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

John CD Doe, a single man,

Plaintiff,

vs.

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.

Case No. CV2020-014920

**BIG BROTHERS BIG SISTERS OF
AMERICA'S FIRST SUPPLEMENTAL
NOTICE OF NON-PARTIES AT FAULT**

(Assigned to the Honorable Bradley Astrowsky)

Defendant Big Brothers Big Sisters of America ("BBBS America"), pursuant to Rule 26(b)(5) of the Arizona Rules of Civil Procedure and A.R.S. §12-2506(B), 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 non-parties identified in this supplemental notice were disclosed to BBBS America by Plaintiff through his Second Supplemental Disclosure Statement on October 29, 2024. The additional non-parties identified herein are in addition to all non-parties identified in BBBS America's Notice of Non-Parties at Fault filed in this matter on November 7, 2022.

1 **1. Unnamed Individual**

2 Location Unknown

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

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

14 Psychological Evaluation of [John CD Doe] performed by Susan Phipps-Yonas, Ph.D.
15 (the **"Expert Report"**), at bates number CD DOE_001045 (emphasis added).

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

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

19 Location Unknown

20 According to the report provided by Plaintiff's Expert, Plaintiff was involved in a
21 sexual relationship with an adult named "Jay" when Plaintiff was still a minor. Under A.R.S.
22 § 13-1405(A), a person commits the crime of sexual conduct with a minor by intentionally
23 or knowingly engaging in sexual intercourse or oral sexual contact with any person who is
24 under eighteen years of age. According to Plaintiff's Expert, Plaintiff was romantically
25 involved for two years with a male partner named "Jay" when Plaintiff was seventeen (17)
26 years old, and Jay was eighteen (18) years old. Expert Report at CD DOE_001046. Plaintiff's
27 Expert did not provide a last name or location for "Jay," but this information is likely to be
28 within Plaintiff's knowledge.

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

1 DATED this 13th day of November, 2024.

2 BERKE LAW FIRM, PLLC

3 By /s/ Lori V. Berke

4 Lori V. Berke

5 Anelisa Benavides

Attorneys for Defendant Big Brothers Big Sisters of America

6 The foregoing document was e-filed this
7 13th day of November 2024, and a copy
e-served via AZTurboCourt and e-mailed to:

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28 By /s/ Laine M. Roberts