

# Exhibit A

Approved, SCAO

Original - Court  
1st Copy - Defendant2nd Copy - Plaintiff  
3rd Copy - Return12-16-21 1:57 pm  
AKDSTATE 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
-------------------------	------------------------------	--------------------------------

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.

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 3<sup>RD</sup> 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 MICHIGAN (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

# Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

### API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

### LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

### FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

### E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.