

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

JANE DOE,

Plaintiff,

v.

DILLARD UNIVERSITY

Defendant.

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CIVIL ACTION NO. 17-2645

JUDGE:

MAG JUDGE:

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COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, Jane Doe, by and through her attorneys, alleges the following on information and belief:

INTRODUCTION

1. In April 2016, Jane Doe, a student at Dillard University, was violently raped by a fellow Dillard Emerging Scholar participant, J.B., in her dormitory. Unknown to Jane, only five months earlier, J.B. had raped another Dillard student, Kate Roe, in the very same dormitory. Kate had immediately reported the rape to Dillard. Dillard did not investigate Kate’s report, warn the student body, ban J.B. from campus, or restrict his access to Dillard dormitories. Because of Dillard’s inaction, J.B. was able to access Jane and rape her.

2. Jane immediately reported the rape to Dillard and the police. This time, Dillard informed its students of the rape and seventeen days later issued a campus wide alert identifying J.B. by name and photograph, publicizing his ban from campus. Had Dillard taken these and other crucial actions in response to Kate’s report, J.B. would not have accessed and raped Jane Doe.

3. In the wake of the rape, J.B. and his friends harassed Jane Doe, blaming her for the ban, and Dillard refused to address this harassment after Jane notified school officials of it. Unable to cope with her severe depression and fear in the wake of the assault, Jane dropped out of Dillard.

4. Dillard had actual knowledge of the substantial and foreseeable risk posed by J.B., whose conduct and presence on Dillard's campus created a sexually hostile environment for female students. By acting with deliberate indifference to that knowledge, Dillard subjected Jane to sexual harassment and deprived her of equal access to educational opportunities in violation of Title IX of the Educational Amendments of 1972, 20 U.S.C. § 1681(a). Dillard University also violated duties owed to Jane as her university and as the owner of the dormitory in which she resided, causing her to suffer significant emotional distress and other physical and emotional injuries.

JURISDICTION

5. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331, 1343, and 2201 as this is a civil action arising under the laws of the United States. This Court has jurisdiction over supplemental claims arising under Louisiana law pursuant to 28 U.S.C. § 1367(a).

6. Venue lies in the United States District Court for the Eastern District of Louisiana pursuant to 28 U.S.C § 1391(b) because the Defendant is situated in the Eastern District of Louisiana. Venue also lies in this district pursuant to 28 U.S.C. § 1391(c) because a substantial part of the events or omissions giving rise to the claims occurred in this district.

PARTIES

7. Jane Doe resides in Louisiana.

8. Defendant Dillard University is an institution of higher education located in New Orleans, Louisiana, and is a recipient of federal financial assistance within the meaning of 20 U.S.C. § 1681(a).

FACTUAL BACKGROUND

I. Jane Doe and J.B. Attended Dillard’s Mandatory Summer Residential Program.

9. Jane Doe had long dreamed of attending Dillard University, a widely respected Historically Black College or University (HBCU). During her senior year of high school, Jane was thrilled to be conditionally admitted to Dillard for the fall 2015 term.

10. Dillard selected Jane to participate in its Emerging Scholars Program (“Emerging Scholars” or “the Program”) before the 2015-2016 academic year. According to Dillard’s website, the Emerging Scholars Program is: a) a “mandatory, residential summer program” for all conditionally admitted students; b) a seven-week summer on-campus program followed by “tutoring, academic counseling and mentoring throughout the [participant’s] freshman year and beyond.”¹; and c) designed to “increase the number of students who successfully matriculate” through Dillard’s undergraduate curriculum by enhancing academic skills and improving cultural and social readiness. The stated goal of the Program is “[t]o identify and enroll prospective Dillard students and equip them with the academic skills and cultural capital which will enable them to persist through college graduation.” Participants are charged tuition and credits earned in the Program count toward the participants’ undergraduate degree credit requirements if they continue at Dillard. In order to matriculate into Dillard for an undergraduate degree,

¹ http://www.dillard.edu/_admissions/_admissions-programs/emerging-scholars.php

conditionally admitted participants must earn a minimum GPA in the Emerging Scholars classes. After a summer of hard work, Jane, having met that requirement, became a Dillard undergraduate student.

11. Through Dillard's Emerging Scholars Program, Jane met J.B., also a participant in the Program. Upon information and belief, J.B. did not achieve the minimum GPA necessary to matriculate into Dillard for the 2015-2016 academic year. However, as a Dillard Emerging Scholars alumnus, J.B. remained close with Dillard students and staff he met through the Program. J.B. spent time on Dillard's campus nearly every day, playing basketball, socializing with students, visiting campus residence hall rooms, including those in Camphor Hall, eating in the Dillard dining halls, using the gym, and attending Dillard sporting events, including women's and men's basketball games, as well as events at the Dillard Professional Schools Building, the main building on campus where classes were held.

II. J.B. Violently Raped Dillard Student Kate Roe in Her Dorm Room and the University Failed to Protect Students in Response.

12. On or about November 8, 2015, J.B. came to the Dillard on-campus residence hall room of freshman Kate Roe in Camphor Hall. Kate asked him to leave, but he refused, pushed himself on top of her, and raped her. Kate told him to stop, but J.B. ignored her pleas. He did not use a condom and, after leaving her room, J.B. sent Kate several text messages, including one indicating that he may have chlamydia and asking whether she may be pregnant.

13. The next day, Kate went to the Dillard Student Health and Wellness center to see a nurse because she was afraid she had contracted a sexually transmitted infection from J.B. The Dillard nurse informed La'Toya Lewis, the Dillard University Office of Residential Life Area Coordinator, about the rape in Camphor Hall. Ms. Lewis approached Kate about the assault, but did not mention Title IX or refer Kate to the Title IX coordinator. Under the Clery Act, Ms.

Lewis was a mandatory reporter to school officials. Similarly, Department of Education Guidance provides that “responsible persons” like Ms. Lewis must “report incidents of sexual violence to the Title IX coordinator or other appropriate school designee.”² Ms. Lewis advised Kate that she (Ms. Lewis) would inform the Dillard Office of Academic Affairs of the incident.

14. Ms. Lewis took Kate to the Dillard University Police Department (DUPD), where Kate reported the rape, identified J.B. as the perpetrator, and provided his name and contact information. The DUPD turned the matter over to the New Orleans Police Department (NOPD), conducting no further investigation.

15. No one in the Dillard administration followed up with Kate, including Ms. Lewis, and Dillard never investigated Kate’s report of rape, as required by Title IX. Nor did Dillard issue a “timely warning” to the student body of the rape, as required by the Clery Act. Despite the known danger posed by J.B., Dillard did not prevent him from continuing to access campus or take other measures to protect its students. The Office of Residential Life failed to put in place a mechanism to prevent J.B. from entering residence halls and preying on unsuspecting Dillard students.

16. Because of Dillard’s inaction, J.B. continued to frequent the Dillard campus. On January 28, 2016, J.B. posted online a video of himself smoking a cigarette in front of a Dillard residence hall. J.B. also attended a party hosted by a Dillard student organization at the Kearney dining hall, during which he approached Jane Doe. Members of the DUPD were present at the event, and aware that J.B. had been identified as a threat to female students by Kate Roe, but did not prevent his entrance or remove him.

² <https://www2.ed.gov/about/offices/list/ocr/docs/qa-201404-title-ix.pdf>

II. J.B. Violently Raped Jane Doe in her Room in a Dillard Campus Residence Hall.

17. Unpunished and emboldened by Dillard's failure to restrict his access to its students following his rape of Kate Roe, on the morning of April 2, 2016, J.B. came to Camphor Hall to watch television with Jane in her room. Jane and J.B. were not, and had never been, in a dating or physical relationship. Because Dillard failed to warn its students of the known danger posed by J.B., Jane was unaware of his recent sexual assault of Kate Roe in the very same residence hall under strikingly similar circumstances.

18. Despite the report to Dillard of J.B. having recently raped a student in her room at Camphor Hall, J.B. easily entered through the front door of the residence hall, which was easily accessible to non-residents and non-students. J.B. was neither required to nor did he provide identification prior to entering. No policy or procedure was in place to prevent J.B. in particular from entering the residence hall.

19. While watching television in her room, J.B. attempted to kiss Jane. When she rebuffed his advance, telling him "no," J.B. became more aggressive and attempted to perform oral sex on her. Jane did not want to engage in any sexual activity with him and again told him so. She told J.B. he had to leave and opened the door for him to exit. Instead, J.B. shut the door, pushed Jane over the edge of the bed, pulled her pants and underwear down, and raped her while Jane continued to say no. After he ejaculated, J.B. kissed Jane on her shoulder and said it was okay. J.B. did not use a condom and Jane was not taking birth control.

20. After J.B. left, Jane, in shock and unable to believe what had just happened, cried for several hours. Later that day she told a female friend what had happened. On her friend's advice, Jane left campus for the weekend.

IV. Dillard's Failure to Address Retaliatory Harassment Against, or Offer Title IX Accommodations to, Jane Doe Caused Her to Drop Out of College

21. On April 4, 2016, Jane returned to Dillard and reported the rape to the DUPD. The DUPD did not inform her of her rights under Title IX, mention the existence of a Title IX office, or refer her to the Title IX coordinator. The DUPD did not inform Jane that another student had reported J.B. for rape fewer than five months prior. After taking Jane's statement, the DUPD turned the matter over to the NOPD and, again, conducted no further investigation. No Dillard administrator reached out to Jane regarding the assault, a safety plan, academic accommodations, or counseling services. At no point did Jane meet Dillard's Title IX coordinator.

22. On April 6, 2016, Dillard issued a "timely warning" of Jane's report of sexual assault, as required under the Clery Act. In a campus-wide email, Dillard officials informed the student body that a rape had occurred on campus. On April 21, 2016, 17 days after Jane reported, Dillard banned J.B. from its campus. School officials issued an alert to the Dillard student body identifying J.B. by name and photograph and publicizing his banishment from campus.

23. Once banned, J.B. threatened Jane publicly. In a text message conversation between a group of Dillard Emerging Scholars, J.B. wrote, "I know exactly who it was/is and I'm going to make her life a living hell." On the same day, J.B. sent a harassing text to Jane, exclaiming "[you] g[o]t me banned off campus" and "[you] told them [I] raped you wtf."

24. Dillard classmates who were friends of J.B. also harassed Jane. Two approached her demanding to know why she reported J.B. and blamed her for his banishment.

25. Jane sent J.B.'s message to Demetrius Johnson, the Dean of Student Affairs and Director of Residential Life, indicating the perpetrator was continuing to contact her. Dean

Johnson forwarded the message to the DUPD and took no further action to protect Jane or address J.B.'s contact with her. Jane told the DUPD about the students' questioning of her, and the DUPD officer told Jane to just not worry about the harassment. A few weeks later, J.B. posted on twitter that he "just ca[m]e off" Dillard's campus, and threatened "ima make her wanna [get the fuck] out of Dillard."

26. Jane was traumatized by the rape and its aftermath, and she became severely depressed. She was seldom able to leave her residence hall room and often stayed in bed, only going out for meals. She missed classes and assignments and lost her motivation to succeed in school. Jane's academic performance plummeted and her GPA dropped below 1.9. As a result, she lost a \$2,500 Dillard grant which was conditional on high academic performance.

27. Jane did not feel safe on campus or in New Orleans. She felt like crying all of the time, believed other students were staring at and judging her, and felt shunned by them. For the rest of the semester Jane attempted to avoid her classmates by staying in her room, and, isolated and without assistance from Dillard, experienced suicidal ideation. Finally, unable to manage her stress and depression, Jane dropped out of Dillard that summer.

28. She only later learned that J.B. had also raped Kate Roe in the same residence hall a few months prior to raping her.

V. J.B. Posed a Substantial and Foreseeable Risk to Dillard Students, Particularly Those, Like Jane Doe, in Residence Halls

29. Dillard knew J.B. presented a substantial and foreseeable risk of serious harm to its students but failed to take action to protect students like Jane.

30. Dillard had direct access to and knowledge of extensive research, studies, and other credible information establishing the dangers that sexual assault offenders, such as J.B., pose to others by repeating their offenses.

31. For example, a well-known 2002 study by David Lisak and Paul Miller found that, while only about 6% of college men interviewed had attempted or successfully raped someone, most of those who had were repeat offenders, with each committing an average 5.8 rapes. Articles, dissertations, audio, visual and other training materials by educators, health care providers, government officials and other professionals have directly, and repeatedly, informed the higher education community, including Dillard, about the substantial and foreseeable risk posed to women on campus by individuals who have raped or sexually assaulted students, particularly when they have done so without suffering consequences.

32. Moreover, Dillard receives allegations and complaints regarding sexual violence on a confidential basis, pursuant to its own policies, state law, and the Family Educational Rights and Privacy Act. Hence, Dillard has exclusive, superior knowledge of the risks facing students from sexual predators, such as J.B. Students, like Jane Doe, as a matter of necessity, and because of Dillard's practices, rely on Dillard to timely and reasonably act with respect to such information to protect them from and warn them of risks known to Dillard but unknown to students.

33. Further, Dillard exercised exclusive control over maintaining the safety and security of its premises, including its residence halls.

34. Dillard's residential staff was on notice that its alumnus J.B. had raped Kate Roe by accessing her in Camphor Hall, information unknown to Jane Doe. Dillard, including staff in charge of the Dillard residence halls, knew of the disturbing report of rape by J.B. of a freshman acquaintance in Camphor Hall. It knew that he used his status as an Emerging Scholar participant and alumnus to access and prey upon its freshman students.

35. Yet, despite this knowledge, Dillard did not take corrective action to decrease the substantial and foreseeable risk J.B. posed to female students, like Jane. It did not, for example, conduct an investigation of his conduct, issue a warning to students about the risk he posed, ban him from campus, restrict his access to residence halls, prevent his access to students on campus or at campus events, or conduct a threat assessment of his predatory behavior. Through its inaction, Dillard communicated to J.B. that he could rape students with impunity.

36. Dillard's failure to take corrective action where a person with authority to do so had actual knowledge of a substantial risk of serious harm is a clearly unreasonable response to the report of a serious sexual assault of its student on its property, by an alumnus of its program who frequents its campus and residence halls.

37. Dillard knew that J.B. posed a substantial risk of serious harm to its students, and its inaction in response to Kate's report of rape put Jane Doe at risk and gives rise to her claims against Dillard. Jane Doe was raped by J.B. in a manner and under circumstances nearly identical to those reported by Kate Roe.

VI. Dillard's Actions and Omissions Severely Damaged Jane Doe.

38. After the assault, Jane's life, including her ability to access her education, entered a downward spiral. Unable to function on a campus where she did not feel safe, knowing the University had allowed a perpetrator to prey on students like her, and that Dillard would not address the ongoing retaliatory harassment, Jane dropped out of college. Rather than remaining on track to finish college, Jane is now working in a low-wage hourly job and is unable to make payments on the student loans she took out to attend Dillard.

39. After leaving Dillard, without student housing and educational access, Jane was homeless for about five months. She slept on the couches of acquaintances and strangers, including for two weeks in a closet with an air mattress. At one point, she received help from

her church to cover the first month's rent for a room. By the third month however, the room had become uninhabitable. The utilities had been shut off, there was neither a stove nor a working kitchen sink, and the room was infested with bed bugs. Jane then shuttled between church members' houses.

40. Jane Doe continues to suffer from severe depression, suicidal thoughts, and anxiety which is triggered by anything related to Dillard. When she sees individuals who attended Dillard her heart begins to race and she has difficulty thinking. Jane has trouble sleeping and often wakes up during the night with flashbacks to the assault. As a result of these flashbacks, nightmares about being raped, Jane wakes up feeling that she cannot breathe or move. She remains afraid to step foot into New Orleans. The emotional lability Jane experiences resulting from the rape and Dillard's failure to provide support or protection after the rape causes her to lash out at friends and avoid social interaction. She is, consequently, socially and emotionally isolated.

CLAIMS FOR RELIEF

Count I

Violation of Title IX 20 U.S.C. § 1681(a)

41. Jane Doe incorporates all preceding paragraphs into this Count by reference as though fully restated herein.

42. Beginning in November 2015, Dillard had actual knowledge of the substantial risk of severe and pervasive sexual harassment presented by J.B. to female students, like Jane Doe, at Dillard University.

43. Beginning in November 2015, Dillard had actual knowledge of the substantial risk of severe and pervasive sexual harassment presented by J.B. to female students, like Jane Doe, in its residence halls.

44. Dillard, through its failure to address the threat posed by J.B., was deliberately indifferent to the substantial risk J.B. posed to Dillard students and on-campus residents, like Jane Doe.

45. Dillard's failure to take action to prevent further sexual harassment including sexual violence by J.B. of its students, despite its authority and ability to do so, was clearly unreasonable in light of known circumstances.

46. As a result of Dillard's deliberate indifference to actual knowledge of a substantial risk of sexual assault by J.B., J.B. raped Jane Doe on April 2, 2016.

47. Jane Doe was subject to sexual harassment so severe, pervasive, and objectively offensive that she was denied access to educational opportunities and benefits. As a result of the rape and continuing harassment thereafter, Jane Doe's grades dropped, she lost a crucial educational grant, and she was forced to drop out of Dillard.

48. As a direct and proximate result of Dillard's deliberate indifference, Jane Doe sustained and continues to sustain economic and non-economic injuries.

COUNT II
Premises Liability

49. Jane Doe incorporates all preceding paragraphs into this Count by reference as though fully restated herein.

50. At all times relevant herein, Jane Doe lived in Camphor Hall, a residence hall owned, operated, and controlled by Dillard.

51. Beginning in November 2015, Dillard knew that J.B. posed a risk to students in its residence halls, including and specifically Camphor Hall, based on J.B.'s rape of Kate Roe.

52. Despite this knowledge, and despite Dillard's duty to its residents to protect them from foreseeable harm on its premises, Dillard took no action to prevent further foreseeable sexual violence by J.B., such as by excluding him from Dillard residence halls.

53. Because of Dillard's failure to act to prevent future violence by J.B., J.B. raped Jane Doe in Dillard's Camphor Hall on April 2, 2016.

54. As a direct and proximate result of Dillard's inaction, Jane Doe sustained and continues to sustain economic and non-economic injuries.

**COUNT III
Negligence**

55. Jane Doe incorporates all preceding paragraphs into this Count by reference as though fully restated herein.

56. Jane Doe was a resident student at Dillard University from the summer of 2015 through the 2015-2016 academic year.

57. After November 2015, when Dillard student Kate Roe reported being raped by J.B. in Camphor Hall, further sexual violence by J.B. against Dillard students was reasonably foreseeable to Dillard University.

58. Despite this knowledge, and despite Dillard's special relationship and consequent duty to resident students like Jane Doe, Dillard failed to take reasonable and necessary steps to protect resident students from further violence by J.B., such as excluding him from Dillard's campus, specifically including residence halls like Camphor Hall.

59. As a result of Dillard's failure to act to prevent future violence by J.B., J.B. raped Jane Doe in Camphor Hall on April 2, 2016.

60. As a direct and proximate result of Dillard's inaction, Jane Doe sustained and continues to sustain economic and non-economic injuries.

61. Plaintiff demands a Jury for all causes of action raised herein.

Prayer for Relief

Plaintiff, Jane Doe, requests that this Court award her:

- A. Compensatory damages on Count I;
- B. Compensatory damages and Civil Penalties on Count II;
- C. Compensatory damages on Count III;
- D. Attorney's fees;
- E. Injunctive relief ordering Dillard University revise its policies, procedures, and practices so that it is in compliance with Title IX; and
- F. Such other and further relief that is just and appropriate under the circumstances.

Respectfully submitted,

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CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Jane Doe

(b) County of Residence of First Listed Plaintiff Orleans (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Soren E. Gisleson Herman, Herman & Katz 820 O'Keefe Avenue, New Orleans, Louisiana 70113 (504)5814892

DEFENDANTS

Dillard University

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large table with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District (specify), 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. §§ 1331, 1343, and 2201

Brief description of cause: Sexual Assault at University, Title IX and state negligence violations

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE 03/29/2017 SIGNATURE OF ATTORNEY OF RECORD S/Soren E. Gisleson

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the
Eastern District of Louisiana

Jane Doe

Plaintiff(s)

v.

Dillard University

Defendant(s)

Civil Action No. 17-2645

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Dillard University
Through Registered Agent:
Denise Wallace
2601 Gentilly Blvd.
Rosenwald Hall Room 235
New Orleans, Louisiana 70122

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Soren E. Gisleson
Herman, Herman & Katz
820 O'Keefe Avenue
New Orleans, Louisiana 70113

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 17-2645

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: