

Exhibit A

Hand Delivered
12-16-21 1:57 PM
AD

Approved, SCAO

Original - Court
1st Copy- Defendant

2nd Copy - Plaintiff
3rd Copy -Return

STATE OF MICHIGAN
THIRD JUDICIAL CIRCUIT
WAYNE COUNTY

SUMMONS

CASE NO.
21-016917-CD
Hon. David J. Allen

Court address : 2 Woodward Ave., Detroit MI 48226

Court telephone no.: 313-224-0250

Plaintiff's name(s), address(es), and telephone no(s)
Ryan, Ramono

v

Defendant's name(s), address(es), and telephone no(s).
Blue Cross Blue Shield of Michigan

Plaintiff's attorney, bar no., address, and telephone no
David C. Peters 48648
PO Box 51787
Livonia, MI 48151-5787

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035
- MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in this court, _____ Court,

where it was given case number _____ and assigned to Judge _____.

The action remains is no longer pending.

Summons section completed by court clerk.

SUMMONS

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. YOU HAVE 21 DAYS after receiving this summons and a copy of the complaint to file a written answer with the court and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date 12/8/2021	Expiration date* 3/9/2022	Court clerk Angila Mayfield
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Cathy M. Garrett- Wayne County Clerk.

This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

CERTIFICATE / AFFIDAVIT OF SERVICE / NONSERVICE

OFFICER CERTIFICATE

 OR

 AFFIDAVIT OF PROCESS SERVER

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

Being first duly sworn, I state that I am a legally competent adult, and I am not a party or an officer of a corporate party (MCR 2.103[A]), and that: (notarization required)

I served personally a copy of the summons and complaint.

I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint, together with _____

List all documents served with the Summons and Complaint

_____ on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled \$	Fee \$	
Incorrect address fee \$	Miles traveled \$	Fee \$	Total fee \$

Signature _____

Name (type or print) _____

Title _____

Subscribed and sworn to before me on _____, _____ County, Michigan.

Date

My commission expires: _____ Date Signature: _____ Deputy court clerk/Notary public

Notary public, State of Michigan, County of _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of the summons and complaint, together with _____ Attachments



STATE OF MICHIGAN
IN THE 3RD JUDICIAL CIRCUIT
COUNTY OF WAYNE

RYAN ROMANO, on behalf of **HIMSELF**
individually and for all others similarly situated

Plaintiffs,
-CD

CASE NUMBER: 21-016917-CD

HON. DAVID J. ALLEN

vs.

BLUE CROSS BLUE SHIELD
OF MICHIGAN, a Michigan Corporation

Defendant

-----/
Dave Peters
Attorney for Plaintiff
Pacific Justice Institute
Metro Detroit Office
PO Box 51787
Livonia, MI 48154-1787
Email: dpeters@pji.org
Phone: (734) 743-5352
-----/

"Title VII does not contemplate asking employees to sacrifice their jobs to observe their religious practices." Adeyeye v. Heartland Sweeteners, LLC, 721 F.3d 444, 456 (7th Cir. 2013)

There are no other prior filings in this Circuit Court involving these parties and/or involving the same transaction and occurrence giving rise to this claim.

CLASS ACTION COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES

Now comes the plaintiff on behalf of himself and all other persons similarly situated who
Complain against the above captioned Defendant for the following reasons:

INTRODUCTION

1. This is a Title VII class action brought to remedy a pattern of religious discrimination by the Defendant BLUE CROSS BLUE SHIELD OF MCHIGAN (hereafter “BCBSM”) against employees who requested religious accommodations from the Defendants governmental inspired mandate that its employees receive the COVID-19 vaccine.
2. This action seeks preliminary and permanent injunctive relief before Plaintiffs are permanently fired from their jobs.
3. In accordance with the now reversed governmental OSHA mandates, the Plaintiffs are scheduled to be placed on unpaid administrative leave on or about December 10, 2021, and will be permanently terminated on or about January 4, 2022 if they refuse to submit to the COVID-19 Vaccine.
4. BCBSM has refused to comply with its obligations under Title VII of the Civil Rights Act of 1964, (Pub. L. 88-352), codified at 42 U.S.C. § 2000e et seq. (“Title VII”), and has informed certain employees, including your named Plaintiff, that their requests for

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