

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE	SUMMONS	CASE NO. 23-1216933-WO William Nichols
---	----------------	---

Court address
106 E 1st Street, Monroe MI 48161

Court telephone no.
734-240-7020

Plaintiff's name(s), address(es), and telephone no(s). RONALD ROSS as Personal Representative of the Estate of Gary Ross (deceased)
Plaintiff's attorney, bar no., address, and telephone no. ALI H. KOUSSAN (P75044) 821 WEST MILWAUKEE STREET DETROIT, MI 48202

Defendant's name(s), address(es), and telephone no(s). MONROE PUBLIC SCHOOLS 1275 North Macomb Street Monroe, MI 48162 (734) 265-3000

v

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

Domestic Relations Case

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

Civil Case

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

been previously filed in this court, _____ Court, where it was given case number _____ and assigned to Judge _____.

The action remains is no longer pending.

Summons section completed by court clerk.

SUMMONS

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

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

Issue date 10-5-23	Expiration date* 1-4-24	Court clerk
------------------------------	-----------------------------------	-----------------

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the Seal of the court.

STATE OF MICHIGAN JUDICIAL DISTRICT 38th JUDICIAL CIRCUIT COUNTY PROBATE	SUMMONS	CASE NO. 23-146933-NO <i>William Nichols</i>
---	----------------	---

Court address: 106 E 1st Street, Monroe MI 48161
 Court telephone no. 734-240-7020

Plaintiff's name(s), address(es), and telephone no(s).
RONALD ROSS
 as Personal Representative of the Estate of Gary Ross
 (deceased)

Defendant's name(s), address(es), and telephone no(s).
MONROE MIDDLE SCHOOL
 1275 North Macomb Street
 Monroe, MI 48162
 (734) 265-3000

v

Plaintiff's attorney, bar no., address, and telephone no.
ALI H. KOUSSAN (P75044)
 821 WEST MILWAUKEE STREET
 DETROIT, MI 48202

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

Domestic Relations Case

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

Civil Case

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

been previously filed in this court, _____ Court, where it was given case number _____ and assigned to Judge _____.

The action remains is no longer pending.

Summons section completed by court clerk.

SUMMONS

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

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

Issue date 10-5-23	Expiration date* 1-4-24	Court clerk <i>[Signature]</i>
------------------------------	-----------------------------------	-----------------------------------

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE	SUMMONS	CASE NO. 23-146933-NO <i>William Nichols</i>
---	----------------	---

Court address 106 East First Street, Monroe, MI 48161 **Court telephone no.**
734-240-7020

Plaintiff's name(s), address(es), and telephone no(s).
RONALD ROSS
 as Personal Representative of the Estate of Gary Ross
 (deceased)

Defendant's name(s), address(es), and telephone no(s).
ANDREW SHAW
 1275 N. Macomb Street
 Monroe, MI 48162
 (734) 265-3000

v

Plaintiff's attorney, bar no., address, and telephone no.
ALI H. KOUSSAN (P75044)
 821 WEST MILWAUKEE STREET
 DETROIT, MI 48202

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

Domestic Relations Case

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

Civil Case

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

been previously filed in this court, _____ Court, where it was given case number _____ and assigned to Judge _____.

The action remains is no longer pending.

Summons section completed by court clerk.

SUMMONS

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

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

Issue date 10-5-23	Expiration date* 1-4-24	Court clerk <i>[Signature]</i>
------------------------------	-----------------------------------	-----------------------------------

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

STATE OF MICHIGAN	JUDICIAL DISTRICT	SUMMONS	CASE NO.
38TH	JUDICIAL CIRCUIT		23-126933-ND
	COUNTY PROBATE		William Nichols

Court address
106 East First Street, Monroe, MI 48161

Court telephone no.
734-240-7020

Plaintiff's name(s), address(es), and telephone no(s).
RONALD ROSS
 as Personal Representative of the Estate of Gary Ross
 (deceased)

Defendant's name(s), address(es), and telephone no(s).
ANGELA TEDORA
 1275 N. Macomb Street
 Monroe, MI 48162
 (734) 265-3000

v

Plaintiff's attorney, bar no., address, and telephone no.
ALI H. KOUSSAN (P75044)
 821 WEST MILWAUKEE STREET
 DETROIT, MI 48202

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

Domestic Relations Case

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

Civil Case

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

been previously filed in this court, _____ Court, where
 it was given case number _____ and assigned to Judge _____.

The action remains is no longer pending.

Summons section completed by court clerk.

SUMMONS

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

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

Issue date 10-5-23	Expiration date* 1-4-24	Court clerk <i>[Signature]</i>
-----------------------	----------------------------	-----------------------------------

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

STATE OF MICHIGAN	SUMMONS	CASE NO. <i>23-146933-NO</i>
38TH JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE		<i>William Nichols</i>

Court address
106 East First Street, Monroe, MI 48161

Court telephone no.
734-240-7020

Plaintiff's name(s), address(es), and telephone no(s).
RONALD ROSS
 as Personal Representative of the Estate of Gary Ross
 (deceased)

Plaintiff's attorney, bar no., address, and telephone no.
ALI H. KOUSSAN (P75044)
 821 WEST MILWAUKEE STREET
 DETROIT, MI 48202

v

Defendant's name(s), address(es), and telephone no(s).
ANDREW DUNCAN
 1275 N. Macomb Street
 Monroe, MI 48162
 (734) 265-3000

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

Domestic Relations Case

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

Civil Case

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

been previously filed in this court, _____ Court, where it was given case number _____ and assigned to Judge _____.

The action remains is no longer pending.

Summons section completed by court clerk.

SUMMONS

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

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

Issue date <i>10-5-23</i>	Expiration date* <i>1-4-24</i>	Court clerk <i>William Nichols</i>
------------------------------	-----------------------------------	---------------------------------------

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

STATE OF MICHIGAN	SUMMONS	CASE NO. 23-1216933-NO William Nichols
38TH		
JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE		

Court address: 106 East First Street, Monroe, MI 48161
 Court telephone no.: 734-240-7020

Plaintiff's name(s), address(es), and telephone no(s).
 RONALD ROSS
 as Personal Representative of the Estate of Gary Ross
 (deceased)

Plaintiff's attorney, bar no., address, and telephone no.
 ALI H. KOUSSAN (P75044)
 821 WEST MILWAUKEE STREET
 DETROIT, MI 48202

Defendant's name(s), address(es), and telephone no(s).
 K.K.

v

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

Domestic Relations Case

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

Civil Case

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

been previously filed in this court, _____ Court, where
 it was given case number _____ and assigned to Judge _____.

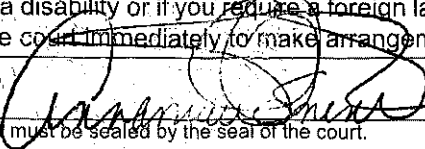
The action remains is no longer pending.

Summons section completed by court clerk.

SUMMONS

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

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

Issue date 10-5-23	Expiration date* 1-4-24	Court clerk: 
-----------------------	----------------------------	--

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

STATE OF MICHIGAN	SUMMONS	CASE NO. 23-146933-ND William Nichols
38TH JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE		

Court address
106 East First Street, Monroe, MI 48161

Court telephone no.
734-240-7020

Plaintiff's name(s), address(es), and telephone no(s).
RONALD ROSS
as Personal Representative of the Estate of Gary Ross
(deceased)

Defendant's name(s), address(es), and telephone no(s).
J.B.

v

Plaintiff's attorney, bar no., address, and telephone no.
ALI H. KOUSSAN (P75044)
821 WEST MILWAUKEE STREET
DETROIT, MI 48202

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

Domestic Relations Case

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

Civil Case

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

been previously filed in this court, _____ Court, where it was given case number _____ and assigned to Judge _____.

The action remains is no longer pending.

Summons section completed by court clerk.

SUMMONS

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

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

Issue date 10-5-23	Expiration date* 1-4-23	Court clerk <i>[Signature]</i>
-----------------------	----------------------------	-----------------------------------

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

STATE OF MICHIGAN JUDICIAL DISTRICT 38TH JUDICIAL CIRCUIT COUNTY PROBATE	SUMMONS	CASE NO. 23-146933-NO <i>William Nichols</i>
--	----------------	---

Court address: 106 East First Street, Monroe, MI 48161
 Court telephone no.: 734-240-7020

Plaintiff's name(s), address(es), and telephone no(s).
RONALD ROSS
 as Personal Representative of the Estate of Gary Ross
 (deceased)

Defendant's name(s), address(es), and telephone no(s).
 D.R.

v

Plaintiff's attorney, bar no., address, and telephone no.
ALI H. KOUSSAN (P75044)
 821 WEST MILWAUKEE STREET
 DETROIT, MI 48202

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

Domestic Relations Case

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

Civil Case

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

been previously filed in this court, _____ Court, where

it was given case number _____ and assigned to Judge _____.

The action remains is no longer pending.

Summons section completed by court clerk.

SUMMONS

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

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

Issue date 10-5-23	Expiration date* 1-4-24	Court clerk <i>[Signature]</i>
-----------------------	----------------------------	-----------------------------------

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

STATE OF MICHIGAN
IN THE MONROE COUNTY CIRCUIT COURT

RONALD ROSS
as Personal Representative of the Estate of
GARY ROSS (deceased),

Case No.: 23-146933-NO

Plaintiffs,

Hon. William P. Nichols

vs.

MONROE MIDDLE SCHOOL,
MONROE PUBLIC SCHOOLS,
JOHN DOE 1, DR (MINOR),
JOHN DOE 2, JB (MINOR),
JOHN DOE 3, KK (MINOR),
JOHN DOE 4, JOHN DOE 5 (MINOR),
JOHN DOE 6, JOHN DOE 7 (MINOR),
JOHN DOE 8, ANDREW DUNCAN,
ANGELA TEDORA and ANDREW SHAW.

Defendant(s).

KOUSSAN LAW
Ali H. Koussan (P75044)
Brooke N. Mathis (P82336)
Attorney for Plaintiffs
821 West Milwaukee
Detroit, Michigan 48202
(313) 444-8348
Fax: (313) 444-7814
ali@k-law.com
brooke@k-law.com
jamie@k-law.com

PLAINTIFF'S FIRST-AMENDED COMPLAINT

NOW COMES Plaintiff, RONALD ROSS as Personal Representative of the Estate of GARY ROSS, by and through counsel, KOUSSAN LAW, and for his Complaint, states as follows:

PARTIES

1. Plaintiff, RONALD ROSS as Personal Representative of the Estate of GARY ROSS ("GARY"), is a resident of Dearborn Heights, County of Wayne, State of Michigan.

2. Defendants, MONROE MIDDLE SCHOOL and MONROE PUBLIC SCHOOLS are political and/or municipal subdivisions as defined under MCL 691.1401(e) and exist in the City of Monroe, County of Monroe and accept service of process through its school board president, Larry Zimmerman, located at 1275 North Macomb Street, Monroe, MI 48162.

3. Based on information and belief, Defendant, JOHN DOE 1 is the parent/legal guardian of Defendant, DR.

4. Based on information and belief, Defendant, DR is an unemancipated minor residing with his custodial parent/legal guardian.

5. Based on information and belief, Defendant, JOHN DOE 2 is the parent/legal guardian of Defendant, JB.

6. Based on information and belief, Defendant, JB is an unemancipated minor residing with her custodial parent/legal guardian.

7. Based on information and belief, Defendant, JOHN DOE 3 is the parent/legal guardian of Defendant KK.

8. Based on information and belief, Defendant, KK is an unemancipated minor residing with his custodial parent/legal guardian

9. Based on information and belief, Defendant, JOHN DOE 4 is the parent/legal guardian of Defendant, JOHN DOE 5.

10. Based on information and belief, Defendant, JOHN DOE 5 is an unemancipated minor residing with his custodial parent/legal guardian

11. Based on information and belief, Defendant, JOHN DOE 6 is the parent/legal guardian of Defendant, JOHN DOE 7.

12. Based on information and belief, Defendant, JOHN DOE 7 is an unemancipated minor residing with his custodial parent/legal guardian

13. Based on information and belief, Defendant JOHN DOE 8 is an agent, administrator or representative of Defendants, MONROE MIDDLE SCHOOL and/or MONROE PUBLIC SCHOOLS who witnessed one or more bullying incidents involving GARY.

14. Defendant ANDREW DUNCAN is an agent, administrator or representative of Defendant, MONROE PUBLIC SCHOOLS, employed as a Principal of MONROE MIDDLE SCHOOL and identified in the school's "Anti-Bullying/Harassment Policy," as required by MCL 380.1310b, subsection 5(d).

15. Defendant ANGELA TEDORA is an agent, administrator or representative of Defendant, MONROE PUBLIC SCHOOLS, employed as a Principal of MONROE MIDDLE SCHOOL and identified in the school's "Anti-Bullying/Harassment Policy", as required by MCL 380.1310b, subsection 5(d).

16. Defendant ANDREW SHAW is an agent, administrator or representative of Defendants, MONROE PUBLIC SCHOOLS, employed as a Superintendent of MONROE PUBLIC SCHOOLS and identified in the school's "Anti-Bullying/Harassment Policy", as required by MCL 380.1310b, subsection 5(d).

17. Plaintiff seeks to reveal the identities of Defendants, JOHN DOEs 1-8 through the course of discovery and reserves the right to amend his complaint.

18. Based on information and belief, the events giving rise to the basis of this Complaint are alleged to have occurred during the defendant, MONROE PUBLIC SCHOOLS' academic school year of 2022-2023 and continued through April 19, 2023.

JURISDICTION AND VENUE

19. The amount in controversy is in excess of Twenty-Five Thousand (\$25,000.00) Dollars.

20. That venue is proper in this honorable jurisdiction.

GENERAL ALLEGATIONS

21. Plaintiff, by reference, incorporate the preceding paragraphs of his Complaint as though fully set forth herein.

22. At all times relevant hereto, GARY was Plaintiff's minor child and a student of Defendant, MONROE PUBLIC SCHOOLS, and was enrolled at Defendant, MONROE MIDDLE SCHOOL.

23. This lawsuit arises from defendants DR, JB, KK, JOHN DOES 5 & 7 repeated acts of bullying, physical assault, creating a disturbance/inciting and disrespect of GARY. Further, that such acts were ignored or promoted by action or inaction by Defendants, MONROE MIDDLE SCHOOL and MONROE PUBLIC SCHOOLS, ANDREW DUNCAN, ANGELA TEDORA and ANDREW SHAW and Defendants, JOHN DOES 1 – 4 and 8. These aforementioned actions or inactions caused the emotional, physical and mental harm and mental distress of GARY that led to his suicide on April 19, 2023.

STATEMENT OF FACTS

24. Based on information and belief, GARY was previously in a dating relationship with Defendant JB. Defendant JB broke off the relationship with GARY and immediately entered into a dating relationship with Defendant KK.

25. Following the breakup, Defendants JB, KK, DR, JOHN DOES 5 & 7 conspired with each other in creating a toxic atmosphere by physically assaulting, bullying, creating a

disturbance/inciting, disrespecting, defaming and causing other unlawful or wrongful acts resulting in emotional, physical and mental harm and mental distress to GARY.

26. Based on information and belief, JOHN DOE 8 is an individual in the employ of Defendants, MONROE PUBLIC SCHOOLS and/or MONROE MIDDLE SCHOOL who bore witness to one or more of the bullying incidents involving GARY and failed to take appropriate action, including but not limited to reporting to the school board. This individual is believed to be identifiable by a student witness.

27. In an undated video, Plaintiff's minor son, GARY was assaulted in Defendant, MONROE PUBLIC SCHOOLS and MONROE MIDDLE SCHOOL's men's lavatory. In the recording, Defendant DR (who is much larger than GARY), is seen beating GARY. GARY is seen defending his life while Defendants JOHN DOE 5 and JOHN DOE 7 are both filming the incident from different positions in the lavatory. This particular video was published on one or more social platforms or through electronic means in direct contravention of MONROE PUBLIC SCHOOLS and MONROE MIDDLE SCHOOL's student code of conduct, MONROE PUBLIC SCHOOLS' "Anti-Bullying/Harassment Policy" and MCL 380.1310b.

28. JOHN DOES 5 and 7 failed to report the physical assault to an administrator in direct contravention of the student code of conduct and MONROE PUBLIC SCHOOLS' "Anti-Bullying/Harassment Policy" and MCL 380.1310b.

29. JOHN DOE 8 failed to report one or more of the bullying incidents involving GARY to the school board, as required by MONROE PUBLIC SCHOOLS' "Anti-Bullying/Harassment Policy" and MCL 380.1310b.

30. Based on information and belief, ANDREW DUNCAN, ANGELA TEDORA and ANDREW SHAW failed to take appropriate action to remedy the injustices faced by GARY after

the same was reported to them as required by MONROE PUBLIC SCHOOLS' "Anti-Bullying/Harassment Policy" and MCL 380.1310b.

31. Defendants DR, JB, KK, JOHN DOES 5 & 7 intended to cause emotional, physical and mental harm to GARY ROSS.

32. Based on information and belief, Defendants MONROE PUBLIC SCHOOLS, MONROE MIDDLE SCHOOL, ANDREW DUNCAN, ANGELA TEDORA and ANDREW SHAW and JOHN DOE 8 knew or should have known of the physical assaults, bullying, disturbances/incitation, disrespect, defamation and other unlawful or wrongful acts GARY suffered.

33. That GARY exhibited signs at school as a result of the above-mentioned acts including but not limited to social withdrawal, mood swings and depression that affected his academics and this should have been identifiable by Defendants, MONROE PUBLIC SCHOOLS and MONROE MIDDLE SCHOOL, ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8 with a counselor referral and suicide crisis intervention.

34. That Defendants, MONROE PUBLIC SCHOOLS and MONROE MIDDLE SCHOOL, ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8 routinely failed to investigate instances of physical assaults, bullying, disturbances/incitations, disrespect, defamation and other unlawful or wrongful acts whereupon GARY was a victim.

35. That Defendants, MONROE PUBLIC SCHOOLS and MONROE MIDDLE SCHOOL, ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8 routinely failed to identify students at risk of being victims of physical assaults, bullying, disturbances/incitations, disrespect, defamation and other unlawful or wrongful acts.

36. That Defendants, MONROE PUBLIC SCHOOLS and MONROE MIDDLE SCHOOL ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8 failed to identify, deter or otherwise take preventative action to avert or minimize instances of physical assaults, bullying, disturbances/incitations, disrespect, defamation and other unlawful or wrongful acts.

37. That Defendants, MONROE PUBLIC SCHOOLS and MONROE MIDDLE SCHOOL, ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW failed to equip their premises with electronic monitoring devices to record audio and video of physical assaults, bullying, disturbances/incitations, disrespect, defamation and other unlawful or wrongful acts, even after they became aware of the aforementioned incidents GARY was suffering through.

38. That Defendants, MONROE PUBLIC SCHOOLS and MONROE MIDDLE SCHOOL ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW knew or should have known that there was an unacceptable volume of physical assaults, bullying, disturbances/incitation, disrespect, defamation and other unlawful or wrongful acts bullying on its premises and failed to enforce its Student Code of Conduct and otherwise act prudently.

39. That as a result of the Defendants' aforementioned actions and inactions, GARY discharged a firearm with the resulting effect of a gunshot wound to his head resulting in his untimely demise.

40. Based on information and belief, GARY died on April 19, 2023 and the cause and manner of death was verified by Wayne County Medical Examiner's Office.

41. That there is an active police investigation with Monroe County Sheriff's Office concerning GARY's death.

42. That GARY's school-issued device was confiscated by the Monroe County Sheriff's Office and has not been returned.

43. Notwithstanding the aforementioned allegations, Defendants failed to take appropriate interventional steps to or for the benefit of GARY.

44. As a proximate cause of Defendants egregious misconduct, Defendants MONROE PUBLIC SCHOOLS, MONROE MIDDLE SCHOOL, ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8 pattern of conduct by failing to enforce school policy, failing to intervene, failing to contact local authorities, GARY was subjected to bullying behavior while the Defendants caused it or contributed to it by action or inaction. Such prolonged experiences altered GARY's state of mental health and as such, he endured mental, emotional and physical injuries leading to his untimely death.

COUNT I – NEGLIGENCE / WRONGFUL DEATH
(Against ALL Defendants)

34. Plaintiff, by reference, incorporates the preceding paragraphs of his Complaint as though fully set forth herein.

35. At all times hereinmentioned it was the Defendants, MONROE PUBLIC SCHOOL, MONROE MIDDLE SCHOOL, ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8 duty to provide a safe learning environment for the students within their care and custody, providing necessary counseling, referrals to counseling, contacting student's parent to report unusual or suspicious behavior and/or or engaging in contacting local authorities when permitted and as articulated in the Student Code of Conduct in the event of an individual's physical, emotional or mental distress requiring medical care or intervention or an individual who has life threatening condition requiring emergency medical services.

36. Defendants, MONROE PUBLIC SCHOOLS, MONROE MIDDLE SCHOOL, ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8 had a duty to exercise due care and caution for the health and well-being of persons lawfully within their care and custody.

37. Notwithstanding the duties imposed upon the Defendants herein by statute and common law, the Defendants, MONROE PUBLIC SCHOOLS, MONROE MIDDLE SCHOOL, ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8 did violate said duties and were negligent in the following acts of negligence and/or omissions:

- a) by negligently failing to exercise due care, to protect GARY from himself;
- b) by failing to exercise ordinary care and prudence by making referrals to counseling;
- c) by failing to local authorities when warranted and as articulated in the student code of conduct;
- d) by failing to enforce school policies including but not limited to their "Anti-Bullying/Harassment Policy";
- e) failing to follow their statutory duties under MCL 380.1310b; and,
- f) by commission of other acts of negligence and/or omissions, which are hereby reserved for proof at the time of trial.

38. Defendants, MONROE PUBLIC SCHOOLS and MONROE MIDDLE SCHOOL ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8 and their employees, agents, representatives stand in loco parentis and as such are responsible for the health and welfare of individuals within their care and custody.

39. Notwithstanding said duties and obligations as a direct and proximate result of the negligence of Defendants, GARY was caused to suffer emotional, physical and mental injuries, altered state of mental health leading to his untimely demise.

40. This wrongful death claim is cognizable under MCL 600.2922.

41. Decedent's estate incurred medical, hospital, funeral and burial expenses for which Defendants are liable.

42. Plaintiff, RONALD ROSS, as Personal Representative for the Estate of GARY ROSS, Deceased, seeks all economic and non-economic damages allowed under the Michigan Wrongful Death Act, MCL 600.2922.

43. GARY's heirs seek damages as a result of GARY's death as allowable under the Wrongful Death Act. These include, but are not limited to:

- a. Ronald Ross (father);
- b. Audra Justine (step-mother);
- c. Any / all other descendants or heirs under the Wrongful Death Act.

44. As a direct and proximate result of Defendant's conduct, GARY's decedents have been damaged in the manner outlined above.

45. Defendant JOHN DOE 1 is vicariously liable for Defendant DAVID REYNOLD'S torts.

46. Defendant JOHN DOE 2 is vicariously liable for Defendant JB's torts.

47. Defendant JOHN DOE 3 is vicariously liable for Defendant KK's torts.

48. Defendant JOHN DOE 4 is vicariously liable for Defendant JOHN DOE 5's torts.

49. Defendant JOHN DOE 6 is vicariously liable for Defendant JOHN DOE 7's torts.

50. Defendants MONROE PUBLIC SCHOOLS and MONROE MIDDLE SCHOOL are vicariously liable for Defendants ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8's torts.

COUNT II - GROSS NEGLIGENCE
(Against ALL Defendants)

51. Plaintiff, by reference, incorporates the preceding paragraphs of his Complaint as though fully set forth herein.

52. "Gross Negligence" means a duty and breach of that duty by conduct so reckless as to demonstrate a substantial lack of concern for whether injury results, causing injury. MCL 691.1407(2).

53. Defendants had a duty to refrain from taking actions that were so reckless as to demonstrate substantial lack of concern for whether an injury results, thereby causing injury.

54. In deliberate breach of this duty, Defendants MONROE PUBLIC SCHOOL and MONROE MIDDLE SCHOOL, ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8 concealed, minimized and downplayed to Plaintiff the known risk of harm to GARY from being a suicide risk.

55. Defendants MONROE PUBLIC SCHOOL and/or MONROE MIDDLE SCHOOL, ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8 were aware of multiple "red flags" alerting them to the danger that GARY presented to himself, yet in a deliberate breach of their duty, Defendants failed to intervene by, *inter alia*: (a) preventing GARY from leaving school; (b) notifying either of GARY's parents and/or the police that he was a suicide risk, as required by MONROE PUBLIC SCHOOL and MONROE MIDDLE SCHOOL's Code of Conduct; (c) failing to provide necessary counseling or counseling referrals; (d) failing to provide first aid resources in the event of GARY's physical, emotional or mental distress requiring

medical care or where GARY had a life threatening condition requiring emergency medical services; (e) by failing to enforce school policies including but not limited to their “Anti-Bullying/Harassment Policy” and/or their statutory duties under MCL 380.1310b, had Defendants done so, GARY’s suicide would have been prevented.

56. In deliberate breach of this duty, Defendants released GARY from MONROE MIDDLE SCHOOL to go home alone and ultimately commit suicide, without taking any precautions after Defendants knew, or should have known, that GARY was in an altered mental state and was a suicide risk.

57. Had Defendants not breached their duties and properly intervened, GARY’s suicide could have been prevented.

58. Defendants’ actions – or inactions – including but not limited to their inadequate and dangerous policies and practices, their affirmative decisions to exclude law enforcement and/or GARY’s parents and their decision to send GARY home after school that day – were so reckless as to demonstrate a substantial lack of concern for whether and injury resulted, and therefore breached their standard of care.

59. Defendants’ acts or omissions were grossly negligence and were the proximate cause of GARY’s injuries because Defendants’ acts or omissions directly placed the victim, GARY, to be in harm’s way and provided him with ample opportunity to commit suicide while in an altered mental state.

60. As a direct and proximate result of Defendants’ actions, GARY suffered a wrongful death, and his estate is entitled to recovery as alleged above.

COUNT III – STATE CREATED DANGER – 42 USC §1983
(Against Defendants ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8)

61. Plaintiff, by reference, incorporates the preceding paragraphs of his Complaint as though fully set forth herein.

62. GARY was a citizen of the United States entitled to all rights, privileges and immunities accorded to all citizens of the State of Michigan and the United States, including the clearly established right to not be deprived of life without due process of law under the Fourteenth Amendment to the United States Constitution, as enforced pursuant to 42 USC §1983.

63. Any reasonable person would be aware of this clearly established right.

64. Defendants MONROE PUBLIC SCHOOL, MONROE MIDDLE SCHOOL, ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8 with knowledge of this clearly established right, and acting in deliberate indifference, violated GARY's right not to be deprived of life without due process, as secured by the Fourteenth Amendment's Due Process Clause, by taking affirmative acts under color of state law to disrupt the status quo and create a danger of death that did not exist in the status quo prior to those affirmative state actions, and by taking affirmative acts which caused the death of GARY, which would not have happened but-for those affirmative state actions.

65. At all relevant times, Defendants ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8 were acting under the color of state law as employees of MONROE PUBLIC SCHOOL and MONROE MIDDLE SCHOOL, a public school district, including but not limited to securing, supervising, advising and directing the activities of GARY; actions and decisions regarding school practices and procedures, both formal and informal; and in their conduct as school administrators and counselors.

66. Defendants knew that GARY was suicidal, that he was in extreme emotional distress; that he presented a substantial risk of danger to himself; that he was urgently requesting help from school staff; and, that he was in an altered mental state due to being bullied by the minor Defendants.

67. Defendants had the authority and obligation as school administrators to maintain the status quo, in which GARY was safe, secure and restricted in the Principal's office or elsewhere on school grounds, where he was supervised by adults and did not have access to the means to harm himself.

68. Defendants had the authority to maintain GARY in a safe and secure location, under the watchful eye of a responsible adult, until such time as he was no longer a threat to himself.

69. Defendants affirmatively misused their authority by releasing GARY from school grounds, despite knowing that he was suicidal and in an altered mental state, and that he posed a substantial threat to himself.

70. Defendants each took affirmative actions that individually, or in concert with one another, created and substantially increased the danger that GARY's conduct would escalate to actual violence against himself and result in his death on April 19, 2023.

71. Defendants took affirmative acts that created or increased the risk of danger, including but not limited to:

- (a) Releasing GARY from the safe and secure confines of the school grounds, despite knowing, or having probable cause to know, that GARY was suicidal and that she was a threat to himself;

- (b) Promoting a policy, practice or custom of concealment, misrepresentation, minimizing or avoidance and non-escalation to higher authorities, including law enforcement, of suspected or known risks of GARY's suicidal ideation;
- (c) Promoting a policy, practice or custom of refusing to secure or hold a student on school grounds, or to otherwise restrict a student from leaving the school premises, where the student is suicidal and presents a risk of harm to himself, like GARY did on April 19, 2023;
- (d) Promoting a policy, practice or custom of not training staff or administrators in the proper manner of interviewing and questioning a student who is known to be suicidal, such as GARY;
- (e) Promoting a policy, practice or custom of not training staff or administrators in the proper methods or completing a risk assessment;
- (f) Disregarding and diverting student mental health crises;
- (g) Declining to file mandatory reports of suspected neglect or abuse concerning GARY in violation of MCL 722.623(a);
- (h) By failing to enforce school policies including but not limited to their "Anti-Bullying/Harassment Policy";
- (i) Failing to follow their statutory duties under MCL 380.1310b; and,
- (j) Any other additional affirmative acts that created or increased the chance that GARY would commit suicide which may become known through the course of this litigation.

72. Defendants' affirmative actions created and exacerbated a state-created danger that substantially increased the special danger of harm to GARY, and in doing so knowingly and recklessly disregarded the substantial risk for danger that GARY posed to himself.

73. The relationship between Defendants, ANDREW DUNCAN, ANGELA TEDORA, ANDREW SHAW and JOHN DOE 8 as school administrators, and GARY, as a student of MONROE PUBLIC SCHOOL and MONROE MIDDLE SCHOOL, was such that Defendants knew that GARY was a foreseeable victim of suicide upon his release from the security of the school grounds on April 19, 2023.

74. Defendants are not entitled to qualified immunity because GARY's right to not be deprived of his life, through self-inflicted harm, was a harm that was likely to occur was clearly established at the time of Defendants' actions.

75. The conduct of Defendants was objectively unreasonable and performed knowingly, deliberately and with deliberate indifference to the safety of GARY causing students at MONROE PUBLIC SCHOOL and MONROE MIDDLE SCHOOL, with suicidal ideation to be less safe than they were before Defendants' affirmative actions.

76. Defendants knew that their conduct, which exacerbated the risk and ultimately caused GARY's death, violated the clearly established rights of MONROE PUBLIC SCHOOL and MONROE MIDDLE SCHOOL students, such as GARY.

77. Defendants had ample time to deliberate and make an unhurried judgment about whether to release GARY – who they knew was suicidal – from the safety and security of the school grounds.

78. Defendants consciously disregarded a substantial risk of serious harm by releasing GARY - who they knew was suicidal – from the safety and security of the school grounds.

79. But for the affirmative acts of Defendants to change the status quo by permitting GARY to leave the schools grounds without contacting his parent(s) and/or police to notify them of his suicidal ideation, GARY would not have waked home and committed suicide on April 19, 2023.

80. But for Defendants actions of releasing GARY from the school grounds, the status quo (i.e. student safety) would have remained.

81. Defendants thus affirmatively created new dangers that did not exist, as long as GARY remained on the school grounds, and affirmatively increased the dangers that did not exist as long as the status quo was preserved.

82. It is shocking to the conscience that Defendants would release GARY from the security of the school grounds and let him go home alone where they knew that GARY was suicidal and that he was a threat to himself.

83. In comparison with the public-at-large, as a student of MONROE PUBLIC SCHOOL and MONROE MIDDLE SCHOOL, GARY was specifically at risk and exposed to the dangers presented by the act of releasing GARY from the safety of the school grounds, where she subsequently committed suicide.

COUNT IV - STATE CREATED DANGER
MONELL LIABILITY UNDER 42 USC §1983

(Against Defendants MONROE PUBLIC SCHOOL, MONROE MIDDLE SCHOOL)

84. Plaintiff, by reference, incorporates the preceding paragraphs of his Complaint as though fully set forth herein.

85. Defendants, along with their administrators and policymakers, adopted and maintained official policies, practices and customs that were the moving force behind, and cause-

in-fact of, the GARY's suicide on April 19, 2023. These official policies, practices and customs include and are not limited to:

- (k) A policy, practice or custom of concealment, misrepresentation, minimizing or avoidance and non-escalation to higher authorities, including law enforcement, of suspected or known risks of GARY's suicide risk;
- (l) Defendants' policy, practice or custom of refusing to secure or hold a student in the counseling office, or to otherwise restrict a student from leaving the school premises where the student is suicidal and presents a risk of harm to himself, like GARY did on April 19, 2023;
- (m) Defendants' policy, practice or custom of not training staff or administrators in the proper manner of interviewing and questioning a student who is known to be suicidal, such as GARY;
- (n) Defendants' policy, practice or custom of not training staff or administrators in the proper methods or completing a risk assessment;
- (o) Disregarding and diverting student mental health crises;
- (p) Declining to file mandatory reports of suspected neglect or abuse concerning GARY in violation of MCL 722.623(a);
- (q) By failing to enforce school policies including but not limited to their "Anti-Bullying/Harassment Policy";
- (r) failing to follow their statutory duties under MCL 380.1310b; and,
- (s) Any other policy, practice or customer that may become known through the course of this litigation.

86. These policies, practices and customs caused employees to inflict constitutional harms by directly causing GARY's suicide on April 19, 2023.

DAMAGES/RELIEF

87. Plaintiff, by reference, incorporates the preceding paragraphs of his Complaint as though fully set forth herein.

88. Accordingly, Plaintiff respectfully requests that this Honorable Court grant the following relief in accordance with 42 USC §1983, MCL 722.621 and Michigan common law:

- a) An award of actual and punitive or exemplary damages recoverable under Michigan's Wrongful Death Statute;
- b) An award of damages as the Court of Jury shall consider fair and equitable, under all the circumstances including reasonable medical, hospital, funeral and burial expenses for which the estate is liable; reasonable compensation for the physical and emotional pain and suffering, while conscious, undergone by GARY in the moments between his injury and death;
- c) An award of damages for the loss of society and companionship of the deceased;
- d) An award of actual attorney's fees and costs; and,
- e) Any further legal and/or relief that the Court and/or Jury deem equitable or just.

WHEREFORE, Plaintiff pray for Judgment against Defendant in the amount of **TWENTY-FIVE MILLION (\$25,000,000.00) Dollars**, together with interest from the date of

this Complaint to the date of Judgment, court costs and attorney fees so wrongfully sustained.

JURY DEMAND

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

Respectfully submitted,

KOUSSAN LAW

/s/ Ali H. Koussan

By: Ali H. Koussan (P75044)

Attorney for Plaintiff

Dated: October 6, 2023