

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

WILLIAM MYRE, and SHERI MYRE, as co-personal
representatives of the estate of TATE MYRE, deceased
and WILLIAM MYRE, and SHERI MYRE, individually;

CHAD GREGORY, Next Friend for
KEEGAN GREGORY, a minor, and CHAD GREGORY
and MEGHAN GREGORY, individually

LAUREN ALIANO, Next Friend for SOPHIA KEMPEN, a minor
and GRACE KEMPEN, a minor, and LAUREN ALIANO, individually

Plaintiffs

v.

PAM PARKER FINE, SHAWN HOPKINS,
NICHOLAS EJAK,
TEACHER #1, TEACHER #2
and TEACHER #3, in their individual capacities,
and ETHAN CRUMBLY, and JENNIFER
CRUMBLY and JAMES CRUMBLY

Defendants

COMPLAINT

NOW COME Plaintiff's, WILLIAM MYRE and SHERI MYRE, individually and as Co-personal representatives of the estate of TATE MYRE, deceased; CHAD GREGORY, as Next Friend for KEEGAN GREGORY, a minor, and CHAD GREGORY and MEGHAN GREGORY, individually; LAUREN ALIANO, Next Friend for SOPHIA KEMPEN, a minor, and GRACE KEMPEN, a minor; and LAUREN ALIANO individually, by their attorneys JOHNSON LAW, PLC, and for their complaint against the Defendants, state as follows:

JURISDICTION AND VENUE

1. Jurisdiction is proper in this court for the reason that it is a tort claim with an amount in controversy exceeding \$25,000 exclusive of interest costs and attorney fees.

2. Venue is proper in this court for the reason that the events out of which the claim arises occurred in Oakland County, and all plaintiffs and defendants either reside in Oakland County or transact their business in person regularly in Oakland County.

PLAINTIFFS

3. At all times relevant to this lawsuit, TATE MYRE (“TATE”) was a minor who lived with parents WILLIAM (“BUCK”) MYRE and SHERI MYRE, who have been duly appointed co-personal representatives of TATE’S Estate.

4. At all times relevant to this lawsuit, KEEGAN GREGORY (“KEEGAN”), a minor, lived with parents CHAD GREGORY, who is being appointed with the filing of this complaint next friend for KEEGAN GREGORY.

5. At all times relevant to this lawsuit, SOPHIA KEMPEN (“SOPHIA”) and GRACE KEMPEN (“GRACE”), were minors who lived with their mother, LAUREN ALIANO, who is being appointed with the filing of this complaint their next friend.

6. All Plaintiffs herein are believed to be residents of Oxford, Oakland County, Michigan.

THE OXFORD DEFENDANTS

7. At all times relevant to this lawsuit, the Oxford High School (“OHS”) was a secondary school, operating as an integral part of the Oxford Community Schools (“OCS”) located in Oxford, Oakland County, Michigan.

8. At all times relevant to this lawsuit, PAM PARKER FINE (“FINE”), NICHOLAS

EJAK (“EJAK”), SHAWN HOPKINS (“HOPKINS”), TEACHER #1, and TEACHER #2 and TEACHER #3 were employees or actual and/or apparent agents of OCS, working in the course and scope of their employment and/or agency at OHS, in Oxford, Oakland County, Michigan.

9. Upon information and belief, FINE, EJAK, HOPKINS, TEACHER #1, TEACHER #2, and TEACHER #3 are residents of Oakland County, Michigan.

10. At all times relevant to this lawsuit, Defendant EJAK was the Dean of Students at OHS working in the course and scope of his employment with OCS.

11. At all times relevant to this lawsuit, Defendant HOPKINS was a counselor at OHS, working in the course and scope of his employment with OCS.

12. At all times relevant to this lawsuit, Defendant FINE was a counselor at OHS, working in the course and scope of her employment with OCS.

13. At all times relevant to this lawsuit, Defendant TEACHER #1, whose name is unknown to the Plaintiffs as of the filing of this complaint, was acting as a classroom teacher at OHS, within the course and scope of her employment with OCS.

14. TEACHER #1 had direct contact with EC on November 29, 2021, when EC violated multiple school policies procedures and rules by searching on the internet for information about ammunition for his Sig Sauer handgun used in the fatal shootings of November 30, 2021.

15. At all times relevant to this lawsuit, Defendant TEACHER #2, whose name is unknown to the Plaintiffs as of the filing of this complaint, was acting as a classroom teacher at OHS, within the course and scope of her employment with OCS.

16. TEACHER #2 had direct contact with EC on November 30, 2021, when he caught EC violating multiple school policies, procedures, and rules by drawing pictures of his above referenced handgun, a bullet, a person shot twice in the chest with blood displayed; and when he

wrote other highly concerning things while in class on a test review paper, instead of doing his schoolwork.

17. TEACHER #2 had direct contact with EC on November 29, 2021, when EC violated multiple school policies, procedures and rules by searching on the internet for information about ammunition for his Sig Sauer handgun used in the fatal shootings of November 30, 2021.

18. TEACHER #3 had direct contact with EC on November 30, 2021, when he/she caught EC violating multiple school policies, procedures and rules by looking up violent videos on his phone.

THE CRUMBLEY DEFENDANTS

19. At all times relevant to this lawsuit, Defendant ETHAN CRUMBLEY, a minor, (“EC”) was the perpetrator of the assaults and murders committed on November 30, 2021, at OHS, and lived with his parents in Oxford, Oakland County, Michigan.

20. At all times relevant to this lawsuit, Defendant JAMES CRUMBLEY (“MR. CRUMBLEY”) was the father of EC, who lived with his parents in Oxford, Oakland County, Michigan.

21. At all times relevant to this lawsuit, Defendant JENNIFER CRUMBLEY (“MRS. CRUMBLEY”) was the mother of EC, and was a resident of Oxford, Oakland County, Michigan.

22. EC, MRS. CRUMBLEY and MR. CRUMBLEY are sometimes referred to collectively in this Complaint as “the Crumbley Defendants”.

COMMON ALLEGATIONS

23. Over the course of the school year 2020/2021, when EC was a freshman, through

approximately June 2021, until such time as he became a sophomore and returned to Oxford OHS in September 2021, EC exhibited some concerning, strange and bizarre behavior which should have alerted his parents, as well as other people who had extensive contact with him, that he was suffering from significant psychiatric problems, and that he might have been subject to child abuse and/or neglect by his parents.

24. In March 2021, EC, on multiple occasions, had texting conversations with his mother, MRS. CRUMBLEY, while EC was at home and the Crumbleys were away from the home working. In these text conversations, EC stated that he was afraid that there were demons, ghosts, and someone else in the home.

25. Despite these concerning potential hallucinations and/or delusions, neither MR. nor MRS. CRUMBLEY did anything to get an assessment of EC's medical/psychiatric condition.

26. In May 2021, EC tortured and killed animals, which he videotaped on his cell phone that was given to him by his parents.

27. One such animal was a bird, whose head EC kept in a jar in his bedroom for several months, that would have been clearly seen by his parents. Hence, they either knew or should have known about it.

28. During this period of time, EC was journaling and also shot videos of himself, wherein he discussed his plan to shoot up the school.

29. Likewise, EC was so distraught and upset with his life, in and out of school, that he stopped doing homework and journaled how shocked he was that his parents neither noticed nor cared.

30. Throughout this same period of time, EC searched on his computer and/or cell phone on multiple occasions for “school shootings” and firearms in general. This research was

so extensive that he began receiving notifications as to mental health and the purchase or use of firearms.

31. This behavior was known or would have been known to his parents, had they reviewed his search history on his computer and or cell phone. Thus, they knew and/or should have known of this behavior.

32. Throughout the same period of time, EC researched Nazi propaganda on the internet on multiple occasions, which also would have been known and/or should have been known to his parents from his computer and/or phone at home.

33. In the same period of time, EC repeatedly asked his parents to buy him a 9 mm handgun and take him to the shooting range.

34. In August of 2021, EC took a video that he sent to one of his OHS classmates, which showed EC holding a gun, and said, "It's time to shoot up the school! JK JK JK." The gun was his father's 22 caliber handgun, thus proving that EC had 24/7 access to his parents' firearms, without limitations or repercussions.

35. As with the other threatening and concerning behaviors described above, this video and statement were on his computer and/or cell phone, and thus were known or should have been known to his parents.

36. In October of 2021, a month after EC returned to OHS as a sophomore, EC became very sad about his best friend leaving OHS. The Crumbley parents were aware of this and knew how upset he was about it.

37. Despite all of the above-described concerning behaviors, and many others, which should have alerted MR. and MRS. CRUMBLEY to the fact that their son was engaged in some concerning, violent behavior, and needed an immediate psychiatric evaluation and treatment, the

Crumbley parents failed to obtain such help for EC. Their failure/refusal to get help for EC was so significant that it rose to the level of child abuse and/or neglect.

38. On November 26, 2021, four days before the OHS shooting, MR. CRUMBLEY and EC went to a local gun dealer and purchased a Sig Saur 9 mm semi-automatic handgun (“the handgun”), which, upon information and belief, they openly referred to as EC’s gun in front of the salesperson.

39. Later that day EC posted a photo of himself with his new gun.

40. The next day, on or about November 27, 2021, three days before the OHS shooting, MRS. CRUMBLEY, at ECs request, took EC to a local gun shooting range so that EC could fire “his” new handgun, load it with ammunition, practice shooting it, as well as learn its other operations, including loading, reloading and firing.

41. On the same day, MRS. CRUMBLEY posted a picture of EC and his “new Christmas present,” clearly referring to the Sig Sauer handgun.

42. Upon information and belief, at the conclusion of the firearm practice, EC’s handgun was stored in his parents’ bedroom drawer, and either was not locked, or if locked, EC was given the ability to unlock it; hence, the handgun was made accessible to him 24 hours per day.

43. Two days later, on Monday, November 29, 2021, the day before the OHS shootings and murders, EC was in the classroom of TEACHER #1, who caught EC looking at ammunition for his gun on his cell phone in violation of a variety of school, rules, procedures and policies.

44. Upon information and belief, TEACHER #1 was so concerned by this behavior that he/she took a picture on his/her cell phone of the ammunition for which EC was searching.

45. Due to TEACHER #1’s grave concerns for EC’s and others’ safety, TEACHER #1

took EC to the counseling office, where EC was left with PARKER FINE.

46. PARKER FINE was given a copy of the of the photograph taken by TEACHER #1, showing the ammunition for EC's gun. PARKER FINE called MRS. CRUMBLEY to discuss this concerning behavior, and asked that the parents return her telephone call. Neither parent returned the call, nor did they discuss EC's above-referenced violent, concerning behaviors with PARKER FINE.

47. In addition to the ammunition that EC looked up on his cell phone, other students saw EC on November 29, 2021 with shell casings and live ammunition rounds at OHS.

48. The ammunition research, coupled with the refusal of the Crumbley parents to respond to PARKER FINE, gave her reasonable cause to suspect child abuse and/or neglect. Hence, PARKER FINE was required under Michigan's Child Protection Act, MCL 722.623, et seq, to contact Child Protective Services ("CPS").

49. The risk posed by EC also required that PARKER FINE notify the police, namely the OHS liaison officer, Oakland County Deputy Jason Louwaert, that EC was a victim of abuse and/or neglect, and posed a threat to himself and others.

50. At no time did TEACHER #1 or PARKER FINE report this information to Child Protective Services or to local law enforcement, as required by Michigan's Child Protection Act; hence they both violated that law.

51. Instead of returning PARKER FINE'S phone call, MRS. CRUMBLEY texted her son later that day and asked "Did you show them a picture of your gun?" "LOL, I'm not gonna get mad at you, you have to learn to not get caught."

52. Despite learning about the ammunition search that day, neither MR. CRUMBLEY nor MRS. CRUMBLEY took further action to secure ECs handgun nor did they intercede in any

way relative to taking EC to a counselor, psychiatric facility, emergency room, or other mental health care provider.

53. The very next day, on Tuesday, November 30, 2021, the day of the shooting, EC returned to school and was in the classroom of TEACHER #2, with the handgun and approximately 48 rounds of ammunition in his backpack.

54. EC was doing a Chapter 5 “Test Review” while he was in math class at 8:59 AM. Instead of utilizing the test document to review for an apparent upcoming test, EC drew a picture of his 9 mm handgun. See Exhibit 1, p 1, which shows the original drawings, followed by EC’s attempts to change the drawings to hide their sinister content (Exhibit 1, pp 2-3). Immediately underneath it, he wrote, “The thoughts won't stop. Help me.” To the right of that, he drew a person who clearly has two gunshot wounds: one in the chest, one of the abdomen with a blood coming from his mouth. To the right of that the statement, he wrote “blood everywhere” and underneath that, there is a hand-drawn shell casing or bullet. In another part of the same document, EC drew a laughing face with tears, and wrote “My life is useless” and “The world is dead.”

55. This drawing and these statements were clearly so violent and disturbing, were an obvious cry for help, and openly expressed EC’s thoughts of violence against himself and/or others.

56. TEACHER #2 became so understandably alarmed by seeing these clearly violent tendencies and violent behaviors, that he/she took a picture of same on the teacher’s cell phone and forwarded that to counselor SHAWN HOPKINS.

57. TEACHER #3 saw EC looking up violent videos that depicted a shooting. TEACHERS #2 and #3 reported this to HOPKINS.

58. At some point, TEACHER #2 took EC to HOPKINS’ office, but left EC’s

backpack in the classroom, without searching the backpack to ensure there were no weapons inside it.

59. HOPKINS spoke extensively with EC, who denied that there were any problems, lied, and said that this was all about a videogame he was designing. Clearly, HOPKINS did not believe this explanation, because of the obviousness of these violent threats; hence HOPKINS called the Crumbley parents and asked them to come to school for a meeting.

60. TEACHER #2, HOPKINS and EJAK, believed, based on the drawings and other information, that EC was having suicidal ideations. This prompted them to call the Crumbley parents to insist on an immediate meeting.

61. Based on these drawings and statements, as well as the direct knowledge of PARKER FINE's involvement with EC the previous day, TEACHER #2, and/or TEACHER #3 and/or HOPKINS had reasonable cause to suspect child abuse and/or neglect, and were required to report same to CPS and law enforcement, specifically Deputy Jason Louwaert, the school liaison officer.

62. Upon information and belief, Defendant SHAWN HOPKINS retrieved EC's backpack from the classroom where it had been left when EC was brought to the counselor. . The backpack contained the Sig Saur 9 mm semi-automatic handgun with 48 live bullets. HOPKINS brought the backpack to the location where EC was being interviewed by school personnel, and restored the backpack to EC's possession.

63. Upon information and belief, HOPKINS, in the presence of EJAK, returned the backpack containing the handgun to EC's possession without inspecting the contents of the backpack or turning it over to the liaison officer or other law enforcement officials, pending an opportunity to conduct a proper and lawful search of the backpack.

64. EJAK and HOPKINS had just cause to either inspect the contents of the backpack or, if they felt that such cause did not exist, to withhold the backpack from EC until proper authority could be provided to them to inspect the backpack themselves or have law enforcement do so.

65. Upon information and belief, once restored to him by HOPKINS, EC maintained control of his backpack, permitting him to access it and carry out his assaults upon the shooting victims.

66. The failure to keep the backpack, with the gun in it, from coming back into EC'S possession was an essential factor in allowing EC to carry out his murderous assaults.

67. Upon information and belief, EC's parents arrived at the school and a meeting was held with Defendant HOPKINS and Defendant EJAK, at which EC was present. At that meeting, the Crumbley parents they were shown the aforesaid drawing.

68. EC's parents were advised by Defendants HOPKINS and/or EJAK that EC needed immediate therapy that day.

69. In fact, HOPKINS and EJAK both knew that EC needed immediate psychiatric intervention and evaluation.

70. The Crumbley parents refused to take EC out of school and obtain for him the intervention that HOPKINS and/or EJAK recommended.

71. The Oxford Defendants knew that the refusal of the parents to address this emergent medical need was: 1) an explanation of how EC had reached this level of desperation; 2) evidence of child abuse/neglect of the kind that needed to be reported immediately under the Child Protection Act; and 3) evidence that EC was going to continue to be a grave risk of harm to himself and others.

72. HOPKINS and/or EJAK then stated that, if the Crumbley parents did not obtain counseling for EC within 48 hours, the school would contact Child Protective Services.

73. Moreover, HOPKINS and EJAK wanted the Crumbleys to take EC out of school because of his need for immediate medical attention. But the Crumbleys again refused, using work obligations as an excuse.

74. At that time, the Oxford Defendants stood in loco parentis as to EC and owed him the obligation to protect him from his own suicidal ideation and the clear risk that he would become a murderer, as he did.

75. Defendants HOPKINS and EJAK knew that threatening to call Child Protective Services within 48 hours, and threatening to remove EC from his home, without actually taking any action, would create and/or increase the likelihood that, if EC had violence in mind, he would act before he lost the opportunity.

76. In making this demand upon the parents, Defendants HOPKINS and EJAK evidenced their awareness that, at a minimum, EC was a threat to himself and others, and that failure to address EC's situation urgently was criminal neglect.

77. This in turn again triggered a requirement under the Michigan Child Protection Act, i.e. MCL 722.621, et seq.

78. After the meeting which Defendants HOPKINS and EJAK attended with EC, and his parents, EC returned to the classroom with his backpack containing the Sig Saur 9 mm semi-automatic handgun and 48 live bullets.

79. Defendants HOPKINS and EJAK deliberately conducted this meeting to the exclusion of the school safety liaison officer, thereby preventing him from being present at the meeting and taking action to prevent the mayhem that followed.

80. The affirmative acts of TEACHER #1, TEACHER #2, TEACHER #3, PARKER FINE, HOPKINS and EJAK, as alleged in the foregoing allegations of this complaint, greatly increased the danger posed by EC and rendered the environment for the Plaintiffs and other students less safe after their acts than before.

81. Upon information and belief, after being allowed to return to his classroom, EC took his backpack to a school bathroom, loaded ammunition into the Sig Saur 9 mm semi-automatic handgun and walked out of the bathroom to carry out the mass shooting, which included the murder of TATE MYRE.

82. At approximately 12:52 p.m., the authorities were notified of an active shooter at Oxford High School.

83. Upon information and belief, EC's massacre was halted when he was apprehended by law enforcement.

84. On December 1, 2021, EC was arraigned and charged as an adult with one count of terrorism causing death, four counts of first-degree murder, seven counts of assault with intent to murder, and twelve counts of possession of a firearm in the commission of a felony.

85. By reason of the knowledge that the Oxford Defendants possessed before the shootings began on November 30, 2021, it was foreseeable by said Defendants that EC would carry out acts of violence on the Plaintiffs and others.

86. The Defendants' affirmative actions were reckless and put the minor plaintiffs herein and the decedents herein represented at substantial risk of serious and immediate harm.

87. The Defendants knew or clearly had to know that their actions would endanger the Plaintiffs herein and other students at Oxford High School.

**COUNT I – WRONGFUL DEATH CLAIMS AGAINST THE OXFORD DEFENDANTS
AS TO TATE MYRE BASED ON NEGLIGENCE AND GROSS NEGLIGENCE**

88. Plaintiffs WILLIAM MYRE and SHERI MYRE, as co-personal representatives of the estate of TATE MYRE, reincorporate the foregoing allegations of the complaint as though fully restated herein.

89. MCL 600.2922, the Wrongful Death Act, provides a cause of action for those persons specified in the statute, when the acts or omissions of others result in the wrongful death of a person.

90. Plaintiff WILLIAM MYRE and SHERI MYRE, as co-personal representatives of the Estate of TATE MYRE, deceased, bring this claim on behalf of those persons provided for in MCL 600.2922.

91. On November 30, 2021, TATE MYRE (“TATE”) was a 16-year-old junior at Oxford High School.

92. At that time, TATE was physically present at OHS and was aware that his life was in danger or that he needed to take precautions, such as refraining from attending school that day.

93. As a direct result of the actions of Defendants, set forth in the foregoing sections of this complaint, TATE MYRE was shot and killed by EC.

94. The Oxford Defendants had the duty, at all times relevant hereto, to take reasonable care to be aware of potential threats to the safety of students made known to them in the course of their employment and to take reasonable measures to prevent an unreasonable risk of harm to students and others on the premises of OHS.

95. The Oxford Defendants stood in loco parentis as to TATE MYRE and owed him the obligation to protect him from the unreasonable risk of injury posed by EC.

96. The Oxford Defendants breached those duties in the ways and for the reasons set forth in the foregoing allegations of this complaint.

97. The negligence of the Oxford Defendants was a proximate cause of TATE MYRE'S death, and as a direct consequence, a proximate cause of the injuries and damages to those persons entitled to make claim under the Wrongful Death Act.

98. To the extent that the court ultimately determines that this case requires application of principles of governmental immunity under the statutes and case law of this state and finds that the facts of this case fail to meet the definitions of gross negligence and "the proximate cause" as determined by the Supreme Court, the requirement that a plaintiff establish a higher standard for proximate cause and establish gross negligence in a case involving governmental actors than would be required of the same plaintiff, on the same facts, in a case against non-governmental defendants, is unconstitutional in that:

- a. it denies the Plaintiffs in this case due process;
- b. it denies the Plaintiffs in this case the equal protection of the law.

99. The Oxford Defendants were grossly negligent within the meaning of Michigan law in that, for the reasons set forth in the foregoing allegations of the complaint, Defendants' acts constituted "conduct so reckless as to demonstrate a substantial lack of concern for whether an injury results."

100. The gross negligence of the Defendants was the proximate cause of injuries and damages both to TATE MYRE and, as a consequence and by operation of law, to those persons entitled to make claim by reason of his death.

101. As a direct and proximate result of the TATE'S death, his survivors under the Wrongful Death Act have suffered the following injuries and damages:

- a. loss of the society and companionship of the deceased;
- b. loss of future support;
- c. loss of other economic benefits that they otherwise would have received.

102. As a direct and proximate result of the actions of the Defendants, TATE MYRE suffered terror, shock, awareness of his imminent death, excruciating pain, suffering and fear.

103. As a direct and proximate result of the acts of the Defendants, TATE MYRE suffered a loss of future earnings and earning capacity over what would have been the balance of his expected lifetime.

WHEREFORE, Plaintiff WILLIAM MYRE and SHERI MYRE, on behalf of the estate of TATE MYRE, deceased, and those persons entitled to make claim under the Wrongful Death Act against defendants, claim judgment in an amount to which those persons, individually and collectively, are found to be entitled, together with interest, costs, attorneys fees and exemplary damages and exemplary damages.

COUNT II - WRONGFUL DEATH CLAIMS AGAINST ETHAN CRUMBLEY JAMES CRUMBLEY AND JENNIFER CRUMBLEY AS TO TATE MYRE BASED ON ASSAULT AND BATTERY

104. Plaintiffs WILLIAM MYRE AND SHERI MYRE, co-personal representatives of the estate of TATE MYRE, reincorporate the foregoing allegations of the complaint as though fully restated herein.

105. The actions of EC as set forth in the common allegations of this complaint constituted an assault and battery of TATE MYRE resulting in his death.

106. By virtue of furnishing EC the Sig Sauer handgun, encouraging EC to show it off and obtain ammunition for it, endorsing his misusing the handgun, so long as he didn't get caught, withholding all information from the school officials concerning EC's mental

disturbance and violent propensities and refusing to pull EC from school when the school officials demanded it, JAMES CRUMBLEY and JENNIFER CRUMBLEY were acting in concert with EC and are equally liable with him for his violent assaults and other intentional torts committed as to the Plaintiffs.

107. As a direct and proximate result of the tortious conduct of the Crumbley defendants and the resulting death of TATE MYRE, his survivors under the Wrongful Death Act have suffered the following injuries and damages:

- a. loss of the society and companionship of the deceased;
- b. loss of future support;
- c. loss of other economic benefits that they otherwise would have received.

108. As a direct and proximate result of the actions of the Defendants, TATE MYRE suffered terror, shock, awareness of his imminent death, excruciating pain, suffering and fear.

109. As a direct and proximate result of the acts of the Crumbley defendants TATE MYRE suffered a loss of future earnings and earning capacity over what would have been the balance of his expected lifetime.

WHEREFORE, Plaintiff WILLIAM MYRE and SHERI MYRE, on behalf of the estate of TATE MYRE, deceased, and those persons entitled to make claim under the Wrongful Death Act against EC, claim judgment in an amount to which those persons, individually and collectively, are found to be entitled, together with interest, costs, attorneys fees and exemplary damages.

**COUNT III– CLAIMS AS TO KEEGAN GREGORY, CHAD GREGORY AND
MEGHAN GREGORY AGAINST THE OXFORD DEFENDANTS BASED ON
NEGLIGENCE AND GROSS NEGLIGENCE**

110. Plaintiff, KEEGAN GREGORY, by his next friend Chad Gregory, CHAD

GREGORY and MEGHAN GREGORY, reincorporate the foregoing allegations of the complaint as though fully restated herein.

111. On November 30, 2021, the minor plaintiff KEEGAN GREGORY (“KEEGAN”) was a student at Oxford High School during the shootings being carried out by Defendant EC.

112. KEEGAN was hiding in one of the bathrooms in a stall with another student, Justin Shilling, when EC entered the bathroom, discovered both Justin and KEEGAN in the bathroom stall and fatally shot Justin in the head. As this was happening, KEEGAN was texting his family and describing these horrific events.

113. EC then ordered KEEGAN out of the stall and onto the floor, whereupon KEEGAN instead dashed out the bathroom door to safety.

114. As a direct and proximate consequence of the experience of seeing Justin Shilling murdered and nearly being murdered himself, KEEGAN has suffered severe anxiety and emotional distress and is now suffering from post-traumatic stress disorder.

115. This is manifest in his inability to sleep, recurrent nightmares, fear of attending school, inability to enjoy movies and games that reprise the shooting incident at Oxford and fear of any loud, sudden noises such as fireworks. These damages are expected to continue into the undetermined future.

116. As to the Oxford Defendants, their conduct was negligent because:

- a. the Oxford Defendants stood in loco parentis as to KEEGAN and owed him the obligation to protect him from the unreasonable risk of injury posed by EC;
- b. they had a duty to KEEGAN to protect him from the conduct of EC that said Defendants knew or should have known was likely to occur;
- c. it was foreseeable that, if EC caused great bodily harm to others, anyone in

the immediate vicinity would suffer great emotional harm;

- d. EC caused great emotional harm to KEEGAN, both by making him witness the murder of Justin Shilling but also by nearly murdering KEEGAN;
- e. the negligence of the Oxford Defendants was a proximate cause of the injuries and damages to KEEGAN.

117. To the extent that the court ultimately determines that this case requires application of principles of governmental immunity under the statutes and case law of this state and finds that the facts of this case fail to meet the definitions of gross negligence and “the proximate cause” as determined by the Supreme Court, the requirement that a plaintiff establish a higher standard for proximate cause and establish gross negligence in a case involving governmental actors than would be required of the same plaintiff, on the same facts, in a case against non-governmental defendants, is unconstitutional in that:

- a. it denies the Plaintiffs in this case due process;
- b. it denies the Plaintiffs in this case the equal protection of the law.

118. The Oxford Defendants were grossly negligent within the meaning of Michigan law in that, for the reasons set forth in the foregoing allegations of the complaint, Defendants’ acts constituted “conduct so reckless as to demonstrate a substantial lack of concern for whether an injury results.”

119. The gross negligence of the Oxford Defendants was the proximate cause of the injuries and damages to KEEGAN GREGORY.

120. As a direct and proximate result of the damages to their son, Plaintiffs CHAD GREGORY AND MEGHAN GREGORY have suffered and will continue to suffer losses into the future, due to the injuries and damages suffered by their Plaintiff child, including, but not

limited to:

- a. the reasonable expense of necessary medical care, treatment and services received by their child;
- b. the reasonable value of the society, companionship and relationship with their child of which they have been deprived; and
- c. all other damages that may be learned through the course of discovery.

121. To the extent that the claims on behalf of CHAD and MEGHAN GREGORY extend beyond what the law permits with respect to consortium claims for parents arising from injuries to children, Plaintiffs maintain that this law is no longer good law and should be overturned.

WHEREFORE, Plaintiffs KEEGAN GREGORY, by his next friend Chad Gregory and CHAD GREGORY and MEGHAN GREGORY individually, claim judgment against the Oxford Defendants in an amount to which they are found to be entitled, together with interest, costs, attorneys fees and exemplary damages.

COUNT IV – ASSAULT AND NEGLIGENCE CLAIMS AGAINST ETHAN CRUMBLEY, JAMES CRUMBLEY AND JENNIFER CRUMBLEY AS TO KEEGAN GREGORY, CHAD GREGORY AND MEGHAN GREGORY

122. Plaintiff, KEEGAN GREGORY, by his next friend Chad Gregory, and CHAD GREGORY and MEGHAN GREGORY individually, reincorporate the foregoing allegations of the complaint as though fully restated herein.

123. The actions of EC as set forth in the common allegations of this complaint constituted an assault upon KEEGAN GREGORY.

124. By virtue of furnishing EC the Sig Sauer handgun, encouraging EC to show it off and obtain ammunition for it, endorsing his misusing the handgun as long as he didn't get

caught, withholding all information from the school officials concerning EC's mental disturbance and violent propensities and their refusal to pull EC from school when the school officials demanded it, JAMES CRUMBLY and JENNIFER CRUMBLY were acting in concert with EC and are equally liable with him for his violent assaults and other intentional torts committed as to the Plaintiffs.

125. As a direct and proximate result of the actions of the Defendants, KEEGAN GREGORY suffered terror, shock, awareness of his imminent death, excruciating pain, suffering and fear.

126. As a direct and proximate result of the acts of Defendant EC, KEEGAN GREGORY suffered severe emotional distress, post-traumatic stress disorder, sleep disturbance, nightmares, fear of attending school, inability to enjoy movies and games that reprise the shooting incident at Oxford and fear of any loud, sudden noises such as fireworks, and can be expected to continue to suffer such damages into the undetermined future.

127. As a direct and proximate result of the damages to their son, Plaintiffs CHAD GREGORY and MEGHAN GREGORY has suffered and will continue to suffer losses into the future due to the injuries and damages suffered by their Plaintiff children, including, but not limited to:

- a. the reasonable expense of necessary medical care, treatment and services received by their children;
- b. the reasonable value of the society, companionship and relationship with their children of which they have been deprived; and
- c. all other damages that may be learned through the course of discovery.

128. To the extent that the claims on behalf of CHAD and MEGHAN GREGORY

extend beyond what the law permits with respect to consortium claims for parents arising from injuries to children, Plaintiffs maintain that this law is no longer good law and should be overturned.

WHEREFORE, Plaintiff KEEGAN GREGORY, by his next friend Chad Gregory, and CHAD GREGORY and MEGHAN GREGORY individually, claim judgment against the Crumbley defendants, jointly and severally, in an amount to which they are found to be entitled, together with interest, costs, attorneys fees and exemplary damages.

COUNT V – CLAIMS AS TO SOPHIA KEMPEN, GRACE KEMPEN AND LAUREN ALIANO AGAINST THE OXFORD DEFENDANTS BASED ON NEGLIGENCE AND GROSS NEGLIGENCE

129. Plaintiffs SOPHIA KEMPEN and GRACE KEMPEN, by their next friend, Lauren Aliano, and Lauren Aliano individually, reincorporate the foregoing allegations of the complaint as though fully restated herein.

130. On November 30, 2021, the minor plaintiffs SOPHIA KEMPEN (“SOPHIA”) and GRACE KEMPEN (“GRACE”) were students at Oxford High School during the shootings being carried out by Defendant EC.

131. Both GRACE and SOPHIA were hiding in classrooms with their classmates while EC was systematically murdering four people and injuring six others.

132. As a direct and proximate consequence of knowing that they had been close to death and that several of their classmates had been killed or injured, both SOPHIA and GRACE have suffered severe emotional distress, post-traumatic stress disorder, sleep disturbance, nightmares, fear of attending school, inability to enjoy movies and games that reprise the shooting incident at Oxford and fear of any loud, sudden noises such as fireworks, and can be expected to continue to suffer such damages into the undetermined future.

133. As to the Oxford Defendants, their conduct was negligent because:
- a. the Oxford Defendants stood in loco parentis as to GRACE and SOPHIA and owed them the obligation to protect them from the unreasonable risk of injury posed by EC;
 - a. they had a duty to GRACE and SOPHIA to protect them from the conduct of EC that said Defendants knew or should have known was likely to occur;
 - b. it was foreseeable that, if EC caused great bodily harm to others, anyone in the immediate vicinity would suffer great emotional harm;
 - c. EC caused great emotional harm to GRACE and SOPHIA, both by subjecting them to the knowledge that their classmates were likely being killed and that GRACE and SOPHIA could easily be injured and/or killed as well, all as a direct and proximate result of the negligence of the Oxford Defendants as set forth in the foregoing allegations of this complaint;
 - d. the negligence of the Oxford Defendants was a proximate cause of the injuries and damages to GRACE and SOPHIA.

134. To the extent that the court ultimately determines that this case requires application of principles of governmental immunity under the statutes and case law of this state and finds that the facts of this case fail to meet the definitions of gross negligence and “the proximate cause” as determined by the Supreme Court, the requirement that a plaintiff establish a higher standard for proximate cause and establish gross negligence in a case involving governmental actors than would be required of the same plaintiff, on the same facts, in a case against non-governmental defendants, is unconstitutional in that:

- a. it denies the Plaintiffs in this case due process;

b. it denies the Plaintiffs in this case the equal protection of the law.

135. The Oxford Defendants were grossly negligent within the meaning of Michigan law in that, for the reasons set forth in the foregoing allegations of the complaint, Defendants' acts constituted "conduct so reckless as to demonstrate a substantial lack of concern for whether an injury results."

136. The gross negligence of the Oxford Defendants was the proximate cause of the injuries and damages to SOPHIA and GRACE.

137. As a direct and proximate result of the negligence of the Oxford Defendants, SOPHIA and GRACE have suffered severe emotional distress, post-traumatic stress disorder, sleep disturbance, nightmares, fear of attending school, inability to enjoy movies and games that reprise the shooting incident at Oxford and fear of any loud, sudden noises such as fireworks, and can be expected to continue to suffer such damages into the undetermined future.

138. As a direct and proximate result of the negligence of the Oxford Defendants, LAUREN ALLIANO has suffered and will continue to suffer losses into the future due to the injuries and damages suffered by her Plaintiff children, including, but not limited to:

- a. The reasonable expense of necessary medical care, treatment and services received by their children;
- b. The reasonable value of the society, companionship and relationship with their children of which they have been deprived; and
- c. All other damages that may be learned through the course of discovery.

139. To the extent that the claims on behalf of LAUREN ALIANO extend beyond what the law permits with respect to consortium claims for parents arising from injuries to children, Plaintiff maintains that this law is no longer good law and should be overturned.

WHEREFORE, Plaintiffs SOPHIA KEMPEN AND GRACE KEMPEN, by their next friend Lauren Aliano, and LAUREN ALIANO individually, claim judgment against the Oxford Defendants in an amount to which they are found to be entitled, together with interest, costs, attorneys fees and exemplary damages.

COUNT VI - CLAIMS AGAINST ETHAN CRUMBLEY, JAMES CRUMBLEY AND JENNIFER CRUMBLEY AS TO SOPHIA KEMPEN GRACE KEMPEN AND LAUREN ALIANO FOR ASSAULT

140. Plaintiffs, SOPHIA KEMPEN and GRACE KEMPEN, by their next friend Lauren Aliano, and LAUREN ALIANO individually, reincorporate the foregoing allegations of the complaint as though fully restated herein.

141. The actions of EC as set forth in the common allegations of this complaint constituted an assault upon SOPHIA KEMPEN and GRACE KEMPEN.

142. By virtue of furnishing EC the Sig Sauer handgun, encouraging EC to show it off and obtain ammunition for it, endorsing his misusing the handgun as long as he didn't get caught, withholding all information from the school officials concerning EC's mental disturbance and violent propensities and their refusal to pull EC from school when the school officials demanded it, JAMES CRUMBLEY and JENNIFER CRUMBLEY were acting in concert with EC and are equally liable with him for his violent assaults and other intentional torts committed as to the Plaintiffs.

143. As a direct and proximate result of the actions of the Defendants, SOPHIA KEMPEN and GRACE KEMPEN suffered terror, shock, awareness of his imminent death, excruciating pain, suffering and fear.

144. As a direct and proximate result of the acts of Defendant EC, SOPHIA KEMPEN and GRACE KEMPEN suffered severe emotional distress, post-traumatic stress disorder, sleep

disturbance, nightmares, fear of attending school, inability to enjoy movies and games that reprise the shooting incident at Oxford and fear of any loud, sudden noises such as fireworks, and can be expected to continue to suffer such damages into the undetermined future.

145. As a direct and proximate result of the damages to her daughters, Plaintiff LAUREN ALIANO has suffered and will continue to suffer losses into the future due to the injuries and damages suffered by her Plaintiff children, including, but not limited to:

- a. the reasonable expense of necessary medical care, treatment and services received by her daughters;
- b. the reasonable value of the society, companionship and relationship with her daughters of which she has been deprived; and
- c. all other damages that may be learned through the course of discovery.

146. To the extent that the claims on behalf of LAUREN ALIANO extend beyond what the law permits with respect to consortium claims for parents arising from injuries to children, Plaintiffs maintain that this law is no longer good law and should be overturned.

WHEREFORE, Plaintiffs SOPHIA KEMPEN and GRACE KEMPEN, by their next friend Lauren Aliano, and LAUREN ALIANO individually, claim judgment against the Crumbley defendants, jointly and severally, in an amount to which they are found to be entitled, together with interest, costs, attorneys fees and exemplary damages.

COUNT VII – CLAIMS UNDER CHILD PROTECTION ACT

147. All Plaintiffs reincorporate foregoing allegations of the complaint as though fully restated herein.

148. MCL 722.623, the Child Protection Act, places upon certain persons the obligation to report abuse and neglect that the persons reasonably suspect may be occurring.

149. Each and every one of the Oxford Defendants was a required reporter within the definitions set forth in the statute.

150. Each and every one of the Oxford Defendants had information sufficient to give them reasonable cause to suspect that EC was being abused and/or neglected by his parents MRS. CRUMBLEY and MR. CRUMBLEY.

151. Defendants HOPKINS and EJAK on November 30, 2021, before EC was allowed to walk out of the meeting with them and his parents and begin his shooting spree, knew that EC had severe mental disturbance that his parents were refusing to address.

152. As alleged in the common allegations, defendants HOPKINS and EJAK knew that the situation was so serious that they threatened to contact Child Protective Services themselves if help was not obtained for EC within 48 hours.

153. By virtue of the fact that MR. CRUMBLEY and MRS. CRUMBLEY had refused to take their son out of school that day despite the specific demand on the part of HOPKINS and EJAK that they do so, said Defendants had ample reason to suspect that action would not be taken by the parents to obtain immediate treatment for their son.

154. The statements made on the note and drawing found by TEACHER #2 on November 30, photographed by her, and made available to defendants HOPKINS and EJAK were sufficient to indicate an unreasonable risk that EC would harm himself and/or others.

155. The Oxford Defendants had been presented with evidence that EC had attempted to purchase ammunition online on November 29, had drawn images of guns and bleeding bodies, annotated with desperate statements about his mental state.

156. These Defendants had specific experience with suicides among students at Oxford High school in the preceding five years, in that there had been at least two students who

had taken their own lives among the OHS student body. This experience heightened their awareness of the risk that EC would take his own life and/or the lives of others.

157. All of this information was more than sufficient, when coupled with the parents' indifference and lack of willingness to address the matter immediately, to cause the Oxford Defendants to suspect that EC was being neglected and that the immediate and subsequent reporting requirements set forth in the Child Protection Law needed to be complied with.

158. MCL 722.633 provides that a mandatory reporter who fails to report suspected abuse or neglect is "civilly liable for the damages proximately caused by the failure."

159. The failure to report by the Oxford Defendants was a proximate cause of the injuries and damages suffered by the plaintiffs herein.

160. To the extent that the court ultimately determines that this case requires application of principles of governmental immunity under the statutes and case law of this state and finds that the law with respect to the Child Protection Act as applied to governmental actors requires that Plaintiffs establish that failure to report as required by the Act requires that this violation be found "the proximate cause," the requirement that a plaintiff establish a higher standard for proximate cause and establish gross negligence in a case involving governmental actors than would be required of the same plaintiff, on the same facts, in a case against non-governmental defendants, is unconstitutional in that:

- a. it denies the Plaintiffs in this case due process;
- b. it denies the Plaintiffs in this case the equal protection of the law.

161. Alternatively, the failure to report by the Oxford Defendants was the proximate cause of the injuries and damages suffered by the plaintiffs herein.

WHEREFORE, all Plaintiffs claim damages against the Oxford Defendants in an amount

to which they are found to be entitled, together with costs, interest , attorneys fees and exemplary damages.

COUNT VIII – ADDITIONAL CLAIMS AGAINST JAMES AND JENNIFER CRUMBLEY BASED ON NEGLIGENT AND RECKLESS CONDUCT

162. All Plaintiffs hereby reincorporate the foregoing allegations of the complaint as though fully restated herein.

163. In the months prior to the shootings of November 30, 2021, Defendants MR. CRUMBLEY and MRS. CRUMBLEY had actual knowledge of mental disturbance in EC due to:

- a. their knowledge of text messages and other communications EC’s belief that there were intruders, ghosts and/or demons in the home;
- b. the fact that he was abusing and torturing animals and keeping a severed bird’s head in his room;
- c. the fact that EC was isolated, without friends, and that one of his only friends had recently moved away.

164. Notwithstanding this knowledge, neither MR. nor MRS. CRUMBLEY did anything to obtain counselling or other emotional support for EC.

165. Instead, MR. and MRS. CRUMBLEY determined to purchase a lethal semi-automatic handgun and make it freely available to EC.

166. The conduct of MR. CRUMBLEY in purchasing a lethal weapon for EC and the conduct of both MR. and MRS. CRUMBLEY in making it available to him without supervision, and leaving it in an unlocked location readily accessible to EC, was negligent as to all plaintiffs herein for the following reasons:

- a. MR. CRUMBLEY purchased the weapon and filled out all required forms relative to the purchase as though he were the purchaser and intended end-user of the weapon when he knew that, in fact, he was purchasing it for a minor;
- b. the necessary forms, including information with respect to the fitness of the purchaser to purchase a weapon, were filled out with regard to MR. CRUMBLEY, thus providing information not about the intended owner of the gun, EC, but MR. CRUMBLEY;
- c. MR. CRUMBLEY knew that his son would not have been permitted to purchase the gun for himself nor be the owner of the weapon when he made the purchase;
- d. neither MR. CRUMBLEY nor MRS. CRUMBLEY secured the weapon by locking it into a secure location or, at a minimum, utilizing a trigger lock or other means of rendering the gun unusable by EC;
- e. neither MRS. CRUMBLEY nor MR. CRUMBLEY informed school officials on November 30 before EC was released from the meeting with his backpack containing the gun, that in fact EC had access to a gun and knew how to operate it by virtue of, among other things, having been taken to a gun range by MRS. CRUMBLEY in the days before the shooting;
- f. MR. CRUMBLEY evidenced his awareness of the risk that EC was capable of having committed the murders and assaults when he learned of the shooting and immediately suspected that his son was the shooter;
- g. having knowledge of his son's mental disturbance and knowing that his son

had access to the gun, MR. CRUMBLEY, together with his wife, refused to take his son out of school when HOPKINS and EJAK demanded that they do so;

- h. when MR. AND MRS. CRUMBLEY met with school officials on November 30, 2021 and were told of EC's troubling behaviors, they intentionally withheld from the school personnel their prior knowledge of EC's instability and the fact that he had unrestricted access to a lethal handgun;
- i. even though there was still time to prevent EC from carrying out his murderous plans, neither R. CRUMBLEY nor MRS. CRUMBLEY took the opportunity to go home after the meeting and before the shootings and be certain that the handgun was still safely at home, and immediately alert the school and the police if it was not.

167. The foregoing negligent acts and omissions of MR. CRUMBLEY and MRS. CRUMBLEY, individually and collectively, constituted negligent supervision of his minor child and a negligent failure to cooperate with school officials to prevent the tragedy that occurred.

168. The purchase of the handgun and the acts and omissions in leading EC to believe that the gun was his and then making the gun available to him constitute negligent entrustment.

169. MRS. CRUMBLEY was further negligent in that she had actual knowledge that EC was searching for ammunition on the Internet and, instead of intervening and making certain that her son could neither obtain ammunition nor have access to a lethal weapon, encouraged his behavior by specifically stating that she was not upset with him but simply wanted to caution him to be more careful and not get caught.

170. The cooperation in her husband's purchase of the handgun and the acts and

omissions in leading EC to believe that the gun was his and then making the gun available to him constitute negligent entrustment by MRS. CRUMBLEY.

171. The foregoing acts and omissions by MR. and MRS. CRUMBLEY were a proximate cause of the injuries and damages to all plaintiffs hereinbefore set forth.

WHEREFORE, all Plaintiffs claim judgment against the defendant MR. CRUMBLEY and MRS. CRUMBLEY in amount to which they are found to be entitled, together with interest, costs, attorney's fees and exemplary damages.

COUNT IX - CLAIMS AS TO ALL PLAINTIFFS AGAINST THE CRUMBLEY DEFENDANTS FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS.

172. All plaintiffs reincorporate the foregoing allegations of the complaint as though fully restated herein.

173. The willful, malicious, reckless and intentional acts of EC constituted an intentional infliction of emotional distress as defined under Michigan law as to all Plaintiffs, because the behavior was outrageous and specifically intended to inflict severe emotional as well as physical harm on the plaintiffs and all others at OHS on November 30, 2021.

174. The willful, malicious, reckless and intentional acts of JAMES CRUMBLEY and JENNIFER CRUMBLEY constituted an intentional infliction of emotional distress as defined under Michigan law as to all plaintiffs, because the behavior was outrageous and they knew or had to know that the result would be severe emotional as well as physical harm to the plaintiffs and all others at OHS on November 30, 2021.

175. As a direct and proximate result of the conduct of the Defendants as alleged herein, plaintiff suffered extreme emotional harm with physical manifestations.

WHEREFORE, all plaintiffs claim judgment against the Crumbley defendants, jointly and severally, in an amount to which they are found to be entitled, together with costs, interest,

attorneys fees and exemplary damages.

COUNT X - NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS UPON ALL INDIVIDUAL PLAINTIFFS BY THE OXFORD DEFENDANTS

176. All individual Plaintiffs reincorporate the foregoing allegations of the complaint as though fully restated herein.

177. The Oxford Defendants negligently and grossly negligently inflicted emotional distress upon all individual Plaintiffs in that:

- a. the injury inflicted on their children, were serious and of a nature certain to cause severe mental disturbance to these Plaintiffs;
- b. the mental shock resulted in actual physical harm to these Plaintiffs;
- c. these plaintiffs were members of immediate family of the direct victims of the Oxford Defendants' negligence and gross negligence;
- d. these Plaintiffs suffered the shock of learning almost immediately following the events that their children had been, in the case of the MYRE plaintiffs, killed and in the case of the remaining defendants, terrorized.

178. The negligence of these defendants was a proximate cause of the injuries and damages to Plaintiffs WILLIAM MYRE and SHERI MYRE.

179. To the extent that the court ultimately determines that this case requires application of principles of governmental immunity under the statutes and case law of this state and finds that the facts of this case fail to meet the definitions of gross negligence and "the proximate cause" as determined by the Supreme Court, the requirement that a plaintiff establish a higher standard for proximate cause and establish gross negligence in a case involving governmental actors than would be required of the same plaintiff, on the same facts, in a case

against non-governmental defendants, is unconstitutional in that:

- a. it denies the Plaintiffs in this case due process;
- b. it denies the Plaintiffs in this case the equal protection of the law.

180. The gross negligence of the Oxford Defendants was the proximate cause of the injuries and damages to WILLIAM MYRE and SHERI MYRE.

WHEREFORE, all individual Plaintiffs claim judgment against the Oxford Defendants in an amount to which they are found to be entitled, together with interest, costs attorneys fees and exemplary damages.

COUNT XI - NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS UPON ALL INDIVIDUAL PLAINTIFFS BY THE CRUMBLEY DEFENDANTS

181. All individual Plaintiffs reincorporate the foregoing allegations of the complaint as though fully restated herein.

182. The Crumbley Defendants, apart from their willful and reckless conduct, negligently inflicted emotional distress upon all individual Plaintiffs in that:

- a. the injury inflicted on their children, were serious and of a nature certain to cause severe mental disturbance to these Plaintiffs;
- b. the mental shock resulted in actual physical harm to these Plaintiffs;
- c. these plaintiffs were members of immediate family of the direct victims of the Crumbley Defendants' negligence;
- d. these Plaintiffs suffered the shock of learning almost immediately following the events that their children had been, in the case of the MYRE plaintiffs, killed and in the case of the remaining defendants, terrorized.

183. The negligence of these defendants was a proximate cause of the injuries and

damages to all Plaintiffs.

WHEREFORE, all individual Plaintiffs claim judgment against the Crumbley Defendants in an amount to which they are found to be entitled, together with interest, costs attorneys fees and exemplary damages.

JOHNSON LAW, PLC
Attorneys for Plaintiffs

By: /s/ Ven Johnson
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Detroit, MI 48226
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vjohnson@venjohnsonlaw.com
jstewart@venjohnsonlaw.com

Dated: January 27, 2022

EXHIBIT 1

Chapter 5 - Test REVIEW #1

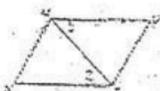
Ethan Crumley
November 30th 2021

1: Using Congruent Triangles

8:59 AM

I can use it as:

Given: $\overline{MQ} \cong \overline{NT}$
 $\overline{MQ} \parallel \overline{NT}$
Prove: $\overline{MN} \cong \overline{QT}$



Given: $\overline{PX} \cong \overline{PZ}$
 \overline{XY} bisects $\angle XPZ$
Prove: $\overline{YZ} \cong \overline{XZ}$



Reasons:

- Given
- Given
- CPCTC
- CPCTC
- SAS
- SAS
- Reflexive Property
- Reflexive Property
- Def'n of Bisector
- Alt. Int. Ang. Thm.

- 1.
2. $\angle 1 \cong \angle 2$
3. $\overline{MP} \cong \overline{NP}$



4. The thoughts
5. don't stop
Help me

- 1.
2. $\angle 1 \cong \angle 2$
3. $\overline{XZ} \cong \overline{XZ}$

4. $\angle PYZ \cong \angle PZX$



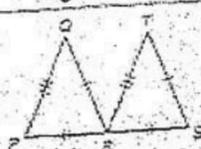
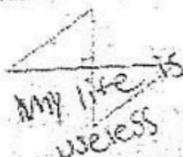
1. Blood
2. everywhere



5.3, 5.5-5.6: Congruent Triangles

Mark any given information on the diagram. Are the triangles congruent? Which theorem proves this?
Write congruent statements for the bottom row.

I can prove it as:



The World is Dead



$\triangle PQR \cong$

$\triangle ABC \cong$

$\triangle MNP \cong$

Chapter 5 - Test REVIEW #1

Ethan Crumbley
November 30th 2021

8:59 AM

I can use \cong Δ s.

5-7: Using Congruent Triangles

Given: $\overline{MQ} \cong \overline{NT}$
 $\overline{MQ} \parallel \overline{NT}$
Prove: $\overline{MN} \cong \overline{QT}$

- 1.
2. $\angle 1 \cong \angle 2$
3. $\overline{MT} \cong \overline{NT}$
4. $\Delta MNT \cong$ _____
- 5.

- 1.
2. ~~scribble~~
3. ~~scribble~~
4. The thoughts
5. Won't stop ~~scribble~~

Given: $\overline{YX} \cong \overline{WX}$
 \overline{ZX} bisects $\angle YXW$.
Prove: $\overline{YZ} \cong \overline{WZ}$

1. RMX 808
2. $\angle 1 \cong \angle 2$
3. $\overline{XZ} \cong \overline{XZ}$
4. $\Delta YXZ \cong \Delta WXZ$
5. ~~scribble~~

1. ~~scribble~~
2. ~~scribble~~
- 3.
- 4.
5. Video game this is

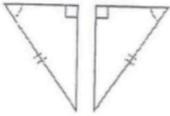
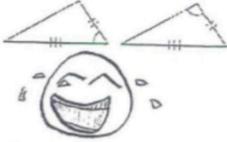
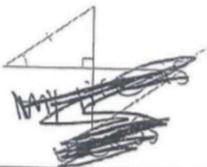
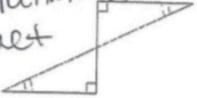
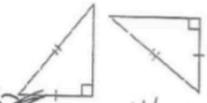
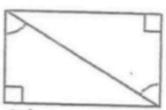
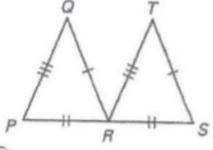
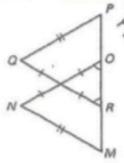
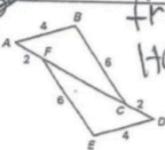
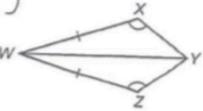
Reason Bank:

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- Given
- CPCTC
- CPCTC
- SAS
- SAS
- Reflexive Property
- Reflexive Property
- Def'n of Bisector
- Alt. Int. \angle s Thm.

5.3, 5.5-5.6: Congruent Triangles

k any given information on the diagram. Are the triangles congruent? Which theorem proves this?
Write congruent statements for the bottom row.

			 OHS Rocks!
	 Harmless cat		
		 Were all friends here	
$\Delta PQR \cong$	$\Delta PQR \cong$	$\Delta ABC \cong$	$\Delta WXY \cong$

		 <p>I love my life So Much!!!</p>	 <p>OHS Rocks!</p>
	<p>Harmless cut</p> 	 <p>Were all friends Here</p>	
 <p>$\Delta PQR \cong$</p>	 <p>$\Delta PQR \cong$</p>	 <p>$\Delta ABC \cong$</p>	 <p>$\Delta WXY \cong$</p>

New evidence released in Oxford High School shooting