IN THE MONTGOMERY COUNTY CIRCUIT COURT, MARYLAND
CIVIL DIVISION

JANE DOE, et al. Plaintiffs, v. SOVEREIGN GRACE MINISTRIES, et al. Defendants.	))))))))))	Case No. 369721V Hon. Sharon V. Burrell

PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTIONS ALLEGING PLEADING FAILURE

Plaintiffs' First Amended Complaint (hereinafter "FAC") alleges Defendants conspired together to cause the sexual and physical abuse of children in their care by (1) failing to stop and instead facilitating known ongoing predation (FAC ¶¶ 1, 3, 4, 24-111); (2) permitting known sexual predators to access young children in physical settings under Defendants' control (*e.g.* churches, schools, home groups) (FAC ¶¶); (3, 4, 24, 25, 27, 28, 111); (3) obstructing justice by giving predators advance warning of arrest and investigation (FAC ¶¶1, 5, 28, 100-111); and (4) conspiring together to hide past and current misconduct (FAC ¶¶1, 3, 5, 27-36, 129-135). Plaintiffs discovered Defendants' conspiratorial misconduct after individual victims broke the silence and began to blog about their individual experiences. Plaintiffs brought this class action lawsuit to hold Defendants accountable for the harms perpetrated on themselves and the many others victimized by Defendants' conspiracy.

Defendants seek to evade accountability and hide the truth about their egregious wrongdoing. Defendants seek dismissal, arguing that the 31-page FAC is vague and that they dispute the facts. *See* SGM Motion, at 1; CLC School Motion, at 18; CLC Motion, at 5;

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Tomczak Motion at 4. Such arguments fail to persuade. As the Court of Appeals has stated, "[t]here is ... a big difference between that which is necessary to prove the [commission of a tort] and that which is necessary merely to allege [its commission]. " *Sharrow v. State Farm Mutual Ins. Co.*, 306 Md. 754, 770, 511 A.2d 492, 500 (1986). And of course, one purpose of discovery is to permit Defendants to explore and understand the evidence undergirding the FAC.

The Court's denial of Defendants' motion to dismiss is not a ruling on the merits of the claims; it merely determines Plaintiffs' right to bring the action. *Figueiredo-Torres v. Nickel,* 321 Md. 642, 647, 584 A.2d 69, 72 (1991). Although Defendants cannot credibly claim the FAC failed to put them on notice of the claims, Plaintiffs stand ready to add further details if ordered to do so by the Court. The FAC, however, indisputably states tort claims cognizable under Maryland law, and cannot be dismissed at this early procedural stage.

INTRODUCTORY COMMENT ON ORGANIZATION OF PLAINTIFFS' OPPOSITIONS

Defendants filed seven motions seeking dismissal, and memorandum in support.[1] Each defendant incorporated by reference the arguments made by the other Defendants, and also repeated many of the same arguments. For clarity and convenience, Plaintiffs are opposing all the motions by filing three (rather than seven) Oppositions. Specifically, this Opposition responds to Defendants' various arguments regarding whether Plaintiffs' First Amended

[1] Defendant Lawrence Tomczak's Motion to Dismiss and Memorandum of Law (Docket No. 47) ("Tomczak Motion"); Defendants Covenant Life Church, Inc., Charles Mahaney, Gary Ricucci, John Loftness and Grant Layman's Motion to Dismiss and Memorandum of Law (Docket No. 48) ("CLC Motion"); Defendant Covenant Life School, Inc.'s Motion to Dismiss and Memorandum of Law (Docket No. 49) ("CLC School Motion"); Defendant Sovereign Grace Ministries, Inc.'s Motion to Dismiss and Memorandum of Law (Docket No. 50) ("SGM Motion"); Defendants David Hinders, Louis Gallo, and Frank Ecelbarger's Motion to Dismiss and Memorandum of Law (Docket No. 51) ("Va. Defendants' Motion"); Defendants Vince Hinders and Mark Mullery's Motion to Dismiss and Memorandum of Law (to be docketed) (incorporates "Va. Defendant's Motion" and included therein); Defendants Sovereign Grace Church of Fairfax's Motion to Dismiss and Memorandum of Law (to be docketed) (individually the "Fairfax Motion" and collectively referred to as "Va. Defendants' Motion").

Complaint (hereinafter "FAC") states viable tort claims that need to be heard by a jury. This Opposition will hereinafter be referred to as "Plaintiffs' Pleading Opposition."[2]

ARGUMENT

In considering Defendants' motion to dismiss, this Court is required by law to "assume the truth of all well-pleaded facts and allegations in the complaint, as well as all inferences that can reasonably be drawn from them," *Morris v. Osmose Wood Preserving*, 340 Md. 519, 531, 667 A.2d 624, 630 (1995); *A.J. Decoster Co. v. Westinghouse*, 333 Md. 245, 249, 634 A.2d 1330, 1332 (1994); *see also Sharrow v. State Farm Mutual Ins. Co.*, 306 Md. 754, 768, 511 A.2d 492, 499-500 (1986) ("[I]n considering the legal sufficiency of [a] complaint to allege a cause of action for tortious interference, we must assume the truth of all relevant and material facts that are well pleaded and all inferences which can be reasonably drawn from those pleadings"). Indeed, not only must the Court assume the truth of all the allegations, but it is required by law to draw all inferences from those facts in a light most favorable to the plaintiffs. *Board of Education v. Browning*, 333 Md. 281, 286, 635 A.2d 373, 376 (1994).

I. Plaintiffs Properly Plead Negligence.

Here, Plaintiffs have a right to bring an action for negligence. The test is straightforward: did Plaintiffs' FAC allege (1) the existence of a duty, (2) breach of that duty, and (3) that damages resulted from that breach? If the FAC did so, the Court should permit the lawsuit to go forward without deciding whether or not Defendants may be able to defend themselves at trial by establishing they are entitled to various fact-based defenses.

[2] Plaintiffs are filing two other Oppositions: (1) one that responds to the First Amendment argument made by all Defendants, which will be referred to as "Plaintiffs' First Amendment Opposition"; and (2) a second that responds to the Virginia Defendants' argument to jurisdiction, which will be referred to as "Plaintiffs' Jurisdictional Opposition."

Here, the FAC clearly meets that test. The FAC alleges the existence of a duty. *See* FAC ¶¶ 1, 116-121.

The FAC alleges Defendants breached that duty. *See* FAC ¶¶ 1, 119.

The FAC alleges that Plaintiffs were damaged by the breaches. *See* FAC ¶¶ 1, 122.

Defendants quibble that the FAC does not identify the precise amount of damages sought, but Plaintiffs' Hearing Statement made quite clear that expert witnesses are quantifying the compensatory damages. The Statement also made clear that the punitive damages attributable to the class are approximately $50 million. *See* Plaintiffs' Hearing Statement at ¶B, Dkt. No. 22. Thus, Defendants are on notice of the sizeable damages being sought in this lawsuit.

Defendants cannot credibly argue the FAC failed to plead a requisite element of a negligence claims. Instead, Defendants try to persuade this Court to dismiss the FAC by arguing that they are entitled to a clergy privilege as a matter of law. *See* CLC Memorandum at 15-16; CLC School at 17; Tomczak at 10-11; SGM at 12; Va Defendants at 13-14. First, the privilege protects only individuals; so that argument fails on its face as to the institutional Defendants. But second and more importantly, it is premature for the Court to make the findings of fact that would be required before any ruling on whether the individual Defendants are entitled to the limited shield from liability established for clergy.

At this juncture, the Court is required to accept as true the facts alleged by Plaintiffs in the FAC. *Board of Education v. Browning*, 333 Md. 281, 286, 635 A.2d 373, 376 (1994). The FAC alleges Defendants learned about ongoing sexual and physical abuse in settings that were not within the clergy exception. *See* FAC ¶¶ 1, 27-30, 37, 38, 43, 51, 52, 55, 60, 61, 63, 75, 88. The FAC alleges Defendants conspired together to engage in a lengthy course of conspiratorial misconduct that was intended to, and did, harm children in their care. *See* FAC ¶¶ 1, 13-22, 24-

36. The FAC alleges that Defendant Tomczak, one of the founders of the Church and leading pastors, personally engaged in extensive physical abuse known to all the other Defendants.[3] See FAC ¶¶ 1, 4.

All of these allegations – which must be accepted as true at this stage of the proceedings – prevent the individual Defendants from invoking any statutory or common-law privileges accorded to confidential spiritual communications. Defendants are free to try to invoke the various statutory and common law privileges after discovery closes, but err by seeking to persuade the Court to commit reversible error by ruling prematurely on such fact-based defenses.

II. Plaintiffs Properly Plead Intentional Infliction of Emotional Distress.

Defendants are similarly unpersuasive in arguing that this Court should dismiss the FAC for failure to state of tort claim for intentional infliction of emotional distress. It is black-letter law that Maryland recognizes the tort of intentional infliction of emotional distress. *Harris v. Jones*, 281 Md. 560, 380 A.2d 611 (1977).

To state a cognizable claim, Plaintiffs' FAC must allege Defendants' conduct was (1) intentional or reckless; (2) extreme and outrageous; and (3) causally connected to emotional distress. Plaintiffs must also allege they suffered severe emotional distress. *Id.* at 566, 380 A.2d at 614. Plaintiffs here have adequately pled each of these elements.

Plaintiffs' FAC clearly passes the pleading hurdles on all elements: The FAC alleges intentional conduct by Defendants. *See* FAC ¶¶ 1, 125.

The FAC alleges reckless conduct by Defendants. *See* FAC ¶¶ 1, 125,

The FAC alleges Defendants engaged in extreme and outrageous conduct. *See* FAC ¶¶ 124, 125, 127.

[3] Plaintiffs are going to be amending the FAC to add more parties, one of whom alleges Defendant John Loftness physically and sexually abused her as a child.

The FAC alleges Defendants' conduct caused Plaintiffs severe emotional distress. *See* FAC ¶¶ 1, 124 ("Representative Plaintiffs and the Plaintiff Class have suffered from extreme stress and severe emotional distress due to Defendants' extreme and outrageous actions"), 125, 127.

Defend ants cannot credibly argue the FAC allegations, all taken as true at this stage, do not state a claim for intentional infliction of emotional distress. Instead, wholly ignoring the facts alleged, Defendants argue that Plaintiffs failed to establish that the distress was "severe," and therefore the claim should be dismissed. This argument is absurd. At the outset, Plaintiffs' express allegations to that effect must be credited. Plus, Plaintiffs alleged hundreds of facts about the nature of the conduct and relationships between the parties that, when examined, evidence severe emotional distress. *See Figueiredo-Torres v. Nickel*, 321 Md. 642, 584 A.2d 69 (Md. App. 1991) (citing *Harris* and noting that "the extreme and outrageous character of the defendant's conduct may arise from his abuse of a position, or relation with another person, which gives him actual or apparent authority over him, or power to affect his interests").

Here, Plaintiffs allege that Defendants caused their continued sexual and physical abuse during their childhood, and conspired to prevent the detection and cessation of such abuse. It is hard to imagine anyone suggesting that the Plaintiffs who were subjected to such egregious misconduct suffered only "minor" rather than "severe" distress. See e.g. *Harris v. Jones*, 281 Md. at 569, 380 A.2d at 615 ("[i]n cases where the defendant is in a peculiar position to harass the plaintiff, and cause emotional distress, his conduct will be carefully scrutinized by the courts."), citing 1 F. Harper & F. James, Jr., The Law of Torts § 9.1 at 666-67 (1956); W. Prosser, Handbook of the Law of Torts § 12 at 56 (4th ed. 1971)).

Yet that is exactly what these Defendants have the temerity to argue. Indeed, one Defendant equates sadomasochistic and ritualized sexual and physical abuse of children to "spanking." Tomczak Memorandum at 13 n.2. Such characterizations of the facts may, of course, be argued to the jury. But Defendants' version of events – untested by discovery – cannot be used as reason to dismiss the lawsuit. The FAC alleges sufficient facts to place the conduct squarely within the parameters of the tort of intentional infliction of emotional distress, and cannot be dismissed as a matter of law.

III. Plaintiffs Properly Plead Conspiracy.

A civil conspiracy tort has been defined in Maryland as "a combination of two or more persons by an agreement or understanding to accomplish an unlawful act or to use unlawful means to accomplish an act not in itself illegal, with the further requirement that the act or the means employed must result in damages to the plaintiff." *Mackey v. Compass Marketing*, 892 A.2d 479 (Md. 2006); *Hoffman v. Stamper*, 385 Md. 1, 24, 867 A.2d 276, 290 (2005) (quoting *Green v. Wash. Sub. San. Comm'n*, 259 Md. 206, 221, 269 A.2d 815, 824 (1970)). The plaintiff must prove an unlawful agreement, the commission of an overt act in furtherance of the agreement, and that as a result, the plaintiff suffered actual injury. *Hoffman* 385 Md. at 25, 867 A.2d at 290. The unlawful agreement is not actionable by itself; rather, the "[t]ort actually lies in the act causing the harm" to the plaintiff. *Id.* A claim for civil conspiracy is an "aggravating factor" that in the presence of other tortious injury to the plaintiff can be a basis for recovery.

In short, Defendants again err as matter of law when they argue civil conspiracy is not an actionable tort in Maryland . Plaintiffs' FAC properly plead all elements of a civil conspiracy.[4]

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[4] Plaintiffs labeled the conspiracy as a "conspiracy to obstruct justice." That label is too narrow, as Defendants conspired to inflict harm on children as well as to protect predators. Plaintiffs are amending the complaint to add further victims, and will amend that count to read "civil conspiracy." The conspiracy acted together to commit all

First, the FAC alleges Defendants reached agreement and acted in concert. *See* FAC ¶¶ 130, alleging Defendants "reached an agreement or understanding."

Second, the FAC alleges Defendants committed overt acts in furtherance of the conspiracy. *See* FAC ¶¶ 24-95, 99-111, alleging Defendants acted in concert to commit a series of wrongful acts.

Third, the FAC alleges Defendants conspiracy damaged Plaintiffs. *See* FAC ¶¶ 34, 112, 113, 114 and 129.

Defendants seek to persuade the Court that the conspiracy was formed to engage in only lawful conduct, not tortious conduct. SGM at 14; CLC at 18; CLC School at 9 and 13; Tomczak at 15; Va Defendants at 16-17. This argument is again seeking dismissal based on Defendants' characterization of the facts, not on the FAC allegations of the facts. Defendants can argue to the jury that beating and sexually abusing children, lying to law enforcement, and giving known sexual predators unfettered access to children in multiple settings, and other misconduct alleged I in the FAC did not cause damage and need not be punished. *See* FAC ¶¶1, 24-114. But the FAC properly alleges tortious activity, and thus the conspiracy to commit such tortious activity is itself a separate tort under Maryland law. *Mackey v. Compass Marketing*, 892 A.2d 479 (Md. 2006); *Hoffman v. Stamper*, 385 Md. 1, 24, 867 A.2d 276, 290 (2005) (quoting *Green v. Wash. Sub. San. Comm'n*, 259 Md. 206, 221, 269 A.2d 815, 824 (1970)).

IV. Plaintiffs Properly Plead Negligent Hiring And Supervision

It is beyond dispute that Maryland recognizes the tort of negligent selection, training, or retention, and has done so for more than 100 years. *Horridge v. St. Mary's County Dep't of Soc. Servs.*, 382 Md. 170, 180, 854 A.2d 1232, 1237 (Md. 2004) (quoting *Norfolk & Western R. Co.*

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torts alleged in the FAC, not merely the tort of obstruction of justice, which is a form of the tort of misrepresentation.

v. Hoover, 79 Md. 253, 29 A. 994 (1894))("Where an employee is expected to come into contact with the public ... the employer must make some reasonable inquiry before hiring or retaining the employee to ascertain his fitness, or the employer must otherwise have some basis for believing that he can rely on the employee.") *See also Jones v. State*, 425 Md. 1, 38 A.3d 333 (Md. 2012); *Evans v. Morsell*, 284 Md. 160, 166-67, 395 A.2d 480 (Md. 1978).

Plaintiffs' FAC properly pleads the tort, which sounds in negligence. Although the nature and extent of the employer's duty of reasonable inquiry varies based upon the facts of each case, Plaintiffs need only plead the four elements of negligence to properly state a claim. *Id.* at 167. Thus, Plaintiffs need only plead the same four elements discussed above in Section I: (1) a duty (2) breached by defendant; (3) that caused (4) plaintiff to suffer injury. *Horridge*, 382 Md. at 182, 854 A.2d at 1238.

Plaintiffs' FAC clearly passes the pleading hurdles on all four elements The FAC alleges a duty. *See* FAC ¶¶ 1, 116, 117, 118, 119.

The FAC alleges Defendants breached the duty. *See* FAC ¶¶ 136, 137.

The FAC alleges Defendants' breach caused Plaintiffs to suffer injury. *See* FAC ¶¶ 138, 139.

Defe ndants claim that the cause of action must be dismissed because Plaintiffs fail to allege an employment relationship. This is false. The FAC alleges repeatedly that the individual defendants were all employees of one or more of the corporate entities. *See* FAC ¶¶ 14-22. The FAC alleges Plaintiff Poe was sexually and physically abused by a Pastor and teacher employed by the Church (FAC ¶¶ 37); and Plaintiff Coe was sexually and physically abused by a Church employee (FAC ¶¶ 14, 43). Indeed, the FAC alleges all the Plaintiffs were harmed by misconduct of employees. *See e.g.* FAC ¶¶ 51, 16, 17(Defendants Ricucci and Layman, both

Church employees, harmed Goe): FAC ¶¶55, 56, 18-21 (Defendants Ecelbarger, Hinders, Gallo and Mullery, all Church employees, harmed Carl Coe); FAC ¶¶60-61, 14-22 (Church employees harmed Doe and Roe). The FAC alleges the Defendants all conspired together to harm Plaintiffs. *See* FAC ¶¶ 24-114, 129. In short, Defendants' arguments about Plaintiffs' pleading failures lack any merit.

V. Plaintiffs Properly Plead Misrepresentation

It is also beyond dispute that Maryland recognizes the tort of negligent misrepresentation. *Lloyd v. General Motors Corp.*, 397 Md. 108, 916 A.2d 257 (Md. 2007); *Gross v. Sussex*, 332 Md. 247, 259, 630 A.2d 1156 (1993); *Martens Chevrolet v. Seney*, 292 Md. 328, 337, 439 A.2d 534, 539 (1982). This tort has four elements, all of which are plead here.

First, the FAC alleges Defendants owed a duty to Plaintiffs, and breached that duty by making false statements. *See* FAC ¶¶ 140, 141, 142.

Second, the FAC alleges Defendants intended that Plaintiffs would rely on their false statements. *See* FAC ¶¶ 141.

Third, the FAC alleges Plaintiffs relied upon Defendants' false statements. *See* FAC ¶¶ 141, 142.

Fourth, the FAC alleges Plaintiffs suffered damages as result of relying on Defendants' false statements. *See* FAC ¶¶ 143.

Defendants seek to dismiss this count, but rely on decisional law regarding intentional, not negligent, misrepresentation. *See* CLC Memorandum at 20, citing *Hoffman v. Stamper*, 385 Md. 1, 28-31, 867 A.2d 276 (Md. 2005). In any event, even as to those elements, the FAC allegations suffice to state a claim. *See* FAC ¶¶ 141-143.

VI. Plaintiffs' Claims Are Not Barred By Any Statute Of Limitations

Defendants' motions are at odds with each other on whether or not they seek to dismiss the FAC or certain FAC Plaintiffs on statute of limitations grounds. Some Defendants claim they cannot file such a motion because they do not know who Plaintiffs are and when the acts of sexual predation occurred. SGM Motion at 7-10.[5] Other Defendants claim they are being sued by only one Plaintiff, and that Plaintiff's claim is time-barred. Tomczak Motion at 2. Yet other Defendants improperly impugn the ethics of Plaintiffs' counsel, asserting that they acted improperly and intentionally to prevent Defendants from being able to bring forward a motion to dismiss on statute of limitations. SGM Memorandum at 8.[6]

What all of the Defendants fail to address, however, is that the FAC alleges ***ongoing*** conspiratorial misconduct by ***all*** the Defendants, and alleges such misconduct is harming Plaintiffs. *See* FAC ¶¶ 24-114. To date, Defendants have not ended their conspiracy.[7] *See* FAC ¶¶ 24-36, 99-114. Defendants continue to conspire to prevent secular authorities from detecting and incarcerating predators. *See e.g.*, Exhibit B, which is the criminal indictment of Morales, one of the many sexual predators given access to children by Defendants. That exhibit describes Defendants (specifically Defendant Layman) conspiring with the predator to avoid detection. This type of wrongdoing was not an isolated event, but was the wrongful purpose of the

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[5] Defendants are scheduled to depose all Plaintiffs in the next three weeks. In the event Defendants continue to believe they have a viable motion for defense after conducting these depositions, they should renew their motions, as they will have on opportunity to obtain all information on all dates on which the various acts and omissions occurred.

[6] This type of argument is quite troubling given that Defendants know that Plaintiffs promised to provide any and all details about timing. When Defendants said they needed more information on timing to ascertain which insurance carriers should be covering the various Defendants, Plaintiffs agreed to provide whatever information was needed on an expedited basis. Plaintiffs merely requested that the information be sought via formal discovery rather than email communications, and offered to expedite discovery responses. *See* Exhibit A. Yet Defendants did nothing – they did not take depositions, or serve any documents requests, interrogatories or requests for admissions.

[7] One or more Defendants may be able to assert withdrawal from the conspiracy, but such a fact-based defense has not been made, and in any event is premature until discovery closes.

conspiracy. Defendants simply have not stopped their conspiratorial efforts to encourage and facilitate the sexual and physical abuse of children, and to prevent past sexual and physical abuse of children from being detected by law enforcement. As alleged in the FAC, Defendants continue to permit known predators to have direct and continuous access to children without providing any warnings to parents. *See* FAC ¶¶ 27, 28 (alleging failures to act continue to date); 29 ("This practice has not stopped, as evidenced by teachings and communications as recent as August 2011.) Defendants continue to hide facts about Plaintiffs' predators from law enforcement. *See* FAC ¶¶ 28, 129-135. Such ongoing conduct harms Plaintiffs and the class. *See* FAC ¶¶ 122, 128, 139, 143. In short, the conspiracy continues to exist, and continues to engage in tortious conduct that is designed to and does harm Plaintiffs and the class.

Plaintiffs believe that the FAC properly puts Defendants on notice that they seek relief for the harms caused by a lengthy and ongoing conspiracy. No statute of limitation bars Plaintiffs from seeking relief for ongoing wrongful conduct.

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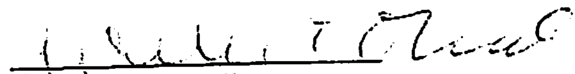

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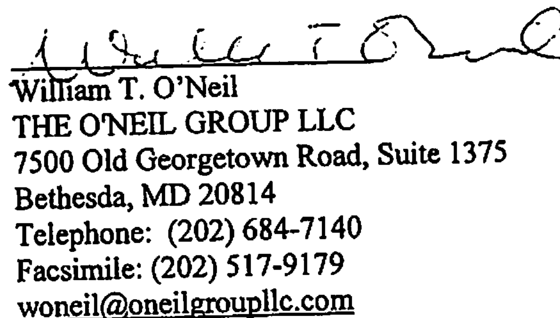
By: 

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