

STATE OF MICHIGAN
CIRCUIT COURT FOR THE COUNTY OF KENT

M [REDACTED] M [REDACTED]

Plaintiff,

**JURY
FEE PAID**

v.

File No. 00-07323NO
Hon.

DEXTER YAGER,

Defendant.

GEORGE S. BUTH
(P-11479)

Judy E. Bregman (P32252)
BREGMAN & WELCH
212 Washington, P.O. Box 885
Grand Haven, MI 49417
(616)846-3145

Charles S. Rominger (P26899)
DILLEY & ROMINGER
330 E. Fulton St.
Grand Rapids, MI 49503-4302
(616)454-9200

There is no other pending or resolved civil action arising out of the transaction or occurrence alleged in the complaint.

COMPLAINT AND JURY DEMAND

1. Plaintiff is a resident of Kent County, Michigan.
2. Defendant resides in Charlotte, North Carolina.
3. This case is brought in the Circuit Court for the County of Kent, State of Michigan as all of the acts occurred in the City of Grand Rapids, which is located in Kent County.
4. The amount in controversy exceeds \$25,000, exclusive of costs and interests.
5. On March 15, 2000, Plaintiff was employed in the Special Events department of

Amway Corporation, as the Photography Administrator. As such, she was asked by Amway to assist in photographing the board of the Independent Business Owners Association ("IBOA") and various committees during an Amway convention of the "IBOA" being held at the Amway Grand Hotel.

6. Defendant Yager, is an Executive Board member of "IBOA" and was present at the convention to be photographed with other board members.
7. During the time photographs were being taken, Defendant Yager intentionally, unlawfully, and repeatedly touched Plaintiff in a sexually suggestive manner, including putting his arms around her, fondling her neck, and pinching her in the genital area.
8. As a direct and proximate result of Defendant's assault of Plaintiff, Plaintiff suffered damages, including the following:
 - a. humiliation, mortification, and embarrassment;
 - b. emotional distress;
 - c. loss of professional integrity;
 - d. loss of job.

WHEREFORE, Plaintiff, M [REDACTED] M [REDACTED], demands the following relief:

1. compensatory damages for her loss of wages and emotional distress;
2. exemplary and/or punitive damages for defendant's outrageous and malicious conduct;
3. actual attorney fees;
4. costs and interest; and

5. any other relief as appears reasonable and just.

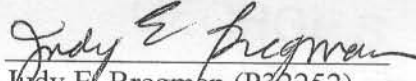
JURY DEMAND

NOW COMES Plaintiff and hereby demands a trial by jury of the above cause.

JURY
FEE PAID

BREGMAN & WELCH

Dated:


Judy E. Bregman (P22252)
Co-Counsel for Plaintiffs
P.O. Box 885
Grand Haven Michigan 49417
(616) 846-3145


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COMPLAINT AND JURY DEMAND

KENT COUNTY CIRCUIT COURT

Detail

<u>Case Number</u>	<u>Status</u>	<u>Judge</u>
00-07323-NO	CLOSED	BUTH, HONORABLE GEORGE

<u>In The Matter Of</u>	<u>Action</u>
M [REDACTED], M [REDACTED] vs. YAGER, DEXTER	COMPLAINT FILED

<u>Party</u>	<u>Type</u>	<u>Attorneys</u>
M [REDACTED], M [REDACTED]	PLNTF	BREGMAN, JUDY E. 212 WASHINGTON PO BOX 885 GRAND HAVEN, MI 49417
YAGER, DEXTER	DFNDT	HERITAGE JR, WILLIAM H. 40 PEARL ST NW FL 2 GRAND RAPIDS, MI 49503

<u>Opened</u>	<u>Judgment Date</u>	<u>Case Type</u>
07/25/2000		NO-OTHER PERSONAL INJURY

Comments:

No.	Date of Filing	Operator	Pleadings and Actions	Original Amt Due/ Amt Dismissed	Balance Due
			Journal Book-Page-Nbr Ref Nbr		
1	07/25/00	cnvKCVdk t00	Complaint, notice to clerk & jury demand filed. fee pd. (3)	0.00	0.00
2	07/25/00	cnvKCVdk t00	Summons issued. filing deadline set for 10/24/00 for Dexter Yager	0.00	0.00
3	09/21/00	cnvKCVdk t00	Proof of Service filed. (Appearance, Answer to Complaint And Affirmative Defenses, Motion and (Proposed) Order for Admission of Counsel Pro Hac Vice and Proof of Service)	0.00	0.00
4	09/21/00	cnvKCVdk t00	Motion and Order for Admission of Counsel Pro Hac Vice filed. (William J Abraham admitted Pro HacVice for Defendant Dexter Yager) mt fee pd	0.00	0.00
5	09/21/00	cnvKCVdk t00	Appearance & Answer to Complaint and Affirmative Defenses filed. by William H. Heritage, Jr. on behalf of Dexter Yager	0.00	0.00
6	09/23/00	cnvKCVdk t00	Summons returned & filed on Dexter Yager (Certified/Restricted Mail, Return Receipt Attached - Non-Perfected Service, Mr. Yager Not @ Address Shown, Return to Sender, Signed for by L. Vinesett)	0.00	0.00

5926

Detail

T COUNTY CIRCUIT COURT

00-07323-NO M [REDACTED], M [REDACTED] vs. YAGER, DEXTER

No.	Date of Filing	Operator	Pleadings and Actions		Original Amt Due/ Amt Dismissed	Balance Due
			Journal Book-Page-Nbr	Ref Nbr		
7	09/23/00	cnvKCVdk t00	Summons returned & filed. Service date 9/6/00 on Dexter Yager		0.00	0.00
8	11/13/00	cnvKCVdk t00	Notice of scheduling conference and proof of service filed. scheduling conference set for 12/14/00 at 4:15 (room 404)		0.00	0.00
9	12/13/00	cnvKCVdk t00	Scheduling Order filed. 1554-163-		0.00	0.00
10	01/22/01	cnvKCVdk t00	Proof of Service filed. (3rd party document request)		0.00	0.00
11	03/13/01	cnvKCVdk t00	Plaintiff's list of expert witnesses & proof of service filed.		0.00	0.00
12	03/30/01	cnvKCVdk t00	Plaintiff's list of witnesses and proof of service filed.		0.00	0.00
13	04/03/01	cnvKCVdk t00	Defendant's lay and expert witness list and proof of service filed.		0.00	0.00
14	04/10/01	cnvKCVdk t00	Case Evaluation Mediation hearing notice & proof of service filed. (set for 6/12/01 at 4:30)		0.00	0.00
15	04/27/01	cnvKCVdk t00	Stipulation & Order to Extend Discovery filed. 1578-191-		0.00	0.00
16	05/30/01	cnvKCVdk t00	Stipulation & Order Modifying Scheduling Order filed. 1583-892-		0.00	0.00
17	07/06/01	cnvKCVdk t00	Plaintiff's lay witness list and proof of service filed.		0.00	0.00
18	08/06/01	cnvKCVdk t00	Proof of Service of Defendant's interrogatories to plaintiff, defendant's requests for production to plaintiff filed.		0.00	0.00
19	08/06/01	cnvKCVdk t00	Proof of Service of Defendant's 3rd party document request & proof of service filed.		0.00	0.00

Detail

ST. JOHNS COUNTY CIRCUIT COURT

00-07323-NO M [REDACTED], M [REDACTED] vs. YAGER, DEXTER

No.	Date of Filing	Operator	Pleadings and Actions Journal Book-Page-Nbr Ref Nbr	Original Amt Due/ Amt Dismissed	Balance Due
20	08/10/01	cnvKCVdk t00	Case evaluation notice/mediation hearing notice filed. (set for 9/27/01 4:30)	0.00	0.00
21	09/26/01	cnvKCVdk t00	Order of Dismissal with prejudice and without costs filed. (Judge Buth) 1604-168-	0.00	0.00

Totals By: INFORMATION

0.00

Detail

ST COUNTY CIRCUIT COURT

00-07323-NO M [REDACTED], M [REDACTED] vs. YAGER, DEXTER
*** End of Report ***

No.	Date of Filing	Operator	Case No.	Description of Proceedings and Actions	Original Fee	Delinquent Fee
1	03/15/05	UNCLERK	00-07323-NO	Complaint filed.	0.00	0.00
2	03/23/05	UNCLERK	00-07323-NO	Answer filed.	0.00	0.00
3	03/23/05	UNCLERK	00-07323-NO	Summons issued.	0.00	0.00
4	03/23/05	UNCLERK	00-07323-NO	Summons returned.	0.00	0.00
5	03/23/05	UNCLERK	00-07323-NO	Summons returned.	0.00	0.00
6	03/23/05	UNCLERK	00-07323-NO	Summons returned.	0.00	0.00
7	03/23/05	UNCLERK	00-07323-NO	Summons returned.	0.00	0.00
8	03/23/05	UNCLERK	00-07323-NO	Summons returned.	0.00	0.00
9	03/23/05	UNCLERK	00-07323-NO	Summons returned.	0.00	0.00
10	03/23/05	UNCLERK	00-07323-NO	Summons returned.	0.00	0.00