

Robert E. Pastor, SBN 021963
MONTROYA, LUCERO & PASTOR, P.A.
3200 North Central Avenue, Suite 2550
Phoenix, Arizona 85012
Phone: (602) 279-8969
Fax: (602) 256-6667
pastor@mlpattorneys.com

Michael S. Daoudi, SBN
Law Offices of Michael S. Daoudi, PC
346 Park Street, Suite 120
Birmingham, Michigan 48009
(248) 220-4377
msd@msd4law.com

Attorneys for Plaintiff

**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.

Case No.: CV2020-014920

**PLAINTIFF'S RESPONSE IN
OPPOSITION TO DEFENDANT
BBBS OF CENTRAL ARIZONA'S
MOTION FOR SUMMARY
JUDGMENT**

(Oral argument requested)

Pursuant to Rule 56, Ariz. R. Civ. P., Plaintiff responds in opposition to Defendant Big Brother Big Sister of Central Arizona's Motion for Summary Judgment. Contemporaneously filed with this Response, Plaintiff filed his Notice of Bankruptcy Court Orders and or Motion to Continue and or Stay these proceedings until such time that the United State Bankruptcy Court issues its rulings currently scheduled for hearing on March 25, 2025.

Plaintiff requests an order continuing or staying these proceedings. In the alternative, Plaintiff requests an order denying Defendant's Motion because Plaintiff has standing. The issue is whether this civil tort claim is being prosecuted in the name of the

1 real party in interest. Under Rule 17, the trial court must afford Plaintiff and the U.S.
2 Trustee a reasonable opportunity to substitute into this matter and resume prosecution.

3 Plaintiff's response is supported by the following memorandum of points and
4 authorities.

5 **MEMORANDUM OF POINTS & AUTHORITIES**

6 **I. FACTS & PROCEDURAL HISTORY**

7 Plaintiff John CD Doe is David Campbell.

8 David Campbell was born in 1973. (DSOF ¶ 9)

9 Defendants operate a mentoring program where Defendants match mentors or
10 Bigs, with mentees or Littles. In January 1983, Defendants matched Italo Arbulu with
11 Plaintiff. Arbulu sexually abused Plaintiff in 1983. Although Phoenix Police
12 investigated, Arbulu fled to California before police could interview him.

13 Under Arizona law in effect in 2009 and 2017, Plaintiff was required to file a civil
14 lawsuit before his 20th birthday in 1993.

15 Plaintiff filed for bankruptcy protection in 2009 and again in 2017. When he filed
16 for bankruptcy protection, any civil tort claim Plaintiff had for the sexual abuse he
17 suffered in Defendants' program had already expired.

18 **The Arizona legislature changed the statute of limitations in 2019.**

19 Child sexual abuse is a national public health crisis, with 3.7 million children
20 sexually abused every year. M. Stoltenborgh, et. al., *A Global Perspective on Child*
21 *Sexual Abuse: Meta-Analysis of Prevalence Around the World*, 16(2) CHILD
22 MALTREATMENT 79 (2011). An extensive body of evidence establishes that
23 childhood sexual abuse survivors are traumatized in a way that is distinguishable from
24 victims of other crimes. These survivors may struggle to disclose their experiences due
25 to the effects of trauma and psychological barriers such as shame, self-blame, or fear, as
26 well as social factors such as gender-based stereotypes ("I don't want anyone to think
27 I'm gay.") or stigma regarding victimization. Ramona Alaggia et. al., *Facilitators and*
28 *Barriers to Child Sexual Abuse Disclosures: A Research Update (2000-2016)*, 20 Trauma

1 Violence Abuse 260, 279 (2019). One study found 44.9% of male victims and 25.4% of
2 female victims of child sex abuse delayed disclosure by more than 20 years. Patrick J.
3 O’Lear & James Barber, *Gender Differences in Silencing following Childhood Sexual*
4 *Abuse*, 17 J. Child Sex Abuse 133 (2008). An Estimated 70% of child sexual assault
5 victims never report the abuse to police. D. Finkelhor et al., *Sexually Assaulted Children:*
6 *National Estimates and Characteristics*, US Dept. of Justice, Office of Justice Programs
7 (2008). Survivors of child sexual abuse, therefore, need more time to process the abuse
8 and disclose the abuse, much less report it. Rebecca Campbell, Ph.D., *The Neurobiology*
9 *of Sexual Assault: Explaining the Effects on the Brain*, Nat’l Inst. Of Justice (2012);
10 Bessel van der Kolk, MD, et al., *Traumatic Stress: The Effects of Overwhelming*
11 *Experience on Mind, Body & Society*, (2006).

12 Making matters worse, cultures of secrecy paired with short statutes of limitations,
13 shielded organizations like Defendants in this caase from public scrutiny and discourages
14 survivors from disclosing abuse. The Boston Globe’s 2002 *Spotlight* investigative report
15 uncovered rampant sexual abuse in the Catholic Church. Since 2002, an alarming
16 number of institutional scandals have come to light including Penn State football; Larry
17 Nassar - USA Gymnastics / Michigan State University, and dozens of other youth-serving
18 organizations.

19 The courage of survivors of child sexual abuse who were sexually abused in the
20 Big Brother Big Sister program has brought to light the fact that the Defendants in this
21 case have known since the 1970’s that sex offenders will seek out volunteer opportunities
22 in Defendants’ programs. Defendants, then and now, continue to give sex offenders the
23 cover they need by delaying and or refusing to report child sexual abuse in the face of
24 red flag behavior.

25 Until 2019, child sex abuse survivors in Arizona had until age 20 to file civil
26 lawsuits against their abusers and other defendants who were responsible. *See* A.R.S. §§
27 12-542, 12-502. Before 2019, Arizona ranked as one of the worst jurisdictions nationally
28 for its SOLs for child sex abuse claims. CHILD USA, *2019 Annual Report, Child Sex*

1 *Abuse Statutes of Limitations Reform 2002-2019*, (May 5, 2020). To remedy the problem,
2 the Arizona Legislature passed House Bill 2466, which extended the statute of limitations
3 from 2 years to 12 years and created a window permitting survivors of child sexual abuse
4 whose claims were barred by ARS § 12-514.

5 The legislative intent behind House Bill 2466 was to ensure that adult survivors
6 of childhood sexual abuse had the time needed to file lawsuits for the sexual abuse they
7 suffered as children. (Arizona House of Representative, HB 2466, Summary). When the
8 statute became effective, Governor Doug Ducey stated the new law was to give survivors
9 like Plaintiff, more time:

10 Today I signed HB 2466

11 .
12 The pain and trauma suffered by victims of child sexual
13 abuse can never be understated. This legislative session, we
14 heard from many of these victims who have turned this pain
15 into a passion – pursuing justice, accountability for their
16 abusers, and to protect innocent children.

17 Their stories are heart breaking. Their work – inspiring.

18 This we know: Victims need time. Time to process,
19 understand what has happened and come forward. And they
20 deserve the right to come forward.

21 HB 2466 is an important first step in providing victims of
22 child sexual abuse with the safety, healing and justice they
23 deserve. I’m hopeful it will protect innocent children who
24 may otherwise have suffered at the hands of these predators.

25 Gov. Douglas A. Ducey, *Arizona Governor’s Message*, HB 2466 (May 27, 2019). As of
26 the signing of HB 2466, it was public policy in Arizona that “every child victimized by
27 sexual abuse is entitled to safety, healing, justice and restitution.” (State of Arizona,
28 Executive Order 2019-05 (May 28, 2019)).

House Bill 2466 reflects the Arizona Legislature’s understanding that child sexual
abuse inflicts a unique trauma on victims; making it difficult for some survivors to discuss
or disclose the sexual abuse until years later. Given the unique and long-lasting trauma

1 caused by child sexual abuse, the Arizona Legislature recognized that survivors of child
2 sexual abuse need more than two years after their 18th birthday to file civil lawsuits for
3 the harm they suffered as children.

4 The Arizona Legislature's broad, remedial intent matches the intent of legislatures
5 in other states to ensure broad access to justice for survivors of childhood sexual abuse.

6 Although precise statistics cannot be known for certain, studies
7 estimate that between 10% and 27% of children are abused before
8 the age of 18. Of those, approximately 80% of them know the
9 perpetrator. Due to a variety of factors such as the severity of the
10 abuse, gender, and social reaction to disclosure, very few victims
11 disclose their abuse during childhood. The average age of
12 disclosure in cases of child sexual abuse is 42.

13 Devin Mashman, *Retroactive Civil Statutes of Limitation and Due Process in the Child*
14 *Sex Abuse Context: The Unique Need to Access Georgia Courts*, 15 Charleston L. Rev.
15 665, 672 (2021).

16 Plaintiff filed this civil lawsuit under HB 2466.

17 The bankruptcy trustee has not yet been appointed nor has the bankruptcy trustee
18 been afforded enough time to hire special counsel to prosecute this civil lawsuit,
19 substitute into this action and resume prosecution.

20 **II. LEGAL ANALYSIS**

21 **A. Plaintiff has standing to prosecute this lawsuit.**

22 Defendant Big Brothers Big Sisters of Central Arizona (BBBS Central Arizona)
23 claims "Plaintiff does not have standing to bring this case against [it] as a matter of law."
24 (See *Deft's Mtn for Summ. Judgment* at pp. 4: 1-2; p. 6: 3-4 ("Plaintiff lacks standing to
25 pursue the claims asserted in the FAC and the Court should therefore dismiss the FAC.")).
26 Defendant's standing argument is predicated on its belief that because Plaintiff filed
27 bankruptcy after the original statute of limitations expired, this claim "became property
28 of the estate." (See *Deft.'s Mtn for Summ. Judgment* at p. 4: 12).

Ownership rights are irrelevant to the issue of standing. *Strawberry Water Co. v.*
Paulsen, 220 Ariz. 401 ¶ 10, 207 P.3d 654 (2008). Unlike the United States Constitution,

1 the Arizona Constitution does not have a case or controversy requirement. *Id. citing*
2 *Armory Park Neighborhood Ass'n v. Episcopal Cmty. Servs.*, 148 Ariz. 1, 6, 712 P.2d
3 914, 919 (1985). Under Arizona law, standing only raises questions of prudential or
4 judicial restraint helping “the courts avoid issuing advisory opinions, guards against
5 mootness, and ensure the full development of the issues.” *Strawberry Water Co. v.*
6 *Paulsen*, 220 Ariz. 401 ¶ 10, 207 P.3d 654 (2008).

7 A party has standing to sue in Arizona if, under all
8 circumstances, the party possesses an interest in the outcome
9 of the litigation. Standing generally requires an injury in fact,
10 economic or otherwise, caused by the complained-of
11 conduct, and resulting in distinct and palpable injury giving
12 the plaintiff a personal stake in the controversy’s outcome.

13 *Strawberry Water Co. v. Paulsen*, 220 Ariz. 401, 207 P.3d 654 (App. 2008)(citations
14 omitted).

15 There is no dispute, Plaintiff has standing. Plaintiff suffered injury as a result of
16 the sexual abuse. Plaintiff has a personal stake in the controversy’s outcome.

17 Defendant’s argument is more accurately characterized as a complaint regarding
18 the caption of the lawsuit and a failure to prosecute in the name of the real party in
19 interest. *See* Ariz. R. Civ. P. 17.

20 **B. The trial cannot dismiss this lawsuit until the Real Party In Interest is
21 afforded an opportunity to substitute into the action.**

22 Rule 17(b)(1), Ariz. R. Civ. P., requires that civil actions “must be prosecuted in
23 the name of the real party in interest.” A trustee, such as a bankruptcy trustee, “may
24 sue in their own names without joining the person [] for whose benefit the action is
25 brought.” Ariz. R. Civ. P. 17(b)(1)(E).

26 Rule 17(a)(3), Ariz. R. Civ. P., prohibits dismissal of this lawsuit. Under the rule,

27 The Court **may not dismiss an action** for failure to prosecute
28 in the name of the real party in interest until, after an objection,
a reasonable time has been allowed for the real party in

1 interest to ratify, join or be substituted into the action. After
2 ratification, joinder, or substitution, the action proceeds as if
it had been originally commenced by the real party in interest.

3 Rule 17(a), Ariz. R. Civ. 17(a)(3)(emphasis added); *See also Carranza v. Madrigal*, 237
4 Ariz. 512, 354 P.3d 389, 390 ¶ 1 (2015)(the rule “limits a court’s ability to dismiss an
5 action on the ground that it is not being prosecuted by the real party in interest.”). *Preston*
6 *v. Kindred Hosp. West LLC*, 226 Ariz. 391, 249 P.3d 771 (2011).

7 Rule 17(a), Ariz. R. Civ. P. “requires a trial court to allow a reasonable opportunity
8 to substitute parties before it dismisses an action for lack of prosecution by the real party
9 in interest.” *Id.* at 390 ¶ 1. *See also Preston v. Kindred Hosp. West LLC*, 226 Ariz. 391,
10 249 P.3d 771 (2011).

11 In *Preston*, the personal representative of the Estate of William Everett “Billy”
12 Preston, a Grammy-award winning artist, filed a lawsuit alleging wrongful death,
13 negligence and elder abuse. Billy Preston was a patient at Defendant’s hospital where he
14 died. Before he entered the hospital, Preston filed for bankruptcy. Defendant moved to
15 dismiss arguing “that the claim belonged to the bankruptcy estate and therefore the
16 bankruptcy trustee was the real party in interest.” *Id.* at 392 ¶ 3. The personal
17 representative requested an opportunity to join or substitute the bankruptcy trustee. *Id.*
18 The trial court granted the defendant’s motion to dismiss because the personal
19 representative knew of the bankruptcy such that “it was not difficult to determine the
20 proper plaintiff and there was no understandable mistake.” *Id.* at p. 392 ¶ 4. The Arizona
21 Court of Appeals reversed the trial court’s order of dismissal. *Id.*

22 In affirming the appellate court, the Arizona Supreme found that “Rule 17(a) does
23 not require a plaintiff to prove an understandable mistake or difficulty in identifying the
24 proper party in order to avoid dismissal.” *Id.* at 393 ¶ 3. The court in *Preston* also found
25 that “[w]hen a real party in interest is substituted for an incorrectly named plaintiff with
26 identical claims, Rule 17(a) itself provides the relevant relation-back rule, stating that
27 ‘substitution shall have the same effects as if the action had been commenced in the name
28 of the real party in interest.’” *Id.* at p. 394 ¶ 12.

1 Rule 17, Ariz. R. Civ. P., prohibits the trial court from dismissing this lawsuit
2 unless Plaintiff is first given a reasonable opportunity for the real party in interest to
3 “ratify, join or be substituted into the action.” *Carranza v. Madrigal*, 237 Ariz. 512, 354
4 P.3d 389, 390 ¶ 1 (2015).

5 Here, Plaintiff submitted a request to the United States Bankruptcy Court to re-
6 open his bankruptcies “to ensure that all debts and obligations are appropriately
7 addressed.” (SOF). Undersigned counsel stands ready to substitute in the real party in
8 interest to ensure that the bankruptcy estate is properly protected once the trustee is re-
9 appointed and bankruptcy court orders the trustee to hire special counsel. (SOF). Upon
10 information and belief, the trustee will request that undersigned counsel be hired as
11 special counsel to prosecute this personal injury claim.

12
13 **C. If this tort claim is part of the bankruptcy estate, the bankruptcy**
14 **court and or the bankruptcy trustee makes the decision whether to**
15 **administer and prosecute this civil tort claim.**

16 Defendant argues this personal injury lawsuit became property of the bankruptcy
17 estate at the time Plaintiff filed for bankruptcy protection; writing:

18 **When** Plaintiff filed his Bankruptcy Case, any and all legal
19 claims that Plaintiff could have potentially pursued arising
20 from conduct which occurred prior to those filings (including
21 claims alleged in this case against BBBSCAZ) became
22 property of the bankruptcy estate. 11 U.S.C. § 541(a).

23 (*Deft’s Mtn Summ. Judgment* at p. 4:9-12)(emphasis added). Defendant recognizes the
24 timing of each petition for bankruptcy is an important factor in the analysis of what
25 property is part of the bankruptcy estate.

26 Indeed, federal statutes, the legislative record and case law, confirm that WHEN
27 the debtor files a petition for bankruptcy is critical to determining the bankruptcy estate.

28 Under federal bankruptcy law, a bankruptcy estate’s property is comprised of “all
legal or equitable interests of the debtor in property as of the commencement of the case.”

1 11 U.S.C. 541(a)(1)(emphasis added). The words “as of the commencement of the case”
2 are critical, if not dispositive.

3 The words of 11 U.S.C. § 541(a)(1) are in accord with the 1978 legislative history
4 about the statute’s creation. The Senate Report for the Bankruptcy Reform Act of 1978
5 confirms that the proper reference point for 11 U.S.C. § 541(a)(1) is the state of the
6 debtor’s rights at the commencement of the bankruptcy case. And so, if a statute of
7 limitations has expired for the debtor, it has expired for the bankruptcy trustee as well:

8
9 Though [11 U.S.C. § 541] will include causes of action and
10 claims by the debtor against others, it is not intended to expand
11 the debtor’s rights against others more than they exist at the
12 commencement of the case. **For example, if the debtor has a**
13 **claim that is barred at the time of the commencement of the**
14 **case by the statute of limitations, then the trustee would not**
 be able to pursue that claim, because he too would be
 barred. He could take no greater rights than the debtor himself
 had.

15 S. Rep. No. 95-989 at 82, 95th Cong., 2nd Sess. (1978), *reprinted in* 1978 U.S. Code
16 Cong. & Admin. News 5787, 5868 (emphasis added). To reinforce the plain importance
17 of these principles, the corresponding House of Representatives Report has identical
18 language. *See* H.R. Rep. No. 95-595 at 367-68, 95th Cong., 2nd Sess. (1977), *reprinted*
19 *in* 1978 U.S. Code Cong. & Admin. News 5963, 6323.

20
21 The congressional record is relevant and consistent with the established principle
22 that the “nature and extent of a debtor’s interest in property is determined by state law,
23 with the estate having no greater rights in property than those held by the debtor prior to
24 bankruptcy.” *In re Coupon Clearing Service, Inc.*, 113 F.3d 1091, 1099 (9th Cir. 1997).
25 A bankruptcy estate’s ability to realize on a cause of action “is subject to whatever
26 limitations existed on the petition date; the estate obtains no greater rights than those held
27 by the debtor before bankruptcy.” *In re Rens*, 633 B.R. 594, 602 (9th Cir. BAP 2021).

1 “The Bankruptcy Code ‘neither creates nor enhances’ the property interests
2 brought into the bankruptcy estate.” *In re Eternal Hills Memorial Gardens & Funeral*
3 *Home, Inc.*, 631 B.R. 756, 761 (Bankr. D. Ore. 2021). “The estate cannot possess
4 anything more than the debtor itself did outside bankruptcy. . . . ‘A debtor’s property does
5 not shrink by happenstance of bankruptcy, but it does not expand, either.’” *Mission*
6 *Product Holdings, Inc. v. Tempnology, LLC*, 139 S.Ct. 1652, 1663 (2019) (quoting
7 Douglas Baird, *Elements of Bankruptcy* 97 (6th ed. 2014)).

8 “Congress has ‘left the determination of property rights in the assets of a
9 bankrupt’s estate to state law,’ since such ‘[p]roperty rights are created and defined by
10 state law.’” *Nobelman v. American Savings Bank*, 508 U.S. 324, 329 (1993)(quoting
11 *Butner v. United States*, 440 U.S. 48, 54-55 (1979)).

12 “When a debtor initiates a bankruptcy proceeding,” of course, “all tangible and
13 intangible assets of the debtor become part of the bankruptcy estate.” *Detruit v. Castle*
14 *Rock Homes LLC*, No. 1 CA-CV 18-0514, 2019 WL 3180466 at *3 ¶ 14 (Ariz. App. July
15 16, 2019) (citing *Mobility Sys. & Equip. Co. v. United States*, 51 Fed. Cl. 233, 236 (2001)
16 (“Any interests that the debtor holds at the time he begins his bankruptcy action become
17 a part of his bankruptcy estate.”); *Sierra Switchboard Co. v. Westinghouse Elec. Corp.*,
18 789 F.2d 705, 707 (9th Cir. 1986) (“The scope of section 541 is broad, and includes
19 causes of action.”); 11 U.S.C. § 541.

20
21 In this case, Plaintiff was born in 1973. The statute of limitations on any personal
22 injury claim he may have had for injuries suffered as a child, including claims for child
23 sexual abuse, expired in 1993; Plaintiff’s 20th birthday. Plaintiff filed two separate
24 petitions for bankruptcy. When Plaintiff filed for bankruptcy the first time, on June 2,
25 2009, any “legal interests” he may have had in any claims against Defendant were limited
26 by the statute of limitations in effect “as of the commencement of the [bankruptcy] case.”
27 11 U.S.C. § 541. Because the statute of limitations for this child sexual abuse claim
28 expired in 1993 – 16 years before he filed bankruptcy – there was no legal interest or

1 cause of action the bankruptcy estate could prosecute as trustee. Similarly, when Plaintiff
2 filed for bankruptcy the second time, on August 23, 2017, Plaintiff had no “legal interest”
3 in a claim against Defendant because the statute of limitations expired and there was no
4 legal claim. With respect to both bankruptcies, the bankruptcy estates cannot possess
5 more rights than the debtor himself did when he filed for bankruptcy. *Mission Product*
6 *Holdings, Inc. v. Tempnology, LLC*, 139 S.Ct. 1652, 1663 (2019) (quoting Douglas Baird,
7 *Elements of Bankruptcy* 97 (6th ed. 2014)).

8 **III. CONCLUSION**

9 Plaintiff requests that the court deny Defendant’s Motion for Summary Judgment
10 on the grounds that Plaintiff lacks standing. Under Arizona law, Plaintiff has standing
11 because Plaintiff suffered a “distinct and palpable injury giving the plaintiff a personal
12 stake in the controversy’s outcome.” *Strawberry Water Co. v. Paulsen*, 220 Ariz. 401,
13 207 P.3d 654 (App. 2008). Ariz. R. Civ. P. 17

14 Plaintiff further requests that the court deny Defendant’s Motion for Summary
15 Judgment on the grounds that this personal injury lawsuit was property of the bankruptcy
16 estate. Federal law is clear: the bankruptcy estate is comprised of “all legal [] interests
17 of the debtor in property as of the commencement of the case.” 11 U.S.C.
18 541(a)(1)(emphasis added). The bankruptcy estate cannot have more legal interest in a
19 cause of action than the debtor at the time the debtor files for bankruptcy. *In re Rens*,
20 633 B.R. 594, 602 (9th Cir. BAP 2021).

21 Recognizing that in many respects bankruptcy is a court of equity, Plaintiff
22 contemporaneously filed a Motion to Stay and or Motion to Continue ruling on
23 Defendant’s Motion for Summary Judgment so that the U.S. Trustee can appoint a trustee
24 and obtain approval from the bankruptcy court to hire special counsel, substitute into this
25 case and resume prosecution. See e.g. Marcia S. Krieger, *The Bankruptcy Court is a*
26 *Court of Equity: What does that mean?*, 50 S.C.L. Rev. 275 (1999); Michelle H. Harner
27 & Emily A. Bryant-Alvarez, *The Equitable Powers of the Bankruptcy Court*, 94 Am.
28 Bankr. L.J. 189 (2020).

1
2 **DATED** this 24th day of February, 2025.

3
4 **MONTOYA, LUCERO & PASTOR, P.A.**

5 By /s/ Robert E. Pastor

6 Robert E. Pastor
7 Attorneys for Plaintiff

8 ORIGINAL of the foregoing e-filed
9 With the Maricopa County Clerk of Court.

10 And a COPY emailed this 24th day of February, 2025 to:

11 Michael S. Daoudi, SBN
12 Law Offices of Michael S. Daoudi, PC
13 346 Park Street, Suite 120
14 Birmingham, Michigan 48009
15 msd@msd4law.com
16 *Attorney for Plaintiff*

17 Lori V. Berke
18 Jody C. Corbett
19 BERKE LAW FIRM, PLLC
20 1601 N. 7th Street, Suite 360
21 Phoenix, AZ 85006
22 lori@berkelawfirm.com
23 jody@berkelawfirm.com
24 *Attorneys for Defendant Big Brothers Big Sisters of America*

25 Mr. John M. O'Neal
26 Mr. Cale S. Johnson
27 Quarles & Brady, LLP
28 Two North Central Avenue, Suite 600
Phoenix, Arizona 85004-2391
John.Oneal@quarles.com
Cale.Johnson@quarles.com
Attorneys for Defendant Big Brothers Big Sisters of Central Arizona

By: /s/C. Wilhelm