

## 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,
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## NOTICE

Please take notice that the foregoing Motion for Class Certification will come on for hearing before the Boone Circuit Court the $12^{\text {h }}$ 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.
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