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*Attorneys for Defendant Big Brothers Big
Sisters of Central Arizona*

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

JOHN CD DOE, a single man,

Plaintiff,

v.

BIG BROTHERS BIG SISTERS OF
AMERICA, a District of Columbia, non-
profit corporation; BIG BROTHERS BIG
SISTERS OF CENTRAL ARIZONA, an
Arizona corporation; JOHN DOE 1-100;
JANE DOE 1-100; and BLACK & WHITE
CORPORATIONS 1-100,

Defendants.

NO. CV2020-014920

**DEFENDANT BIG BROTHERS BIG
SISTERS OF CENTRAL ARIZONA'S
FIRST SUPPLEMENTAL NOTICE
OF NON-PARTIES AT FAULT**

(Assigned to Hon. Christopher Whitten)

Pursuant to Ariz. R. Civ. P. 26(b)(5) and A.R.S. § 12-2506(B), Defendant Big Brothers Big Sisters of Central Arizona ("BBBSCAZ") hereby submits this First Supplemental Notice of Non-Parties at Fault to allege that the following persons that are not parties to this action may be wholly or partially at fault for Plaintiff's alleged damages. The additional party identified in this supplemental notice was disclosed to BBBSCAZ by

1 Plaintiff through its Second Supplemental Disclosure Statement on October 29, 2024. The
2 additional party identified in this supplemental notice is in addition to all parties disclosed
3 through BBSCAZ's Notice of Non-Parties at Fault filed in this matter on April 25, 2023.

4 **1. Unnamed Individual**

5 Location Unknown

6 According to the report provided by Plaintiff's expert witness, Dr. Susan
7 Phipp-Yonas ("**Plaintiff's Expert**"), Plaintiff was, in Plaintiff's own words, molested by
8 an unnamed former employer and roommate of Plaintiff subsequent to the allegations set
9 forth by Plaintiff in this lawsuit. Specifically, Plaintiff's Expert reported the following:

10 Asked about jobs [Plaintiff] had as a teen, he stated that he
11 worked at restaurants. After Glendale Community College, he
12 enrolled at Phoenix Community College and went to beauty
13 school for a while. **That was when he was living with an
older hairdresser, who gave him part-time jobs in his salon,
but also molested him,** crimes that [Plaintiff] never reported
14 to authorities, in the belief that he would be blamed since he
was choosing to live where he did.

15 Psychological Evaluation of David Campbell performed by Susan Phipps-Yonas, Ph.D. (the
16 "**Expert Report**"), at bates number CD DOE_001045 (emphasis added).

17 Plaintiff's Expert did not provide a name or location for the individual indicated
18 above, but this information is likely to be within Plaintiff's knowledge.

19 **2. "Jay" Unknown Last Name**

20 Location Unknown

21 According to the report provided by Plaintiff's Expert, Plaintiff was involved in a
22 sexual relationship with an adult named "Jay" when Plaintiff was still a minor. Under
23 A.R.S. § 13-1405(A), a person commits sexual conduct with a minor by intentionally or
24 knowingly engaging in sexual intercourse or oral sexual contact with any person who is
25 under eighteen years of age. According to Plaintiff's Expert, Plaintiff was romantically
26

1 involved for two years with a male partner named “Jay” when Plaintiff was seventeen (17)
2 years old and Jay was eighteen (18) years old. Expert Report at CD DOE_001046.
3 Plaintiff’s Expert did not provide a last name or location for “Jay,” but this information is
4 likely to be within Plaintiff’s knowledge.

5 Discovery and is ongoing and BBBSCAZ names these additional non-parties at fault
6 based on available information to date regarding Plaintiff’s allegations. BBBSCAZ reserves
7 the right to further supplement this notice as discovery continues.

8 **RESPECTFULLY SUBMITTED** this 13th day of November, 2024.

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13 By /s/ Anthony F. Pusateri
14 John M. O’Neal
15 Jeffrey D. Gardner
16 Anthony F. Pusateri
17 *Attorneys for Plaintiffs*

18 **E-FILED** via AZ TurboCourt
19 this 13th day of November, 2024.

20 **COPY** of the foregoing served via e-mail
21 this 13th day of November, 2024, to:

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/s/ Dawn McCombs