MICHAEL MOE Nos. 1 - 10 knew, or in the exercise of reasonable care should have known, that the defendant PERPETRATORS, and other deceased priests, brothers and lay employees who are named in this action, were not fit persons to be retained in a position in which they would have access to young males and females.

93. Defendant ARCHBISHOP, defendant BISHOPS, INSTITUTIONAL DEFENDANTS and defendants MICHAEL MOE Nos. 1 - 10 knew, or in the exercise of reasonable care should have discovered, that the defendant PERPETRATORS, and other deceased priests, brothers and lay employees who are named in this action, were engaged in illegal and inappropriate sexual conduct with young males and females under their supervision.

94. Defendant ARCHBISHOP, defendant BISHOPS, INSTITUTIONAL DEFENDANTS and defendants MICHAEL MOE Nos. 1 - 10 failed to train and supervise the defendant PERPETRATORS, and other deceased priests and lay employees who are named in this action, to perform their duties as supervisors of young males and females properly.

95. Defendant ARCHBISHOP, defendant BISHOPS, INSTITUTIONAL DEFENDANTS and defendants MICHAEL MOE Nos. 1 - 10 all knew, at various times during the

past fifty years, that the aforesaid acts of sexual abuse were occurring, but conspired to keep this from becoming public knowledge, which conspiracy made it possible for the defendant PERPETRATORS, other deceased priests and lay employees who are named in this action, as well as other unnamed priests, to commit, and to continue to commit, sexual abuses, assaults and rapes upon the plaintiffs and others.

96. As a result of the assaults upon them by the defendant PERPETRATORS, and other deceased priests and lay employees who are named in this action, and the negligence of the defendant ARCHBISHOP, BISHOPS, INSTITUTIONAL DEFENDANTS and defendants MICHAEL MOE Nos. 1 - 10, the plaintiffs have been seriously and permanently injured, and continue to suffer at present from psychological disease, which impairs and affects all aspects of their lives.

#### **COUNT 1**

97. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
98. Defendant PORTER assaulted and battered plaintiff JOHN DOE No. 30.

#### **COUNT 2**

99. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
100. Defendant PORTER negligently inflicted emotional distress upon plaintiff JOHN DOE No. 30.

#### **COUNT 3**

101. Plaintiffs reallege and incorporate herein the allegations contained in each and

every other paragraph of this Complaint.

102. Defendant PORTER intentionally inflicted emotional distress upon plaintiff JOHN DOE No. 30.

#### **COUNT 4**

103. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

104. Defendant PORTER breached his fiduciary duty to the plaintiff to provide spiritual guidance and religious instruction to the plaintiff when he sexually abused plaintiff JOHN DOE No. 30, and committed clergy malpractice.

#### **COUNT 5**

105. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

106. Defendant PORTER interfered with plaintiff JOHN DOE No. 30's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

#### **COUNT 6**

107. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

108. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 30 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred

expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

#### **COUNT 7**

109. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
110. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which defendant PORTER injured plaintiff JOHN DOE No. 30.

#### **COUNT 8**

111. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
112. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendant PORTER sexually abusing plaintiff JOHN DOE No. 30.

#### **COUNT 9**

113. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
114. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 30 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

#### **COUNT 10**

115. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.



116. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 30.

**COUNT 11**

117. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
118. Defendant SHANLEY assaulted and battered plaintiff MARY ROE No. 7.

**COUNT 12**

119. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
120. Defendant SHANLEY negligently inflicted emotional distress upon plaintiff MARY ROE No. 7.

**COUNT 13**

121. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
122. Defendant SHANLEY intentionally inflicted emotional distress upon plaintiff MARY ROE No. 7.

**COUNT 14**

123. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
124. Defendant SHANLEY breached his fiduciary duty to the plaintiff to provide spiritual guidance and religious instruction to the plaintiff when he sexually abused plaintiff MARY ROE No. 7, and committed clergy malpractice.

### **COUNT 15**

125. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
126. Defendant SHANLEY interfered with plaintiff MARY ROE No. 7 's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

### **COUNT 16**

127. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
128. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff MARY ROE No. 7 was sexually assaulted. She suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. She has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

### **COUNT 17**

129. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
130. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which defendant SHANLEY injured plaintiff MARY ROE No. 7.

### **COUNT 18**

131. Plaintiffs reallege and incorporate herein the allegations contained in each and

every other paragraph of this Complaint.

132. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendant SHANLEY sexually abusing plaintiff MARY ROE No. 7.

#### **COUNT 19**

133. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
134. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff MARY ROE No. 7 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

#### **COUNT 20**

135. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
136. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff MARY ROE No. 7.

#### **COUNT 21**

137. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
138. Defendant LAURANO assaulted and battered plaintiff JOHN DOE No. 33.

#### **COUNT 22**

139. Plaintiffs reallege and incorporate herein the allegations contained in each and

every other paragraph of this Complaint.

140. Defendant LAURANO negligently inflicted emotional distress upon plaintiff JOHN DOE No. 33.

**COUNT 23**

141. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

142. Defendant LAURANO intentionally inflicted emotional distress upon plaintiff JOHN DOE No. 33.

**COUNT 24**

143. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

144. Defendant LAURANO breached his fiduciary duty to the plaintiff to provide spiritual guidance and religious instruction to the plaintiff when he sexually abused plaintiff JOHN DOE No. 33, and committed clergy malpractice.

**COUNT 25**

145. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

146. Defendant LAURANO interfered with plaintiff JOHN DOE No. 33's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

**COUNT 26**

147. Plaintiffs reallege and incorporate herein the allegations contained in each and

every other paragraph of this Complaint.

148. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 33 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 27**

149. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
150. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which defendant LAURANO injured plaintiff JOHN DOE No. 33.

**COUNT 28**

151. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
152. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendant LAURANO sexually abusing plaintiff JOHN DOE No. 33.

**COUNT 29**

153. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
154. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 33 was the result of

wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 30**

155. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
156. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 33.

**COUNT 31**

157. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
158. Defendant MAHAN assaulted and battered plaintiff JOHN DOE No. 34.

**COUNT 32**

159. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
160. Defendant MAHAN negligently inflicted emotional distress upon plaintiff JOHN DOE No. 34.

**COUNT 33**

161. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
162. Defendant MAHAN intentionally inflicted emotional distress upon plaintiff JOHN DOE No. 34.

**COUNT 34**

163. Plaintiffs reallege and incorporate herein the allegations contained in each and

every other paragraph of this Complaint.

164. Defendant MAHAN breached his fiduciary duty to the plaintiff to provide spiritual guidance and religious instruction to the plaintiff when he sexually abused plaintiff JOHN DOE No. 34, and committed clergy malpractice.

#### **COUNT 35**

165. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
166. Defendant MAHAN interfered with plaintiff JOHN DOE No. 34's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

#### **COUNT 36**

167. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
168. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 34 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

#### **COUNT 37**

169. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

170. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which defendant MAHAN injured plaintiff JOHN DOE No. 34.

**COUNT 38**

171. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

172. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendant MAHAN sexually abusing plaintiff JOHN DOE No. 34.

**COUNT 39**

173. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

174. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE NO. 34 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 40**

175. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

176. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 34.

**COUNT 41**

177. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.



178. Defendant LANE assaulted and battered plaintiff JOHN DOE Nos. 39 & 43.

**COUNT 42**

179. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

180. Defendant LANE negligently inflicted emotional distress upon plaintiff JOHN DOE Nos. 39 & 43.

**COUNT 43**

181. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

182. Defendant LANE intentionally inflicted emotional distress upon plaintiff JOHN DOE Nos. 39 & 43.

**COUNT 44**

183. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

184. Defendant LANE breached his fiduciary duty to the plaintiff to provide spiritual guidance and religious instruction to the plaintiff when he sexually abused plaintiff JOHN DOE Nos. 39 & 43, and committed clergy malpractice.

**COUNT 45**

185. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

186. Defendant LANE interfered with plaintiff JOHN DOE Nos. 39 & 43 's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiffs in accordance

with G.L. c. 12, §11H and I.

**COUNT 46**

187. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
188. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE Nos. 39 & 43 were sexually assaulted. They suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. They have incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and have suffered loss of income.

**COUNT 47**

189. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
190. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which defendant LANE injured plaintiff JOHN DOE Nos. 39 & 43.

**COUNT 48**

191. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
192. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendant LANE sexually abusing plaintiff JOHN DOE Nos. 39 & 43.

**COUNT 49**

193. Plaintiffs reallege and incorporate herein the allegations contained in each and

every other paragraph of this Complaint.

194. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE Nos. 39 & 43 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 50**

195. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
196. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE Nos. 39 & 43.

**COUNT 51**

197. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
198. Defendant TAGUE assaulted and battered plaintiff JOHN DOE No. 47.

**COUNT 52**

199. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
200. Defendant TAGUE negligently inflicted emotional distress upon plaintiff JOHN DOE No. 47.

**COUNT 53**

201. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

202. Defendant TAGUE intentionally inflicted emotional distress upon plaintiff JOHN DOE No. 47.

**COUNT 54**

203. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

204. Defendant TAGUE breached his fiduciary duty to the plaintiff to provide spiritual guidance and religious instruction to the plaintiff when he sexually abused plaintiff JOHN DOE No. 47, and committed clergy malpractice.

**COUNT 55**

205. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

206. Defendant TAGUE interfered with plaintiff JOHN DOE No. 47's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

**COUNT 56**

207. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

208. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 47 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological

treatment, and has suffered loss of income.

**COUNT 57**

209. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
210. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which defendant TAGUE injured plaintiff JOHN DOE No. 47.

**COUNT 58**

211. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
212. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendant TAGUE sexually abusing plaintiff JOHN DOE No. 47.

**COUNT 59**

213. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
214. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 47 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 60**

215. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
216. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE

Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 47.

**COUNT 61**

217. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
218. Defendant LaVOIE assaulted and battered plaintiff JOHN DOE No. 41.

**COUNT 62**

219. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
220. Defendant LaVOIE negligently inflicted emotional distress upon plaintiff JOHN DOE No. 41.

**COUNT 63**

221. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
222. Defendant LaVOIE intentionally inflicted emotional distress upon plaintiff JOHN DOE No. 41.

**COUNT 64**

223. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
224. Defendant LaVOIE breached his fiduciary duty to the plaintiff to provide spiritual guidance and religious instruction to the plaintiff when he sexually abused plaintiff JOHN DOE No. 41, and committed clergy malpractice.

**COUNT 65**

225. Plaintiffs reallege and incorporate herein the allegations contained in each and

every other paragraph of this Complaint.

226. Defendant LaVOIE interfered with plaintiff JOHN DOE No. 41's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

#### **COUNT 66**

227. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
228. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 41 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

#### **COUNT 67**

229. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
230. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which defendant LaVOIE injured plaintiff JOHN DOE No. 41.

#### **COUNT 68**

231. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
232. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant

BISHOPS which resulted in defendant LaVOIE sexually abusing plaintiff JOHN DOE No. 41.

**COUNT 69**

233. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

234. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 41 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 70**

235. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

236. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 41.

**COUNT 71**

237. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

238. Defendants GRAY and REICHARD assaulted and battered plaintiff JOHN DOE No. 44.

**COUNT 72**

239. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

240. Defendants GRAY and REICHARD negligently inflicted emotional distress upon



plaintiff JOHN DOE No. 44.

**COUNT 73**

241. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
242. Defendants GRAY and REICHARD intentionally inflicted emotional distress upon plaintiff JOHN DOE No. 44.

**COUNT 74 [INTENTIONALLY OMITTED]**

**COUNT 75**

243. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
244. Defendants GRAY and REICHARD interfered with plaintiff JOHN DOE No. 44's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

**COUNT 76**

245. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
246. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS, defendant CARDINAL CUSHING, defendant BIG BROTHERS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 44 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered

loss of income.

**COUNT 77**

247. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
248. Defendants ARCHBISHOP, BISHOPS, defendant CARDINAL CUSHING, defendant BIG BROTHERS are vicariously liable for the negligent acts by which defendants GRAY and REICHARD injured plaintiff JOHN DOE No. 44.

**COUNT 78**

249. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
250. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendants GRAY and REICHARD sexually abusing plaintiff JOHN DOE No. 44.

**COUNT 79**

251. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
252. Defendant ARCHBISHOP, defendant BISHOPS, defendant CARDINAL CUSHING, defendant BIG BROTHERS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 44 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 80**

253. Plaintiffs reallege and incorporate herein the allegations contained in each and

every other paragraph of this Complaint.

254. Defendant ARCHBISHOP, defendant BISHOPS, defendant CARDINAL CUSHING, defendant BIG BROTHERS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 44.

**COUNT 81**

255. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
256. Defendant DALY assaulted and battered plaintiff JOHN DOE No. 45.

**COUNT 82**

257. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
258. Defendant DALY negligently inflicted emotional distress upon plaintiff JOHN DOE No. 45.

**COUNT 83**

259. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
260. Defendant DALY intentionally inflicted emotional distress upon plaintiff JOHN DOE No. 45.

**COUNT 84**

261. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
262. Defendant DALY breached his fiduciary duty to the plaintiff to provide spiritual guidance and religious instruction to the plaintiff when he sexually abused plaintiff

JOHN DOE No. 45, and committed clergy malpractice.

**COUNT 85**

263. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
264. Defendant DALY interfered with plaintiff JOHN DOE No. 45's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

**COUNT 86**

265. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
266. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 45 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 87**

267. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
268. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which defendant DALY injured plaintiff JOHN DOE No. 45.

**COUNT 88**

269. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
270. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendant DALY sexually abusing plaintiff JOHN DOE No. 45.

**COUNT 89**

271. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
272. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 45 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 90**

273. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
274. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 45.

**COUNT 91**

275. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
276. Defendant D-1 assaulted and battered plaintiff JOHN DOE No. 46.

**COUNT 92**

277. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
278. Defendant **D-1** negligently inflicted emotional distress upon plaintiff JOHN DOE No. 46.

**COUNT 93**

279. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
280. Defendant **D-1** intentionally inflicted emotional distress upon plaintiff JOHN DOE No. 46.

**COUNT 94**

281. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
282. Defendant **D-1** breached his fiduciary duty to the plaintiff to provide spiritual guidance and religious instruction to the plaintiff when he sexually abused plaintiff JOHN DOE No. 46, and committed clergy malpractice.

**COUNT 95**

283. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
284. Defendant **D-1** interfered with plaintiff JOHN DOE No. 46's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

### **COUNT 96**

285. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
286. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 46 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

### **COUNT 97**

287. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
288. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which defendant [REDACTED] D-1 injured plaintiff JOHN DOE No. 46.

### **COUNT 98**

289. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
290. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendant [REDACTED] D-1 sexually abusing plaintiff JOHN DOE No. 46.

### **COUNT 99**

291. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

292. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 46 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 100**

293. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

294. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 46.

**COUNT 101**

295. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

296. Defendant McQUADE assaulted and battered plaintiff JOHN DOE No. 49.

**COUNT 102**

297. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

298. Defendant McQUADE negligently inflicted emotional distress upon plaintiff JOHN DOE No. 49.

**COUNT 103**

299. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

300. Defendant McQUADE intentionally inflicted emotional distress upon plaintiff JOHN DOE No. 49.



#### **COUNT 104**

301. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
302. Defendant McQUADE breached his fiduciary duty to the plaintiff to provide spiritual guidance and religious instruction to the plaintiff when he sexually abused plaintiff JOHN DOE No. 49, and committed clergy malpractice.

#### **COUNT 105**

303. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
304. Defendant McQUADE interfered with plaintiff JOHN DOE No. 49's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

#### **COUNT 106**

305. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
306. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 49 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 107**

307. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
308. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which defendant McQUADE injured plaintiff JOHN DOE No. 49.

**COUNT 108**

309. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
310. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendant McQUADE sexually abusing plaintiff JOHN DOE No. 49.

**COUNT 109**

311. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
312. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 49 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 110**

313. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
314. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 49.

### **COUNT 111**

315. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
316. Defendant [REDACTED] D-2 assaulted and battered plaintiff JOHN DOE No. 51.

### **COUNT 112**

317. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
318. Defendant [REDACTED] D-2 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 51.

### **COUNT 113**

319. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
320. Defendant [REDACTED] D-2 intentionally inflicted emotional distress upon plaintiff JOHN DOE No. 51.

### **COUNT 114**

321. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
322. Defendant [REDACTED] D-2 breached his fiduciary duty to the plaintiff to provide spiritual guidance and religious instruction to the plaintiff when he sexually abused plaintiff JOHN DOE No. 51, and committed clergy malpractice.

### **COUNT 115**

323. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

324. Defendant [REDACTED] D-2 interfered with plaintiff JOHN DOE No. 51's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

**COUNT 116**

325. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

326. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 51 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 117**

327. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

328. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which defendant [REDACTED] D-2 injured plaintiff JOHN DOE No. 51.

**COUNT 118**

329. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

330. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendant [REDACTED] D-2 sexually abusing plaintiff JOHN

DOE No. 51.

**COUNT 119**

331. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

332. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 51 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 120**

333. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

334. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 51.

**COUNT 121**

335. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

336. Defendant FAHEY assaulted and battered plaintiff JOHN DOE No. 52.

**COUNT 122**

337. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

338. Defendant FAHEY negligently inflicted emotional distress upon plaintiff JOHN DOE No. 52.

**COUNT 123**

339. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
340. Defendant FAHEY intentionally inflicted emotional distress upon plaintiff JOHN DOE No. 52.

**COUNT 124 [INTENTIONALLY OMITTED]**

**COUNT 125**

341. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
342. Defendant FAHEY interfered with plaintiff JOHN DOE No. 52's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

**COUNT 126**

343. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
344. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 52 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 127**

345. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
346. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which defendant FAHEY injured plaintiff JOHN DOE No. 52.

**COUNT 128**

347. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
348. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendant FAHEY sexually abusing plaintiff JOHN DOE No. 52.

**COUNT 129**

349. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
350. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 52 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 130**

351. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
352. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 52.

**COUNT 131**

353. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

354. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 32 was sexually assaulted by Joseph Birmingham. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 132**

355. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

356. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Joseph Birmingham injured plaintiff JOHN DOE No. 32.

**COUNT 133**

357. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

358. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Joseph Birmingham sexually abusing plaintiff JOHN DOE No. 32.

**COUNT 134**

359. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.



360. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 32 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 135**

361. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

362. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 32.

**COUNT 136**

363. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

364. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE Nos. 31, 36, 37 & 38 were sexually assaulted by Leo Dwyer. They suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. They have incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and have suffered loss of income.

**COUNT 137**

365. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

366. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Leo Dwyer injured plaintiff JOHN DOE Nos. 31, 36, 37 & 38.

**COUNT 138**

367. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
368. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Leo Dwyer sexually abusing plaintiff JOHN DOE Nos. 31, 36, 37 & 38.

**COUNT 139**

369. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
370. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE Nos. 31, 36, 37 & 38 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 140**

371. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
372. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE Nos. 31, 36, 37 & 38.

**COUNT 141**

245. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
373. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS

and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff MARY ROE No. 6 was sexually assaulted by Alphonse Jansonis. She suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. She has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 142**

374. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
375. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Alphonse Jansonis injured plaintiff MARY ROE No. 6.

**COUNT 143**

376. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
377. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Alphonse Jansonis sexually abusing plaintiff MARY ROE No. 6.

**COUNT 144**

378. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
379. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff MARY ROE No. 6 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 145**

380. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
381. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff MARY ROE No. 6.

**COUNT 146**

382. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
383. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 35 was sexually assaulted by Fidelis DeBerardinis. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 147**

384. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
385. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Fidelis DeBerardinis injured plaintiff JOHN DOE No. 35.

**COUNT 148**

386. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
387. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant

BISHOPS which resulted in Fidelis DeBerardinis sexually abusing plaintiff JOHN DOE No. 35.

**COUNT 149**

388. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

389. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 35 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 150**

390. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

391. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 35.

**COUNT 151**

392. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

393. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 40 was sexually assaulted by Lawrence Guerin. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 152**

394. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
395. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Lawrence Guerin injured plaintiff JOHN DOE No. 40.

**COUNT 153**

396. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
397. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Lawrence Guerin sexually abusing plaintiff JOHN DOE No. 40.

**COUNT 154**

398. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
399. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 40 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 155**

400. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
401. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 40.

**COUNT 156**

402. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
403. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 42 was sexually assaulted by Charles Dewey. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 157**

404. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
405. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Charles Dewey injured plaintiff JOHN DOE No. 42.

**COUNT 158**

406. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
407. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Charles Dewey sexually abusing plaintiff JOHN DOE No. 42.

**COUNT 159**

408. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

409. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 42 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 160**

410. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

411. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 42.

**COUNT 161**

412. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

413. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 48 was sexually assaulted by Benedict Mawn. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 162**

414. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

415. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Benedict Mawn injured plaintiff JOHN DOE No. 48.



**COUNT 163**

416. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
417. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Benedict Mawn sexually abusing plaintiff JOHN DOE No. 48.

**COUNT 164**

418. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
419. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 48 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 165**

420. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
421. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 48.

**COUNT 166**

422. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
423. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN

DOE No. 50 was sexually assaulted by William H. Morgan. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 167**

424. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
425. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which William H. Morgan injured plaintiff JOHN DOE No. 50.

**COUNT 168**

426. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
427. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in William H. Morgan sexually abusing plaintiff JOHN DOE No. 50.

**COUNT 169**

428. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
429. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 50 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

### **COUNT 170**

430. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
431. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 50.

### **COUNT 171**

432. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
433. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 53 was sexually assaulted by Anthony Laurano. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

### **COUNT 172**

434. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
435. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Anthony Laurano injured plaintiff JOHN DOE No. 53.

### **COUNT 173**

436. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
437. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant

BISHOPS which resulted in Anthony Laurano sexually abusing plaintiff JOHN DOE No. 53.

**COUNT 174**

438. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
439. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 53 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 175**

440. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
441. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 53

**COUNT 176**

442. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
443. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 54 was sexually assaulted by Anthony Laurano. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 177**

444. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
445. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Anthony Laurano injured plaintiff JOHN DOE No. 54.

**COUNT 178**

446. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
447. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Anthony Laurano sexually abusing plaintiff JOHN DOE No. 54.

**COUNT 179**

448. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
449. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 54 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 180**

450. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
451. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 54

### **COUNT 181**

452. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
453. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 55 was sexually assaulted by Anthony Laurano. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

### **COUNT 182**

454. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
455. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Anthony Laurano injured plaintiff JOHN DOE No. 55.

### **COUNT 183**

456. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
457. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Anthony Laurano sexually abusing plaintiff JOHN DOE No. 55.

### **COUNT 184**

458. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

459. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 55 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 185**

460. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

461. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 55

**COUNT 186**

462. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

463. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 56 was sexually assaulted by Anthony Laurano. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 187**

464. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

465. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Anthony Laurano injured plaintiff JOHN DOE No. 56.

**COUNT 188**

466. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
467. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Anthony Laurano sexually abusing plaintiff JOHN DOE No. 56.

**COUNT 189**

468. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
469. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 56 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 190**

470. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
471. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 56

**COUNT 191**

472. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
473. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN



DOE No. 57 was sexually assaulted by Leo V. Dwyer. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 192**

474. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
475. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Leo V. Dwyer injured plaintiff JOHN DOE No. 57.

**COUNT 193**

476. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
- 
477. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Leo V. Dwyer sexually abusing plaintiff JOHN DOE No. 57.

**COUNT 194**

478. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
479. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 57 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 195**

480. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

481. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 57

**COUNT 196**

482. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

483. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 58 was sexually assaulted by Robert L. Ryer. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 197**

484. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

485. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Robert L. Ryer injured plaintiff JOHN DOE No. 58.

**COUNT 198**

486. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

487. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant

BISHOPS which resulted in Robert L. Ryer sexually abusing plaintiff JOHN DOE No. 58.

**COUNT 199**

488. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

489. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 58 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 200**

490. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

491. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 58.

**COUNT 201**

492. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

493. Defendant CURRAN assaulted and battered plaintiff JOHN DOE No. 59.

**COUNT 202**

494. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

495. Defendant CURRAN negligently inflicted emotional distress upon plaintiff JOHN DOE No. 59.

### **COUNT 203**

496. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
497. Defendant CURRAN intentionally inflicted emotional distress upon plaintiff JOHN DOE No. 59.

### **COUNT 204**

498. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
499. Defendant CURRAN breached his fiduciary duty to the plaintiff to provide spiritual guidance and religious instruction to the plaintiff when he sexually abused plaintiff JOHN DOE No. 59, and committed clergy malpractice.

### **COUNT 205**

500. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
501. Defendant CURRAN interfered with plaintiff JOHN DOE No. 59's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

### **COUNT 206**

502. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
503. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN

DOE No. 59 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 207**

504. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

505. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which defendant CURRAN injured plaintiff JOHN DOE No. 59.

**COUNT 208**

506. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

507. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendant CURRAN sexually abusing plaintiff JOHN DOE No. 59.

**COUNT 209**

508. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

509. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 59 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 210**

510. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

511. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 59.

**COUNT 211**

512. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

513. Defendant DEBERARDINIS assaulted and battered plaintiff JOHN DOE No. 60.

**COUNT 212**

514. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

515. Defendant DEBERARDINIS negligently inflicted emotional distress upon plaintiff JOHN DOE No. 60.

**COUNT 213**

516. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

517. Defendant DEBERARDINIS intentionally inflicted emotional distress upon plaintiff JOHN DOE No. 60.

**COUNT 214**

518. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

519. Defendant DEBERARDINIS breached his fiduciary duty to the plaintiff to provide

spiritual guidance and religious instruction to the plaintiff when he sexually abused plaintiff JOHN DOE No. 60, and committed clergy malpractice.

**COUNT 215**

520. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

521. Defendant DEBERARDINIS interfered with plaintiff JOHN DOE No. 60's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

**COUNT 216**

522. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

523. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS, defendant FRANCISCANS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 60 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 217**

524. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

525. Defendant ARCHBISHOP and defendant FRANCISCANS are vicariously liable for the negligent acts by which defendant DEBERARDINIS injured plaintiff JOHN DOE

No. 60.

**COUNT 218**

526. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
527. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendant DEBERARDINIS sexually abusing plaintiff JOHN DOE No. 60.

**COUNT 219**

528. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
529. Defendant ARCHBISHOP, defendant BISHOPS, defendant FRANCISCANS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 60 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 220**

530. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
531. Defendant ARCHBISHOP, defendant BISHOPS, defendant FRANCISCANS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 60.

**COUNT 221**

532. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.



533. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS, defendant SCALABRINIANS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 61 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 222**

534. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

535. Defendant ARCHBISHOP and defendant SCALABRINIANS are vicariously liable for the negligent acts by which Septimo Basso injured plaintiff JOHN DOE No. 61.

**COUNT 223**

536. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

537. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Septimo Basso sexually abusing plaintiff JOHN DOE No. 61.

**COUNT 224**

538. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

539. Defendant ARCHBISHOP, defendant BISHOPS, defendant SCALABRINIANS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 61 was the result of wilful or wanton misconduct, acts or omissions intentionally

designed to harm, and grossly negligent acts or omissions.

**COUNT 225**

540. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
541. Defendant ARCHBISHOP, defendant BISHOPS, defendant SCALABRINIANS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 61.

**COUNT 226**

542. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
543. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 62 was sexually assaulted by Joseph Birmingham. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 227**

544. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
545. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Joseph Birmingham injured plaintiff JOHN DOE No. 62.

**COUNT 228**

546. Plaintiffs reallege and incorporate herein the allegations contained in each and

every other paragraph of this Complaint.

547. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Joseph Birmingham sexually abusing plaintiff JOHN DOE No. 62.

**COUNT 229**

548. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
549. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 62 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 230**

550. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
551. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 62.

**COUNT 231**

552. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
553. Defendant D-3 assaulted and battered plaintiff JOHN DOE No. 63.

**COUNT 232**

554. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

555. Defendant **D-3** negligently inflicted emotional distress upon plaintiff JOHN DOE No. 63.

**COUNT 233**

556. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

557. Defendant **D-3** intentionally inflicted emotional distress upon plaintiff JOHN DOE No. 63.

**COUNT 234**

558. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

559. Defendant **D-3** breached his fiduciary duty to the plaintiff to provide spiritual guidance and religious instruction to the plaintiff when he sexually abused plaintiff JOHN DOE No. 63, and committed clergy malpractice.

**COUNT 235**

560. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

561. Defendant **D-3** interfered with plaintiff JOHN DOE No. 63's rights under the constitution and laws of the United States, and under the constitution and laws of the Commonwealth of Massachusetts. He is liable to said plaintiff in accordance with G.L. c. 12, §11H and I.

**COUNT 236**

562. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

563. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 63 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 237**

564. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

565. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which defendant **D-3** injured plaintiff JOHN DOE No. 63.

**COUNT 238**

566. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

567. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in defendant **D-3** sexually abusing plaintiff JOHN DOE No. 63.

**COUNT 239**

568. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

569. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 63 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and

grossly negligent acts or omissions.

**COUNT 240**

570. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

571. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 63.

**COUNT 241**

572. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

573. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 64 was sexually assaulted by Joseph P. Reilly. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 242**

574. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

575. Defendant ARCHBISHOP is vicariously liable for the negligent acts by which Joseph P. Reilly injured plaintiff JOHN DOE No. 64.

**COUNT 243**

576. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

577. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Joseph P. Reilly sexually abusing plaintiff JOHN DOE No. 64.

**COUNT 244**

578. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

579. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 64 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 245**

580. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

581. Defendant ARCHBISHOP, defendant BISHOPS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 64.

**COUNT 246**

582. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

583. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS, defendant CENTRAL CATHOLIC, defendant MARISTS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 65 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely

incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 247**

584. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

585. Defendant ARCHBISHOP, defendant CENTRAL CATHOLIC and defendant MARISTS are vicariously liable for the negligent acts by which Brother Albert injured plaintiff JOHN DOE No. 65.

**COUNT 248**

586. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

587. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Brother Albert sexually abusing plaintiff JOHN DOE No. 65.

**COUNT 249**

588. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

589. Defendant ARCHBISHOP, defendant BISHOPS, defendant CENTRAL CATHOLIC, defendant MARISTS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 65 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.



**COUNT 250**

590. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
591. Defendant ARCHBISHOP, defendant BISHOPS, defendant CENTRAL CATHOLIC, defendant MARISTS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 65.

**COUNT 251**

592. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
593. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS, defendant CENTRAL CATHOLIC, defendant MARISTS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 66 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 252**

594. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
595. Defendant ARCHBISHOP, defendant CENTRAL CATHOLIC and defendant MARISTS are vicariously liable for the negligent acts by which Brother Edward Michael injured plaintiff JOHN DOE No. 66.

**COUNT 253**

596. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
597. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Brother Edward Michael sexually abusing plaintiff JOHN DOE No. 66.

**COUNT 254**

598. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
599. Defendant ARCHBISHOP, defendant BISHOPS, defendant CENTRAL CATHOLIC, defendant MARISTS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 66 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 255**

600. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
601. Defendant ARCHBISHOP, defendant BISHOPS, defendant CENTRAL CATHOLIC, defendant MARISTS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 66.

**COUNT 256**

602. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

603. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS, defendant CENTRAL CATHOLIC, defendant MARISTS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 67 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 257**

604. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

605. Defendant ARCHBISHOP, defendant CENTRAL CATHOLIC and defendant MARISTS are vicariously liable for the negligent acts by which Brother Leonard Xavier injured plaintiff JOHN DOE No. 67.

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**COUNT 258**

606. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

607. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Brother Leonard Xavier sexually abusing plaintiff JOHN DOE No. 67.

**COUNT 259**

608. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

609. Defendant ARCHBISHOP, defendant BISHOPS, defendant CENTRAL CATHOLIC,

defendant MARISTS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 67 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 260**

610. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
611. Defendant ARCHBISHOP, defendant BISHOPS, defendant CENTRAL CATHOLIC, defendant MARISTS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 67.

**COUNT 261**

612. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
613. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS, defendant XAVERIANS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff JOHN DOE No. 68 was sexually assaulted. He suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. He has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 262**

614. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
615. Defendant ARCHBISHOP and defendant XAVERIANS are vicariously liable for the

negligent acts by which Brother Cuthbert injured plaintiff JOHN DOE No. 68.

**COUNT 263**

616. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

617. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in Brother Cuthbert sexually abusing plaintiff JOHN DOE No. 68.

**COUNT 264**

618. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

619. Defendant ARCHBISHOP, defendant BISHOPS, defendant XAVERIANS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff JOHN DOE No. 68 was the result of wilful or wanton misconduct, acts or omissions intentionally designed to harm, and grossly negligent acts or omissions.

**COUNT 265**

620. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

621. Defendant ARCHBISHOP, defendant BISHOPS, defendant CENTRAL CATHOLIC, defendant MARISTS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff JOHN DOE No. 68.

**COUNT 266**

245. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

622. As a direct and proximate result of defendant ARCHBISHOP, defendant BISHOPS, defendant AUGUSTINIANS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty, plaintiff MARY ROE No. 8 was sexually assaulted by John Gallagher. She suffered bodily harm, humiliation, severe emotional distress, and permanent psychological damages. She has incurred expenses and/or will likely incur future expenses for medical and psychological treatment, and has suffered loss of income.

**COUNT 267**

623. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

624. Defendant ARCHBISHOP and defendant AUGUSTINIANS are vicariously liable for the negligent acts by which John Gallagher injured plaintiff MARY ROE No. 8.

**COUNT 268**

625. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

626. Defendant ARCHBISHOP is vicariously liable for the negligence of defendant BISHOPS which resulted in John Gallagher sexually abusing plaintiff MARY ROE No. 8.

**COUNT 269**

627. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.

628. Defendant ARCHBISHOP, defendant BISHOPS, defendant AUGUSTINIANS and defendants MICHAEL MOE Nos. 1 - 10's breach of their duty to plaintiff MARY ROE No. 8 was the result of wilful or wanton misconduct, acts or omissions intentionally

designed to harm, and grossly negligent acts or omissions.

**COUNT 270**

629. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
630. Defendant ARCHBISHOP, defendant BISHOPS, defendant AUGUSTINIANS and defendants MICHAEL MOE Nos. 1 - 10 negligently inflicted emotional distress upon plaintiff MARY ROE No. 8.

**COUNT 271**

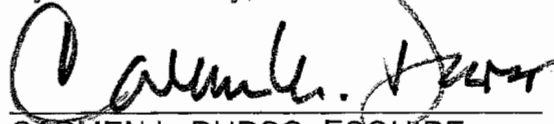
631. Plaintiffs reallege and incorporate herein the allegations contained in each and every other paragraph of this Complaint.
632. Defendant ARCHBISHOP, defendant BISHOPS, INSTITUTIONAL DEFENDANTS and defendants MICHAEL MOE Nos. 1 - 10 each, at various times during the past fifty years, intentionally and fraudulently hid the existence of the aforesaid acts of sexual abuse, conspired to keep this information from becoming public knowledge, and protected the offending priests from criminal prosecution.
633. By virtue of said conspiracy, defendant ARCHBISHOP, defendant BISHOPS, INSTITUTIONAL DEFENDANTS and defendants MICHAEL MOE Nos. 1 - 10 are jointly and severally liable to the plaintiffs for the injuries which they have suffered because of the acts of the defendant PERPETRATORS, other deceased priests and lay employees named in this action, as well as other unnamed priests, who were able thereby to commit, and to continue to commit, sexual abuses, assaults and rapes upon the plaintiffs.

## DEMAND

The plaintiffs demand judgment against the defendants on each of the Counts stated, in an amount which is fair, just and adequate for the injuries and damages sustained, and the pain and suffering endured, plus interest and costs.

**PLAINTIFFS DEMAND A TRIAL BY JURY ON ALL COUNTS.**

By their Attorney,

A handwritten signature in black ink, appearing to read "Carmen L. Durso", written over a horizontal line.

CARMEN L. DURSO, ESQUIRE

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December 27, 2007