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County of Solano
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SOLANO**

11 JANE DOE 2, a minor, by and through her)
12 guardian ad litem [REDACTED] JANE DOE 3, a minor, by)
13 and through her guardian ad litem [REDACTED] JANE)
14 DOE 4, a minor, by and through her guardian ad)
15 litem [REDACTED] and JANE DOE 5, a minor, by and)
16 through her guardian ad litem [REDACTED])

17 Plaintiffs,)

18 vs.)

19 BENICIA UNIFIED SCHOOL DISTRICT,)
20 a public school district;)
21 MATTHEW JOSEPH SHELTON, an individual;)
22 and DOES 1 through 50,)

23 Defendants.)

Case No.: CU24-03148

COMPLAINT FOR PERSONAL INJURIES AND DAMAGES ARISING FROM CHILDHOOD SEXUAL ABUSE/ASSAULT

[DEMAND FOR JURY TRIAL]

24 Plaintiffs JANE DOE 2, a minor, by and through her guardian ad litem [REDACTED] JANE DOE 3, a
25 minor, by and through her guardian ad litem [REDACTED] JANE DOE 4, a minor, by and through her guardian
26 ad litem [REDACTED] and JANE DOE 5, a minor, by and through her guardian ad litem [REDACTED] (collectively
27 referred to as "Plaintiffs") hereby complain and allege against Defendants BENICIA UNIFIED
28 SCHOOL DISTRICT, MATTHEW JOSEPH SHELTON, and DOES 1 through 50, inclusive, and each
of them, as follows:

1 **GENERAL ALLEGATIONS**

2 **The Parties:**

3 1. Plaintiff JANE DOE 2 is currently 11 years old. She was the victim of unlawful
4 childhood sexual assault, abuse, harassment, and other misconduct during her time as a student at
5 Robert Semple Elementary School by defendant MATTHEW JOSEPH SHELTON which is the subject
6 matter of this Complaint. As a result of the sensitive nature of these facts, Plaintiff’s full identity has
7 been concealed from public court filings in order to prevent those not directly involved in this action
8 from learning her identity and making her identity public.

9 2. Plaintiff JANE DOE 3 is currently 12 years old. She was the victim of unlawful
10 childhood sexual assault, abuse, harassment, and other misconduct during her time as a student at
11 Robert Semple Elementary School by defendant MATTHEW JOSEPH SHELTON which is the subject
12 matter of this Complaint. As a result of the sensitive nature of these facts, Plaintiff’s full identity has
13 been concealed from public court filings in order to prevent those not directly involved in this action
14 from learning her identity and making her identity public.

15 3. Plaintiff JANE DOE 4 is currently 12 years old. She was the victim of unlawful
16 childhood sexual assault, abuse, harassment, and other misconduct during her time as a student at
17 Robert Semple Elementary School by defendant MATTHEW JOSEPH SHELTON which is the subject
18 matter of this Complaint. As a result of the sensitive nature of these facts, Plaintiff’s full identity has
19 been concealed from public court filings in order to prevent those not directly involved in this action
20 from learning her identity and making her identity public.

21 4. Plaintiff JANE DOE 5 is currently 12 years old. JANE DOE was the victim of unlawful
22 childhood sexual assault, abuse, harassment, and other misconduct during her time as a student at
23 Robert Semple Elementary School by defendant MATTHEW JOSEPH SHELTON which is the subject
24 matter of this Complaint. As a result of the sensitive nature of these facts, Plaintiff’s full identity has
25 been concealed from public court filings in order to prevent those not directly involved in this action
26 from learning her identity and making her identity public.

1 5. Jurisdiction is proper in Solano County because the defendants are either residents of
2 Solano County or do business in Solano County, and also because the acts which are the basis of this
3 lawsuit occurred in Solano County.

4 6. Defendant BENICIA UNIFIED SCHOOL DISTRICT (“BUSD”) is a public educational
5 agency organized, existing, and conducting business under the laws of the County of Solano and the
6 State of California. BUSD operates numerous schools within its school district, including Robert
7 Semple Elementary School, which is located at 2015 E. 3rd St., Benicia, CA 94510. BUSD was
8 responsible for the administration, maintenance, operation, and oversight of its schools and employees,
9 including Defendant MATTHEW JOSEPH SHELTON, and DOES 1 through 20, inclusive, and each of
10 them. DOES 1 through 20, inclusive, and each of them, are employees and/or agents of BUSD,
11 responsible for the administration, supervision, and oversight of BUSD employees and include other
12 teachers and assistants at BUSD.

13 7. Defendant MATTHEW JOSEPH SHELTON (“SHELTON”) was an employee of
14 BUSD and upon information and belief is a resident of the County of Solano, State of California.
15 SHELTON and DOES 21 through 40, inclusive, and each of them, are individuals who sexually abused
16 Plaintiff and/or failed to intervene in the sexual abuse of Plaintiff.

17 8. DOES 41 through 50, inclusive, and each of them, are the persons and/or entities who
18 run, manage, operate, supervise, oversee, fund, are joint venturers, parent organizations, are the
19 subsidiaries, are contractually related, and/or are principals and/or agents of the business, entities,
20 and/or principals who owed a duty of care to Plaintiff and breached that duty of care.

21 9. The true names and capacities of each defendant designated herein as DOES 1 through
22 50, whether an individual, business, public entity, or some other entity are presently unknown to
23 Plaintiff, who therefore sues said Defendants by such fictitious names, pursuant to Code of Civil
24 Procedure section 474. Each DOE defendant is responsible in some actionable manner for the events
25 alleged herein. Plaintiff will amend this Complaint to state the true names and capacities of said
26 defendants when the same have been ascertained.

27 10. Each of the defendants sued herein as DOES 1 through 50, inclusive, and each of them,
28 was the agent and employee of each of the remaining defendants and was at all times acting within the

1 course and scope of such agency and employment with the full knowledge, consent, authority,
2 ratification, and/or permission of each of the remaining defendants.

3 11. Wherever appearing in this complaint, each and every reference to Defendants, or any of
4 them, is intended to include, and shall be deemed to include, all fictitiously named Defendants.

5 **Exemption from Government Tort Claims Act**

6 12. Government Code section 905(m) exempts the government tort claim presentation
7 requirements of the Government Tort Claims Act for claims made pursuant to Section 340.1 of the
8 Code of Civil Procedure for the recovery of damages suffered as a result of childhood sexual assault.
9 As such, Plaintiff was not required to present a government tort claim to BUSD.

10 **FACTS COMMON TO ALL CAUSES OF ACTION**

11 13. In 2006, SHELTON was hired by the Napa Valley Unified School District as a third-
12 grade teacher at Phillips Edison Elementary School. During the 2006-2007 school year, i.e.
13 SHELTON's first year on the job, four female students between the ages of 8 and 9 years old at
14 Edison alleged that he inappropriately touched and sexually abused them. SHELTON was
15 subsequently arrested in September 2007 and was charged with six counts of sexual molestation.

16 14. In 2015, BUSD hired SHELTON as a teacher at Robert Semple Elementary School.
17 Prior to this, SHELTON had worked as a substitute teacher for BUSD.

18 15. During the 2018-2019 school year, SHELTON inappropriately touched and sexually
19 assaulted a student at Semple. At the time of this abuse, the student was only 6 years old.

20 16. During the 2022-2023 school year, SHELTON sexually assaulted a student at Semple
21 that was participating in its after school program.

22 17. During the 2022-2023 school year, Plaintiffs had SHELTON as their fifth-grade
23 teacher at Semple.

24 18. SHELTON, who was in his 40s, immediately took an interest in Plaintiffs and began
25 grooming and conditioning them with the specific intent of manipulating their emotions and taking
26 advantage of their young age so that he could ultimately sexually abuse them. This conduct included
27 openly flirting with Plaintiffs while on campus at Semple, engaging in inappropriate physical contact
28 with Plaintiffs, and making inappropriate/creepy comments towards Plaintiffs.

1 19. SHELTON’s grooming, conditioning, and manipulation of Plaintiffs culminated in
2 SHELTON inappropriately touching and sexually assaulting Plaintiffs on numerous occasions during
3 the first semester of the 2022-2023 school year at Semple. The abuse took place in SHELTON’s
4 classroom, as well as other locations.

5 20. In November 2022, SHELTON was allowed to go on Semple’s annual 5th grade
6 overnight camping trip with other 5th grade teachers and employees of BUSD. During this trip,
7 SHELTON engaged in inappropriate behavior towards female students, including some of the
8 Plaintiffs.

9 21. Towards the end of the first semester of the 2022-2023 school year, Semple’s
10 principal, Christina Moore, was made directly aware of SHELTON’s inappropriate conduct towards
11 female students. Because Ms. Moore was close friends with SHELTON and his wife, she set out on a
12 course to attempt to sweep these allegations under the rug to protect SHELTON. Any student that
13 came to Ms. Moore to report misconduct by SHELTON was told by her to not talk about it with
14 anyone else, including their parents. She also made clear to these students that she did not believe
15 SHELTON engaged in the behavior that they were reporting and that it was unfortunate that these
16 students were making these false allegations. This had a chilling effect on these students, as they felt
17 like Ms. Moore was openly hostile to their attempts to inform her about a predatory teacher at Semple
18 that was harming children.

19 22. Worse yet, Ms. Moore engaged in retaliatory conduct towards any students (and their
20 parents) that reported SHELTON’s misconduct to her. She would shun them at school, give their
21 parents dirty looks and, in one instance, attempted to get one of the student’s parents in trouble with
22 law enforcement.

23 23. Despite Ms. Moore’s best efforts, SHELTON realized that he could not continue at
24 Semple given the avalanche of accusations being made against him. As a result, SHELTON and Ms.
25 Moore concocted a plan: SHELTON would quietly resign from BUSD to seek employment from
26 West Contra Costa Unified School District (“WCCUSD”) and Ms. Moore would ensure that if a
27 reference check was done, nothing negative would be said about SHELTON’s time at Semple. The
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1 plan worked, as SHELTON secured employment with WCCUSD as an assistant principal for Walter
2 T. Helms Middle School the following school year.

3 24. Despite multiple students coming forward with allegations about SHELTON's
4 misconduct, no one at Semple or BUSD made any efforts whatsoever to determine whether there
5 were any other victims of SHELTON out there. In fact, neither Semple nor BUSD put out any
6 statements related to SHELTON's departure at all, leaving students and parents completely in the
7 dark. It wasn't until it was made public that criminal charges had been filed against SHELTON that
8 BUSD put out a statement related to SHELTON. This was done solely for damage control purposes.

9 25. On February 23, 2024, SHELTON was criminally charged with 5 counts of violating
10 Penal Code section 288(a) related to his misconduct towards the Semple student participating in its
11 after school program during the 2022-2023 school year, mentioned above.

12 26. On March 11, 2024, SHELTON was charged with two additional counts of violating
13 Penal Code section 288(a) related to his misconduct towards the then 6-year-old female student
14 during the 2018-2019 school year, mentioned above.

15 **FIRST CAUSE OF ACTION**

16 **SEXUAL ABUSE OF A MINOR**

17 **(Against Defendant SHELTON and Defendant DOES 21 through 40)**

18 27. Plaintiffs reassert and reallege each and every allegation contained in paragraphs 1
19 through 26, inclusive, and incorporates the same by reference as though here set forth in full.

20 28. While Plaintiffs were students at Semple, SHELTON took advantage of his position of
21 authority and trust to engage in unlawful sexual activity and other harmful misconduct with Plaintiffs.
22 These crimes and misconduct took place during the 2022-2023 school year.

23 29. As a direct and legal result of the acts and omissions of SHELTON, Plaintiffs suffered
24 physical and emotional injuries and other harm, including economic and non-economic damages in
25 amounts to be determined, but which exceed the minimum jurisdictional limits of this Court.

26 30. In performing the aforementioned acts, SHELTON acted with willfulness, malice, and
27 oppression, justifying an award of punitive damages against him.

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1 **SECOND CAUSE OF ACTION**

2 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

3 **(Against Defendants SHELTON and DOES 21 through 40)**

4 31. Plaintiffs reassert and reallege each and every allegation contained in paragraphs 1
5 through 30, inclusive, and incorporates the same by reference as though here set forth in full.

6 32. Acting with knowledge of his superior position and of Plaintiffs' trust, and realizing their
7 special susceptibility to emotional distress due to their young age, SHELTON engaged in unlawful
8 sexual misconduct with Plaintiffs.

9 33. The misconduct of SHELTON was outrageous, particularly because of the age difference
10 between Plaintiffs, minors at the time, and SHELTON, who was an adult in his 40s at the time.

11 34. The acts of SHELTON were intentional, willful, oppressive, and malicious, and done for
12 the purpose of causing Plaintiffs to suffer emotional harm, humiliation, mental anguish, and emotional
13 distress, or with reckless disregard for the likelihood that they would cause Plaintiffs such distress.

14 35. As a direct and legal result of the acts and omissions of SHELTON, Plaintiffs suffered
15 physical and emotional injuries and other harm, including economic and non-economic damages in
16 amounts to be determined, but which exceed the minimum jurisdictional limits of this Court.

17 36. In performing the aforementioned acts, SHELTON acted with willfulness, malice, and
18 oppression, justifying an award of punitive damages against him.

19 **THIRD CAUSE OF ACTION**

20 **SEXUAL ASSAULT AND BATTERY**

21 **(Against Defendant SHELTON and DOES 21 through 40)**

22 37. Plaintiffs reassert and reallege each and every allegation contained in paragraphs 1
23 through 36, inclusive, and incorporates the same by reference as though here set forth in full.

24 38. SHELTON's misconduct described above was intentional and sexually offensive,
25 constituting sexual assault and battery under California Civil Code section 1708.5, as he acted with the
26 intent to cause a harmful or offensive contact with an intimate part of Plaintiffs, and a sexually
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1 offensive contact with Plaintiffs directly resulted. Plaintiffs did not consent to this sexually offensive
2 contact, nor did they welcome it.

3 39. As a direct and legal result of the acts and omissions of SHELTON, Plaintiffs suffered
4 physical and emotional injuries and other harm, including economic and non-economic damages in
5 amounts to be determined, but which exceed the minimum jurisdictional limits of this Court.

6 40. In performing the aforementioned acts, SHELTON acted with willfulness, malice, and
7 oppression, justifying an award of punitive damages against him.

8 **FOURTH CAUSE OF ACTION**

9 **SEXUAL HARASSMENT**

10 **(CIVIL CODE §§ 51.9 & 52)**

11 **(Against Defendants SHELTON and DOES 21 through 40)**

12 41. Plaintiff reasserts and realleges each and every allegation contained in paragraphs 1
13 through 40, inclusive, and incorporates the same by reference as though here set forth in full.

14 42. Defendant SHELTON had a teacher-student relationship with Plaintiffs, and was in a
15 position of authority over the minor Plaintiffs. SHELTON made sexual advances and solicitations of
16 Plaintiffs, and engaged in other verbal, visual, and physical conduct of a sexual nature based on
17 Plaintiffs' gender that were unwelcome, severe, and pervasive.

18 43. Plaintiffs were unable to easily terminate the relationship because they were minors and
19 were under the care and control of SHELTON who held a position of authority relative to Plaintiffs.

20 44. As a direct and legal result of the acts and omissions of SHELTON, Plaintiffs suffered
21 physical and emotional injuries and other harm, including economic and non-economic damages in
22 amounts to be determined, but which exceed the minimum jurisdictional limits of this Court.

23 45. Pursuant to Section 52 of the California Civil Code, Plaintiffs also seek exemplary
24 damages in an amount to be determined by the jury and attorney's fees against said defendant.

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1 **FIFTH CAUSE OF ACTION**

2 **NEGLIGENT HIRING, SUPERVISION & RETENTION OF AN UNFIT EMPLOYEE**

3 **(Against Defendants BUSD and DOES 1 through 20)**

4 46. Plaintiffs reassert and reallege each and every allegation contained in paragraphs 1
5 through 45, inclusive, and incorporates the same by reference as though here set forth in full.

6 47. Defendants BUSD and DOES 1 through 20, inclusive, and each of them, had the
7 responsibility and mandatory duty to adequately and properly investigate, hire, train, and supervise their
8 staff and to protect their students from harm caused by unfit and dangerous individuals hired as staff.

9 48. BUSD and DOES 1 through 20, inclusive, and each of them, knew or should have known
10 that SHELTON was unfit to be teacher.

11 49. BUSD and DOES 1 through 20, inclusive, and each of them, breached their mandatory
12 duty to properly and adequately investigate, hire, train, and supervise SHELTON and DOES 21 through
13 40, inclusive, and each of them.

14 50. Had BUSD and DOES 1 through 20, inclusive, and each of them, properly investigated,
15 supervised, trained, and monitored the conduct and actions of SHELTON, and DOES 21 through 40,
16 inclusive, and each of them, as teachers and staff members, they would have discovered that he was
17 unfit to be so employed. By failing to adequately supervise, monitor, or investigate, BUSD and DOES
18 1 through 20, inclusive, and each of them, allowed SHELTON, and DOES 21 through 40, inclusive, and
19 each of them, to continue, unhindered, with their predatory conduct directed towards underage students,
20 including Plaintiffs.

21 51. BUSD and DOES 1 through 20, inclusive, and each of them, negligently hired,
22 supervised, retained, monitored, and otherwise employed SHELTON and DOES 21 through 40,
23 inclusive, and each of them, and negligently failed to ensure the safety of minor students, Plaintiffs, who
24 was entrusted to Defendants' custody, care, and control.

25 52. BUSD and DOES 1 through 20, inclusive, and each of them, also negligently failed to
26 adequately implement or enforce any districtwide procedures or policies that were aimed at preventing,
27 detecting, or deterring the sexual harassment or abuse of students by teachers, supervisors, or others.

1 inappropriately with minor children. And yet, no one reported the suspected sexual abuse as required by
2 their employment to BUSD and mandated by Child Abuse and Neglect Reporting Act.

3 60. BUSD, acting through its employees and agents DOES 1 through 20, failed to report
4 suspected child abuse to a law enforcement agency or child protective services as required by the
5 provisions of the Child Abuse and Neglect Reporting Act (Penal Code section 11164, et seq.).

6 61. When BUSD's employees violated the Child Abuse and Neglect Reporting Act, Penal
7 Code section 11164, et seq, they were acting within the course and scope of their employment, and
8 BUSD is vicariously liable for their failure.

9 62. By failing to report suspected child abuse, Defendants allowed SHELTON and DOES
10 21 through 40, inclusive, and each of them, to continue, unhindered, in their abuse of adolescent
11 children, including Plaintiffs.

12 63. As a direct and legal result of the acts and omissions of Defendants BUSD and DOES 1
13 through 20, inclusive, and each of them, Plaintiffs suffered physical and emotional injuries and other
14 harm, including economic and non-economic damages in amounts to be determined, but which exceed
15 the minimum jurisdictional limits of this Court.

16 **SEVENTH CAUSE OF ACTION**

17 **NEGLIGENT FAILURE TO WARN, TRAIN, OR EDUCATE**

18 **(Against Defendant BUSD and DOES 1 through 20)**

19 64. Plaintiffs reassert and reallege each and every allegation contained in paragraphs 1
20 through 63, inclusive, and incorporates the same by reference as though here set forth in full.

21 65. Defendants BUSD and DOES 1 through 20 had a duty to warn, train and educate the
22 students in its custody, care and control, like Plaintiffs, on known and knowable dangers posed by its
23 faculty and staff. BUSD and DOES 1 through 20 also had a duty to warn, train and educate its faculty
24 and staff on its sexual harassment policy and inappropriate boundary crossing with students.

25 66. BUSD and DOES 1 through 20 breached their duty to Plaintiffs by failing to warn her
26 of known and knowable dangers posed by its faculty and staff, including SHELTON; by failing to
27 inform and educate her on its sexual harassment policies and the methods to identify, report and respond
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1 to inappropriate sexual harassment by teachers; and by failing to train its faculty, including SHELTON,
2 on BUSD's sexual harassment policies.

3 67. As a direct and legal result of the negligence of BUSD and DOES 1 through 20,
4 Plaintiffs were groomed, manipulated and ultimately sexually assaulted and abused by SHELTON.

5 68. Had BUSD and DOES 1 through 20 fulfilled their duties and responsibilities, Plaintiffs
6 would not have been injured.

7 69. As a direct and legal result of this, Plaintiffs suffered injuries including, but not limited
8 to, physical injuries, mental pain and suffering, emotional distress, past and future costs of medical care
9 and treatment, past and future loss of earnings and/or earning capacity, and other economic and non-
10 economic damages in an amount not yet ascertained, but which exceed the minimum jurisdictional
11 limits of this Court.

12 **EIGHTH CAUSE OF ACTION**

13 **NEGLIGENT SUPERVISION OF A MINOR**

14 **(Against Defendant BUSD and DOES 1 through 20)**

15 70. Plaintiffs reassert and reallege each and every allegation contained in paragraphs 1
16 through 69, inclusive, and incorporates the same by reference as though here set forth in full.

17 71. Defendants BUSD and DOES 1 through 20, inclusive, and each of them, were
18 responsible for the care, custody, control, supervision, and protection of the minor students entrusted to
19 them, including Plaintiffs. Said Defendants had a duty to adequately and properly supervise, monitor,
20 and protect Plaintiffs from known and knowable dangers, such as those posed by SHELTON and DOES
21 21 through 40, inclusive, and each of them.

22 72. BUSD and DOES 1 through 20, inclusive, and each of them, breached their duty to
23 properly and adequately supervise, monitor, and protect Plaintiffs, in part by ignoring clear and obvious
24 signs that SHELTON and DOES 21 through 40, inclusive, and each of them, were engaged in an
25 inappropriate and harassing relationship with Plaintiffs; allowing Plaintiffs to spend unsupervised time
26 with SHELTON and DOES 21 through 40, inclusive, and each of them; and allowing SHELTON and
27 DOES 21 through 40, inclusive, and each of them, to repeatedly sexually harass and abuse Plaintiffs.

1 81. Despite having knowledge of the misconduct of SHELTON and DOES 21 through 40,
2 inclusive, and each of them, Defendants DOES 41 through 50, inclusive, and each of them, failed to
3 take any preventative action to control, curb, and/or prevent that conduct, and failed to warn Plaintiffs
4 or their parents, or anyone else, of that wrongful conduct, despite having a legal duty to do so.

5 82. As a direct and legal result of the negligence of Defendants DOES 41 through 50,
6 inclusive, and each of them, Plaintiffs was sexually assaulted and abused by SHELTON and DOES 21
7 through 40, inclusive, and each of them.

8 83. Had Defendants DOES 41 through 50, inclusive, and each of them, fulfilled their duty
9 and responsibility, Plaintiffs would not have been subjected to all or most of the misconduct perpetrated
10 against them.

11 84. As a direct and legal result of Defendants DOES 41 through 50, inclusive, and each of
12 them, having breached their duty to properly supervise and/or warn Plaintiffs and/or her parents, or
13 anyone else, of the wrongful conduct, Plaintiffs suffered physical and emotional injuries and other
14 harm, including economic and non-economic damages in amounts to be determined, but which exceed
15 the minimum jurisdictional limits of this Court.

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1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiffs pray for judgment against Defendants BUSD, SHELTON, and
3 DOES 1 through 50, inclusive, and each of them, as follows:

- 4 1. For an award of special (economic) and general (non-economic) damages according to
5 proof against all defendants;
- 6 2. For punitive and exemplary damages against Defendant SHELTON;
- 7 3. For reasonable attorneys' fees of said suit as specifically provided in California Civil Code
8 section 52(b)(3) against SHELTON;
- 9 4. For costs of suit incurred herein; and
- 10 5. For such other and further relief as the Court deems just and proper.

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12 Dated: April 24, 2024

TAYLOR & RING

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14 By: 

15 John C. Taylor
16 Brendan P. Gilbert
17 Attorneys for Plaintiffs
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DEMAND FOR JURY TRIAL

Plaintiffs hereby demand that their action be determined by trial by jury.

Dated: April 24, 2024

TAYLOR & RING

By: 

John C. Taylor
Brendan P. Gilbert
Attorneys for Plaintiff

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