

Quarles & Brady LLP
One Renaissance Square
Two North Central Avenue, Suite 600
Phoenix, AZ 85004-2391
TELEPHONE 602.229.5200

John M. O'Neal (#015945)
John.ONeal@quarles.com
Jeffrey D. Gardner (#021783)
Jeff.Gardner@quarles.com
Anthony F. Pusateri (#036206)
Anthony.Pusateri@quarles.com

*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
STATEMENT OF FACTS IN
SUPPORT OF MOTION FOR
SUMMARY JUDGMENT**

(Assigned to Hon. Christopher Whitten)

Defendant Big Brothers Big Sisters of Central Arizona (“**BBBSCAZ**”) submits its Statement of Facts in support of its Motion for Summary Judgment filed concurrently herewith. This Statement of Facts is supported by the *Declaration of Sybil Taylor Aytch* and the *Declaration of Bryan Blair* attached hereto as **Exhibit “A”** and **Exhibit “B”**, respectively.

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1 on May 25, 2018. Discharge Order, Second Bankruptcy Case (the “**Second Bankruptcy**
2 **Discharge Order**”), attached hereto as **Exhibit “J”**; *see also* Second Bankruptcy Docket.
3 The trustee in the Second Bankruptcy Case did not expressly abandon any claims. *See*
4 Second Bankruptcy Docket.

5 7. Plaintiff alleges that he was sexually abused in 1983 by Arbulu while Arbulu
6 was a “Big Brother” with BBBSCAZ. Plaintiff also asserts that in July of 1983, Plaintiff
7 reported Arbulu’s alleged sexual abuse of Plaintiff to the Phoenix Police Department.
8 Plaintiff claims that BBBSCAZ is liable for Arbulu’s alleged conduct. [First Amended
9 Complaint (“**FAC**”), filed in this case on June 29, 2021, ¶¶ 33, 36–37; 39-112.]

10 8. Plaintiff knew of Arbulu’s alleged sexual abuse of Plaintiff in 1983, and no
11 later than 2005, because: (a) Plaintiff described the alleged sexual abuse when Plaintiff was
12 interviewed by the San Mateo (California) Police Department on January 28, 2005; and
13 (b) Plaintiff alleges that he reported Arbulu’s alleged sexual abuse of Plaintiff to the
14 Phoenix Police Department in July 1983. Reports from San Mateo Police Department
15 produced in response to subpoena duces tecum (the “**San Mateo Records**”), attached hereto
16 as **Exhibit “K”**; FAC, ¶ 36.

17 9. Plaintiff’s date of birth is September 3, 1973. San Mateo Records; FAC, ¶ 36.
18 Plaintiff turned eighteen (18) years old on September 3, 1991.

19 **RESPECTFULLY SUBMITTED** this 26th day of December, 2024.
20

21 QUARLES & BRADY LLP
22 One Renaissance Square
23 Two North Central Avenue, Suite 600
Phoenix, Arizona 85004-2322

24 By /s/ Anthony F. Pusateri
25 John M. O’Neal
Jeffrey D. Gardner
26 Anthony F. Pusateri
Attorneys for Plaintiffs

1 **E-FILED** via AZ TurboCourt
2 this 26th day of December, 2024.

3 **COPY** of the foregoing served via e-mail
4 this 26th day of December, 2024, to:

5 Robert E. Pastor
6 Montoya, Lucero & Pastor, P.A.
7 3200 N. Central Avenue, Suite 2550
8 Phoenix, AZ 85012
9 pastor@mlpattorneys.com
10 *Attorneys for Plaintiff*

11 Michael S. Daoudi
12 Law Offices of Michael S. Daoudi, PC
13 560 Kirts Blvd., Suite 104
14 Troy, MI 48084
15 msd@msd4law.com
16 *Attorneys for Plaintiff*

17 David L. Abney
18 Ahwatukee Legal Office P.C.
19 P.O. Box 50351
20 Phoenix, AZ 85076
21 abneymaturin@aol.com
22 *Attorneys for Plaintiff*

23 Lori V. Berke
24 Berke Law Firm PLLC
25 1601 N. 7th Street, #360
26 Phoenix, AZ 85006
lori@berkelawfirm.com
anelisa@berkelawfirm.com
laine@berkelawfirm.com
Attorneys for Defendant Big Brothers
Big Sisters of America

/s/ Dawn McCombs