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VIA NYSCEF

Hon. Thomas D. Buchanan
Supreme Court Chambers
612 State Street, 2d Floor
Schenectady, NY 12305

Re: Anthony N. Chambers v. Broadalbin-Perth School
District et al.
Fulton County Index No. 2020-08421

Dear Judge Buchanan:

Pursuant to Chambers' request, we submit the following:

Outline of the case: Plaintiff was sexually abused by Elizabeth A. Munn beginning in approximately 2005 and lasting through approximately 2006. Plaintiff was in 8th grade when the abuse started. The abuse continued throughout the summer and ended when Plaintiff was in 9th grade during the football season. Elizabeth Munn was Plaintiff's social studies teacher and was also the CARES instructor. CARES was, upon information and belief, a program which helped students who were failing two or more classes. Elizabeth Munn began abusing Plaintiff in the program. The abuse occurred throughout the inside of the school, at a truck stop in Fonda, in the school parking lot with parents and coaches walking right by the vehicle and at Elizabeth Munn's house among other places. The abuse would occur on a daily basis. The abuse included oral sex and vaginal and anal sex. Elizabeth would also contact Plaintiff via AOL Instant Messenger, through her daughter's account. Plaintiff notified his mother, sister and various friends about this abuse. The receptionist at school was also notified. In addition, other students saw the sexual abuse as it occurred right in front of them. Plaintiff has suffered from numerous physical, mental and emotional injuries as a result of the sexual abuse including but not limited to the following: Depression, flashbacks of the abuse, Post Traumatic Stress Disorder, and relationship issues.

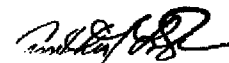
Status of discovery: The summons and complaint were filed 7/31/20. Defendant served an answer on 11/25/2020. Plaintiff served his discovery demands 5/11/2021. Defendants have responded to those demands 12/7/22. Defendants sent Plaintiff discovery demands 11/25/2020. Plaintiff responded to those demands on 8/12/21.

Status of settlement: There has been no indication that defense wishes to discuss settlement. Plaintiff has been deposed but depositions of Defendants have not been held.

There is a conference scheduled for September 15th, 2023 at 2PM in the Albany County Courthouse.

Respectfully,

LaFave, Wein & Frament, PLLC



By: _____

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CSL/ms

VIA NYSCEF:

cc: Christopher K. Mills, Esq.