

NO. DC-19-03706

JOHN DOE

Plaintiff,

vs.

CATHOLIC SOCIETY OF  
RELIGIOUS AND LITERARY  
EDUCATION AND JESUIT  
COLLEGE PREPARATORY  
SCHOOL OF DALLAS INC.

Defendants.

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IN THE DISTRICT COURT OF

DALLAS COUNTY, TEXAS

A-14TH  
JUDICIAL DISTRICT

**PLAINTIFF JOHN DOE'S ORIGINAL PETITION AND  
REQUESTS FOR DISCLOSURE**

TO THE HONORABLE JUDGE:

COMES NOW Plaintiff John Doe (hereinafter sometime referred to as "Plaintiff" or "John Doe") and files this his Original Petition complaining of the Catholic Society of Religious and Literary Education (hereinafter "the Jesuit Order" "Jesuit Order" or "The Jesuits") AND

PLAINTIFF'S ORIGINAL PETITION - PAGE 1

Jesuit College Preparatory School of Dallas, Inc. (hereinafter "Jesuit Dallas") and states the following:

**1.**  
**DISCOVERY CONTROL PLAN AND REQUIRED PLEADING**  
**OF CLAIMS FOR RELIEF**

1.01 As required by Tex. R. Civ. P. 190 Plaintiff John Doe files this suit under a Level 3 discovery control plan, and in accordance with Tex. R. Civ. P. 47 pleads for monetary relief in excess of one million dollars in damages per defendant.

**2.**

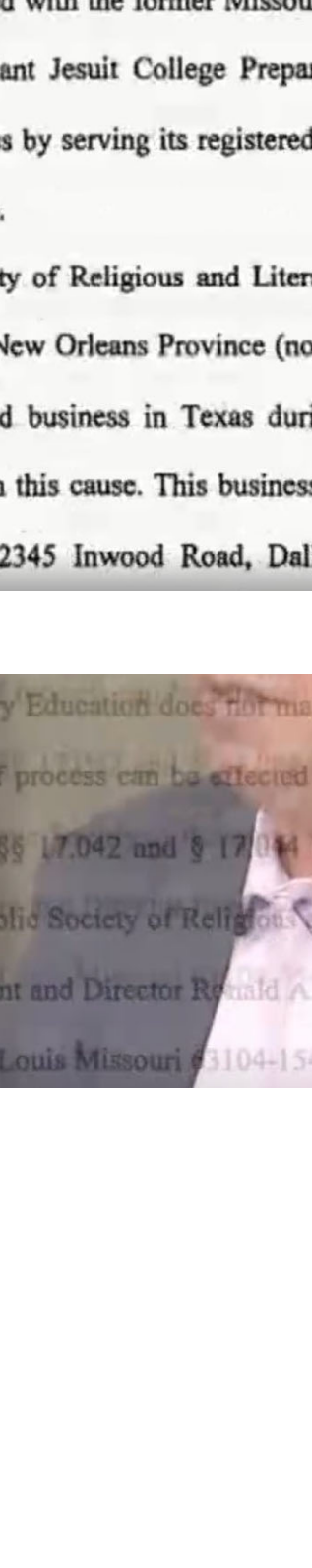
**PARTIES**

2.01 Plaintiff John Doe resided in Dallas County Texas during all times relevant to the claims made the basis of this suit. His identity is being made known to the Defendants by separate correspondence to each of the Defendants by Plaintiff's counsel. The last 3 digits of Plaintiff's Texas driver's license number are 979 and the last 3 digits of his Social Security Number are 172. John Doe was a minor at all times during the emotional and sexual abuse he was subjected to by Donald Dickerson, a Jesuit Scholastic, as described in more detail herein below.

2.02 Defendant Jesuit College Preparatory School of Dallas Inc., is a Texas not-for-profit corporation that owns and operates an all-male, private, college-preparatory school, located in Dallas, Texas. The Society of Jesus owns the school. The Society of Jesus also known as the Jesuit Order or the Jesuits is a religious order of the Roman Catholic Church. Defendant Jesuit College Preparatory School of Dallas Inc., or Jesuit Dallas is located within the U.S. Central and Southern Province of the Jesuit Order. At the time of all events relevant to the Plaintiff's claims in this cause, Jesuit Dallas was located within the New Orleans province of the

Jesuit Order which in 2014 was combined with the former Missouri province to create the U.S. Central and Southern Province. Defendant Jesuit College Preparatory School of Dallas Inc. (Jesuit Dallas) can be served with process by serving its registered agent Michael A. Earsing at 12345 Inwood Road, Dallas Texas 75244.

2.03 Defendant Catholic Society of Religious and Literary Education is a Louisiana non-profit corporation under which the New Orleans Province (now U.S. Central and Southern Province of the Jesuit Order) conducted business in Texas during all times relevant to the Plaintiff's claims and causes of action in this cause. This business included operation of Jesuit Dallas preparatory school located at 12345 Inwood Road, Dallas Texas 75244. Defendant



Catholic Society of Religious and Literary Education does not maintain an agent for service of process in Texas and therefore service of process can be effected under the Texas "Long-Arm Statute", Tex. Civ. Prac. & Rem. Code §§ 17.042 and § 17.044 by substituted service on the Texas Secretary of State. Defendant Catholic Society of Religious and Literary Education can be served with process by serving its President and Director Ronald A. Mercier at Leo Brown Jesuit Community, 3550 Russell Boulevard, St. Louis Missouri 63104-1549.