

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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HL1, HL2, HL3, HL4, HL5, HL6, HL7, HL8, HL10,
HL11, HL12, HL13, HL14, HL16, HL17, HL18, HL19
HL20, HL21, HL22, HL23, HL24, HL25, HL26, HL27
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HL150, HL151, HL152, HL153, HL154, HL155, HL156,
HL157, HL158, HL159,

Index No. _____

Plaintiffs,

COMPLAINT

-against-

THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE
CITY OF NEW YORK; COLUMBIA UNIVERSITY
COLLEGE OF PHYSICIANS AND SURGEONS;
COLUMBIA PRESBYTERIAN MEDICAL CENTER;
COLUMBIA UNIVERSITY MEDICAL CENTER; THE
NEW YORK AND PRESBYTERIAN HOSPITAL;
SLOANE HOSPITAL FOR WOMEN; PRESBYTERIAN
HOSPITAL PHYSICIAN SERVICES ORGANIZATION,
INC.; COLUMBIA-CORNELL CARE, LLC; COLUMBIA
CORNELL NETWORK PHYSICIANS, INC.; EAST
SIDE ASSOCIATES; COLUMBIA PRESBYTERIAN
MEDICAL CENTER, EAST SIDE ASSOCIATES; and
DOES 1-10;

Defendants.

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TO THE SUPREME COURT OF THE STATE OF NEW YORK:

PLAINTIFFS, HL1, HL2, HL3, HL4, HL5, HL6, HL7, HL8, HL10, HL11, HL12, HL13, HL14, HL16, HL17, HL18, HL19 HL20, HL21, HL22, HL23, HL24, HL25, HL26, HL27 HL28, HL29, HL30, HL31, HL32, HL33, HL34, HL35 HL36, HL37, HL38, HL39, HL40, HL41, HL42, HL43, HL44, HL45, HL46, HL47, HL48, HL49, HL50, HL51, HL52, HL53, HL54, HL55, HL56, HL57, HL58, HL59, HL60, HL61, HL62, HL63, HL64, HL65, HL66, HL67, HL69, HL70, HL71, HL72, HL73, HL74, HL75, HL76, HL77, HL78, HL79, HL80, HL81, HL82, HL83, HL84, HL85, HL86, HL87, HL88, HL89, HL90, HL91, HL92, HL93, HL94, HL95, HL96, HL97, HL98, HL99, HL100, HL101, HL102, HL103, HL104, HL105, HL106, HL107, HL108, HL109, HL110, HL111, HL112, HL113, HL114, HL115, HL116, HL117, HL118, HL119, HL120, HL121, HL122, HL123, HL124, HL125, HL126, HL127, HL128, HL129, HL130, HL131, HL132, HL133, HL134, HL135, HL136, HL137, HL138, HL139, HL140, HL141, HL142, HL143, HL144, HL145, HL146, HL147, HL148, HL149, HL150, HL151, HL152, HL153, HL154, HL155, HL156, HL157, HL158, HL159 (hereinafter “PLAINTIFFS”), by and through undersigned counsel, respectfully shows to this Court and alleges as follows:

INTRODUCTION

1. This action arises from heinous acts of sexual assault and abuse on women, and is brought pursuant to the New York Adult Survivors Act codified in CPLR § 214-j, the Victims of Gender-Motivated Violence Law, N.Y.C. Admin. Code § 10-1101 *et seq.*, and principles of common law negligence. PLAINTIFFS were sexually abused and assaulted under the guise of medical care by serial sexual predator, ROBERT HADDEN, M.D., (hereinafter “HADDEN”), an employee and/or agent of THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS;

COLUMBIA PRESBYTERIAN MEDICAL CENTER; COLUMBIA UNIVERSITY MEDICAL CENTER ; THE NEW YORK AND PRESBYTERIAN HOSPITAL, PRESBYTERIAN HOSPITAL PHYSICIAN SERVICES ORGANIZATION, INC.; COLUMBIA-CORNELL CARE, LLC; COLUMBIA CORNELL NETWORK PHYSICIANS, INC.; AND DOES 1-10, (hereinafter “DEFENDANTS”).

PARTIES, JURISDICTION AND VENUE

2. PLAINTIFFS bring this Complaint using pseudonyms as shown in the above caption because of the sensitive nature of the allegations of sexual assault and abuse in this Complaint, which is a matter of the utmost intimacy.

3. Upon information and belief, DEFENDANT THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK (hereinafter “TRUSTEES”), is a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York, with its principal offices located at 211 Low Library, 535 West 116th Street, New York, NY 10032.

4. Upon information and belief, DEFENDANT COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS (hereinafter “CUCPS”) is a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York with its principal offices located at 680 W. 168th Street, New York, NY 10032.

5. Upon information and belief, DEFENDANT COLUMBIA PRESBYTERIAN MEDICAL CENTER (hereinafter “CPMC”) is a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York with its principal offices located at 525 East 68th Street, New York, NY 10065.

6. Upon information and belief, DEFENDANT COLUMBIA UNIVERSITY MEDICAL CENTER (hereinafter “CUMC”) is a domestic not-for-profit corporation organized

and existing under and by virtue of the laws of the State of New York with its principal offices located at 630 West 168th St., New York, NY 10032.

7. Upon information and belief, DEFENDANT THE NEW YORK AND PRESBYTERIAN HOSPITAL (hereinafter “NYPH”) is a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York with its principal offices located at 525 East 68th Street, New York, NY 10065.

8. Upon information and belief, SLOANE HOSPITAL FOR WOMEN serves as the obstetrics and gynecological service within THE NEW YORK AND PRESBYTERIAN HOSPITAL, and the Department of Obstetrics and Gynecology of the COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS. Upon information and belief, DEFENDANT NYPH and DEFENDANT CUCPS do business as Sloane Hospital for Women (hereinafter “SLOANE”), which is located at 161 Fort Washington Avenue, New York, NY 10032.

9. Upon information and belief, DEFENDANT PRESBYTERIAN HOSPITAL PHYSICIAN SERVICES ORGANIZATION, INC. (hereinafter “PHPSO”) is a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York with its principal offices located at 1211 Avenue of the Americas, New York, NY 10036.

10. Upon information and belief, DEFENDANT COLUMBIA-CORNELL CARE, LLC (hereinafter “CCC”) is a domestic not-for-profit entity with its principal office located at 16 E. 60th Street, Suite 480, New York, NY 10022.

11. Upon information and belief, DEFENDANT COLUMBIA CORNELL NETWORK PHYSICIANS, INC. (hereinafter “CCNP”) is a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York with its principal offices located at 900 Third Avenue, Suite 500, New York, NY 10022.

12. Upon information and belief, EAST SIDE ASSOCIATES (“ESA”) serves as an obstetrics and gynecological service department within THE NEW YORK AND PRESBYTERIAN HOSPITAL, and the Department of Obstetrics and Gynecology of the COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS. Upon information and belief, DEFENDANTS NYPH and DEFENDANTS CUCPS do business as EAST SIDE ASSOCIATES located at 16 E. 60th Street, Suite 408, New York, NY 10022.

13. Upon information and belief, COLUMBIA PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES (“CPMC-ESA”) serves as an obstetrics and gynecological service department within THE NEW YORK AND PRESBYTERIAN HOSPITAL, and the Department of Obstetrics and Gynecology of the COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS. Upon information and belief, DEFENDANT NYPH and DEFENDANT CUCPS do business as COLUMBIA PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES, located at 16 E. 60th Street, Suite 408, New York, NY 10022.

14. Upon information and belief, CPMC-ESA serves as an obstetrics and gynecological service department within THE NEW YORK AND PRESBYTERIAN HOSPITAL, and the Department of Obstetrics and Gynecology of the COLUMBIA UNIVERSITY MEDICAL CENTER. Upon information and belief, DEFENDANTS NYPH and DEFENDANTS CUMC do business as COLUMBIA PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES located at 16 E. 60th Street, Suite 408, New York, NY 10022.

15. Defendant DOES 1-10 are persons, entities or locations where HADDEN was employed, maintained hospital privileges, performed medical services, and/or saw patients, who have not to date been identified. Plaintiffs have made diligent efforts to identify these Defendants prior to the filing of the Complaint and have been unable to do so.

16. PLAINTIFFS were sexually abused and assaulted under the guise of medical care, by HADDEN at locations owned, operated and controlled by DEFENDANTS, hereinafter "DEFENDANT'S OFFICES", including but not limited to, the locations noted in paragraphs 3 through 15 *supra*.

17. Venue is proper in Supreme Court, New York County pursuant to New York CPLR § 503 as one or more of the DEFENDANTS resides in New York County.

18. This Court has personal jurisdiction over each of the DEFENDANTS as each has offices in New York County, or at relevant times conducted activities in New York that give rise to the claims asserted herein.

19. The amount in controversy exceeds the jurisdictional limit of all lower courts.

20. HL1 ([REDACTED]) was born in 1967 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES in approximately 1998. HADDEN's sexual abuse of HL1 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; inappropriate removal of her clothing; inappropriate and uncomfortable groping of the buttocks; multiple inappropriate breast exams during one visit; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit, including throughout the prenatal period; inappropriate and uncomfortable pubic hair touching and pulling; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's g-spot and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals;

continuous suggestions and pressure by HADDEN to undergo tubal ligation which she felt persuaded to do. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

21. HL2 ([REDACTED] [REDACTED]) was born in 1978 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2005 until 2012. HADDEN's sexual abuse of HL2 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; multiple inappropriate breast exams during one visit; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit, including throughout the prenatal period; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's g-spot and clitoris; prolonged, painful, aggressive pelvic exams which included inserting his fist inside her vagina; inappropriate, uncomfortable and painful anal penetration; inappropriate, improper, unwarranted and unnecessary "stretch" exams which included HADDEN directing her to bend over nude in front of him; unnecessary close proximity between his face and her genitals; continuous suggestions and pressure by HADDEN to undergo tubal ligation. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

22. HL3 ([REDACTED]) was born in 1968 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1998 until 2011. HADDEN's sexual abuse of HL3 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed to inflict pain and for his own sexual gratification; inappropriate and uncomfortable groping of the buttocks; multiple inappropriate breast exams during one visit; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit, including throughout the prenatal period; inappropriate and uncomfortable anal penetration one time; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's g-spot and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; continuous suggestions and pressure by HADDEN to undergo tubal ligation. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

23. HL4 ([REDACTED]) was born in 1969 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 1998 until 2011. HADDEN's sexual abuse of HL4 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed to inflict pain and for his own sexual

gratification; inappropriate and uncomfortable groping of the buttocks; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's g-spot and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; inappropriate, improper, unwarranted and unnecessary "mole" and "scoliosis" exam which included HADDEN directing her to bend over nude in front of him; unnecessary close proximity between his face and her genitals. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

24. HL5 ([REDACTED]) was born in 1977 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2002 until 2011. HADDEN's sexual abuse of HL5 included but was not limited serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; inappropriate and uncomfortable rubbing of her anus; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; inappropriate, improper, unwarranted and unnecessary "mole" and "scoliosis" checks which included HADDEN directing her to bend over nude in front of him; idle

questioning and prolonged small talk while her body was naked or exposed; unnecessary close proximity between his face and her genitals. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

25. HL6 ([REDACTED]) was born in 1969 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2000 until 2009. HADDEN's sexual abuse of HL6 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; inappropriate and uncomfortable groping of the thighs and pelvic region; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's labia and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; inappropriate, uncomfortable and painful anal penetration during every visit; unnecessary close proximity between his face and her genitals. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

26. HL7 ([REDACTED]) was born in 1970 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 1998 until 2003. HADDEN's sexual abuse of HL7 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit

consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; inappropriate and uncomfortable groping of the buttocks; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's labia and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; inappropriate, improper, unwarranted and unnecessary "tailbone" check which included HADDEN directing her to bend over nude in front of him. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

27. HL8 ([REDACTED]) was born in 1978 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2006 until 2009. HADDEN's sexual abuse of HL8 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; inappropriate and uncomfortable groping of the buttocks; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's labia and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals.

Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

28. HL10 ([REDACTED]) was born in 1961 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 1999 until 2011. HADDEN's sexual abuse of HL10 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; inappropriate and uncomfortable groping of the buttocks; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's labia and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; inappropriate, improper, unwarranted and unnecessary "scoliosis" check which included HADDEN directing her to bend over nude in front of him. HADDEN also directed Plaintiff to go to his office after her exam. When she entered the room HADDEN appeared to be masturbating himself. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

29. HL11 ([REDACTED]) was born in 1977 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2007 until 2009. HADDEN's sexual abuse of HL11 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every

visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; inappropriate and uncomfortable groping of the buttocks; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing Plaintiff's vagina; prolonged, painful, aggressive pelvic exams which included digital thrusting; prolonged, painful, aggressive pelvic exams which included digital thrusting and anal penetration simultaneously; unnecessary close proximity between his face and her genitals. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

30. HL12 ([REDACTED]) was born in 1971 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1994 until 2012. HADDEN's sexual abuse of HL12 included but was not limited serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; inappropriate and uncomfortable groping of the thighs; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing Plaintiff's labia and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; prolonged, painful, aggressive pelvic exams which

included digital thrusting and anal penetration simultaneously; unnecessary close proximity between his face and her genitals. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

31. HL13 ([REDACTED]) was born in 1965 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1993 until 2000. HADDEN's sexual abuse of HL13 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at most visits consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing Plaintiff's vagina and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

32. HL14 ([REDACTED]) was born in 1986 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2000 until 2010. HADDEN's sexual abuse of HL14 included but was not limited sexual acts; serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; inappropriate

and uncomfortable groping of the buttocks; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's labia and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals; unnecessary and uncomfortable hugging and kissing on her cheek. HADDEN inappropriately required Plaintiff to bend over completely nude and exposed when administering Plaintiff's HPV vaccine. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

33. HL16 ([REDACTED]) was born in 1979 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2001 until 2006. HADDEN's sexual abuse of HL16 included but was not limited to physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing Plaintiff's labia and clitoris; on approximately five occasions improper, inappropriate, unwarranted and unnecessary oral contact by HADDEN'S mouth and tongue on Plaintiff's vagina. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

34. HL17 ([REDACTED]) was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2009 until 2012. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2009 until 2012. HADDEN's sexual abuse of HL17 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts, in a manner designed for his own sexual gratification; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, with extended digital penetration.

35. HL18 ([REDACTED]) was born in 1960 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 1996 until 2012. HADDEN's sexual abuse of HL18 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; inappropriate and uncomfortable groping of the thighs; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary rough vaginal exams. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

36. HL19 ([REDACTED]) was born in 1978 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2004 until 2012. HADDEN's sexual abuse of HL19 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of

HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; inappropriate and uncomfortable groping of the thighs; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary rough vaginal exams at almost every visit with extended digital penetration. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

37. HL20 ([REDACTED]) was born in 1964 and was a patient of DEFENDANTS. She treated with HADDEN for gynecology at DEFENDANT'S OFFICES from approximately 1996 until 2012. HADDEN's sexual abuse of HL20 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary rough vaginal exams at almost every visit with extended digital penetration and thrusting. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

38. HL21 ([REDACTED]) was born in 1986 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1997 until 2012. HADDEN's sexual abuse of HL21 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; physical examinations performed outside the presence of

a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at every visit; approximately three visits included unexpected and painful anal penetration; requiring Plaintiff to do “Kegel” exercises regularly during visits while he digitally penetrated her; unnecessary, inappropriate and prolonged digital rubbing and penetration of Plaintiff’s vagina. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff’s body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

39. HL22 ([REDACTED]) was born in 1960 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT’S OFFICES in approximately 2000. HADDEN’s sexual abuse of HL22 included but was not limited to serial, prolonged, improper and inappropriate breast examinations perform consisting of HADDEN caressing, fondling, and squeezing of Plaintiff’s breasts and nipples, in a manner for his own sexual gratification; HADDEN inappropriately, improperly and unnecessarily attempted to express breast milk for no medical purpose or reason, other than his own desire; physical examinations performed outside the presence of a chaperone.

40. HL23 ([REDACTED]) was born in 1967 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT’S OFFICES. Upon information and belief, HADDEN’s sexual abuse of HL included but was not limited to inappropriate breast examinations and/or inappropriate vaginal exams.

41. HL24 ([REDACTED]) was born in 1978 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT’S OFFICES in approximately 2009. HADDEN’s sexual abuse of HL24 included but was not limited serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff’s prenatal period, consisting of HADDEN caressing, fondling, squeezing,

pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; multiple inappropriate breast exams during one visit; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; inappropriate and uncomfortable pubic hair touching and pulling; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's g-spot, clitoris and labia; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals; unnecessary and uncomfortable blowing and breathing on Plaintiff's vagina; unnecessary pressing and touching of Plaintiff's pelvic area forcing Plaintiff to urinate. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

42. HL25 ([REDACTED]) was born in 1966 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2003 until 2008. HADDEN's sexual abuse of HL25 included but was not limited to improper and inappropriate anal penetration.

43. HL26 ([REDACTED]) was born in 1961 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES in approximately 2000. HADDEN's sexual abuse of HL26 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; unnecessary, inappropriate and prolonged digital rubbing and penetration of Plaintiff's vagina. Additionally, HADDEN made sexually inappropriate comments regarding

Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

44. HL27 ([REDACTED]) was born in 1959 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1993 until 2000. Upon information and belief, HADDEN's sexual abuse of HL 27 included but was not limited to inappropriate breast examinations and/or inappropriate vaginal exams.

45. HL28 ([REDACTED]) was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2012. Upon information and belief, HADDEN's sexual abuse of HL 28 included but was not limited to inappropriate breast examinations and improper, inappropriate, unnecessary and unwarranted vaginal exams including prolonged digital penetration.

46. HL29 ([REDACTED]) was born in 1973 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1995 until 1997. Upon information and belief, HADDEN's sexual abuse of HL 29 included but was not limited to inappropriate breast examinations and/or inappropriate vaginal exams.

47. HL30 ([REDACTED]) was born in 1963 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1995 until 1997. HADDEN's sexual abuse of HL30 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling,

squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit, including improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris; prolonged, painful, aggressive pelvic exams which including digital penetration to the point where Plaintiff requested HADDEN to stop, however he continued on; inappropriate and uncomfortable anal penetration; continuous suggestions and pressure by HADDEN to undergo tubal ligation. Plaintiff reported HADDEN's conduct to a nurse after one exam, the nurse responded that Plaintiff's feelings were attributed to her hormones.

48. HL31 ([REDACTED]) was born in 1988 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2010. HADDEN's sexual abuse of HL31 included but was not limited to serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate and prolonged vaginal exams. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

49. HL32 ([REDACTED]) was born in 1970 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1988 until 2006. HADDEN's sexual abuse of HL32 included but was not limited to serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; physical examinations

performed outside the presence of a chaperone; improper, inappropriate and prolonged vaginal exams. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

50. HL33 ([REDACTED]) was born in 1974 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1998 until 2010. HADDEN's sexual abuse of HL33 included but was not limited to serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; physical examinations performed outside the presence of a chaperone. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

51. HL34 ([REDACTED]) was born in 1971 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2003 until 2009. HADDEN's sexual abuse of HL34 included but was not limited to serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate and prolonged vaginal exams. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

52. HL35 ([REDACTED]) was born in 1976 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1998 until 2008. HADDEN's sexual abuse of HL35 included but was not limited to serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate and prolonged vaginal exams. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

53. HL36 ([REDACTED]) was born in 1987 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2004 until 2006. Upon information and belief, HADDEN's sexual abuse of HL 36 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris and labia; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals; unnecessary pressing. During one breast exam HADDEN inappropriately breast his body against hers. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance, specifically how "tight" her vagina was.

54. HL37 ([REDACTED]) was born in 1970 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2004 until 2006. HADDEN's sexual abuse of HL37 included but was not limited to serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; multiple unnecessary breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate and prolonged vaginal exams. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

55. HL38 ([REDACTED]) was born in 1968 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 1991 until 2001. HADDEN's sexual abuse of HL38 included but was not limited serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; multiple unnecessary breast exams during one visit; physical examinations performed outside the presence of a chaperone. Additionally, HADDEN spoke to Plaintiff in a demeaning and dismissive tone when explaining medical prognosis.

56. HL39 ([REDACTED]) was born in 1966 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1994 until 1996. HADDEN's sexual abuse of HL39 included but was not limited to serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's

breasts, in a manner designed for his own sexual gratification; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; improper, inappropriate, unwarranted and unnecessary touching, stroking, and rubbing of the outside of Plaintiff's vagina.

57. HL40 ([REDACTED]) was born in 1975 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 1993 until 1994. HADDEN's sexual abuse of HL40 included but was not limited to serial, prolonged, improper and inappropriate breast examinations; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

58. HL41 ([REDACTED]) was born in 1978 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2003 through 2009. HADDEN's sexual abuse of HL41 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris and labia; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals; unnecessary pressing, rubbing and touching of her clitoris while penetrating her vagina; unnecessary and painful anal penetration; unnecessary and uncomfortable hugging and kissing on

her cheek. During one visit HADDEN required Plaintiff to undergo a pelvic exam when she was only scheduled for a sonogram. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance specifically her weight; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

59. HL42 ([REDACTED]) was born in 1983 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES in approximately 2011. HADDEN's sexual abuse of HL42 included but was not limited to while Plaintiff was in active labor, improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris in the company of many residents.

60. HL43 ([REDACTED]) was born in 1991 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2007 until 2012. HADDEN's sexual abuse of HL43 included but was not limited to serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; multiple unnecessary breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unwarranted and unnecessary touching, stroking, and rubbing of Plaintiff's vagina in a sexual way; unnecessary pressing, touching and groping of Plaintiff's pelvic area forcing Plaintiff to urinate; unnecessary and painful anal penetration. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance specifically her nipples; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

61. HL44 ([REDACTED]) was born in 1981 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2008 until 2009. HADDEN's sexual abuse of HL44 included but was not limited to serial,

prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; multiple unnecessary breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unwarranted and unnecessary touching, stroking, and rubbing of Plaintiff's vagina in a sexual way; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing included digital penetration; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing included digital penetration causing Plaintiff to ejaculate. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance specifically her nipples; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

62. HL45 ([REDACTED]) was born in 1974 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2002 until 2005. HADDEN's sexual abuse of HL45 included but was not limited to serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; physical examinations performed outside the presence of a chaperone. HADDEN required Plaintiff to undergo an unnecessary, embarrassing and uncomfortable exams in which HADDEN directed Plaintiff to stand completely nude and exposed while he commented on her body. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance specifically her nipples; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

63. HL46 ([REDACTED]) was born in 1976 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2006 until 2012. HADDEN's sexual abuse of HL46 included but was not

limited to serial, prolonged, improper and inappropriate breast examinations, in a manner designed for his own sexual gratification; unnecessary and inappropriate groping and pulling of Plaintiffs breasts to express milk for no medical reason. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance specifically her nipples; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

64. HL47 ([REDACTED]) was born in 1941 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2007 until 2011. HADDEN's sexual abuse of HL47 included but was not limited to verbal and physical grooming; boundary violations; serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breasts, in a manner designed for his own sexual gratification.

65. HL48 ([REDACTED]) was born in 1979 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2002 until 2003. Upon information and belief, HADDEN's sexual abuse of HL 36 included but was not limited to inappropriate breast examinations; and ungloved inappropriate vaginal exams; inappropriate pelvic exams which included digital penetration followed by HADDEN smelling his fingers.

66. HL49 ([REDACTED]) was born in 1981 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2000 until 2005. HADDEN's sexual abuse of HL49 included but was not limited serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breasts, in a manner designed for his own sexual gratification; physical examinations performed outside the presence of a chaperone; ungloved improper, inappropriate, unwarranted and unnecessary touching, stroking, and rubbing

of Plaintiff's vagina in a sexual rather than medical manner; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

67. HL50 ([REDACTED]) was born in 1974 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 1995 until 2007. HADDEN's sexual abuse of HL50 included but was not limited to serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; unnecessary and inappropriate attempts to express breast milk; physical examinations performed outside the presence of a chaperone; prolonged, improper and inappropriate vaginal exam conducted without gloves.

68. HL51 ([REDACTED]) was born in 1963 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1997 until 2002. HADDEN's sexual abuse of HL51 included but was not limited to prolonged, improper, painful and inappropriate vaginal exams; inappropriate and painful unannounced anal penetration.

69. HL52 ([REDACTED]) was born in 1979 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES in approximately 2005. HADDEN's sexual abuse of HL52 included but was not limited serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breast, in a manner designed for his own sexual

gratification; physical examinations performed outside the presence of a chaperone; prolonged, improper and inappropriate vaginal exam.

70. HL53 ([REDACTED]) was born in 1972 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1995 through 2012. HADDEN's sexual abuse of HL53 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed to inflict pain and for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating of the inside of Plaintiff's vagina; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary and uncomfortable hugging of Plaintiff while she was naked and exposed; inappropriate, improper, unwarranted and unnecessary "rash" exam which included HADDEN directing her to bend over nude in front of him. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts. HADDEN also inappropriately suggested that Plaintiff provide "sex toys" to her minor daughter.

71. HL54 ([REDACTED]) was born in 1979 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2004 through 2010. HADDEN's sexual abuse of HL54 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; physical examinations performed outside

the presence of a chaperone; improper, inappropriate, unnecessary and prolonged vaginal exams. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts

72. HL55 ([REDACTED]) was born in 1966 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1990 until 2012. HADDEN's sexual abuse of HL55 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed to inflict pain and for his own sexual gratification; inappropriate and uncomfortable pubic hair touching and pulling; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating of Plaintiff's labia and clitoris; prolonged pelvic exams which included HADDEN attempting to sexually arouse Plaintiff; inappropriate and uncomfortable groping of the buttocks; inappropriately flicking the inside of Plaintiff's vagina and inappropriate pulling of Plaintiff's labia. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance, specifically her pubic hair, and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

73. HL56 ([REDACTED]) was born in 1955 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2000 until 2006. HADDEN's sexual abuse of HL56 included but was not limited to serial,

prolonged, improper and inappropriate breast examinations consisting of HADDEN cupping and fondling Plaintiff's breast and nipples, in a manner designed for his own sexual gratification; improper, inappropriate, unnecessary and unwarranted vaginal exams; prolonged, painful, aggressive pelvic exams which included digital thrusting; painful and unnecessary rectal penetration.

74. HL57 ([REDACTED]) was born in 1970 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2008 until 2011. HADDEN's sexual abuse of HL57 included but was not limited to serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing and pulling of the Plaintiff's breast and nipples, in a manner designed for his own sexual gratification.

75. HL58 ([REDACTED]) was born in 1963 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2008. HADDEN's sexual abuse of HL55 included but was not limited to improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating of Plaintiff's labia, clitoris and g-spot; prolonged pelvic exams which included HADDEN attempting to sexually arouse Plaintiff; improper, inappropriate, unwarranted and unnecessary touching, stroking, and rubbing of Plaintiff's vagina in a sexual rather than medical manner; unnecessary and uncomfortable blowing and breathing on Plaintiff's vagina; unnecessary pressing and touching of Plaintiff's clitoris while thrusting his fingers into her vagina.

76. HL59 ([REDACTED]) was born in 1972 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2007. HADDEN's sexual abuse of HL59 included but was not limited serial, prolonged, improper and inappropriate breast examinations performed at every visit, consisting of HADDEN caressing,

fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; multiple inappropriate breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exam; inappropriate and uncomfortable groping of the Plaintiff's thigh while digitally penetrating Plaintiff; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's labia; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; unnecessary close proximity between his face and her genitals; unannounced and painful anal penetration. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance, specifically her labia, and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

77. HL60 ([REDACTED]) was born in 1982 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2007 and 2011. Upon information and belief, HADDEN's sexual abuse of HL 60 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exam; inappropriate and uncomfortable groping of the Plaintiff's thigh while digitally penetrating Plaintiff; removing gloves half-way through the exam before a prolonged, painful, aggressive pelvic exams which included deep digital thrusting; unnecessary close proximity between his face and her genitals; inserting multiple fingers into Plaintiff's vagina at once; inappropriately pulling on pubic hair. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance, specifically

her labia, and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

78. HL61 ([REDACTED]) was born in 1983 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2003. HADDEN's sexual abuse of HL61 included but was not limited an improper, inappropriate, unnecessary and unwarranted vaginal exam; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris; prolonged, painful, aggressive pelvic exams which included deep digital penetration. HADDEN alleged that he was required to sexually stimulate Plaintiff to conduct the exam. HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

79. HL62 ([REDACTED]) was born in 1970 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2003 until 2008. HADDEN's sexual abuse of HL62 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed to inflict pain and for his own sexual gratification. HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

80. HL63 ([REDACTED]) was born in 1958 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 1992 until 1995. HADDEN's sexual abuse of HL63 included but was not limited serial, prolonged, improper and inappropriate breast examinations performed at every visit, consisting of HADDEN

caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed to inflict pain and for his own sexual gratification; multiple inappropriate breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate, ungloved unnecessary and unwarranted vaginal exam; improper, inappropriate, unwarranted and unnecessary touching, stroking, pulling and stimulating Plaintiff's labia; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; unnecessary close proximity between his face and her genitals; unannounced and painful anal and vaginal penetration simultaneously. During one exam HADDEN required Plaintiff to undress and kneel on her hands and knees on the exam table. HADDEN inappropriately, unnecessarily and painfully forced the speculum and his fingers into Plaintiff's vagina simultaneously. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

81. HL64 ([REDACTED]) was born in 1984 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2000 until 2010. HADDEN's sexual abuse of HL64 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed to inflict pain and for his own sexual gratification; continuous and unnecessary attempts to express breast milk prior to birth; multiple inappropriate breast exams during one visit; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina;

improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's g-spot, clitoris and labia; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals; unnecessary and uncomfortable blowing and breathing on Plaintiff's vagina; unnecessary pressing and touching of Plaintiff's clitoris while thrusting his fingers into her vagina; Unnecessary digital thrusting simulating sex; inappropriate, improper, unwarranted and unnecessary "mole" and "scoliosis" exams which included HADDEN directing her to bend over nude in front of him; inappropriate and uncomfortable groping of the buttocks; inappropriate moving of Plaintiff's knees to open her legs; inappropriate touching and squeezing of Plaintiff's knees and thighs during vaginal exams. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

82. HL65 ([REDACTED]) was born in 1941 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2006 until 2008. HADDEN's sexual abuse of HL65 included but was not limited to prolonged, improper and inappropriate anal penetration.

83. HL66 ([REDACTED]) was born in 1978 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2008 until 2011. HADDEN's sexual abuse of HL66 included but was not limited serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed to inflict pain and for his own sexual gratification; continuous and unnecessary attempts to express breast milk prior to birth; multiple inappropriate breast exams during one visit; physical

examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris and labia; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals; unnecessary pressing and touching of Plaintiff's clitoris while thrusting his fingers into her vagina; unnecessary digital thrusting simulating sex; inappropriate, improper, unwarranted and unnecessary "scoliosis" exams which included HADDEN directing her to bend over nude in front of him; inappropriate and uncomfortable groping of the buttocks; inappropriate moving of Plaintiff's knees to open her legs. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

84. HL67 (██████████) was born in 1989 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES in approximately 2011. HADDEN's sexual abuse of HL67 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; improper, inappropriate and prolonged vaginal exams performed bare-handed. Additionally, HADDEN asked inappropriate and invasive questions about Plaintiff's sexual acts.

85. HL69 (██████████) was born in 1958 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from

approximately 1992 until 1993. HADDEN's sexual abuse of HL69 included but was not limited serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; unnecessary close proximity between his face and her genitals; prolonged and uncomfortable vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris; unannounced and inappropriate anal penetration during multiple exams. After Plaintiff's last visit with HADDEN, she contacted her regular gynecologist, Dr. Levine, and reported the discomfort she experienced while treating with HADDEN. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance.

86. HL70 ([REDACTED]) was born in 1947 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2002. HADDEN's sexual abuse of HL70 included but was not limited to serial, prolonged, improper and inappropriate breast examinations, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; improper, inappropriate, unnecessary and unwarranted vaginal exams; unannounced and inappropriate anal penetration. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance, specifically his suggestion for her to lose weight and the size of her clitoris.

87. HL71 ([REDACTED]) was born in 1978 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1993 until 1998. HADDEN's sexual abuse of HL71 included but was not limited to serial, prolonged, improper and inappropriate breast examinations, consisting of HADDEN

caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; prolonged, painful, aggressive pelvic exams which included deep digital penetration.

88. HL72 ([REDACTED]) was born in 1968 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2005 until 2007. HADDEN's sexual abuse of HL72 included but was not limited to serial, prolonged, improper and inappropriate breast examinations, consisting of HADDEN caressing and fondling of the Plaintiff's breasts, in a manner for his own sexual gratification. Additionally, on one visit HADDEN required Plaintiff to stand completely nude and exposed while he stared at her body while she was pregnant. Additionally, HADDEN asked inappropriate and invasive questions about Plaintiff's sexual acts.

89. HL73 ([REDACTED]) was born in 1968 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2000 until 2001. HADDEN's sexual abuse of HL73 included ungloved inappropriate and uncomfortable touching, squeezing, groping and fondling Plaintiff's buttocks in a sexual manner; prolonged and uncomfortable vaginal penetration. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance, specifically her weight loss while uncomfortably touching her buttocks.

90. HL74 ([REDACTED]) was born in 1966 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1991 until 1993. HADDEN's sexual abuse of HL71 included but was not limited to serial, prolonged, improper and inappropriate breast examinations, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; prolonged pelvic exams which included deep digital

penetration. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

91. HL75 ([REDACTED]) was born in 1957 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1991 until 1993. HADDEN's sexual abuse of HL75 included but was not limited to serial, prolonged, improper and inappropriate breast examinations, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; prolonged pelvic exams which included deep digital penetration.

92. HL76 ([REDACTED]) was born in 1975 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2001 until 2002. HADDEN's sexual abuse of HL76 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; multiple inappropriate breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's g-spot, clitoris and labia; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals; unnecessary pressing, touching and groping of Plaintiff's pelvic area forcing Plaintiff to urinate; unannounced and painful anal and vaginal penetration simultaneously; unnecessary and inappropriate touching of Plaintiff's vagina

attempting sexual arousal. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance.

93. HL77 ([REDACTED]) and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1990 until 2000. HADDEN's sexual abuse of HL77 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating labia; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals.

94. HL78 ([REDACTED]) was born in 1985 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2001. HADDEN's sexual abuse of HL78 included but was not limited to improper, inappropriate, unnecessary and unwarranted vaginal exams; prolonged, painful, aggressive vaginal exams which included digital thrusting.

95. HL79 ([REDACTED]) was born in 1968 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2001 until 2006. HADDEN's sexual abuse of HL79 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed to inflict pain and for his own sexual gratification; inappropriate

removal of her clothing; inappropriate and uncomfortable groping of the thighs; multiple inappropriate breast exams during one visit; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; intrusive and inappropriate touching of her pubic hair; unannounced, prolonged and painful anal penetration; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's g-spot and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

96. HL80 ([REDACTED]) was born in 1972 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2008. HADDEN's sexual abuse of HL80 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed to inflict pain and for his own sexual gratification; inappropriate and uncomfortable groping of the thighs; multiple inappropriate breast exams during one visit; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; intrusive and inappropriate touching of her pubic hair; unannounced, prolonged and painful anal penetration; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's g-spot and clitoris; prolonged, painful, aggressive pelvic exams which included digital

thrusting; unnecessary close proximity between his face and her genitals; inserted his fingers into her vagina with one hand and pinched her nipple with the other hand; unannounced and painful anal and vaginal penetration simultaneously; HADDEN inappropriately and intrusively rubbed and pressed his erect penis on Plaintiff's arm during an exam trapping her in a position preventing her from moving away; inappropriately and intrusively rubbing a substance on Plaintiff's clitoris and labia while digitally penetrating her; inappropriate and intrusive touching of Plaintiff's vagina while using a tongue depressor. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts; inappropriate and intrusive and continuous comments by HADDEN that he was attempting to make her "wet" and "moist".

97. HL81 ([REDACTED]) was born in 1973 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2008 until 2012. HADDEN's sexual abuse of HL81 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of Plaintiff's breasts and nipples in a manner for his own sexual gratification; inappropriate touching, pulling and groping of buttocks; inappropriate multiple breasts exams during one visit; unnecessary and inappropriate groping and pulling of Plaintiff's breasts to express milk; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unnecessary and unwarranted vaginal exams; prolonged, painful, aggressive pelvic exams which included digital thrusting;. HADDEN inappropriately and intrusively rubbed and pressed his erect penis on Plaintiff's arm during an exam. HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

98. HL82 (██████████) was born in 1974 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 1998 until 1999. HADDEN's sexual abuse of HL 82 consisted of but was not limited to HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification.

99. HL83 (██████████) was born in 1970 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES in approximately 1993. HADDEN's sexual abuse of HL83 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; multiple inappropriate breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's g-spot, clitoris and labia; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals; unnecessary pressing, touching and groping of Plaintiff's buttocks; unnecessary and inappropriate touching of Plaintiff's vagina attempting sexual arousal. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance.

100. HL84 (██████████) was born in 1983 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2007 until 2012. HADDEN's sexual abuse of HL84 included but were not limited to caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own

sexual gratification; inappropriately, improperly and unnecessarily expressing Plaintiff's breast milk; physical examinations performed outside the presence of a chaperone; uncomfortable, improper and inappropriate vaginal exams with digital penetration; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating of Plaintiff's clitoris on multiple occasion directing Plaintiff to stand competently naked and exposed while he visually "examined" her. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

101. HL85 ([REDACTED]) was born in 1974 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1994 until 2006. HADDEN's sexual abuse of HL85 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately, improperly and unnecessarily attempting to express breast milk; multiple inappropriate breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's g-spot, clitoris and labia; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals; unnecessary pressing, touching and groping of Plaintiff's buttocks; unnecessary and inappropriate touching of Plaintiff's vagina attempting sexual arousal; inappropriate, unnecessary and painful anal penetration; during multiple exams HADDEN directing Plaintiff to stand competently naked and exposed while he visually

“examined” her. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff’s body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

102. HL86 ([REDACTED]) was born in 1972 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT’S OFFICES from approximately 2007 until 2008. HADDEN’s sexual abuse of HL86 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff’s prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff’s breasts and nipples, in a painful manner and for his own sexual gratification; inappropriately, improperly and unnecessarily attempting to express breast milk; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted rough and painful vaginal exams which resulted in bleeding. Plaintiff did report the incidents surrounding the exam to her treating gynecologist, Joshua Holden.

103. HL87 ([REDACTED]) was born in 1972 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT’S OFFICES from approximately 2002 until 2006. HADDEN’s sexual abuse of HL87 included but was not limited to examinations performed outside the presence of a chaperone; improper, inappropriate, ungloved, unnecessary and unwarranted vaginal exams.

104. HL88 ([REDACTED]) was born in 1979 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT’S OFFICES from approximately 2006 until 2008. HADDEN’s sexual abuse of HL88 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, and massaging of the Plaintiff’s breasts, in a

manner for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking and rubbing of Plaintiff's clitoris while inserting speculum; prolonged, painful, aggressive pelvic exams; unnecessary close proximity between his face and her genitals.

105. HL89 ([REDACTED]) was born in 1971 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2011. HADDEN's sexual abuse of HL89 included but was not limited to physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking and rubbing of Plaintiff's clitoris; repeated, unnecessary and inappropriate thruster of a catheter, in a sexual manner while inappropriately touching Plaintiff's clitoris; prolonged, painful, aggressive pelvic exams; unnecessary close proximity between his face and her genitals. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance.

106. HL90 ([REDACTED]) was born in 1970 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1997 until 1998. HADDEN's sexual abuse of HL89 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately, improperly and unnecessarily attempting to express breast milk for no medical purpose or reason multiple inappropriate breast exams during one visit; physical examinations performed outside the presence

of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris and labia; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals; unnecessary pressing, touching and groping of Plaintiff's thighs; unnecessary and inappropriate touching of Plaintiff's vagina attempting sexual arousal; during multiple exams HADDEN directing Plaintiff to stand competently naked and exposed while he visually "examined" her. HADDEN also conducted inappropriate vaginal exams while Plaintiff was in labor which consisted of him rubbing her clitoris and attempting to stimulate her. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

107. HL91 ([REDACTED]) was born in 1974 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2000 until 2012. HADDEN's sexual abuse of HL91 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; multiple inappropriate breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate, prolonged vaginal exams; unnecessary anal penetration where HADDEN alleged to be checking where the placement of her uterus was; during multiple exams HADDEN directing Plaintiff to stand competently naked and exposed while he visually "examined" her. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and

physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

108. HL92 ([REDACTED]) was born in 1982 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2006 until 2011. HADDEN's sexual abuse of HL92 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; multiple inappropriate breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate, prolonged vaginal exams. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

109. HL93 ([REDACTED]) was born in 1972 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES in approximately 2004. HADDEN's sexual abuse of HL93 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately, improperly and unnecessarily attempting to express breast; multiple inappropriate breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris and labia; prolonged, painful, aggressive pelvic exams which included digital thrusting;

unnecessary close proximity between his face and her genitals; unnecessary pressing, touching and groping of Plaintiff's thighs; unnecessary and uncomfortable pulling and groping of Plaintiff's hips; unnecessary and inappropriate touching of Plaintiff's vagina attempting sexual arousal; unnecessary multiple pelvic exams during one visit; unnecessary close proximity between his face and her genitals; unnecessary and uncomfortable blowing and breathing on Plaintiff's vagina; Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

110. HL94 ([REDACTED]) was born in 1975 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2011 until 2012. HADDEN's sexual abuse of HL91 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; multiple inappropriate breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate, prolonged vaginal exams; unnecessary anal penetration where HADDEN alleged to be checking where the placement of her uterus was; during multiple exams HADDEN directing Plaintiff to stand competently naked and exposed while he visually "examined" her. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

111. HL95 ([REDACTED]) was born in 1982 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately

2012. Upon information and belief, HADDEN's sexual abuse of HL included but was not limited to inappropriate breast examinations and or inappropriate vaginal exams.

112. HL96 ([REDACTED]) was born in 1980 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2001 until 2012. HADDEN's sexual abuse of HL96 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate, prolonged vaginal exams. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

113. HL97 ([REDACTED]) was born in 1981 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES in approximately 2007. HADDEN's sexual abuse of HL97 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately, improperly and unnecessarily attempting to express breast milk; multiple inappropriate breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris and labia; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals; unnecessary pressing,

touching and groping of Plaintiff's thighs; unnecessary and inappropriate touching of Plaintiff's vagina attempting sexual arousal; unnecessary and uncomfortable pulling and groping of Plaintiff's labia; unnecessary and painful anal penetration and rubbing; unnecessary close proximity between his face and her genitals; unnecessary and uncomfortable blowing and breathing on Plaintiff's vagina; Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper including shaming her for weight gain, commenting on the smell of his fingers after her pelvic exam and inappropriate, unwarranted and unnecessary questioning about sexual acts.

114. HL98 (██████████) was born in 1975 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2000 until 2010. HADDEN's sexual abuse of HL98 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; unnecessary pressing, touching and groping of Plaintiff's thighs; physical examinations performed outside the presence of a chaperone; improper, inappropriate, prolonged vaginal exams; unnecessary and painful anal penetration. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted, and unnecessary questioning about sexual acts.

115. HL99 (██████████) was born in 1977 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2006 until 2012. HADDEN's sexual abuse of HL99 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the

Plaintiff's breasts and nipples, in a manner for his own sexual gratification; unnecessary pressing, touching and groping of Plaintiff's thighs; physical examinations performed outside the presence of a chaperone; improper, inappropriate, prolonged vaginal exams; unnecessary and inappropriate touching of Plaintiff's vagina attempting sexual arousal; unnecessary and uncomfortable pulling, groping and rubbing of Plaintiff's clitoris. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted, and unnecessary questioning about sexual acts.

116. HL100 (██████████) was born in 1963 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2000. Upon information and belief, HADDEN's sexual abuse of HL100 included but was not limited to inappropriate breast examinations and/or inappropriate vaginal exams.

117. HL101 (██████████) was born in 1973 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2001 until 2007. HADDEN's sexual abuse of HL101 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; unnecessary pressing, touching and groping of Plaintiff's thighs; physical examinations performed outside the presence of a chaperone; improper, inappropriate, prolonged vaginal exams; unnecessary and inappropriate touching of Plaintiff's vagina attempting sexual arousal; unnecessary and uncomfortable touching, groping and rubbing of Plaintiff's clitoris; unnecessary and painful anal penetration; inappropriate, improper, unwarranted and unnecessary "mole" exams which included HADDEN directing her to stand in front of him nude and exposed. Additionally, HADDEN made sexually inappropriate

comments regarding Plaintiff's body and physical appearance specifically her breasts, and improper, inappropriate, unwarranted, and unnecessary questioning about sexual acts.

118. HL102 (██████████) was born in 1979 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2010. Upon information and belief, HADDEN's sexual abuse of HL102 included but was not limited to inappropriate breast examinations and/or inappropriate vaginal exams.

119. HL103 (██████████) was born in 1971 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2009 until 2012. HADDEN's sexual abuse of HL103 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate, prolonged vaginal exams with digital penetration.

120. HL104 (██████████ ██████████) was born in 1963 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care in approximately 2005 at DEFENDANT'S OFFICES. HADDEN's sexual abuse of HL 104 included but was not limited to physical examinations performed bare-handed and outside the presence of a chaperone; unnecessary pressing, touching and groping of Plaintiff's thighs; unnecessary pressing, touching and groping of Plaintiff's vagina; inappropriate and unwarranted touching, and caressing of vagina and pelvic area while performing a cervical biopsy. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance specifically her weight. Plaintiff immediately complained to a nurse at the front desk in the office. The nurse

provided no response. Plaintiff also complained to her primary gynecologist Dr. Richard Levine who took no action.

121. HL105 ([REDACTED]) was born in 1974 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2009 until 2010. HADDEN's sexual abuse of HL105 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate, prolonged vaginal exams with digital penetration.

122. HL106 ([REDACTED]) was born in 1950 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2001 until 2007. HADDEN's sexual abuse of HL106 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; unnecessary pressing, touching and groping of Plaintiff's thighs; physical examinations performed outside the presence of a chaperone; improper, inappropriate, prolonged vaginal exams; unnecessary and inappropriate touching of Plaintiff's vagina attempting sexual arousal; unnecessary and uncomfortable touching, groping and rubbing of Plaintiff's clitoris; unnecessary and painful anal penetration; inappropriate, improper, unwarranted and unnecessary "mole" exams, which included HADDEN directing her to stand in front of him nude and exposed. During the "mole" exams, HADDEN inappropriately touched, caressed, and groped Plaintiff's vagina, buttocks, and thighs. Additionally, HADDEN

made sexually inappropriate comments regarding Plaintiff's body and physical appearance specifically her breasts.

123. HL107 ([REDACTED]) was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2010. HADDEN's sexual abuse of HL107 included but was not limited to serial, prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts, in a manner for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate, prolonged vaginal exams with digital penetration.

124. HL108 ([REDACTED]) was born in 1976 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1994 until 2012. HADDEN's sexual abuse of HL12 included but was not limited serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed to inflict pain and for his own sexual gratification; improperly and unnecessarily attempted to express breast milk; inappropriate and uncomfortable groping of the thighs; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing Plaintiff's labia and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; prolonged, painful, aggressive pelvic exams which included digital thrusting and anal penetration simultaneously; unnecessary close proximity between his face and her genitals; inappropriate and unnecessary placement of his

fingers and the speculum into Plaintiff's vagina simultaneously. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance specifically her breasts and clitoris, and improper, inappropriate, unwarranted, and unnecessary questioning about sexual acts.

125. HL109 (██████████) was born in 1976 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2006 until 2012. HADDEN's sexual abuse of HL109 included but was not limited to verbal and physical grooming; boundary violations; gratuitous commentary about her body and physical appearance; improper, inappropriate, unwarranted and unnecessary questioning about sexual acts; serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts, in a manner designed for his own sexual gratification; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; prolonged, painful, aggressive pelvic exams which included digital thrusting; prolonged, painful, aggressive pelvic exams which included anal penetration inappropriate, improper, unwarranted and unnecessary "mole" exams, which included HADDEN directing her to stand in front of him nude and exposed. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance, and improper, inappropriate, unwarranted, and unnecessary questioning about sexual acts.

126. HL110 (██████████) was born in 1971 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1992- 2002. HADDEN's sexual abuse of HL110 included but was not limited to

serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately, improperly and unnecessarily pinching and pulling on Plaintiff's breast to express breast milk; physical examinations performed outside the presence of a chaperone; inappropriate and uncomfortable groping of the buttocks; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris and labia; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals; unnecessary pressing, touching and groping of Plaintiff's thighs; unnecessary and inappropriate touching of Plaintiff's vagina attempting sexual arousal; unnecessary and uncomfortable pulling and groping of Plaintiff's labia; unnecessary close proximity between his face and her genitals; unnecessary and uncomfortable blowing and breathing on Plaintiff's vagina; Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper including commenting on the smell of the speculum after her pelvic exam and inappropriate, commenting on discharge after her pelvic exam, and unwarranted and unnecessary questioning about sexual acts.

127. HL111 ([REDACTED]) was born in 1976 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1991 until 2012. HADDEN's sexual abuse of HL11 serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed to inflict pain and for his own sexual gratification; inappropriate and uncomfortable groping of the thighs; physical examinations performed bare-handed and outside

the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing Plaintiff's labia and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; prolonged, painful, aggressive pelvic exams which included digital thrusting and anal penetration simultaneously; unnecessary close proximity between his face and her genitals; inappropriate touching and groping of Plaintiff's thighs and buttocks; inappropriate touching and groping of Plaintiff's thighs, knees and buttocks while digitally penetrating Plaintiff; unnecessary and uncomfortable blowing and breathing on Plaintiff's vagina; unnecessary pressing, touching and groping of Plaintiff's pelvic area forcing Plaintiff to urinate; inappropriate, improper, unwarranted and unnecessary "mole" checks which included HADDEN directing her to bend over nude in front of him; unnecessary touching and rubbing of her perineum. During Plaintiff's "mole" exams HADDEN inappropriately and unnecessarily groped, touched and rubbed her breasts, vagina and buttocks including opening her buttocks and touching her rectum. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance, and improper, inappropriate, unwarranted, and unnecessary questioning about sexual acts.

128. HL112 (██████████) was born in 1973 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES in 2012. HADDEN's sexual abuse of HL112 included but was not limited serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; inappropriate and uncomfortable groping of the thighs; physical examinations performed bare-handed and outside the presence of a

chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; prolonged, painful, aggressive pelvic exams which included digital thrusting. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance specifically her breasts, and improper, inappropriate, unwarranted, and unnecessary questioning about sexual acts.

129. HL113 ([REDACTED]) was born in 1968 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 1998. Upon information and belief, HADDEN's sexual abuse of HL113 included but was not limited to inappropriate breast examinations and/or inappropriate vaginal exams.

130. HL114 ([REDACTED]) was born in 1969 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2011. HADDEN's sexual abuse of HL114 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately physical examinations performed outside the presence of a chaperone; inappropriate and uncomfortable groping of the buttocks; improper, inappropriate, unnecessary and unwarranted vaginal exams; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary pressing, touching and groping of Plaintiff's thighs; unnecessary and inappropriate touching of Plaintiff's vagina attempting sexual arousal; unnecessary multiple vaginal exams during one visit; unnecessary close proximity between his face and her genitals; unnecessary and uncomfortable blowing and breathing on Plaintiff's vagina;

Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and inappropriate, commenting on discharge after her pelvic exam, and unwarranted and unnecessary questioning about sexual acts.

131. HL115 ([REDACTED]) was born in 1969 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2002 until 2012. HADDEN's sexual abuse of HL11 serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed to inflict pain and for his own sexual gratification; inappropriate and uncomfortable groping of the thighs; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals; inappropriate, improper, unwarranted and unnecessary "mole" checks which included HADDEN directing her to bend over nude in front of him. During Plaintiff's "mole" exams, HADDEN inappropriately and unnecessarily groped, touched and rubbed Plaintiff's breasts, vagina and buttocks.

132. HL116 ([REDACTED]) was born in 1974 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2003. Upon information and belief, HADDEN's sexual abuse of HL116 included but was not limited to inappropriate breast examinations and/or inappropriate vaginal exams.

133. HL117 ([REDACTED]) was born in 1970 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES

from approximately 2007 until 2012. HADDEN's sexual abuse of HL117 included but were not limited to caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately, improperly and unnecessarily expressed breast milk; physical examinations performed outside the presence of a chaperone; uncomfortable, improper and inappropriate vaginal exams with digital penetration; uncomfortable, improper and painful anal penetration; on multiple occasions HADDEN directed Plaintiff to stand competently naked and exposed while he visually "examined" her, however HADDEN would proceed to grope Plaintiff's vagina and pelvic area during the exam. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

134. HL118 ([REDACTED]) was born in 1979 was born in 1970 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2010 until 2011. HADDEN's sexual abuse of HL118 included but were not limited to caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately, improperly and unnecessarily attempted to express breast milk; physical examinations performed outside the presence of a chaperone; uncomfortable, improper, painful and inappropriate vaginal exams with digital penetration; uncomfortable, improper and painful anal penetration; uncomfortable, improper, painful and inappropriate vaginal exams which involved thrusting the sonogram wand in and out of Plaintiff's vagina; inappropriate and uncomfortable groping of the buttocks. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

135. HL119 ([REDACTED]) was born in 1990 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT’S OFFICES from approximately 2009 until 2011. HADDEN’s sexual abuse of HL119 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff’s breasts and nipples, in a manner for his own sexual gratification; unnecessary pressing, touching and groping of Plaintiff’s thighs; physical examinations performed outside the presence of a chaperone; improper, inappropriate, prolonged vaginal exams; unnecessary and inappropriate touching of Plaintiff’s vagina attempting sexual arousal; unnecessary and uncomfortable pulling, groping and rubbing of Plaintiff’s clitoris; unnecessary and painful anal penetration; inappropriate, improper, unwarranted and unnecessary “mole” exams, which included HADDEN directed her to stand in front of him nude and exposed. During the “mole” exams, HADDEN would also direct Plaintiff to bend over in front of him. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff’s body and physical appearance specifically her vagina and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

136. HL120 ([REDACTED]) was born in 1982 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT’S OFFICES from approximately 2004 until 2010. HADDEN’s sexual abuse of HL120 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff’s breasts and nipples, in a manner for his own sexual gratification; physical examinations performed outside the presence of a chaperone; bare-handed improper, inappropriate, prolonged vaginal exams including digital penetration; unnecessary and inappropriate touching of Plaintiff’s clitoris attempting sexual arousal; unnecessary and uncomfortable pulling, groping and rubbing of

Plaintiff's clitoris; unnecessary and painful anal penetration. HADDEN also inappropriately and unnecessarily rubbed and touched Plaintiff's clitoris while she was holding her newborn baby. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance specifically her vagina and improper, inappropriate, unwarranted, and unnecessary questioning about sexual acts.

137. HL121 ([REDACTED]) was born in 1976 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2010 until 2011. HADDEN's sexual abuse of HL121 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; physical examinations performed outside the presence of a chaperone; bare-handed improper, inappropriate, prolonged vaginal exams including digital penetration; unnecessary and inappropriate touching of Plaintiff's clitoris; unnecessary and uncomfortable pulling, groping and rubbing of Plaintiff's clitoris; unnecessary and painful anal penetration. On multiple occasions after Plaintiff had given birth, and while she was at the hospital, a team of physicians which included HADDEN, was making rounds as a group and examined Plaintiff. HADDEN, moment later would enter her hospital room by himself and proceed to inappropriately and unnecessarily digitally penetrate and touch Plaintiff's clitoris. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance specifically her vagina and improper, inappropriate, unwarranted, and unnecessary questioning about sexual acts.

138. HL122 ([REDACTED]) was born in 1963 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 1991 until 2012. HADDEN's sexual abuse of H122 included but

was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; inappropriate and uncomfortable groping of the buttocks; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's labia and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; prolonged, painful, aggressive pelvic exams which included digital thrusting and anal penetration simultaneously; unnecessary close proximity between his face and her genitals; inappropriate, improper, unwarranted and unnecessary "mole" check which included HADDEN directing her to bend over nude in front of him. HADDEN directed Plaintiff to kneel on the exam table on her hands and knees naked while he stared at her from behind. HADDEN also directed Plaintiff to go to his office after her exam, when she entered he was in the course of masturbating himself. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance specifically her vagina and improper, inappropriate, unwarranted, and unnecessary questioning about sexual acts.

139. HL123 ([REDACTED]) was born in 1955 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2007 and 1993. Upon information and belief, HADDEN's sexual abuse of HL 123 included but was not limited to inappropriate breast examinations; improper, inappropriate and prolonged pelvic exams which included deep digital penetration.

140. HL 124 ([REDACTED]) was born in 1982 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2000 until 2004. Upon information and belief, HADDEN's sexual abuse of HL 124 included but was not limited to inappropriate breast examinations; improper, inappropriate and prolonged pelvic exams; ungloved, improper, inappropriate and prolonged pelvic exams which included deep digital penetration; ungloved, unnecessary and painful anal penetration.

141. HL125 ([REDACTED]) was born in 1979 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2001 until 2002. HADDEN's sexual abuse of HL125 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every exam, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately, improperly, and unnecessarily squeezing and groping of breasts in an attempt to express milk; multiple unnecessary breast exams during one visit; unnecessary pressing, touching and groping of Plaintiff's thighs; physical examinations performed outside the presence of a chaperone; bare-handed prolonged, painful, aggressive pelvic exams which included deep digital thrusting. HADDEN inappropriately, unnecessarily, and painfully forced the speculum and his fingers into Plaintiff's vagina simultaneously. After this, HADDEN removed the speculum and proceeded to smell it and press it against his lips. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance specifically her vagina and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

142. HL126 ([REDACTED]) was born in 1973 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from

approximately 1992 until 2012. HADDEN's sexual abuse of HL126 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately, improperly and unnecessarily attempting to express breast milk for no medical purpose or reason; multiple inappropriate breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris and labia; prolonged, painful, aggressive pelvic exams which included digital thrusting; unnecessary close proximity between his face and her genitals; Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

143. HL127 ([REDACTED]) was born in 1972 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2001 until 2002. HADDEN's sexual abuse of HL127 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every exam, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately, improperly, and unnecessarily squeezing and groping of breasts in an attempt to express milk; physical examinations performed outside the presence of a chaperone; bare-handed prolonged, painful, aggressive pelvic exams which included deep digital thrusting improper, inappropriate, unnecessary and unwarranted vaginal exams including extensive touching of the outside of Plaintiff's vagina and pressing on her ovaries. Additionally, HADDEN made sexually

inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

144. HL128 (██████████) was born in 1959 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2000 until 2011. HADDEN's sexual abuse of HL128 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriate and uncomfortable groping of the thighs and buttocks; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit even though Plaintiff already had a hysterectomy; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing Plaintiff's labia, g-spot and clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting; prolonged, painful, aggressive pelvic exams which included digital thrusting with one hand and gripping Plaintiff's buttocks with the other; on approximately five occasions improper, inappropriate, unwarranted and unnecessary oral contact by HADDENS mouth and tongue on Plaintiff's vagina; unnecessary close proximity between his face and her genitals. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance, specifically her vagina, and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

145. HL129 ([REDACTED]) was born in 1956 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1993 until 2012. HADDEN's sexual abuse of HL129 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; bare-handed prolonged and uncomfortable vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; unannounced and inappropriate anal penetration during multiple exams; inappropriate and uncomfortable groping of Plaintiff's buttocks. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance.

146. HL130 ([REDACTED]) was born in 1981 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2010 until 2012. HADDEN's sexual abuse of HL130 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately pulling on pubic hair; bare-handed prolonged and uncomfortable vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris; unnecessary close proximity between his face and her genitals. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance.

147. HL131 ([REDACTED]) was born in 1976 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES

from approximately 1997 until 1998. HADDEN's sexual abuse of H131 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; multiple inappropriate breast exams during one visit; unnecessary and inappropriate groping and pulling of Plaintiff's breasts to express milk for no medical reason; physical examinations performed outside the presence of a chaperone; improper, inappropriate, ungloved unnecessary and unwarranted vaginal exam; improper, inappropriate, unwarranted and unnecessary touching, stroking, pulling and stimulating Plaintiff's labia and clitoris; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; inappropriate pressing on Plaintiff's clitoris while aggressively thrusting his fingers into her vagina; unnecessary close proximity between his face and her genitals. During one exam HADDEN required Plaintiff to undress and kneel on her hands and knees on the exam table. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance, and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

148. HL132 ([REDACTED]) was born in 1969 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES in approximately 1999. HADDEN's sexual abuse of H132 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; multiple inappropriate breast exams during one visit; physical examinations performed outside the presence of a chaperone; improper, inappropriate, ungloved unnecessary and unwarranted vaginal exam; improper, inappropriate, unwarranted and unnecessary touching,

stroking, pulling and stimulating Plaintiff's labia and clitoris; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; inappropriate pressing on Plaintiff's clitoris while aggressively thrusting his fingers into her vagina; unnecessary close proximity between his face and her genitals. HADDEN deeply and aggressively digitally penetrated Plaintiff's vagina while she was five months pregnant. Plaintiff then suffered a high fever and proceeded to the hospital. HADDEN was there and induced her into labor. He then penetrated Plaintiff with his fist and pulled the baby and placenta out. The baby only lived approximately six minutes. HADDEN never provided a reason why Plaintiff was required to be induced. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance and specifically the smell of her vagina, and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

149. HL133 (██████████) was born in 1954 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 1990 until 2012. HADDEN's sexual abuse of HL133 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at every visit; unexpected, inappropriate and painful anal penetration; requiring Plaintiff to do "Kegel" exercises during visits while he digitally penetrated her vagina; unnecessary and painful wide use of speculum; unnecessary, inappropriate and prolonged digital rubbing and penetration of Plaintiff's vagina; improper, inappropriate, ungloved unnecessary and unwarranted vaginal exam; prolonged, painful, aggressive pelvic exams which included deep digital thrusting.

150. HL134 ([REDACTED]) was born in 1971 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 1996 until 2012. HADDEN's sexual abuse of HL134 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification.

151. HL135 ([REDACTED]) was born in 1976 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES in approximately 1995. HADDEN's sexual abuse of HL135 included but was not limited to a physical examination performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exam; unexpected, inappropriate and painful anal penetration; unnecessary, inappropriate and prolonged digital rubbing and penetration of Plaintiff's vagina; prolonged, painful, aggressive pelvic exams which included deep digital thrusting.

152. HL136 ([REDACTED]) was born in 1981 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care DEFENDANT'S OFFICES in approximately 2001. HADDEN's sexual abuse of HL136 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit including throughout Plaintiff's prenatal period, consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed to inflict pain and for his own sexual gratification; inappropriate and uncomfortable groping of her buttocks and between her buttocks; multiple inappropriate breast exams during one visit; physical examinations performed bare-handed and outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at almost every visit, including

throughout the prenatal period; inappropriate and uncomfortable pubic hair touching and pulling; removing his gloves during most exams before inserting his bare fingers into Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's g-spot and clitoris; inappropriate pulling and touch of Plaintiff's labia; prolonged, painful, aggressive pelvic exams which included digital thrusting; inappropriate pressing on Plaintiff's clitoris while aggressively thrusting his fingers into her vagina; unnecessary close proximity between his face and her genitals; unnecessary pressing, touching and groping of Plaintiff's pelvic area forcing Plaintiff to urinate; unnecessary and painful wide use of speculum. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance including her vagina and breasts; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts. After Plaintiff's last visit with HADDEN she reported the inappropriate exam to a nurse at the front desk. The nurse provided Plaintiff with a website however the website would only accept a number rating and there was no placement for a comment.

153. HL137 ([REDACTED]) was born in 1976 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2002 until 2010. HADDEN's sexual abuse of HL137 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriate and uncomfortable groping of the buttocks and thighs; HADDEN inappropriately and uncomfortably rubbed his beard on Plaintiff's thighs; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at every visit; requiring Plaintiff to do "Kegel" exercises regularly during visits while he was digitally penetrating her; unnecessary,

inappropriate and prolonged digital rubbing and penetration of Plaintiff's vagina; physical examinations performed outside the presence of a chaperone; improper, inappropriate, ungloved unnecessary and unwarranted vaginal exam; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris; inappropriate, unwarranted and unnecessary pulling of Plaintiff's labia; multiple unnecessary vaginal exams during one visit; unnecessary and painful wide use of speculum; providing Plaintiff with birth control however requiring her to obtain a vaginal exam to obtain it when a PAP was not due. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance including her vagina and breasts; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

154. HL138 (██████████) was born in 1955 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2010 until 2012. HADDEN's sexual abuse of HL138 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; improper, inappropriate, unnecessary and unwarranted vaginal exams; unnecessary, inappropriate and prolonged digital penetration of Plaintiff's vagina; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris; inappropriate, unwarranted and unnecessary attempt to penetrate Plaintiff's vagina with his fist; inappropriate rubbing of Plaintiff's leg during vaginal exam.

155. HL139 (██████████) was born in 1972 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2001. HADDEN's sexual abuse of HL139 included but was not limited to serial, prolonged,

improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriate and uncomfortable groping of the buttocks and thighs; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; unnecessary, inappropriate and prolonged digital rubbing and penetration of Plaintiff's vagina; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris; inappropriate, unwarranted and unnecessary pulling of Plaintiff's labia; unnecessary close proximity between his face and her genitals; unnecessary and painful wide use of speculum. HADDEN then removed the speculum and proceeded to smell it and press it against his lips. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance including her breasts; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts and rubbed his fingers together after vaginal exam and then smelled them.

156. HL140 ([REDACTED]) was born in 1974 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2007 until 2012. HADDEN's sexual abuse of HL140 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams; unnecessary, inappropriate and prolonged digital penetration of Plaintiff's vagina; Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance

including her breasts; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

157. HL141 ([REDACTED]) was born in 1978 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2010 until 2012. HADDEN's sexual abuse of HL141 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately, improperly and unnecessarily expressing breast milk all over Plaintiff; inappropriate and uncomfortable groping of the buttocks and thighs; HADDEN inappropriately and uncomfortably rubbed his beard on Plaintiff's thighs; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at every visit; unnecessary, inappropriate and prolonged digital rubbing and penetration of Plaintiff's vagina; improper, inappropriate, ungloved unnecessary and unwarranted vaginal exam; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris; inappropriate, improper, unwarranted and unnecessary "spine" exams which included HADDEN directing Plaintiff to bend over nude in front of him; providing Plaintiff with birth control however requiring her to obtain a vaginal exam to obtain it when a PAP was not due. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

158. HL142 ([REDACTED]) was born in 1976 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1996 until 2001. HADDEN's sexual abuse of HL142 included but was not limited

to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately, improperly and unnecessarily expressing breast milk all over Plaintiff; inappropriate and uncomfortable groping of the buttocks and thighs; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at every visit; unnecessary, inappropriate and prolonged digital rubbing and penetration of Plaintiff's vagina; physical examinations performed outside the presence of a chaperone; inappropriate and uncomfortable pubic hair touching and pulling; improper, inappropriate, ungloved unnecessary and unwarranted vaginal exam; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris and g-spot; improper, inappropriate, unwarranted and unnecessary touching and pulling of labia; unnecessary pressing and touching of Plaintiff's clitoris while thrusting his fingers into her vagina; unnecessary pressing, touching and groping of Plaintiff's pelvic area forcing Plaintiff to urinate; inappropriate and unnecessary placement of his fingers and the speculum into Plaintiff's vagina simultaneously; unnecessary close proximity between his face and her genitals; unnecessary and uncomfortable blowing and breathing on Plaintiff's vagina; inappropriate, improper, unwarranted and unnecessary "mole" exams which included HADDEN directing Plaintiff to bend over nude in front of him. During Plaintiff's "mole" exams HADDEN inappropriately and unnecessarily groped, touched and rubbed her breasts, vagina and buttocks including opening her buttocks and touching her rectum. HADDEN provided Plaintiff with birth control however he required her to obtain a vaginal exam to obtain it when PAP was not due. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical; and improper, inappropriate, unwarranted and unnecessary questioning about sexual

acts. HADDEN also directed Plaintiff to go to his office after her exam, when she entered he was in the course of masturbating himself.

159. HL143 (██████████) was born in 1969 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2008 until 2009. HADDEN's sexual abuse of HL143 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriately, improperly and unnecessarily attempting to express breast milk even though Plaintiff was not breast feeding; inappropriate and uncomfortable groping of the buttocks and thighs; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at every visit; ungloved unnecessary, inappropriate and prolonged digital rubbing and penetration of Plaintiff's vagina; inappropriate and uncomfortable pubic hair touching and pulling; improper, inappropriate, ungloved unnecessary and unwarranted vaginal exam; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris and g-spot; improper, inappropriate, unwarranted and unnecessary touching and pulling of labia; unnecessary pressing and touching of Plaintiff's clitoris while thrusting his fingers into her vagina; unnecessary pressing, touching and groping of Plaintiff's pelvic area forcing Plaintiff to urinate; unnecessary close proximity between his face and her genitals; unnecessary and uncomfortable blowing and breathing on Plaintiff's vagina; inappropriate, uncomfortable and painful anal penetration; inappropriate, uncomfortable and painful vaginal thrusting including three to four fingers. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's

body and physical specifically her public hair and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

160. HL144 (██████████) was born in 1977 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2007. HADDEN's sexual abuse of HL144 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; improper, inappropriate, unnecessary and unwarranted vaginal exams; unwarranted and unnecessary touching, stroking and pulling on Plaintiff's labia; prolonged, painful, aggressive pelvic exams which included deep digital thrusting penetration; inappropriate, uncomfortable and painful anal penetration; unnecessary close proximity between his face and her genitals. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical specifically her public hair and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

161. HL145 (██████████) was born in 1968 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 2001 until 2004. HADDEN's sexual abuse of HL145 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriate and uncomfortable groping of the buttocks and thighs; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at every visit; inappropriate and unnecessary placement of his fingers and speculum into Plaintiff's vagina simultaneously; painful placement of speculum wide in Plaintiff's vagina; unnecessary, inappropriate and prolonged

digital rubbing and penetration of Plaintiff's vagina; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris; inappropriate, improper, unwarranted and unnecessary "mole" exams which included HADDEN directing Plaintiff to bend over nude in front of him. During Plaintiff's "mole" exams HADDEN inappropriately and unnecessarily groped, touched and rubbed her breasts, vagina and buttocks including opening her buttocks and touching her rectum. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

162. HL146 (██████████) was born in 1966 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 1991 until 1995. HADDEN's sexual abuse of H122 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, squeezing, pulling, tugging, and pinching of the Plaintiff's breasts and nipples, in a manner designed for his own sexual gratification; inappropriately slapped her breasts; improper, inappropriate, unnecessary and unwarranted vaginal exams; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris; prolonged, painful, aggressive pelvic exams which included digital thrusting simulating sex; ; painful placement of speculum wide in Plaintiff's vagina; uncomfortable, improper and painful anal penetration; uncomfortable, improper, painful and inappropriate vaginal exams which involved thrusting the sonogram wand in and out of Plaintiff's vagina; unnecessary close proximity between his face and her genitals. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical; and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

163. HL147 ([REDACTED]) was born in 1962 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES in approximately 1993. HADDEN's sexual abuse of HL147 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; inappropriate and uncomfortable groping of the buttocks and thighs; physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exams at every visit; ungloved unnecessary, inappropriate and prolonged digital rubbing and penetration of Plaintiff's vagina; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris; improper, inappropriate, unwarranted and unnecessary touching and pulling of labia; unnecessary pressing, touching and groping of Plaintiff's pelvic area forcing Plaintiff to urinate; unnecessary close proximity between his face and her genitals; unnecessary and uncomfortable blowing and breathing on Plaintiff's vagina; inappropriate, uncomfortable and painful anal penetration; Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

164. HL148 ([REDACTED]) was born in 1959 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2008. HADDEN's sexual abuse of HL148 included but was not limited to physical examinations performed outside the presence of a chaperone; improper, inappropriate, unnecessary and unwarranted vaginal exam; ungloved unnecessary, inappropriate and prolonged digital rubbing and penetration of Plaintiff's vagina; prolonged, painful, aggressive

pelvic exams which included deep digital thrusting. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical.

165. HL149 ([REDACTED]) was born in 1968 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S. HADDEN's sexual abuse of HL149 included but was not limited to physical examinations performed outside the presence of a chaperone; serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; improper, inappropriate, unnecessary and unwarranted vaginal exam; improper, inappropriate, unwarranted and unnecessary touching and pulling of labia; unnecessary, inappropriate and prolonged digital rubbing and penetration of Plaintiff's vagina; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; unnecessary and painful wide use of speculum. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical.

166. HL150 ([REDACTED]) was born in 1955 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1988 until 2011. HADDEN's sexual abuse of HL150 included but was not limited to physical examinations performed outside the presence of a chaperone; serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; improper, inappropriate, unnecessary and unwarranted vaginal exam; improper, inappropriate, unwarranted and unnecessary touching and pulling of labia; unnecessary, inappropriate and prolonged digital rubbing and penetration of Plaintiff's vagina; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris;

painful placement of speculum wide in Plaintiff's vagina; inappropriate, uncomfortable and painful anal penetration; unnecessary pressing, touching and groping of Plaintiff's pelvic area forcing Plaintiff to urinate. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical.

167. HL151 ([REDACTED]) was born in 1965 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES in approximately 2004. HADDEN's sexual abuse of HL150 included but was not limited to physical examinations performed outside the presence of a chaperone; serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; multiple unnecessary breasts exams during one visit; improper, inappropriate, unnecessary and unwarranted vaginal exam; improper, inappropriate, unwarranted and unnecessary touching and pulling of labia; ungloved unnecessary, inappropriate and prolonged digital rubbing and penetration of Plaintiff's vagina; prolonged, painful, aggressive pelvic exams which included deep digital thrusting; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris; inappropriate, uncomfortable and painful anal penetration; unnecessary and painful wide use of speculum vagina; unnecessary pressing, touching and groping of Plaintiff's pelvic area forcing Plaintiff to urinate; unnecessary close proximity between his face and her genitals. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance specifically her nipples, and improper, inappropriate, unwarranted and unnecessary questioning about sexual acts.

168. HL152 ([REDACTED]) was born in 1957 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES from approximately 1999 until 2011. HADDEN's sexual abuse of

HL152 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; improper, inappropriate, unnecessary and unwarranted vaginal exam; ungloved unnecessary, inappropriate and prolonged digital rubbing and penetration of Plaintiff's vagina; Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance, inappropriate, unwarranted and unnecessary questioning about sexual acts.

169. HL153 (██████████) was born in 1944 and was a patient of DEFENDANTS. She treated with HADDEN for obstetrics and gynecological care at DEFENDANT'S OFFICES in approximately 2010. HADDEN's sexual abuse of HL150 included but was not limited to serial, prolonged, improper and inappropriate breast examinations performed at every visit consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; improper, inappropriate, unnecessary and unwarranted vaginal exam; unnecessary, inappropriate, rough and painful vaginal penetration unnecessary, inappropriate, rough and painful anal penetration. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance, inappropriate, unwarranted and unnecessary questioning about sexual acts.

170. HL154 (██████████) was born in 1979 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2001. Upon information and belief, HADDEN's sexual abuse of HL154 included but was not limited to inappropriate breast examinations and/or inappropriate vaginal exams.

171. HL155 (██████████) was born in 1980 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES in approximately 2011. HADDEN's sexual abuse of HL155 included but was not limited to prolonged, improper

and inappropriate breast examinations consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; improper, inappropriate, unnecessary and unwarranted vaginal exam; unnecessary, inappropriate digital penetration; improper, inappropriate, unwarranted and unnecessary touching, stroking, rubbing and stimulating Plaintiff's clitoris.

172. HL156 ([REDACTED]) was born in 1964 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 1999 until 2000. HADDEN's sexual abuse of HL156 included but was not limited to prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts and nipples, in a manner for his own sexual gratification; improper. Upon information and belief, inappropriate vaginal exams.

173. HL157 ([REDACTED]) was born in 1982 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2010 until 2011. Upon information and belief, HADDEN's sexual abuse of HL157 included but was not limited to inappropriate breast examinations and/or inappropriate vaginal exams.

174. HL158 ([REDACTED]) was born in 1981 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 2007 until 2012. HADDEN's sexual abuse of HL158 included but was not limited to prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts, in a manner for his own sexual gratification; improper, inappropriate, unnecessary and unwarranted vaginal exam; prolonged pelvic exams which included deep digital penetration; inappropriate, improper, unwarranted and unnecessary "mole" exams which included HADDEN directed Plaintiff to stand nude in front of him while he

excessively stared at her. Additionally, HADDEN made sexually inappropriate comments regarding Plaintiff's body and physical appearance, inappropriate, unwarranted and unnecessary questioning about sexual acts.

175. HL159 ([REDACTED]) was born in 1977 and was a patient of DEFENDANTS. She treated with HADDEN for gynecological care at DEFENDANT'S OFFICES from approximately 1998 until 2003. HADDEN's sexual abuse of HL159 included but was not limited to prolonged, improper and inappropriate breast examinations consisting of HADDEN caressing, fondling, and squeezing of Plaintiff's breasts, in a manner for his own sexual gratification. Upon information and belief, inappropriate vaginal exams.

HADDEN'S SEXUAL ASSAULTS OF HIS PATIENTS

176. The sexual assaults and abuse of each of the PLAINTIFFS described above demonstrates a particular plan and scheme of HADDEN, executed over a period of approximately two decades with impunity and despite the notice and knowledge of DEFENDANTS. This plan and scheme includes the following means and methods, among others, to facilitate his abuse:

- a. HADDEN frequently created opportunities to be alone with his victims. Among other things, HADDEN invited his victims to meet with him alone in his office, sent nurses and medical assistants out of the examination room for periods of time, and/or intentionally failed to tell nurses and medical assistants when he was going into examination rooms so that he could be alone with his victims.
- b. Once alone with his victims, HADDEN attempted to develop a rapport with them and put them at ease by asking them questions about their personal lives and telling them about his own life and family. In this regard, he made the victims feel that they were receiving special attention and treatment.

- c. HADDEN frequently brought up inappropriate and medically irrelevant sexual topics without prompting from his patients. For example, HADDEN asked many of his victims detailed, inappropriate questions about their own sexual activities and sexual partners. He told some victims he could see sperm inside their vaginas and suggested they must have recently had sex. HADDEN also offered unsolicited advice/comments to some of his victims regarding such inappropriate subjects as whether they enjoyed sex with their partners, how to masturbate and have orgasms, and how to groom their pubic hair. In some instances, HADDEN made sexualized comments about his victims' physiques and encouraged them to go on diets so they could continue to look attractive.

177. HADDEN sexually abused hundreds of victims for decades. The sexual abuse perpetrated by HADDEN included but was not limited to, excessively long and sexualized breast examinations, which included, among other things, HADDEN caressing or groping a victim's breasts, and pinching, twisting, or otherwise manipulating a victim's nipples; pelvic examinations during which HADDEN used his hands to touch the victim's clitoris, labia, vagina, and/or anus without a valid medical purpose or explanation; and pelvic examinations on victims during which he licked the victim's vagina or placed his face extremely close to or touching the victim's genitalia. All of HADDEN's sexually assaultive and abusive behaviors were without a legitimate medical purpose.

178. This action sets forth causes of action involving physical, psychological and emotional injuries and trauma, suffered as a result of conduct that constitutes one or more sexual offenses as defined in Article 130 of the New York Penal Law including, but not limited to, sexual abuse (consisting of sexual contact), NY Penal Law §§130.55-130.77.

179. On February 23, 2016, in Supreme Court, New York, HADDEN plead guilty and was convicted of Criminal Sexual Act in the Third Degree (NY Penal Law §130.40(1)), and one count of Forcible Touching (NY Penal Law §130.52), consistent with the allegations of sexual abuse of Plaintiff outlined herein.

180. On February 26, 2016, the New York State Department of Health State Board for Professional Medical Conduct issued a Surrender Order, ordering HADDEN to surrender his license as a physician in the State of New York.

181. In January 2023, HADDEN was convicted in federal court of six counts of enticement and inducement to travel to engage in illegal sex acts, consistent with the allegations of sexual abuse outlined herein. On July 25, 2023 HADDEN was sentenced to twenty-years in prison for this conduct.

NOTICE – FORESEEABILITY

182. Upon information and belief, HADDEN was at all relevant times a serial sexual predator who sexually assaulted and abused Plaintiff and numerous other patients while he was employed by and/or provided services for DEFENDANTS, on their premises and under their supervision.

183. Upon information and belief, at all relevant times DEFENDANTS knew that HADDEN was sexually assaulting his patients under the guise of appropriate medical care.

184. Upon information and belief, DEFENDANTS were put on notice of the danger posed by HADDEN in numerous instances, including, but not limited to, the following:

- a. In 1992, a nurse who worked with HADDEN walked in on HADDEN sexually abusing a victim at one of DEFENDANTS' facilities. When the nurse reported to her supervisor that she had observed HADDEN sexually abusing a patient, the

supervisor's response was for the nurse to "keep quiet", "stay with your doctor", and "don't let him get himself in trouble."

- b. In 1992, immediately after being sexually abused during an exam at one of DEFENDANT's facilities, a victim of HADDEN reported the abuse to Patient Relations. DEFENDANTS responded that they would follow up with the victim, but no further action was taken. HADDEN remained in his position and continued to sexually assault and abuse patients as detailed above.
- c. In 1993, DEFENDANTS received a letter detailing HADDEN's sexual abuse of a victim. DEFENDANTS responded that they would investigate, but no further action was taken. HADDEN remained in his position and continued to sexually assault and abuse patients as detailed above.
- d. In 1994, DEFENDANTS received a letter from a victim of HADDEN that detailed the sexual abuse she suffered at the hands of HADDEN at one of DEFENDANTS' hospitals. The head of the hospital's Department of Obstetrics and Gynecology Unit responded with a letter to the victim acknowledging receipt and stated that the victim's concerns would be addressed. According to the victim, no one from the hospital ever followed up or took action.

185. Despite this notice, DEFENDANTS took no action whatsoever against HADDEN, and as a result, HADDEN sexually assaulted and abused PLAINTIFF's and other women.

186. At all relevant times, DEFENDANTS knew, or in the exercise of reasonable care should have known, that HADDEN had a propensity for the conduct which caused injury to Plaintiff, particularly that he had a propensity to engage in the sexual abuse of female patients under the guise of appropriate medical care.

187. At all relevant times, it was reasonably foreseeable to DEFENDANTS that HADDEN would commit acts of sexual abuse or assault on female patients.

188. At all relevant times, DEFENDANTS knew or should have known that HADDEN was unfit, dangerous, and a threat to the health, safety and welfare of the female patients entrusted to his counsel, care and/or protection.

DUTY AND BREACH

189. DEFENDANTS were in a special relationship with female patients, in which female patients, including PLAINTIFFS, placed themselves in a vulnerable position for the purpose of receiving medical care and treatment from DEFENDANTS. By virtue of this special relationship, DEFENDANTS owed a duty to exercise reasonable care to prevent foreseeable harm to PLAINTIFFS from sexual assault.

190. DEFENDANTS failed to warn PLAINTIFFS, other patients, and the public that HADDEN was a sexual predator and that they had been, or were at risk of being, sexually assaulted by HADDEN in the course of purported medical care or treatment.

191. Despite knowledge of HADDEN's serious threat to the health, safety and welfare of patients, DEFENDANTS provided HADDEN with unsupervised and unfettered access to patients, including PLAINTIFFS, needlessly endangering their health, safety, and welfare.

192. DEFENDANTS breached their duties in providing HADDEN the opportunity to commit foreseeable acts of sexual abuse or assault.

193. DEFENDANTS breached their duties by failing to use reasonable care to provide a safe environment for PLAINTIFFS where they would be free from the unwanted sexual contacts and dangerous propensities of HADDEN as an employee/agent of DEFENDANTS.

194. DEFENDANTS breached their duties by failing to take corrective action or adequately investigate reports or allegations of sexual misconduct by HADDEN.

195. DEFENDANTS breached their duties in hiring HADDEN when he posed a foreseeable risk of sexual abuse his patients.

196. DEFENDANTS breached their duties in retaining and failing to supervise HADDEN when they knew or should have known that he posed a foreseeable risk of harm of sexual assault and abuse to his patients.

197. DEFENDANTS' breaches included: (i) failing to protect PLAINTIFFS from sexual assault and lewd and lascivious acts committed by their agent and employee; (ii) failing to establish policies and procedures that were adequate to protect the health, safety and welfare of patients and protect them from sexual abuse by a health care provider; (iii) failing to implement and enforce policies and procedures that were adequate to protect the health, safety and welfare of patients and protect them from sexual assault or abuse by a health care provider; (iv) failing to adopt, implement or enforce an appropriate escort policy that would have prevented HADDEN from being alone with vulnerable female patients; and (v) failing to train other medical professionals and staff in the protection of patients from sexual abuse in their facilities.

198. At all relevant times, DEFENDANTS concealed their knowledge that HADDEN was unsafe.

199. DEFENDANTS breached their duties by failing to take corrective action or adequately investigate reports or allegations of sexual misconduct by HADDEN.

200. Given DEFENDANTS' constructive and/or actual knowledge concerning the dangerous propensities of HADDEN, the sexual assaults and abuse perpetrated against PLAINTIFFS were reasonably foreseeable to DEFENDANTS.

201. As a direct and proximate result of DEFENDANTS' breach of their duties, PLAINTIFFS were sexually assaulted and abused by HADDEN.

202. The limitation of liability set forth in CPLR Art. 16 is not applicable to the claim

of personal injury alleged herein, by reason of one or more of the exemptions provided in CPLR § 1602, including without limitation, that DEFENDANTS acted with reckless disregard for the safety of PLAINTIFFS, or knowingly or intentionally, in concert with its agents and employees.

COUNT I
NEGLIGENCE
(Against All Defendants)

203. Plaintiffs repeat and reallege Paragraphs 1 through 202 above.

204. DEFENDANTS were negligent.

205. DEFENDANTS owed a duty of care to Plaintiff.

206. DEFENDANTS breached the duty of care owed to Plaintiff.

207. DEFENDANTS had actual or constructive notice that PLAINTIFFS were being sexually abused by its employee and/or agent, and failed to protect PLAINTIFFS or otherwise make the facility safe for PLAINTIFFS. PLAINTIFFS were sexually abused after DEFENDANTS knew or should have known that PLAINTIFFS, as female patients of HADDEN, were in danger of being sexually assaulted by HADDEN.

208. It was reasonably foreseeable to DEFENDANTS that allowing HADDEN unfettered access to patients would result in sexual assault or abuse of those patients.

209. As a direct and proximate result of this negligence, PLAINTIFFS have suffered and continue to suffer severe and permanent psychological, emotional, and physical injuries, shame, humiliation, and the inability to lead a normal life.

210. The foregoing acts, conduct and omissions demonstrate a reckless or willful disregard for the safety and well-being of Plaintiff and other patients.

211. By reason of the foregoing, DEFENDANTS are jointly and severally liable to Plaintiff for compensatory damages, and for punitive damages, together with interest and costs.

COUNT II
NEGLIGENT HIRING, RETENTION, DIRECTION & SUPERVISION
(Against All Defendants)

212. Plaintiffs repeat and reallege Paragraphs 1 through 202 above.

213. DEFENDANTS, their agents, servants and/or employees, hired, employed, contracted, credentialed and/or enlisted HADDEN to render obstetric and gynecological care to their patients.

214. DEFENDANTS, their agents, servants and/or employees, were negligent in hiring, employing, credentialing, contracting, enlisting and/or affiliating with HADDEN because they knew, or should have known, through the exercise of reasonable care, of HADDEN's propensity to engage in nonconsensual sexual behavior, and lewd and lascivious conduct, with DEFENDANTS' patients.

215. HADDEN would not, and could not, have been in a position to sexually abuse, sexually exploit, sexually assault and/or molest PLAINTIFFS if not for this negligent hiring, retention, direction and/or supervision.

216. HADDEN continued to sexually abuse, sexually exploit, assault and molest PLAINTIFFS while practicing in said capacity at locations owned, operated and/or controlled by DEFENDANTS. Had HADDEN not been hired, credentialed, employed, contracted and/or enlisted by DEFENDANTS, PLAINTIFFS would not have been harmed.

217. The harm complained of herein was foreseeable, known, knowable, covered up, and/or ratified by DEFENDANTS.

218. PLAINTIFFS would not have suffered the foreseeable harm complained of herein but for the negligence of DEFENDANTS, in having placed, allowed and/or permitted HADDEN to remain in his position.

219. DEFENDANTS were negligent in their direction and/or supervision of HADDEN in that they knew, or should have known, through the exercise of ordinary care, that HADDEN's conduct would subject third parties to an unreasonable risk of harm, including HADDEN's propensity to engage in nonconsensual sexual behavior and lewd and lascivious conduct with female patients.

220. DEFENDANTS failed to take the necessary, appropriate and/or timely steps and/or actions, to prevent such horrific misconduct from occurring.

221. DEFENDANTS were negligent in their retention of HADDEN in that they knew of his propensity to engage in sexual behavior and lewd and lascivious conduct with female patients without their consent.

222. DEFENDANTS retained HADDEN in his position, and thus provided him unfettered and unsupervised access to vulnerable females, enabling him to continue such behavior, unabated.

223. DEFENDANTS were further negligent in their retention, supervision and/ or direction of HADDEN in that HADDEN sexually abused, exploited and molested PLAINTIFFS on the premises of locations or locations owned, operated and/or controlled by DEFENDANTS.

224. DEFENDANTS failed to take reasonable steps and/or actions to prevent such events from occurring on their premises.

225. HADDEN would not, and could not, have been in a position to sexually abuse, sexually exploit, sexually assault and/or molest PLAINTIFFS had he not been negligently retained, supervised and/or directed.

226. By reason of the foregoing, DEFENDANTS are jointly and severally liable to Plaintiff for compensatory damages, and for punitive damages, together with interest and costs.

COUNT III
CIVIL CAUSE OF ACTION PURSUANT TO N.Y.C. ADMIN. CODE § 10-1104
(Against All Defendants)

227. Plaintiffs repeat and reallege Paragraphs 1 through 202 above.

228. The acts of HADDEN on each of PLAINTIFFS are “crimes of violence” and “crimes of violence motivated by gender,” as defined in N.Y.C. Admin. Code § 10-1103.

229. DEFENDANTS injured each of PLAINTIFFS by directing, enabling, participating in, and/or conspiring in the commission of one or more crimes of violence motivated by gender, consisting of HADDEN’s acts complained of herein. As a result, each of the PLAINTIFFS has a cause of action against DEFENDANTS pursuant to N.Y.C. Admin. Code § 10-1104.

230. Each of the acts and omissions complained of herein, including HADDEN’s acts of sexual assault and abuse, and DEFENDANTS’ acts and omissions in directing, enabling, participating in, and/or conspiring in HADDEN’s acts of gender-motivated violence, occurred within the territory and jurisdiction of New York City, and are subject to the laws set forth in the N.Y.C. Administrative Code.

231. Pursuant to N.Y.C. Admin. Code § 10-1104, PLAINTIFFS are entitled to the following relief against DEFENDANTS: compensatory damages, punitive damages, attorney’s fees and costs, and such other relief as the Court may deem appropriate.

DEMAND FOR A JURY TRIAL

232. Plaintiff demands a Jury Trial in this action.

WHEREFORE, the amount in controversy exceeds the jurisdictional limits of all lower courts, and Plaintiff demands judgment against DEFENDANTS jointly and severally for compensatory damages, pain and suffering, punitive damages, attorney fees, the costs and

disbursements of this action, and such other and further relief as this Court deems necessary just and proper.


Dated: New York, NY
November 9, 2023

Respectfully submitted,

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