THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA Civil Division

JANE DOE	*	
c/o Jackson and Associates Law Firm	*	
1300 Caraway Court St. 100	*	
Upper Marlboro, MD 20774	*	
	*	
Plaintiff,	*	
	*	
v.	*	
	*	
DISTRICT OF COLUMBIA	*	
1350 Pennsylvania Avenue NW	*	
Washington, DC 20004	*	
	*	
SERVE ON	*	
	*	
Office of the Attorney General	*	
441 4th Street, NW,	*	
Washington, DC 20001	*	
	*	
And	*	
	*	
DISTRICT OF COLUMBIA	*	
PUBLIC SCHOOL SYSTEM	*	CASE NO.:
1200 First Street, NE	*	
Washington, DC 20002	*	
	*	
SERVE ON	*	
0.60	*	
Office of the Attorney General	*	
441 4th Street, NW,	*	
Washington, DC 20001	*	
	*	
And	*	
	*	
DUKE ELLINGTON SCHOOL	*	
OF THE ARTS	*	
3500 R St NW	*	
Washington, DC 20007	*	
A J	*	
And	*	
DONNA HOLLIC	*	
DONNA HOLLIS	•	

c/o Duke Ellington School of the Arts	*
3500 R St NW	*
Washington, DC 20007	*
_	*
And	*
	*
MARK WALKER	*
3915 7 TH Street NE	*
Apt 1	*
Washington, DC 20017	*
_	*
Defendants.	*
	*

COMPLAINT

Plaintiff Jane Doe, by and through Dawn Jackson, Esquire, and Jackson & Associates Law Firm, LLC, hereby sues Defendants District of Columbia, District of Columbia Public School System (hereinafter referred to as "DCPS"), Duke Ellington School of the Arts (hereinafter referred to as "Duke Ellington"), Donna Hollis (hereinafter referred to as "Hollis"), and Mark Walker (hereinafter referred to as "Walker") and states as follows:

IURISDICTION AND VENUE

- 1. This Court has jurisdiction over the subject matter of this Complaint pursuant to 28 U.S.C. § 1331.
- 2. Venue is proper in this Court since the events giving rise to the Plaintiff's claims occurred in the District of Columbia.

ALLEGATIONS COMMON TO ALL COUNTS

- 3. Plaintiff Jane Doe is an adult citizen of the United States and a resident of Washington, DC. The Plaintiff for most of the relevant incident was a minor who was the victim of unlawful intentional sexual battery, statutory rape and other acts of sexual misconduct, and is being identified by this pseudonym to protect her privacy.
- 4. The actual identity of the Plaintiff is known to the Defendants.

- 5. Defendant Duke Ellington is a public secondary school located in the District of Columbia that receives federal funding. Defendants District of Columbia and DCPS owned, managed, operated, maintained, and controlled the subject property known as "Duke Ellington School of the Arts" located at 3500 R St NW, Washington, DC 20007 and its common areas.
- 6. Defendants District of Columbia and DCPS employed agents, employees, officers, staff, administrators, representatives and servants; exercised jurisdiction and control over said agents, employees, officers, staff, administrators, representatives, and/or servants; and determined the qualifications or lack of qualifications of said agents, employees, officers, staff, administrators, representatives, and servants.
- 7. Defendants devised all policies, programs, and/or activities for the aforementioned agents, employees, staff, administrators, representatives and servants, and/or residents of the community, and said agents, employees, staff, administrators, representatives and servants, worked in a common effort for the benefit for the aforementioned Defendants.
- 8. Defendant Hollis was employed by Defendant District of Columbia and Defendant DCPS as the Dean of Students for Defendant Duke Ellington.
- 9. Defendant Walker was also employed by Defendant District of Columbia and Defendant DCPS as a teacher at Duke Ellington and is now facing criminal charges by the District of Columbia for "First Degree Child Abuse (Rape)" of Plaintiff which were initiated in June of 2020. *See* Exhibit A.
- 10. The District of Columbia was put on notice June 20, 2020 when the initial police report was filed. *See* Exhibit A.

- 11. During the 2015-2016 school year, Defendant Walker was hired as a new temporary photography teacher at Duke Ellington.
- 12. Defendant Walker during this time befriended students, one specifically being

 Plaintiff who was fifteen (15) years old at the time and an aspiring fashion designer.
- 13. Defendant Walker immediately singled Plaintiff out using the recent death of her father and special treatment to groom Plaintiff in preparation for sexual abuse.
- 14. Defendant Walker often brought Plaintiff food and gifts to school and allowed her to not do certain assignments.
- 15. On one occasion, Defendant Walker gave Plaintiff a letter in class detailing his affections for her.
- 16. Defendant Walker used his position as a teacher to communicate with Plaintiff through messages and to host an afterschool program; using both mediums to grow closer to Plaintiff.
- 17. Defendant Walker used Duke Ellington premises to host these afterschool programs that went on until late in the evening with Defendant Walker being the only faculty present.
- 18. On one of these occasions while on Duke Ellington Premises, Defendant Walker fondled Plaintiff's leg.
- 19. At the end of these afterschool programs, Defendant Walker would walk Plaintiff home alone, often stopping at a nearby park where he committed sexual misconduct.
- 20. Defendant Walker continued the same sexual misconduct on Duke Ellington premises often hugging and "feeling up" Plaintiff.

- 21. During this time period, Defendant Walker was ineffectively supervised and monitored.
- 22. During the summer before the 2016-2017 school year, Defendant Walker convinced Plaintiff to come to his home on three occasions.
- 23. On all three occasions, the Defendant committed sexual misconduct with the Plaintiff and on the last occasion sexually assaulted Plaintiff.
- 24. During the 2016-2017, school year Defendant Hollis was informed by another parent that there were allegations regarding a sexual relationship between Defendant Walker and Plaintiff.
- 25. Defendant Hollis notified Defendant Walker of these allegations but failed to competently investigate these allegations or report them as mandated by law.
- 26. Following these allegations, Plaintiff was not removed from Defendant Walker's classes and had to maintain classes with her assaulter.
- 27. Defendant Walker's last contact with Plaintiff was on September 11, 2020, when the Defendant sent her a cash app following his recent request in an attempt to buy Plaintiff's silence regarding the assault.
- 28. During the pattern of grooming and the escalation of Defendant Walker's sexual advances, Plaintiff felt helpless and believed that allowing Defendant Walker's sexual advances was in her best interest.
- 29. Defendant Walker exploited the opportunities created by Defendants District of Columbia, DCPS, Duke Ellington, and Hollis and completed his grooming, sexual harassment and sexual abuse of Plaintiff, some of which occurred on school grounds.

- 30. Defendants District of Columbia, DCPS, and Duke Ellington are responsible for providing public education to minor students, including Plaintiff, through (a) oversight and supervision of all school functions, school property and school student programs; and (b) the hiring, supervision, management, assignment, control and regulation of individuals who serve as staff members, including but not limited to school teachers as well as the review and supervision of curricula developed by the district, schools and teachers.
- 31. Defendants District of Columbia, DCPS, and Duke Ellington are also responsible for all policies and procedures within the school. This charge and responsibility includes supervision and discipline of teachers and administrators including but not limited to Defendant Walker.
- 32. Plaintiff's sexual abuse occurred while Plaintiff was under the control and direction of Defendant Walker, in areas of the school to which Defendant Walker had access by virtue of his employment.
- 33. Defendant Hollis and other members of the administration of Duke Ellington were mandated to report child abuse pursuant to DC law.
- 34. Despite knowledge of Defendant Walker's propensity to have inappropriate relationships with students and knowledge of Defendant Walker's grooming of students for sexual abuse, Defendants District of Columbia, DCPS, Duke Ellington, and Hollis nevertheless: (a) permitted Defendant Walker to have unsupervised access to various rooms and areas of the school; (b) permitted Defendant Walker to have unsupervised contact with students after school hours; (c) did not report the acts of Defendant Walker to law enforcement that constituted sexual harassment,

sexual grooming and sexual abuse; (d) did not competently investigate the complaints of students about Defendant Walker's conduct; (e) did not disclose to the students, including Plaintiff, the concerns about Defendant Walker; (f) failed to comply with the duties set forth in District policies and procedures and federal law; (g) concealed Defendant Walker's sexual harassment, sexual grooming and sexual abuse of students; (h)failed to remove Plaintiff from Defendant Walker's classes after being made aware of Plaintiff's sexual abuse by Defendant Walker; (i) were deliberately indifferent to the safety, security and well-being of students at Duke Ellington, including but not limited to Plaintiff; (j) prevented students, including Plaintiff, from receiving an education without a condition of such education being sexual harassment, sexual grooming and sexual abuse; and, (k) promoted school policies that fostered a climate to flourish where innocent students, including Plaintiff, were victims of sexual abuse.

COUNT I

(Title IX, 20 U.S.C. §1681, et seq.)

- 35. Plaintiff incorporates her previous allegations as if fully rewritten herein.
- 36. Title IX of the Education Amendments of 1972 requires that "No person... shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance..."
- 37. At least by 2017, Defendants District of Columbia, DCPS, Duke Ellington, and Hollis possessed actual notice of liability under Title IX for teacher-on-student sexual harassment, sexual grooming, sexual discrimination and sexual abuse.

- 38. At least by 2017, Defendants District of Columbia, DCPS, Duke Ellington and Hollis possessed actual knowledge of Defendant Walker's sexual harassment, sexual grooming, sexual discrimination and sexual abuse of students.
- 39. At least by 2017, Defendants District of Columbia, DCPS, Duke Ellington and Hollis possessed actual knowledge that Defendant Walker had a high potential to sexually abuse female students.
- 40. Plaintiff in 2015-2020 was subjected to discrimination in her education at Duke Ellington based on her gender in that she suffered teacher-on-student sexual harassment, sexual grooming, sexual abuse, and inappropriate contact as a condition of her receipt of an education at Duke Ellington. That abuse and harassment continued even after she graduated.
- 41. Defendants District of Columbia, DCPS, Duke Ellington and Hollis failed to take appropriate corrective action, thereby acting with deliberate indifference to the rights and safety of Plaintiff in one or more of the following ways: (a) failing to report teacher-on-student sexual harassment, sexual grooming and sexual abuse to appropriate authorities; (b) failing to cure or even attempt to cure obvious and known risks to minor female students at Duke Ellington placed under Defendant Walker's supervision and authority; (c) failing to communicate any precautions, directives or educational materials that might be utilized between parent and child to identify inappropriate conduct that occurred between any student and adult, whether generally or specifically in relation to Defendant Walker; and, (d) allowing Defendant Walker to have unsupervised contact with minor female students, including Plaintiff, without conducting, documenting and concluding a competent

- investigation into the allegations and specific facts brought to light prior to that time.
- 42. The deliberate indifference, actions and omissions described above caused Plaintiff to suffer criminal sexual harassment and abuse by Defendant Walker.
- 43. Title IX requires Defendants DCPS, Duke Ellington and Hollis to provide educational opportunity on an equal basis to all students regardless of their gender.
- 44. Defendants DCPS, Duke Ellington and Hollis failed to comply with Title IX in that despite prior allegations of misconduct, Defendants continued to allow Defendant Walker unsupervised access to minor female students and access to certain rooms and areas where Defendant Walker had the privacy to carry out the sexual abuse of minor female students, including Plaintiff.
- 45. Defendants DCPS, Duke Ellington and Hollis failed to comply with Title IX in that it failed to ensure that the education provided to minor female students would be on an equal basis compared to the education provided by Duke Ellington to minor male students.
- 46. 20 U.S.C. § 1981 affords Plaintiff a civil cause of action for damages. 42 U.S.C. § 1988 identifies damages, court costs, litigation expenses and attorney's fees as within the remedies available in an action brought pursuant to 20 U.S.C. § 1981.
- 47. As a direct and proximate result of the conduct of Defendants District of Columbia, DCPS, Duke Ellington and Hollis as described herein, Plaintiff has sustained severe and permanent bodily injury, sickness and/or disease, including but not limited to sleep disturbance, nightmares, depression, posttraumatic stress disorder, fatigue, social anxiety, anger, panic attacks and as a result thereof she has and will continue

to experience: (a) physical and mental pain and suffering; (b) emotional distress; (c) loss of a normal life; (d) medical and counseling expenses; and (e) lost wages.

WHEREFORE, Plaintiff, Jane Doe, sues the Defendants for damages in the amount of Ten Million Dollars (\$10,000,000.00) plus pre-judgment and post-judgment interest to the extent allowed by law, plus costs and interest, and demands trial by jury of all issues so triable as of right by jury.

COUNT II

(42 U.S.C. § 1983- Hollis)

- 48. Plaintiff incorporates her previous allegations as if fully rewritten herein.
- 49. During Plaintiff's abuse by Defendant Walker, Defendants Hollis knew or reasonably should have known that Defendant Walker exhibited dangerous propensities and was a threat of harm to minor female students, including Plaintiff.
- 50. Defendant Hollis was uniquely aware of Defendant Walker's propensity to commit acts of sexual harassment, sexual grooming, sexual abuse or misconduct against minor female students, including Plaintiff, making Defendant Walker's continued misconduct and the harm that was likely to result from that future misconduct reasonably foreseeable to Defendant Hollis.
- 51. Defendant Hollis was uniquely aware that Defendant Walker had used Duke

 Ellington property to perpetuate acts of sexual harassment, sexual grooming, sexual
 abuse and/or misconduct against minor female students to which Defendant Walker
 had access by and through his employment with the school and District.
- 52. Defendant Hollis turned a blind eye to complaints of sexual harassment, sexual grooming, sexual abuse and misconduct, ignored complaints, failed to respond to

- allegations of misconduct, and acted with deliberate indifference to the rights of minor female students, including Plaintiff.
- 53. Plaintiff was deprived of her constitutional liberty and equal protection interests under the Fourteenth Amendment by Defendant Hollis's creation and promotion of policies, customs, or practices that fostered a climate to flourish where minor female students, including Plaintiff, were left vulnerable to and actually were subject to sexual abuse, sexual grooming and sexual harassment by Defendant Walker, an agent, servant and/or employee of Duke Ellington and DCPS.
- 54. The conduct of Defendant Hollis was arbitrary and offensive, shocking the conscience and interfering with minor female students', including Plaintiff's rights and liberties granted by the constitution and protected by law.
- 55. 42 U.S.C. § 1983 affords Plaintiff a civil cause of action for damages. 42 U.S.C. § 1988 identifies damages, court costs, litigation expenses and attorney's fees as within the remedies available in an action brought pursuant to 42 USC § 1983.
- 56. As a direct and proximate result of the conduct of Defendant Hollis as described herein, Plaintiff has sustained severe and permanent bodily injury, sickness and/or disease, including but not limited to sleep disturbance, nightmares, depression, posttraumatic stress disorder, fatigue, social anxiety, anger, panic attacks and as a result thereof she has and will continue to experience to experience: (a) physical and mental pain and suffering; (b) emotional distress; (c) loss of a normal life; (d) medical and counseling expenses; and (e) lost wages.

- 57. The conduct of Defendant Hollis constituted a violation of trust or confidence, showing complete indifference to or conscious disregard for the safety and wellbeing of Plaintiff and other minor female students.
- 58. Justice and the public good require an award of punitive or exemplary damages in such sum which will serve to punish Defendant Hollis and to deter like conduct.

WHEREFORE, Plaintiff, Jane Doe, sues the Defendants for damages in the amount of Ten Million Dollars (\$10,000,000.00) plus pre-judgment and post-judgment interest to the extent allowed by law, plus costs and interest, and demands trial by jury of all issues so triable as of right by jury.

COUNT III

(42 U.S.C § 1983- Duke Ellington)

- 59. Plaintiff incorporates her previous allegations as if fully rewritten herein.
- 60. Duke Ellington established, through both action and inaction, a widespread policy, practice or custom of allowing sexual harassment, sexual grooming, sexual abuse and misconduct to continue to occur without corrective action.
- 61. Such policy, practice or custom includes, but is not limited to: (a) failing to report teacher-on-student sexual harassment, sexual grooming and sexual abuse and to appropriate authorities; (b) failing to cure or even attempt to cure obvious and known risks to minor female students at Duke Ellington placed under Defendant Walker's supervision and authority; (c) failing to communicate any precautions, directives or educational materials that might be utilized between parent and child to identify inappropriate conduct that occurred between any student and adult, whether generally or specifically in relation to Defendant Walker; (d) allowing Defendant Walker to have unsupervised contact with minor female students,

including Plaintiff, without conducting, documenting and concluding a competent investigation into the allegations and specific facts brought to light prior to that time; (e) allowing Defendant Walker to have unsupervised access to various rooms and areas at Duke Ellington while having absolutely no effective plan for supervision or surveillance of Defendant Walker.

- 62. Duke Ellington established such policy, practice or custom which fostered a climate facilitating sexual abuse of minor students by Defendant Walker and evidenced a reckless disregard and/or a deliberate indifference to the consequence that such action or inaction may, and did, have on minor female students at Duke Ellington, including Plaintiff.
- 63. Duke Ellington board of Directors and administrators, and Hollis in particular, had final policymaking authority of Duke Ellington and exercised that granted authority in making decisions that perpetuated and/or allowed the sexual abuse of Plaintiff by Defendant Walker and caused Plaintiff's harm to occur and/or continue.
- 64. Plaintiff was deprived of her constitutional liberty interest and equal protection under the Fourteenth Amendment by Duke Ellington by Duke Ellington's creation and promotion of policies, customs, or practices that fostered a climate to flourish where minor female students, including Plaintiff, were left vulnerable to and actually were subject to sexual abuse by Defendant Walker, an agent, servant and/or employee of Duke Ellington.
- 65. Duke Ellington's conduct was arbitrary and offensive, shocking the conscience and interfering with minor female students', including Plaintiff's, rights and liberties granted by the Constitution and protected by law.

- 66. 42 U.S.C. § 1983 affords Plaintiff a civil cause of action for damages. 42 U.S.C. § 1988 identifies damages, court costs, litigation expenses and attorney's fees as within the remedies available in an action brought pursuant to 42 U.S.C § 1983.
- 67. As a direct and proximate result of the conduct of Duke Ellington as described herein, Plaintiff has sustained severe and permanent bodily injury, sickness and/or disease, including but not limited to sleep disturbance, nightmares, depression, posttraumatic stress disorder, fatigue, social anxiety, anger, panic attacks and as a result thereof she has and will continue to experience: (a) physical and mental pain and suffering; (b) emotional distress; (c) loss of normal life; (d) medical and counseling expenses; and (e) lost wages.
- 68. The conduct of Duke Ellington constitutes a violation of trust or confidence, showing complete indifference to or conscious disregard for the safety and well-being of Plaintiff and other minor female students.
- 69. Justice and the public good require an award of punitive or exemplary damages in such sum which will serve to punish Duke Ellington and to deter like conduct.

WHEREFORE, Plaintiff, Jane Doe, sues the Defendants for damages in the amount of Ten Million Dollars (\$10,000,000.00) plus pre-judgment and post-judgment interest to the extent allowed by law, plus costs and interest, and demands trial by jury of all issues so triable as of right by jury.

COUNT IV

(Negligent Hiring, Training, Supervision and Retention- DCPS and Duke Ellington)

- 70. Plaintiff incorporates her previous allegations as if fully rewritten herein.
- 71. At all times material, Defendants DCPS and Duke Ellington owed a duty to the public and specifically the then minor Plaintiff, Jane Doe, to employ qualified and

- competent teachers to work within its schools. This duty is even greater in the context of a public school where parents have a trust and faith in the leaders, a reliance on those who are chosen to lead, and the school acts *in loco parentis*.
- 72. At all times material, Defendants DCPS and Duke Ellington owed a duty to the public and specifically Plaintiff to supervise its employees, servants, and/or agents with access to its minor students, including Plaintiff.
- 73. At all times material, Defendant DCPS and Duke Ellington owed a duty to properly and effectively supervise its students, including Plaintiff.
- 74. At all times material, Defendants DCPS and Duke Ellington owed a duty to the public and Plaintiff to make an appropriate investigation of its employees, servants, and/or agents who were in or would be placed in a position to come in contact with minor students of DCPS and Duke Ellington.
- 75. At all times material, Defendants DCPS and Duke Ellington owed a duty to Plaintiff, to terminate any and all employees, servants and/or agents that it knew or should have known had engaged or sought to engage in inappropriate communication and/or unlawful sexual activities with its minor students.
- 76. At all times material, Defendants DCPS and Duke Ellington owed a duty to the public and Plaintiff to train its employees, servants and/or agents to identify when an inappropriate sexual relationship with a minor student is ongoing or is potentially sought and report it accordingly.
- 77. Defendants knew, or in the exercise of reasonable care should have known, that by allowing Defendant Walker to have unfettered access to female students, privacy in

his classroom, and no supervision, female students at Duke Ellington were at grave risk for sexual abuse.

- 78. At all times material, Defendants DCPS and Duke Ellington breached its duty to Plaintiff in the following ways:
 - a. Failing to hire competent and qualified employees, servants and/or agents without proclivities to engage in sexual battery against its minor students;
 - Failing to hire competent and qualified employees, servants and/or agents
 with knowledge and training needed to accurately identify sexual
 predators like Defendant Walker and act accordingly;
 - c. Failing to investigate the fitness for employment of Defendant Walker;
 - d. Failing to train its employees, servants and/or agents to identify and report when a member of the Duke Ellington staff is engaging in unlawful sexual behavior with its minor students;
 - e. Failing to supervise Defendant Walker in a proper manner to prevent the sexual battery against its minor student including Plaintiff;
 - f. Failing to train its employees, servants and/or agents to identify when an inappropriate sexual relationship with another employee, servant and/or agent and a minor student is ongoing and report it accordingly;
 - g. Failing to terminate or reassign those employees, servants and/or agents who were aware of the actions of Defendant Walker against Plaintiff but did nothing to stop or report it;
 - h. Failing to terminate and/or provide remedial measures to ensure the safety of students once Defendant Duke Ellington knew or should have

- known of Defendant Walker's propensities for inappropriate contact with female students:
- Failing to properly investigate and reasonably warn students once
 Defendant Walker's propensities were made abundantly clear when he
 was accused of having a sexual relationship with Plaintiff;
- j. Failing to procure or develop policies and procedures to prohibit sexual relationships between agents or employees and minor students.
- 79. As a direct and proximate result of Defendant DCPS and Duke Ellington's negligence, Defendant Walker committed sexual battery on Plaintiff, causing her serious and permanent injuries.
- 80. As a direct and proximate result of the negligence of DCPS and Duke Ellington,

 Plaintiff was sexually battered, raped, traumatized, and caused to suffer mental pain
 and suffering, psychological injuries, and the loss of the capacity for the enjoyment
 of life.
- 81. As a further direct and proximate cause of the negligence of Defendants DCPS and Duke Ellington, Plaintiff has incurred in the past medical and psychological expenses for the treatment of her injuries, and will incur such expenses in the future.
- 82. As a further direct and proximate cause of the negligence of Defendants DCPS and Duke Ellington, it is expected that the Plaintiff will also incur lost future earning capacity as a result of these acts. All of said damages are permanent and continuing in nature.

WHEREFORE, Plaintiff, Jane Doe, sues the Defendants for damages in the amount of Ten Million Dollars (\$10,000,000.00) plus pre-judgment and post-judgment interest to the

extent allowed by law, plus costs and interest, and demands trial by jury of all issues so triable as of right by jury.

COUNT V

(Intentional Infliction of Emotional Distress – All Defendants)

- 83. Plaintiff incorporates her previous allegations as if fully rewritten herein.
- 84. The aforesaid conduct of all Defendants was outrageous.
- 85. As a direct and proximate result of Defendants' outrageous conduct, Plaintiff has suffered severe emotional distress as outlined above.

WHEREFORE, Plaintiff, Jane Doe, sues the Defendants for damages in the amount of Ten Million Dollars (\$10,000,000.00) plus pre-judgment and post-judgment interest to the extent allowed by law, plus costs and interest, and demands trial by jury of all issues so triable as of right by jury.

COUNT VI

(Civil Assault and Battery- Walker)

- 86. Plaintiff incorporates her previous allegations as if fully rewritten herein.
- 87. Defendant Walker, without privilege to do so, committed assault and battery upon Plaintiff as described above.
- 88. As a direct and proximate result of Defendant Walker's assault and battery, Plaintiff has suffered the damages outlined above.

WHEREFORE, Plaintiff, Jane Doe, sues the Defendants for damages in the amount of Ten Million Dollars (\$10,000,000.00) plus pre-judgment and post-judgment interest to the extent allowed by law, plus costs and interest, and demands trial by jury of all issues so triable as of right by jury.

COUNT VII

(Wanton or Reckless Conduct – All Defendants)

- 89. Plaintiff incorporates her previous allegations as if fully rewritten herein.
- 90. The conduct of Defendant Hollis as described above was wanton and reckless.
- 91. As a direct and proximate result of Hollis's wanton or reckless conduct, Plaintiff has suffered the damages outlined above.

WHEREFORE, Plaintiff, Jane Doe, sues the Defendants for damages in the amount of Ten Million Dollars (\$10,000,000.00) plus pre-judgment and post-judgment interest to the extent allowed by law, plus costs and interest, and demands trial by jury of all issues so triable as of right by jury.

Respectfully submitted,

Dawn Jackson, Esq. (Bar No. 485118) JACKSON & ASSOCIATES LAW FIRM, LLC 1300 Caraway Court Suite 100 Largo, MD 20774 301 883 0800 Tel. 301 883 0801 Fax djackson@jacksonassociateslawfirm.com Counsel for Plaintiff

IURY DEMAND

Plaintiff demands trial by a jury on all issues so triable.

Dawn Jackson (485118)

Exhibit A

CCN #20103970	– PUBLIC INCIDENT R	EPUKI			
REPORT DATE / TIME	DISTRICT / PSA	3	TE / TIME - EVENT ENO DATE / TIME	INCIDENT STATIST	
Jul 20, 2020 09:38	Sixth District / 608	May 01, 201	5 00:01 - May 31, 2016 23:59	School-Based	Event,
RESPONDING OFFICER		WEATHER			
Kiel Tilley (#9099) – MPI					
ASSISTING OFFICER (ASSIST TYPE)	;				
TELETYPE DATE / TIME	YELETYPE#	PERSON NOTIFIE	D AT TELETYPE	SHOTS FIRED	SHOTS EFFECT
				YES 💹 NO	∷ YES ∭ NO
REPORTING PER	SON				
NAME					
R-1 Kiel Tilley					
OFFENSE #1 - 20	0103970				
OFFENSE				OFFENSE COMPLE	
First Degree Child Sex A	buse (rape) (22DC3008)			COMPLETED	ATTEMPTED
OFFENSE CASE STATUS	UF 0004)				
Cleared By Arrest (Mar 2	25, 2021)				
OFFENSE LOCATION	VACUINCTON DC 20017 Tomos	Docidonas/Usus	Public/Private: Private PSA: 405 Di	istrist. Faunth District	
LOCATION TYPE	VASHINGTON, DC 20017 Type:			Strict: Fourth District	
Residence/ Home		POSITION (BEHIND, FRONT, INSIDE, SIDE) Inside			
LOCATION DESCRIPTION					
AGGRAVATED ASSAULT FACTORS,	/HOMICIDE FACTORS		OFFENSE PROPERTIES		
			Child Abuse		
HATE BIAS/MOTIVIATION					
WEAPON/FORCE INVOLVED					
Personal Weapons (Hand	ds / Feet),				
CRIMINAL ACTIVITIES			MODUS OPERANO:		
FORCEO ENTRY	# OF PREMISES	SECURITY SYSTEM		CARGO THIFT	
YES NO				YES NO	
NEGLIGENT MANSLAUGHTER CIR				BUILDING INHABIT	
PROPERTY & ITE	MS				
CCN #20103970	- PUBLIC NARRATIVE				
The complainant disclo	sed engaging in sexual acts with	the suspect in 20	15. At the time of the offenses, the cor	mplainant was 15 years o	ld and in a

Exhibit B

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA CIVIL DIVISION

JANE DOE,) Case No. 2021 CA
Plaintiff,)
VS.)
DISTRICT OF COLUMBIA et al.,))
Defendants.)))
ORDER GRANTING MOTION TO	PROCEED UNDER PSEUDONYM
Upon consideration of Plaintiff's Motion	n to Proceed under Pseudonym, it is this 13 th Day
of May 2021:	
ORDERED that Plaintiff's Motion to Pr	roceed under Pseudonym is hereby GRANTED .
	Jose M. Lopez, Associate Judge Judge-in-Chambers
Copy to:	

Dawn R. Jackson

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH

INFORMATION SHEET Jane Doe Case Number: Date: 05-17-2021 District & Columbia, et al. One of the defendants is being sued in their official capacity. Name: (Please Print) Relationship to Lawsuit Dawn Jackson Attorney for Plaintiff Firm Name: Dackson and Associates Lawrican ☐ Self (Pro Se) Telephone No.: Six digit Unified Bar No.: Other: Ÿ85118 301-883-0800 ☐ 6 Person Jury TYPE OF CASE: Non-Jury ☐ 12 Person Jury Demand: \$ 10,000,000 Other: ___ PENDING CASE(S) RELATED TO THE ACTION BEING FILED Judge: _____ Calendar #: Judge: Case No.: Calendar#: NATURE OF SUIT: (Check One Box Only) A. CONTRACTS COLLECTION CASES ☐ 14 Under \$25,000 Pltf. Grants Consent ☐ 16 Under \$25,000 Consent Denied ☐ 01 Breach of Contract ☐ 17 OVER \$25,000 Pltf. Grants Consent ☐ 18 OVER \$25,000 Consent Denied ☐ 02 Breach of Warranty 06 Negotiable Instrument 27 Insurance/Subrogation 26 Insurance/Subrogation 07 Personal Property Over \$25,000 Pltf. Grants Consent Over \$25,000 Consent Denied 13 Employment Discrimination 34 Insurance/Subrogation 07 Insurance/Subrogation 15 Special Education Fees Under \$25,000 Pltf, Grants Consent Under \$25,000 Consent Denied 28 Motion to Confirm Arbitration Award (Collection Cases Only) B. PROPERTY TORTS 05 Trespass ☐ 01 Automobile 03 Destruction of Private Property ☐ 02 Conversion ☐ 04 Property Damage ____ 07 Shoplifting, D.C. Code § 27-102 (a) C. PERSONAL TORTS ☐ 01 Abuse of Process 10 Invasion of Privacy ✓ 17 Personal Injury- (Not Automobile, 11 Libel and Slander 12 Malicious Interference ☐ 02 Alienation of Affection Not Malpractice) 18Wrongful Death (Not Malpractice) 03 Assault and Battery 04 Automobile- Personal Injury 13 Malicious Prosecution ☐ 19 Wrongful Eviction 05 Deceit (Misrepresentation) 20 Friendly Suit ☐ 14 Malpractice Legal 00 raise 07 False Arrest 06 False Accusation 15 Maipractice Medical (Including Wrongful Death) 21 Asbestos [] 16 Negligence- (Not Automobile, 22 Toxic/Mass Torts

SEE REVERSE SIDE AND CHECK HERE

23 Tobacco 24 Lead Paint

IF USED

Not Malpractice)

08 Fraud

Information Sheet, Continued

77 to		
C. OTHERS O1 Accounting O2 Att. Before Judgment O5 Ejectment O9 Special Writ/Warrants (DC Code § 11-941) I0 Traffic Adjudication II Writ of Replevin I2 Enforce Mechanics Lien I6 Declaratory Judgment	☐ 17 Merit Personnel Act (OEA) (D.C. Code Title 1, Chapter 6) ☐ 18 Product Liability ☐ 24 Application to Confirm, Modify, Vacate Arbitration Award (DC Cod ☐ 29 Merit Personnel Act (OHR) ☐ 31 Housing Code Regulations ☐ 32 Qui Tam ☐ 33 Whistleblower	
II. 03 Change of Name 06 Foreign Judgment/Domestic 08 Foreign Judgment/Internation 13 Correction of Birth Certificate 14 Correction of Marriage Certificate 26 Petition for Civil Asset Forfe 27 Petition for Civil Asset Forfe 28 Petition for Civil Asset Forfe	2-1802.03 (h) or 32-151 9 (a)] 20 Master Meter (D.C. Code § 42-3301, et seq.) iture (Vehicle) iture (Currency)	☐ 21 Petition for Subpoena [Rule 28-I (b)] ☐ 22 Release Mechanics Lien ☐ 23 Rule 27(a)(!) (Perpetuate Testimony) ☐ 24 Petition for Structured Settlement ☐ 25 Petition for Liquidation
D. REAL PROPERTY 09 Real Property-Real Estate 12 Specific Performance 04 Condemnation (Eminent Doma 10 Mortgage Foreclosure/Judicia 11 Petition for Civil Asset Forfei	l Sale 🔲 31 Tax Lien Bid Off Certifica	nt Denied
M. M Attorney's Signatur	е.	05-17-2621 Date

Superior Court of the District of Columbia CIVIL DIVISION

Civil Actions Branch

500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001 Telephone: (202) 879-1133 Website: www.dccourts.gov

Jane Doe

Plaintiff

vs.

Case Number _____

District of Columbia

Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Dawn Jackson Esq. Name of Plaintiff's Attorney	Clerk of the Court	
1300 Caraway Court, St. 100 Address Upper Marlborn, MD 20774	Ву	Deputy Clerk
301-883-0800 Telephone	Date	
如需翻译, 请打电话 (202) 879-4828 Veuillez appeler au (202)	879-4828 pour une traduction ^クツッグデネー (202) 879-4828 - ୧.୧४	Để có một bài dịch, hãy gọi (202) 879-4828

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, <u>DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME</u>.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation Vea al dorso la traducción al español





TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA DIVISIÓN CIVIL

Sección de Acciones Civiles 500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001 Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

Jane Doe.			
	Demandante		
contra			
Dial val of Cal Iva		Número de Caso:	
District & Columbia	Demandado		

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le require entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

CITATORIO

A usted también se le require presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

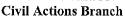
efectivo el desagravio que se busca en la demanda. Davor Sackson Esq. Nombre del abogado del Demandante	SECR	ETARIO DEL TRIBUNAL	
1300 Caraway Court, St. 100 Dirección Upper Marlboro, MD 20774	Por:	Subsecretario	·
301-883-0800 Teléfono	Fecha		
如需翻译,情打电话 (202) 879-4828 Veuillez appeler au (202) 879	t	ction Để có một bài dịch, hãy gọi (202) 879-48	28

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, <u>NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO</u>.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

Vea al dorso el original en inglés See reverse side for English original

Superior Court of the District of Columbia CIVIL DIVISION



500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001 Telephone: (202) 879-1133 Website: www.dccourts.gov

or co	· ·	
Jane	Doe	

Plaintiff

VS.

District of Columbia Public School System

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

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Dawn Jackson, Esq. Name of Plaintiff's Attorney	Clerk of the Court		
1300 Caraway Court, St. 100 Address Upper Marlbora, MD 20774	Ву	Deputy Clerk	
301-883-0800 Telephone	Date		
如需翻译,请打电话 (202) 879-4828 Veuillez appeler au (202) 879	-4828 pour une traduction	24, ()	

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

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See reverse side for Spanish translation - Vea al dorso la traducción al español





TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA DIVISIÓN CIVIL

Sección de Acciones Civiles 500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001 Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

Jane Doe			
contra	Demandante		
District of Columbia Public	School Sustern Demandado	Número de Caso:	V
Al susodicho Demandado:	CITATORIO		
A I SUSOCIEDO LIEMARCIACO,			

Por la presente se le cita a comparecer y se le require entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted hava recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le require presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga

Pawn Jackson Esq. Nombre del abogado del Demandánte	SECRETARIO DEL TRIBUNAL
1300 Caraway Court, St. 100 Dirección Upper Marlboro, MD 20774	Por: Subsecretario
301-883-0860 Teléfono	Fecha
如需翻译,請打电话 (202) 879-4828 Veuillez appeler au (202) 8 让記念题外知 短(202) 879-4828 宝态短时沿丛 风	879-4828 pour une traduction Để có một bải dịch, hãy gọi (202) 879-4828 የአማርኛ ትርጉም ለጣዋንት (202) 879-4828 ይደውሉ

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

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> Vea al dorso el original en inglés See reverse side for English original

Superior Court of the District of Columbia CIVIL DIVISION

Civil Actions Branch

500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001 Telephone: (202) 879-1133 Website: www.dccourts.gov

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Jane -	1)ne
	1

Plaintiff

Duke Ellington School of the Arts

vs.

Case Number

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

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Dawn Jackson, Esq. Name of Plaintiff's Attorney	Clerk of the Court
1300 Caraway Court, St. 100	By
Address Upper Marlbora, MD 20774	Deputy Clerk
301-883-0860	Date
Telephone	
如需翻译,请打电话 (202) 879-4828 Veuillez appele	er au (202) 879-4828 pour une traduction — Để có một bài dịch, hãy gọi (202) 879-4828
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IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

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TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA DIVISIÓN CIVIL

Sección de Acciones Civiles 500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001 Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

Jame Due			
	Demandante		
contra			
		Número de Caso:	
Duke Ellington School of the	Acts		
	Demandado		
-			
	CITATORIO		
Al susodicho Demandado:			
Por la presente se le cita a comparecer y se persona o por medio de un abogado, en el plazo de citatorio, excluyendo el día mismo de la entrega de agente del Gobierno de los Estados Unidos de Nosesenta (60) días, contados después que usted hay enviarle por correo una copia de su Contestación abogado aparecen al final de este documento. Si el copia de la Contestación por correo a la dirección que su contestación por correo a la dirección que se comparecen al final de este documento.	de veintiún (21) de lei citatorio. Si us lorteamérica o de ya recibido este con al abogado de lemandado no tie	ías contados después que ted está siendo demandad l Gobierno del Distrito d itatorio, para entregar su la parte demandante. El ene abogado, tiene que en	usted haya recibido este lo en calidad de oficial o le Columbia, tiene usted Contestación. Tiene que nombre y dirección del
A usted también se le require presentar la Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p los sábados. Usted puede presentar la Contestac demandante una copia de la Contestación o en el p	o.m., de lunes a vie ción original ante	ernes o entre las 9:00 a.m. e el Juez ya sea antes q	y las 12:00 del mediodía que usted le entregue al

efectivo el desagravio que se busca en la demanda.

SECDETADIO DEI TOIDINAI

Nombre del abogado del Demandan	tte	SECRETAR	IO DEL TRIBUNAL
1300 Caraway Cour	-t, St.100	Por:	
Upper Marlboco,	MD 20774	•	Subsecretario
301-883-0860		Fecha	
Teléfono 如鬻翻译,请打电话 (202) 879-4828	Veuillez appeler au (202) 87	79-4828 pour une traduction	Để có một bài dịch, hãy gọi (202) 879-4828

usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga

社會是多例如於202)879-4828 至至**想因為从於** የአማርኛ ትርጉም ለማዋኘት (202) 879-4828 ይደውሉ

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO. PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO, SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

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> Vea al dorso el original en inglés See reverse side for English original

Superior Court of the District of Columbia CIVIL DIVISION

Civil Actions Branch

		venue, N.W., Suite 5000 Wasi : (202) 879-1133 Website: www		
Jane Doe		Plaintiff		
	VS,	Plainilli		
			Case Number	
Donna Hollis	<u>`</u>	Defendant		

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

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Dawn Jackson, Esq. Name of Plaintiff's Attorney	Clerk of the Court	
1300 Caraway Court, St.100 Address Upper Marlbora, MD 20774	By	
301-383-0800 Telephone	Date	
如需翻译,请打电话 (202) 879-4828 Veuillez appeler au (202)	879-4828 pour une traduction Để có một bái dịch, hãy gọi (202) 879-4 ለማዋች (202) 879-4828 ይደውሉ	.828

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT, IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

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TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA DIVISIÓN CIVIL

Sección de Acciones Civiles 500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001 Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

Jane Doe	
Demandante	····
contra	
Donna Hollis	Número de Caso:
Demandado	
CITATOR Al susodicho Demandado:	IO .
Al susonicho Demandado.	
Por la presente se le cita a comparecer y se le require e persona o por medio de un abogado, en el plazo de veintiún (2 citatorio, excluyendo el día mismo de la entrega del citatorio, agente del Gobierno de los Estados Unidos de Norteamérica sesenta (60) días, contados después que usted haya recibido e enviarle por correo una copia de su Contestación al abogado abogado aparecen al final de este documento. Si el demandado copia de la Contestación por correo a la dirección que aparece en A usted también se le require presentar la Contestació Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes los sábados. Usted puede presentar la Contestación original demandante una copia de la Contestación o en el plazo de siete usted incumple con presentar una Contestación, podría dictars efectivo el desagravio que se busca en la demanda. Dauxo Contestación del Demandante	21) días contados después que usted haya recibido este Si usted está siendo demandado en calidad de oficial o o del Gobierno del Distrito de Columbia, tiene usted ste citatorio, para entregar su Contestación. Tiene que o de la parte demandante. El nombre y dirección del no tiene abogado, tiene que enviarle al demandante una n este Citatorio. en original al Tribunal en la Oficina 5000, sito en 500 a viernes o entre las 9:00 a.m. y las 12:00 del mediodía ante el Juez ya sea antes que usted le entregue al (7) días de haberle hecho la entrega al demandante. Si
1300 Carawary Court, St. 100 Dirección	Subsecretario
Upper Marlhora, MD 20774	Subsecteratio
70. 000	echa
Leleiono	
如需翻译,请打电话 (202) 879-4828	pour une traduction Để có một bài dịch, hãy gọi (202) 879-4828 ና ትርጉም ለጣፕንት (202) 879-4828 ይደውሉ

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

Vea al dorso el original en inglés See reverse side for English original

Superior Court of the District of Columbia CIVIL DIVISION

Civil Actions Branch

500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001 Telephone: (202) 879-1133 Website: www.dccourts.gov

Toring the second	Telephone: (2	102) 879-1133 Website: w	ww.dccourts.gov	
Jane Doe				
	***************************************	Plaintiff		
	VS.			
			Case Number	
Mark Walke	r			
		Defendant		

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Dawn Jackson, Esq. Name of Plaintiff's Attorney	Clerk	t of the Court
1300 Caraway Court, St. 160 Address Upper Marlbors, MD 20774	Ву	Deputy Clerk
301-883-0800 Telephone	Date	
如需 翻 译,请打电话 (202) 879-4828 Veuillez appeler au (202) 879		Để có một bài dịch, hãy gọi (202) 879-4828

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation Vea al dorso la traducción al español





TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA DIVISIÓN CIVIL

Sección de Acciones Civiles 500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001 Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

Jane Doe		
Demandan	te	
contra		
lo a de la sala	Número de Caso:	
Mark Walker		
Demandad	do	
CITATO	PRIO	
Al susodicho Demandado:		
Por la presente se le cita a comparecer y se le require entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio. A usted también se le require presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.		
Dawn Jackson, Esq. Nombre del abogado del Demandante	SECRETARIO DEL TRIBUNAL	
1300 Caraway Court, St. 100	Por:	
Upper Marlboro, MD 20774	Subsecretario	
301-883-0860 Teléfono	Fecha	
如需翻译,请打电话 (202) 879-4828	8 pour une traduction 13ê sé mêt bài diab lias, mi /000\ 970 4000	
	8 pour une traduction — Để có một bài địch, hãy gọi (202) 879-4828 შიშ პიიუ ბოურა (202) 879-4828 "გვთტ	

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