

DOCKET NO.: WWM-CV-21-5012142 S : **SUPERIOR COURT**
JANE DOE : **J. D. OF WINDHAM**
V. : **AT PUTNAM**
HYDE SCHOOL AT SOUTH
WOODSTOCK, INC. : **SEPTEMBER 14, 2021**

NOTICE OF REVISED COMPLAINT

The plaintiff hereby requests leave of the Court to file the attached Revised Complaint pursuant to defendant's Request to Revise dated June 17, 2021.

THE PLAINTIFF,
JANE DOE

By 431770
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CERTIFICATION

I certify that a copy of this document was or will immediately be mailed or delivered electronically or non-electronically on September 14, 2021 to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all counsel and self-represented parties of record who received or will immediately be receiving electronic delivery.

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By 431770
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JANE DOE : J. D. OF WINDHAM
V. : AT PUTNAM
HYDE SCHOOL AT SOUTH
WOODSTOCK, INC. : SEPTEMBER 14, 2021

REVISED COMPLAINT

FIRST COUNT:

(JANE DOE v. HYDE SCHOOL AT SOUTH WOODSTOCK, INC. - Negligence)

1. At all times mentioned herein, the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, was a domestic corporation that was authorized to transact business within the State of Connecticut.

2. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, operated a boarding school that was open from 1997-2007, located at 150 Route 169 in Woodstock, Connecticut.

3. At all times mentioned herein, the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, its agents, servants and/or employees, owned, possessed, managed, controlled and/or maintained the premises located at 150 Route 169, in Woodstock, Connecticut, hereinafter "Woodstock Campus."

4. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, operated a “Summer Leadership Challenge” hereinafter “Summer Camp” at their Woodstock Campus in the Summer of 2005.

5. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**’s website states that, “For 50 years, Hyde’s Summer Challenge programs have inspired students and parents looking to take the summer experience to the next level by developing character, making new friends, and accomplishing what they never thought they could.”¹

6. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**’s Summer Camp was a co-ed multi-week overnight summer camp open to children between the ages of thirteen to eighteen that required campers to sleep in tents and/or cabins.

7. In the Summer of 2005, the plaintiff, **JANE DOE**, a minor at the time, was a camper at the Summer Camp located on the Woodstock Campus.

8. At some time prior to the Summer of 2005, the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, hired agents, servants and/or employees, to act as camp counselors, camp supervisors, camp coaches and/or camp staff, hereinafter “camp staff.”

9. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**’s, camp staff were responsible for overseeing the campers, maintaining order and/or protecting

¹ <https://www.hyde.edu/admissions/summer/summer-leadership-challenge/>

the safety of the campers and did so under the direction, supervision and/or control of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**

10. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, had a duty to supervise, train, and/or monitor their camp staff, while they were working on its behalf.

11. On or about the Summer of 2005, the plaintiff, **JANE DOE**, was awoken in the middle of the night by two male campers and taken to a secluded spot.

12. While at the secluded spot, the two unknown male campers made sexual and physical contact with the plaintiff, **JANE DOE**.

13. The negligent sexual and/or physical touching of the plaintiff, **JANE DOE**, and her injuries resulting therefrom were caused by the negligence and carelessness of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, its agents, servants and/or employees, in that it:

- a. had a duty to supervise its campers, yet failed to do so when it knew or should have known that they posed a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- b. failed to properly observe, monitor, and/or control the actions of its campers, particularly the two male campers who made sexual and physical contact with the minor plaintiff;

- c. negligently placed the tents and/or cabins of its female campers near members of the opposite sex;
- d. failed to implement proper safeguards and/or procedures to ensure the safety and security of its campers;
- e. failed to appoint and/or direct its camp staff to perform periodic checks on its campers throughout the night;
- f. negligently left the campers alone when they knew or should have known it was unsafe to do so;
- g. failed to appoint and/or direct its camp staff to supervise its campers throughout the night;
- h. failed to implement proper safeguards and/or procedures to ensure that its campers did not sneak out at night;
- i. failed to have adequate personnel to properly observe, monitor, and/or control the actions of its campers, particularly the two male campers who made sexual and physical contact with the minor plaintiff;
- j. failed to ensure that its campers were behaving appropriately and/or professionally toward other campers, including the plaintiff, **JANE DOE**;
- k. failed to implement procedures and/or policies to protect people such as the plaintiff, **JANE DOE**, from campers in its charge;

- l. failed to warn the plaintiff that other campers had a propensity to behave in a dangerous, violent, and/or inappropriate manner; and/or
- m. caused, allowed and/or permitted an insufficient supervision of its campers when it knew or should have known that some campers had a propensity to behave in a dangerous, violent, and/or inappropriate manner.

14. As a result of the carelessness and negligence of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, its agents, servants and/or employees, two unknown male campers made sexual and physical contact with the plaintiff, **JANE DOE**, causing the minor plaintiff the injuries, losses and damages as hereinafter set forth, some or all of which may be permanent in nature:

- a. Post-traumatic stress disorder;
- b. Depression; and
- c. Pain and suffering, both mental and physical.

15. As a result of the negligence of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, the plaintiff, **JANE DOE**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

16. As a further result of the negligence of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

SECOND COUNT: (JANE DOE v. HYDE SCHOOL AT SOUTH WOODSTOCK, INC. - Negligent Infliction of Emotional Distress)

1-16. Paragraphs 1 through 16 of the First Count are hereby incorporated and made corresponding paragraphs of this Second Count as if fully set forth herein.

17. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, through its actions and/or the actions of its agents, servants or employees above knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the minor plaintiff, **JANE DOE**.

18. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, by its negligence, knew or should have known that their actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the minor plaintiff, **JANE DOE**.

THIRD COUNT: (JANE DOE v. HYDE SCHOOL AT SOUTH WOODSTOCK, INC.) (Negligent Supervision/Training)

1. At all times mentioned herein, the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, was a domestic corporation that was authorized to transact business within the State of Connecticut.

2. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, operated a boarding school that was open from 1997-2007, located at 150 Route 169 in Woodstock, Connecticut.

3. At all times mentioned herein, the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, its agents, servants and/or employees, owned, possessed, managed, controlled and/or maintained the premises located at 150 Route 169, in Woodstock, Connecticut, hereinafter “Woodstock Campus.”

4. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, operated a “Summer Leadership Challenge” hereinafter “Summer Camp” at their Woodstock Campus in the Summer of 2005.

5. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**’s website states that, “For 50 years, Hyde’s Summer Challenge programs have inspired students

and parents looking to take the summer experience to the next level by developing character, making new friends, and accomplishing what they never thought they could.”²

6. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**’s Summer Camp was a co-ed multi-week overnight summer camp open to children between the ages of thirteen to eighteen that required campers to sleep in tents and/or cabins.

7. In the Summer of 2005, the plaintiff, **JANE DOE**, a minor at the time, was a camper at the Summer Camp located on the Woodstock Campus.

8. At some time prior to the Summer of 2005, the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, hired agents, servants and/or employees, to act as camp counselors, camp supervisors, camp coaches and/or camp staff, hereinafter “camp staff.”

9. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**’s, camp staff were responsible for overseeing the campers, maintaining order and/or protecting the safety of the campers and did so under the direction, supervision and/or control of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**

10. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, had a duty to supervise, train, and/or monitor their camp staff, while they were working on its behalf.

11. On or about the Summer of 2005, the plaintiff, **JANE DOE**, was awoken in the middle of the night by two male campers and taken to a secluded spot.

² <https://www.hyde.edu/admissions/summer/summer-leadership-challenge/>

12. While at the secluded spot, the two unknown male campers made sexual and physical contact with the plaintiff, **JANE DOE**.

13. The negligent sexual and/or physical touching of the plaintiff, **JANE DOE**, and her injuries resulting therefrom were caused by the negligence and carelessness of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, its agents, servants and/or employees, in that it:

- a. had a duty to supervise its camp staff, yet failed to do so when it knew or should have known that they posed a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- b. failed to properly supervise and/or train its camp staff, even though it knew or should have known that its failure to supervise could cause injury to others, including the plaintiff, **JANE DOE**;
- c. had a duty to train and/or adequately train its camp staff, yet failed to do so when it knew or should have known that such failure posed a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- d. knew or should have known that failing to train and/or supervise its camp staff would pose a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**, when their responsibilities as an agent, servant, and/or employee included interacting protecting the safety of other campers;

- e. failed to properly observe, monitor, and/or control the actions of its camp staff;
- f. failed to have adequate personnel to properly observe, monitor, and/or control the actions of its campers, particularly the two male campers who made sexual and physical contact with the minor plaintiff;
- g. failed to monitor the actions of its camp staff while they were in charge of providing care and safety for its campers;
- h. failed to ensure that its camp staff was behaving appropriately and/or professionally toward other campers, including the plaintiff, **JANE DOE**;
- i. failed to implement procedures and/or policies to protect people such as the plaintiff, **JANE DOE**, from campers in its charge;
- j. failed to warn the plaintiff that other campers had a propensity to behave in a dangerous, violent, and/or inappropriate manner; and/or
- k. caused, allowed and/or permitted an insufficient supervision of its campers when it knew or should have known that some campers had a propensity to behave in a dangerous, violent, and/or inappropriate manner.

14. As a result of the failure of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, its agents, servants and/or employees, to properly supervise, train, and/or monitor its campers, two unknown male campers made sexual and physical contact

with the plaintiff, **JANE DOE**, causing her to suffer the injuries, losses and damages as hereinafter set forth, some or all of which may be permanent in nature:

- a. Post-traumatic stress disorder;
- b. Depression; and
- c. Pain and suffering, both mental and physical.

15. As a result of the negligence of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, the plaintiff, **JANE DOE**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

16. As a further result of the negligence of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

FOURTH COUNT: (**JANE DOE v. HYDE SCHOOL AT SOUTH WOODSTOCK, INC. - Negligent Infliction of Emotional Distress**)

COUNT WITHDRAWN

FIFTH COUNT: (JANE DOE v. HYDE SCHOOL AT SOUTH WOODSTOCK, INC. - Negligent Hiring/Retention)

1. At all times mentioned herein, the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, was a domestic corporation that was authorized to transact business within the State of Connecticut.

2. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, operated a boarding school that was open from 1997-2007, located at 150 Route 169 in Woodstock, Connecticut.

3. At all times mentioned herein, the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, its agents, servants and/or employees, owned, possessed, managed, controlled and/or maintained the premises located at 150 Route 169, in Woodstock, Connecticut, hereinafter "Woodstock Campus."

4. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, operated a "Summer Leadership Challenge" hereinafter "Summer Camp" at their Woodstock Campus in the Summer of 2005.

5. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**'s website states that, "For 50 years, Hyde's Summer Challenge programs have inspired students

and parents looking to take the summer experience to the next level by developing character, making new friends, and accomplishing what they never thought they could.”³

6. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.’s** Summer Camp was a co-ed multi-week overnight summer camp open to children between the ages of thirteen to eighteen that required campers to sleep in tents and/or cabins.

7. In the Summer of 2005, the plaintiff, **JANE DOE**, a minor at the time, was a camper at the Summer Camp located on the Woodstock Campus.

8. At some time prior to the Summer of 2005, the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, hired agents, servants and/or employees, to act as camp counselors, camp supervisors, camp coaches and/or camp staff, hereinafter “camp staff.”

9. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.’s**, camp staff were responsible for overseeing the campers, maintaining order and/or protecting the safety of the campers and did so under the direction, supervision and/or control of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**

10. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, had a duty to supervise, train, and/or monitor their camp staff, while they were working on its behalf.

11. On or about the Summer of 2005, the plaintiff, **JANE DOE**, was awoken in the middle of the night by two male campers and taken to a secluded spot.

³ <https://www.hyde.edu/admissions/summer/summer-leadership-challenge/>

12. While at the secluded spot, the two unknown male campers made sexual and physical contact with the plaintiff, **JANE DOE**.

13. The negligent sexual and/or physical touching of the plaintiff, **JANE DOE**, and her injuries resulting therefrom were caused by the negligence and carelessness of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, its agents, servants and/or employees, in that it:

- a. failed to investigate the background of its camp staff, even though it knew or should have known that failing to do so risked the health and safety of the public, customers, and/or potential customers, including the plaintiff, **JANE DOE**;
- b. failed to adequately investigate the background of its camp staff, even though it knew or should have known that failing to do so risked the health and safety of the public, customers, and/or potential customers, including the plaintiff, **JANE DOE**.
- c. knew or should have known that its camp staff behaved in a negligent manner around its campers, yet failed to take actions to address this behavior;
- d. knew or should have known that its camp staff was unfit to protect the safety of its campers, yet failed to address this; and/or

- e. knew or should have known of the background of its camp staff and yet hired him when they knew or should have known that hiring said staff risked the health and safety of its campers, including the plaintiff, **JANE DOE**.

14. As a result of the carelessness and negligence of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, its agents, servants and/or employees, two unknown male campers made sexual and physical contact with the plaintiff, **JANE DOE**, causing the minor plaintiff the injuries, losses and damages as hereinafter set forth, some or all of which may be permanent in nature:

- a. Post-traumatic stress disorder;
- b. Depression; and
- c. Pain and suffering, both mental and physical.

15. As a result of the negligence of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, the plaintiff, **JANE DOE**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

16. As a further result of the negligence of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

SIXTH COUNT: (JANE DOE v. HYDE SCHOOL AT SOUTH WOODSTOCK, INC. - Negligent Infliction of Emotional Distress)

COUNT WITHDRAWN

SEVENTH COUNT: (JANE DOE v. HYDE SCHOOL - Negligence)

1. At all times mentioned herein, the defendant, **HYDE SCHOOL**, was and is an educational institution with a principal place of business located at 616 High Street in Bath, Maine.

2. The defendant, **HYDE SCHOOL**, operated a boarding school that was open from 1997-2007, located at 150 Route 169 in Woodstock, Connecticut.

3. At all times mentioned herein, the defendant, **HYDE SCHOOL**, its agents, servants and/or employees, owned, possessed, managed, controlled and/or maintained the premises located at 150 Route 169, in Woodstock, Connecticut, hereinafter "Woodstock Campus."

4. The defendant, **HYDE SCHOOL**, operated a "Summer Leadership Challenge" hereinafter "Summer Camp" at their Woodstock Campus in the Summer of 2005.

5. The defendant, **HYDE SCHOOL**'s website states that, "For 50 years, Hyde's Summer Challenge programs have inspired students and parents looking to take the summer

experience to the next level by developing character, making new friends, and accomplishing what they never thought they could.”⁴

6. The defendant, **HYDE SCHOOL**’s Summer Camp was a co-ed multi-week overnight summer camp open to children between the ages of thirteen to eighteen that required campers to sleep in tents and/or cabins.

7. In the Summer of 2005, the plaintiff, **JANE DOE**, a minor at the time, was a camper at the Summer Camp located on the Woodstock Campus.

8. At some time prior to the Summer of 2005, the defendant, **HYDE SCHOOL**, hired agents, servants and/or employees, to act as camp counselors, camp supervisors, camp coaches and/or camp staff, hereinafter “camp staff.”

9. The defendant, **HYDE SCHOOL**’s, camp staff were responsible for overseeing the campers, maintaining order and/or protecting the safety of the campers and did so under the direction, supervision and/or control of the defendant, **HYDE SCHOOL**.

10. The defendant, **HYDE SCHOOL**, had a duty to supervise, train, and/or monitor their camp staff, while they were working on its behalf.

11. On or about the Summer of 2005, the plaintiff, **JANE DOE**, was awoken in the middle of the night by two male campers and taken to a secluded spot.

⁴ <https://www.hyde.edu/admissions/summer/summer-leadership-challenge/>

12. While at the secluded spot, the two unknown male campers made sexual and physical contact with the plaintiff, **JANE DOE**.

13. The negligent sexual and/or physical touching of the plaintiff, **JANE DOE**, and her injuries resulting therefrom were caused by the negligence and carelessness of the defendant, **HYDE SCHOOL**, its agents, servants and/or employees, in that it:

- a. had a duty to supervise its campers, yet failed to do so when it knew or should have known that they posed a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- b. failed to properly observe, monitor, and/or control the actions of its campers, particularly the two male campers who made sexual and physical contact with the minor plaintiff;
- c. negligently placed the tents and/or cabins of its female campers near members of the opposite sex;
- d. failed to implement proper safeguards and/or procedures to ensure the safety and security of its campers;
- e. failed to appoint and/or direct its camp staff to perform periodic checks on its campers throughout the night;
- f. negligently left the campers alone when they knew or should have known it was unsafe to do so;

- g. failed to appoint and/or direct its camp staff to supervise its campers throughout the night;
- h. failed to implement proper safeguards and/or procedures to ensure that its campers did not sneak out at night;
- i. failed to have adequate personnel to properly observe, monitor, and/or control the actions of its campers, particularly the two male campers who made sexual and physical contact with the minor plaintiff;
- j. failed to ensure that its campers were behaving appropriately and/or professionally toward other campers, including the plaintiff, **JANE DOE**;
- k. failed to implement procedures and/or policies to protect people such as the plaintiff, **JANE DOE**, from campers in its charge;
- l. failed to warn the plaintiff that other campers had a propensity to behave in a dangerous, violent, and/or inappropriate manner; and/or
- m. caused, allowed and/or permitted an insufficient supervision of its campers when it knew or should have known that some campers had a propensity to behave in a dangerous, violent, and/or inappropriate manner.

14. As a result of the carelessness and negligence of the defendant, **HYDE SCHOOL**, its agents, servants and/or employees, two unknown male campers made sexual

and physical contact with the plaintiff, **JANE DOE**, causing the minor plaintiff the injuries, losses and damages as hereinafter set forth, some or all of which may be permanent in nature:

- d. Post-traumatic stress disorder;
- e. Depression; and
- f. Pain and suffering, both mental and physical.

15. As a result of the negligence of the defendant, **HYDE SCHOOL**, the plaintiff, **JANE DOE**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

16. As a further result of the negligence of the defendant, **HYDE SCHOOL**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

EIGHTH COUNT: (**JANE DOE v. HYDE SCHOOL - Negligent Infliction of Emotional Distress**)

1-16. Paragraphs 1 through 16 of the Seventh Count are hereby incorporated and made corresponding paragraphs of this Eighth Count as if fully set forth herein.

17. The defendant, **HYDE SCHOOL**, through its actions and/or the actions of its agents, servants or employees above knew or should have known that its actions would create

an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the minor plaintiff, **JANE DOE**.

18. The defendant, **HYDE SCHOOL**, by its negligence, knew or should have known that their actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the minor plaintiff, **JANE DOE**.

NINTH COUNT: **(JANE DOE v. HYDE SCHOOL)**
 (Negligent Supervision/Training)

1. At all times mentioned herein, the defendant, **HYDE SCHOOL**, was and is an educational institution with a principal place of business located at 616 High Street in Bath, Maine.

2. The defendant, **HYDE SCHOOL**, operated a boarding school that was open from 1997-2007, located at 150 Route 169 in Woodstock, Connecticut.

3. At all times mentioned herein, the defendant, **HYDE SCHOOL**, its agents, servants and/or employees, owned, possessed, managed, controlled and/or maintained the premises located at 150 Route 169, in Woodstock, Connecticut, hereinafter “Woodstock Campus.”

4. The defendant, **HYDE SCHOOL**, operated a “Summer Leadership Challenge” hereinafter “Summer Camp” at their Woodstock Campus in the Summer of 2005.

5. The defendant, **HYDE SCHOOL**'s website states that, "For 50 years, Hyde's Summer Challenge programs have inspired students and parents looking to take the summer experience to the next level by developing character, making new friends, and accomplishing what they never thought they could."⁵

6. The defendant, **HYDE SCHOOL**'s Summer Camp was a co-ed multi-week overnight summer camp open to children between the ages of thirteen to eighteen that required campers to sleep in tents and/or cabins.

7. In the Summer of 2005, the plaintiff, **JANE DOE**, a minor at the time, was a camper at the Summer Camp located on the Woodstock Campus.

8. At some time prior to the Summer of 2005, the defendant, **HYDE SCHOOL**, hired agents, servants and/or employees, to act as camp counselors, camp supervisors, camp coaches and/or camp staff, hereinafter "camp staff."

9. The defendant, **HYDE SCHOOL**'s, camp staff were responsible for overseeing the campers, maintaining order and/or protecting the safety of the campers and did so under the direction, supervision and/or control of the defendant, **HYDE SCHOOL**.

10. The defendant, **HYDE SCHOOL**, had a duty to supervise, train, and/or monitor their camp staff, while they were working on its behalf.

⁵ <https://www.hyde.edu/admissions/summer/summer-leadership-challenge/>

11. On or about the Summer of 2005, the plaintiff, **JANE DOE**, was awoken in the middle of the night by two male campers and taken to a secluded spot.

12. While at the secluded spot, the two unknown male campers made sexual and physical contact with the plaintiff, **JANE DOE**.

13. The negligent sexual and/or physical touching of the plaintiff, **JANE DOE**, and her injuries resulting therefrom were caused by the negligence and carelessness of the defendant, **HYDE SCHOOL**, its agents, servants and/or employees, in that it:

- a. had a duty to supervise its camp staff, yet failed to do so when it knew or should have known that they posed a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- b. failed to properly supervise and/or train its camp staff, even though it knew or should have known that its failure to supervise could cause injury to others, including the plaintiff, **JANE DOE**;
- c. had a duty to train and/or adequately train its camp staff, yet failed to do so when it knew or should have known that such failure posed a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- d. knew or should have known that failing to train and/or supervise its camp staff would pose a foreseeable risk of harm to others, such as the plaintiff, **JANE**

DOE, when their responsibilities as an agent, servant, and/or employee included interacting protecting the safety of other campers;

- e. failed to properly observe, monitor, and/or control the actions of its camp staff;
- f. failed to have adequate personnel to properly observe, monitor, and/or control the actions of its campers, particularly the two male campers who made sexual and physical contact with the minor plaintiff;
- g. failed to monitor the actions of its camp staff while they were in charge of providing care and safety for its campers;
- h. failed to ensure that its camp staff was behaving appropriately and/or professionally toward other campers, including the plaintiff, **JANE DOE**;
- i. failed to implement procedures and/or policies to protect people such as the plaintiff, **JANE DOE**, from campers in its charge;
- j. failed to warn the plaintiff that other campers had a propensity to behave in a dangerous, violent, and/or inappropriate manner; and/or
- k. caused, allowed and/or permitted an insufficient supervision of its campers when it knew or should have known that some campers had a propensity to behave in a dangerous, violent, and/or inappropriate manner.

14. As a result of the failure of the defendant, **HYDE SCHOOL**, its agents, servants and/or employees, to properly supervise, train, and/or monitor its campers, two

unknown male campers made sexual and physical contact with the plaintiff, **JANE DOE**, causing her to suffer the injuries, losses and damages as hereinafter set forth, some or all of which may be permanent in nature:

- a. Post-traumatic stress disorder;
- b. Depression; and
- c. Pain and suffering, both mental and physical.

15. As a result of the negligence of the defendant, **HYDE SCHOOL**, the plaintiff, **JANE DOE**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

16. As a further result of the negligence of the defendant, **HYDE SCHOOL**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

TENTH COUNT: (**JANE DOE v HYDE SCHOOL - Negligent Infliction of Emotional Distress**)

COUNT WITHDRAWN

ELEVENTH COUNT:

(JANE DOE v. HYDE SCHOOL - Negligent Hiring/Retention)

1. At all times mentioned herein, the defendant, **HYDE SCHOOL**, was and is an educational institution with a principal place of business located at 616 High Street in Bath, Maine.

2. The defendant, **HYDE SCHOOL**, operated a boarding school that was open from 1997-2007, located at 150 Route 169 in Woodstock, Connecticut.

3. At all times mentioned herein, the defendant, **HYDE SCHOOL**, its agents, servants and/or employees, owned, possessed, managed, controlled and/or maintained the premises located at 150 Route 169, in Woodstock, Connecticut, hereinafter “Woodstock Campus.”

4. The defendant, **HYDE SCHOOL**, operated a “Summer Leadership Challenge” hereinafter “Summer Camp” at their Woodstock Campus in the Summer of 2005.

5. The defendant, **HYDE SCHOOL**’s website states that, “For 50 years, Hyde’s Summer Challenge programs have inspired students and parents looking to take the summer experience to the next level by developing character, making new friends, and accomplishing what they never thought they could.”⁶

⁶ <https://www.hyde.edu/admissions/summer/summer-leadership-challenge/>

6. The defendant, **HYDE SCHOOL's** Summer Camp was a co-ed multi-week overnight summer camp open to children between the ages of thirteen to eighteen that required campers to sleep in tents and/or cabins.

7. In the Summer of 2005, the plaintiff, **JANE DOE**, a minor at the time, was a camper at the Summer Camp located on the Woodstock Campus.

8. At some time prior to the Summer of 2005, the defendant, **HYDE SCHOOL**, hired agents, servants and/or employees, to act as camp counselors, camp supervisors, camp coaches and/or camp staff, hereinafter "camp staff."

9. The defendant, **HYDE SCHOOL's**, camp staff were responsible for overseeing the campers, maintaining order and/or protecting the safety of the campers and did so under the direction, supervision and/or control of the defendant, **HYDE SCHOOL**.

10. The defendant, **HYDE SCHOOL**, had a duty to supervise, train, and/or monitor their camp staff, while they were working on its behalf.

11. On or about the Summer of 2005, the plaintiff, **JANE DOE**, was awoken in the middle of the night by two male campers and taken to a secluded spot.

12. While at the secluded spot, the two unknown male campers made sexual and physical contact with the plaintiff, **JANE DOE**.

13. The negligent sexual and/or physical touching of the plaintiff, **JANE DOE**, and her injuries resulting therefrom were caused by the negligence and carelessness of the defendant, **HYDE SCHOOL**, its agents, servants and/or employees, in that it:

- a. failed to investigate the background of its camp staff, even though it knew or should have known that failing to do so risked the health and safety of the public, customers, and/or potential customers, including the plaintiff, **JANE DOE**;
- b. failed to adequately investigate the background of its camp staff, even though it knew or should have known that failing to do so risked the health and safety of the public, customers, and/or potential customers, including the plaintiff, **JANE DOE**.
- c. knew or should have known that its camp staff behaved in a negligent manner around its campers, yet failed to take actions to address this behavior;
- d. knew or should have known that its camp staff was unfit to protect the safety of its campers, yet failed to address this; and/or
- e. knew or should have known of the background of its camp staff and yet hired him when they knew or should have known that hiring said staff risked the health and safety of its campers, including the plaintiff, **JANE DOE**.

14. As a result of the carelessness and negligence of the defendant, **HYDE SCHOOL**, its agents, servants and/or employees, two unknown male campers made sexual and physical contact with the plaintiff, **JANE DOE**, causing the minor plaintiff the injuries, losses and damages as hereinafter set forth, some or all of which may be permanent in nature:

- a. Post-traumatic stress disorder;
- b. Depression; and
- c. Pain and suffering, both mental and physical.

15. As a result of the negligence of the defendant, **HYDE SCHOOL**, the plaintiff, **JANE DOE**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

16. As a further result of the negligence of the defendant, **HYDE SCHOOL**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

TWELFTH COUNT:

(JANE DOE v. HYDE SCHOOL - Negligent Infliction of Emotional Distress)

COUNT WITHDRAWN

WHEREFORE, the plaintiff claims money damages as to all counts.

THE PLAINTIFF,
JANE DOE

By: 431770
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Her Attorneys

DOCKET NO.: WWM-CV-21-5012142 S : SUPERIOR COURT
JANE DOE : J. D. OF WINDHAM
V. : AT PUTNAM
HYDE SCHOOL AT SOUTH
WOODSTOCK, INC. : SEPTEMBER 14, 2021

STATEMENT OF AMOUNT IN DEMAND

The amount of money damages claimed is greater than Fifteen Thousand Dollars (\$15,000.00), exclusive of interest and costs.

THE PLAINTIFF,
JANE DOE

By: 431770
Chrysten A. Dufour, Esq.
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CERTIFICATION

I certify that a copy of this document was or will immediately be mailed or delivered electronically or non-electronically on September 14, 2021 to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all counsel and self-represented parties of record who received or will immediately be receiving electronic delivery.

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REVISIONS

FOURTH COUNT: (JANE DOE v. HYDE SCHOOL AT SOUTH WOODSTOCK, INC. - Negligent Infliction of Emotional Distress)

~~1-16. Paragraphs 1 through 16 of the Third Count are hereby incorporated and made corresponding paragraphs of this Fourth Count as if fully set forth herein.~~

~~17. The defendant, HYDE SCHOOL AT SOUTH WOODSTOCK, INC., through its actions and/or the actions of its agents, servants or employees above knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the plaintiff, JANE DOE.~~

~~18. The defendant, HYDE SCHOOL AT SOUTH WOODSTOCK, INC., by its failure to properly train, supervise, and/or monitor its camp staff, knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury to the plaintiff, JANE DOE.~~

FIFTH COUNT: (JANE DOE v. HYDE SCHOOL AT SOUTH WOODSTOCK, INC. - Negligent Hiring/Retention)

1. At all times mentioned herein, the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, was a domestic corporation that was authorized to transact business within the State of Connecticut.

sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

16. As a further result of the negligence of the defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

SIXTH COUNT: **(JANE DOE v. HYDE SCHOOL AT SOUTH WOODSTOCK, INC. - Negligent Infliction of Emotional Distress)**

~~1-16. Paragraphs 1 through 16 of the Fifth Count are hereby incorporated and made corresponding paragraphs of this Sixth Count as if fully set forth herein.~~

~~15. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, through its actions and/or the actions of its agents, servants or employees above knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the minor plaintiff, **JANE DOE**.~~

~~16. The defendant, **HYDE SCHOOL AT SOUTH WOODSTOCK, INC.**, by its hiring and/or retention of its camp staff, knew or should have known that their actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the minor plaintiff, **JANE DOE**.~~

16. As a further result of the negligence of the defendant, **HYDE SCHOOL**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

TENTH COUNT: **(JANE DOE v HYDE SCHOOL - Negligent Infliction of Emotional Distress)**

~~1-16. Paragraphs 1 through 16 of the Ninth Count are hereby incorporated and made corresponding paragraphs of this Tenth Count as if fully set forth herein.~~

~~17. The defendant, **HYDE SCHOOL**, through its actions and/or the actions of its agents, servants or employees above knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the plaintiff, **JANE DOE**.~~

~~18. The defendant, **HYDE SCHOOL**, by its failure to properly train, supervise, and/or monitor its camp staff, knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury to the plaintiff, **JANE DOE**.~~

care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

16. As a further result of the negligence of the defendant, **HYDE SCHOOL**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

TWELFTH COUNT:

(JANE DOE v. HYDE SCHOOL - Negligent Infliction of Emotional Distress)

~~1-16. Paragraphs 1 through 16 of the Eleventh Count are hereby incorporated and made corresponding paragraphs of this Twelfth Count as if fully set forth herein.~~

~~15. The defendant, **HYDE SCHOOL**, through its actions and/or the actions of its agents, servants or employees above knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the minor plaintiff, **JANE DOE**.~~

~~16. The defendant, **HYDE SCHOOL**, by its hiring and/or retention of its camp staff, knew or should have known that their actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the minor plaintiff, **JANE DOE**.~~