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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 SEPARATE
STATEMENT OF FACTS IN
SUPPORT OF ITS RESPONSE IN
OPPOSITION TO DEFENDANT
BBBS OF CENTRAL ARIZONA'S
MOTION FOR SUMMARY
JUDGMENT**

(Oral argument requested)

Plaintiff submits the following Separate Statement of Facts in Support of Plaintiff's Response in Opposition to Defendant Big Brother Big Sister of Central Arizona's Motion for Summary Judgment.

1. Plaintiff does not dispute paragraphs 1-7 and paragraph 9 of Defendant's Statement of Facts.
2. Under previously existing Arizona law, survivors of child sexual abuse were required to file civil claims like this one on or before their 20th birthday. In this case, Plaintiff would have been required to file on or before his 20th

1 birthday in 1993.

2 3. In 2009, Plaintiff's statute of limitations for this civil lawsuit was expired
3 under Arizona law in effect in 2009.

4 4. In 2017, Plaintiff's statute of limitations for this civil lawsuit was expired
5 under Arizona law in effect in 2017.

6 5. In 2019, the Arizona legislature changed the statute of limitations for survivors
7 of child sexual abuse. The change included a look-back or revival window.
8 *See* HB2466.¹

9 **DATED** this 24th day of February, 2025.

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11 **MONTOYA, LUCERO & PASTOR, P.A.**

12 By /s/ Robert E. Pastor

13 Robert E. Pastor
14 Attorneys for Plaintiff

15 ORIGINAL of the foregoing e-filed
16 With the Maricopa County Clerk of Court.

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

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¹ *See Appendix A and Appendix B in support of Plaintiff's Response to Defendants' Motion to Dismiss* filed 06/29/2021.

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By: /s/C. Wilhelm