COMMONWEALTH	OF KENTUCKY	RECEIVED JUL - B 2003
BOONE CIRC CASE NO:		BOONE CIRCUIT/DISTRICT COURT
		JUL 3 2003
GREG S. HARVEY, et al.,		BY: BY: DC
Plaintiffs	: JUDGE	JOSEPH BAMBERGER
vs.	:	
ROMAN CATHOLIC DIOCESE	:	
OF COVINGTON		
Defendar	it :	

## PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Pursuant to Rule 23, Kentucky Rules of Civil Procedure, Plaintiffs hereby move the Court to certify this action to proceed as a class action under Rule 23.02(c), on behalf of the following class:

> All persons who, while still minors at anytime during the period January 1, 1956 through the present, were subjected to acts of sexual abuse and sexual misconduct by priests or members of religious orders who, at the time of such abuse or misconduct, were assigned to or employed by the Diocese of Covington.

Plaintiffs state that the requirements of Rule 23.01 and 23.02 are satisfied as

demonstrated in the attached Memorandum of Law.

Respectfully submitted,

------

Stanley M. Chesley (KY-11810) (OH-0000852)

Stanley M. Chesley (KY-11810)/(OH-0000852) Robert A. Steinberg, Esq. (OH - 0032932) WAITE, SCHNEIDER, BAYLESS & CHESLEY CO., L.P.A. 1513 Fourth & Vine Tower One West Fourth Street Cincinnati, Ohio 45202 (513) 621-0267 bobsteinberg@wsbclaw.cc

and

MICHAEL O'HARA (KY 52530) (OH 0014966) O'HARA, RUBERG, TAYLOR, SLOAN & SERGENT 25 Crestview Hills Mall Road, Suite 201 P. O. Box 17411 Covington, KY 41017-0411 (859) 331-2000 mohara@ortlaw.com

and

Barbara D. Bonar (KY-42213) B. DAHLENBURG BONAR, P.S.C. 118 W. Fifth Street Covington, Kentucky 41011 859-431-3333 bbonar@lawatbdb.com

## NOTICE

Please take notice that the foregoing Motion for Class Certification will come on for hearing before the Boone Circuit Court the 12<sup>th</sup> of August, 2003, at 9:00 a.m. or as soon thereafter as counsel may be heard.

## CERTIFICATION

I hereby certify that I have, this 3d day of July, 2003, mailed a copy of the foregoing pleading to the following attorneys of record:

William J. Moran, Jr., Esq. Deters, Benzinger & LaVelle, P.S.C. 125 East Court Street, Suite 950 Cincinnati, OH 45202

Archael Olan MICHAEL O'HARA

O'HARA, RUBERG, TAYLOR, SLOAN & SERGENT

E:\docs\Harvey.clv\Pleadings\Class Cert - Memo Supt.rtf