

IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MASSACHUSETTS  
Western Division

_____	)	
KRISTINA RUEHLI,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION No. _____
	)	
WILLIAM H. COSBY, JR.	)	
	)	
Defendant.	)	
_____	)	

**COMPLAINT AND JURY DEMAND**

**INTRODUCTION**

1. The Plaintiff was the victim of an attempted rape by Defendant, William H. Cosby, Jr., in 1965. In 2005, Plaintiff became aware of another victim, Andrea Constand, who had initiated a civil suit against the Defendant to recover for injuries resulting from her own sexual assault by the Defendant, and the Plaintiff came forward anonymously in that lawsuit as another prior victim. In 2014, as women began to come forward and publicly identify themselves as among the victims of the Defendant's sexual attacks, the Plaintiff also came forward, telling her story to a reporter on November 20, 2014. The following day, with knowledge that the Plaintiff was joining the women who were telling the stories of their victimization at the hand of a long-admired public entertainer, the Defendant, through agents, issued a press release branding the Plaintiff and the other women who had come forward as fanciful liars.

2. The statements on behalf of the Defendant, the only other person in the room on the night of his attack of Plaintiff at the young age of 22, were false and defamatory. It is one

thing for an accused sexual assailant to remain silent and allow the legal process, or public opinion, to run its course, but it is quite another for him to unleash his agents to deny that he attacked the Plaintiff and other women, to invite others to republish his statements, and to brand them as unreliable liars.

3. By this action, the Plaintiff seeks a verdict that will vindicate her and her story after so many years and serve to remedy the emotional distress, reputational damage and other harm inflicted by Defendant's false and defamatory statements.

#### **JURISDICTION AND VENUE**

4. This Court has jurisdiction pursuant to 28 U.S.C. § 1332 as Plaintiff and Defendant are citizens of different states and the amount in controversy exceeds \$75,000.

5. Venue is proper under 28 U.S.C. § 1391(b)(1) as the Defendant resides in Massachusetts.

#### **PARTIES**

6. Plaintiff Kristina Ruehli ("Ms. Ruehli") resides in and is a citizen of New Hampshire.

7. Defendant William H. Cosby, Jr. ("Mr. Cosby") is an actor and comedian who is known internationally. On information and belief, Mr. Cosby resides in and is a citizen of Massachusetts.

#### **FACTS**

##### ***The Sexual Assault***

8. In 1965, at the age of 22, Ms. Ruehli, who was named Donna Czaplá at that time, was employed as a secretary at a talent agency called Artists Agency Corp. ("Artists Agency") in Los Angeles.

9. Mr. Cosby came into the Artists Agency office in December 1965. While there, he said that he was going to be on a television variety show and that he was going to have a party at his home afterwards. He invited Ms. Ruehli and others to the party.

10. Ms. Ruehli arrived at Mr. Cosby's home at approximately 10 p.m., expecting that others would have already arrived. His house was nearly empty.

11. Mr. Cosby invited Ms. Ruehli in and told her that his wife was out of town. He brought her to a bedroom where an infant was asleep and showed her the infant.

12. Ms. Ruehli accepted a drink that Mr. Cosby prepared for her. Mr. Cosby prepared Ms. Ruehli a second drink. Shortly after the second drink, Ms. Ruehli passed out.

13. After an unknown period of time, Ms. Ruehli regained consciousness and found herself on a bed with Mr. Cosby. She was naked. Mr. Cosby had his penis in her face and his hand on the back of her head. He was attempting to place his penis in her mouth and force her to give him oral sex.

14. As Ms. Ruehli regained consciousness, she immediately became violently nauseated. She ran to the bathroom and threw up several times. It was unusual for her to become sick after two drinks. Based on her own experience and the accounts of other women, Ms. Ruehli came to believe that Mr. Cosby slipped a drug into her drink without her knowledge.

15. When Ms. Ruehli returned from the bathroom, Mr. Cosby was not there. Ms. Ruehli dressed, found her way out of the house and went home.

16. Ms. Ruehli left the talent agency shortly after the attempted rape. She never saw or spoke to Mr. Cosby again.

*Ms. Ruehli Reveals the Sexual Assault Publicly.*

17. In 2005, Ms. Ruehli learned that Andrea Constand (“Ms. Constand”) had filed suit against Mr. Cosby alleging she had been drugged and sexually assaulted by Mr. Cosby. Ms. Ruehli recognized the similarities between her experience with Mr. Cosby and Ms. Constand's allegations. She felt compelled to get in touch with Ms. Constand's lawyer, to tell her story, and to support Andrea Constand because she, too, had been victimized by Mr. Cosby.

18. Ms. Ruehli contacted Ms. Constand’s attorneys and was one of 13 women selected from many, many others who alleged they had been drugged and sexually assaulted by Mr. Cosby. The 13 women selected were identified in Ms. Constand's lawsuit as “Jane Does.”

19. Ms. Constand's lawsuit settled before Ms. Ruehli had been deposed or gave any other accounts of her attempted rape. Ms. Ruehli was known in the lawsuit as a Jane Doe.

20. In the fall of 2014, having learned of approximately nine other women speaking out publicly about their own experiences of being drugged and sexually assaulted by Mr. Cosby, Ms. Ruehli decided to come forward publicly with her own 1965 sexual assault by Ms. Cosby. She once again recognized the similarity in these women’s stories and her own, and it was important to her to come forward to support them.

21. On or about November 20, 2014, Ms. Ruehli was interviewed by Philadelphia Magazine and told her story.

22. Also on November 20, 2014, Victor Fiorillo, the reporter who interviewed Ms. Ruehli, called Martin D. Singer (“Mr. Singer”), one of Mr. Cosby’s attorneys and his agent, in order to seek a response on behalf of Mr. Cosby to Ms. Ruehli's allegations. Mr. Fiorillo did not reach Mr. Singer and left a message with an assistant.

23. That same day, Mr. Fiorillo sent an e-mail to John (Jack) Schmitt, another of Mr. Cosby's lawyers and agents, whose name had been associated with Mr. Cosby and Mr. Singer, again, to seek a response from Mr. Cosby. In the email, Mr. Fiorillo set out the allegations of Ms. Ruehli in substantial detail.

24. By the telephone call and e-mail to Mr. Cosby's agents, Mr. Fiorillo sought a response to include in his article, which was to run on November 21, 2014. Ultimately, Mr. Fiorillo received no response, and the article published by Philadelphia Magazine so stated.

25. On November 21, 2014, at or around 10:08 a.m., Philadelphia Magazine published Ms. Ruehli's story online, under the headline, "Kristina Ruehli Says Bill Cosby Drugged and Tried to Sexually Assault Her in 1965."

*Mr. Cosby Defames Ms. Ruehli.*

26. On November 21, 2014, after Philadelphia Magazine published Ms. Ruehli's story, Mr. Cosby, acting by and through his agent and attorney, Mr. Singer, issued a false and defamatory statement in which he called Ms. Ruehli, along with the other women who had recently told similar accounts of sexual assault by Mr. Cosby, a liar. The complete text of the statement (the "November 21 Statement") is as follows:

**STATEMENT BY MARTIN D. SINGER  
ATTORNEY FOR BILL COSBY**

The new, never-before-heard claims from women who have come forward in the past two weeks with unsubstantiated, fantastical stories about things they say occurred 30, 40, or even 50 years ago have escalated far past the point of absurdity.

These brand new claims about alleged decades-old events are becoming increasingly ridiculous, and it is completely illogical that so many people would have said nothing, done nothing, and made no reports to law enforcement or asserted civil claims if they thought they had been assaulted over a span of so many years.

Lawsuits are filed against people in the public eye every day. There has never been a shortage of lawyers willing to represent people with claims against rich, powerful men, so it makes no sense that not one of these new women who just came forward for the first time now ever asserted a legal claim back at the time they allege they had been sexually assaulted.

This situation is an unprecedented example of the media's breakneck rush to run stories without any corroboration or adherence to traditional journalistic standards. Over and over again, we have refuted these new unsubstantiated stories with documentary evidence, only to have a new uncorroborated story crop up out of the woodwork. When will it end?

It is long past time for this media vilification of Mr. Cosby to stop.

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27. At the time that Mr. Cosby's agent, Mr. Singer, issued this false and defamatory statement, Mr. Cosby and his agents were aware that Ms. Ruehli had contacted the press, specifically Mr. Fiorillo, in order to publicly disclose her story. In the November 21 Statement, the reference to "women who have come forward in the past two weeks" includes Ms. Ruehli, whose allegations were made known to Mr. Cosby's agents, Mr. Singer and Mr. Schmitt, by Mr. Fiorillo the day before the November 21 Statement was issued.

28. Indeed, as of November 21, 2014 (and continuing to this day), Ms. Ruehli has come forward with the earliest account of sexual assault by Mr. Cosby, with her assault occurring in December 1965, nearly 49 years prior to issuance of the November 21 Statement. On information and belief, the reference to "fantastical stories" from "even 50 years ago" was directed at Ms. Ruehli's allegations, which were published online by Philadelphia Magazine earlier in the day on November 21, 2014, and which Mr. Cosby and his agents knew were to be published by at least November 20, 2014.

29. Inside Edition broadcast an interview of Ms. Ruehli on November 24, 2014, in which Ms. Ruehli recounts what happened to her in 1965. At the conclusion of the interview, a

reporter states, "In a statement Cosby's attorney denies the allegations calling them ridiculous and unsubstantiated." This statement was repeated in a report of the November 24, 2014 interview published on the internet.

30. In the false and defamatory November 21 Statement, Mr. Cosby's agent, Mr. Singer, stated explicitly, stated in effect, stated by innuendo, and/or implied that Ms. Ruehli was a liar, that her story had not been and could not be corroborated or verified because it was untrue, and that she and her story were fantastical, ridiculous, and absurd.

***Mr. Cosby Is Directly Liable for Mr. Singer's Defamatory Statement.***

31. The November 21 Statement was issued at Mr. Cosby's direction and/or with his knowledge and/or approval.

32. At the time of its publication, Mr. Cosby knew that the November 21 Statement was false, he recklessly disregarded the truth of the statement, and/or he negligently disregarded the truth. Indeed, Mr. Cosby knew, or based on his knowledge of his own pattern of drugging and sexually assaulting women beginning *at least* in 1965, had substantial reason to believe and recklessly disregarded, that Ms. Ruehli's account was true.

33. On information and belief, notwithstanding his knowledge, Mr. Cosby authorized issuance of the November 21 Statement in an effort to discourage other women from coming forward and to salvage his own reputation and career including pending engagements which would earn him substantial income, notwithstanding and/or disregarding any harm issuance of the false and defamatory statement would cause to Ms. Ruehli.

***Mr. Cosby Is Vicariously Liable for Mr. Singer's Defamatory Statement.***

34. At all relevant times, Mr. Singer acted as an agent, authorized representative, attorney, servant, and/or employee of Mr. Cosby, and he acted within the course and scope of his

employment and/or agency. Specifically, Mr. Singer acted within the scope of his authority in issuing the November 21 Statement on behalf of Mr. Cosby.

35. Mr. Singer's publication of the November 21 Statement was done negligently and/or with reckless disregard for the truth of the statement. Specifically, in light of the similar allegations that had been made by approximately ten women at that time, the substantial factual similarity among the accusations, his knowledge that Mr. Cosby had settled a prior suit, and the haste with which Mr. Singer publicly denied Ms. Ruehli's allegations among others, Mr. Singer negligently and/or recklessly published the November 21, 2014 statement as to Ms. Ruehli.

***Publication of the Defamatory Statement***

36. Mr. Cosby, by and through his agent Mr. Singer, gave this false and defamatory statement to the press for publication. This was done with the expectation and intent that the statement would be published in numerous media outlets.

37. This false and defamatory statement was published and republished in numerous print and electronic news outlets throughout the United States and the world. Such publication and republication was reasonably foreseeable, and in fact, intended, by Mr. Cosby and his agent.

38. As a foreseeable result of the publication and republication of Mr. Cosby's false and defamatory statement in numerous media outlets concerning Ms. Ruehli, she has been damaged.

**COUNT I**  
**Defamation**

39. Plaintiff restates each of the foregoing paragraphs as if fully restated herein.

40. As set forth above, by and through his authorized attorneys, agents, servants, and/or employees, Mr. Cosby published the November 21 Statement of and concerning Ms. Ruehli which he knew to be false, which he published with reckless disregard for the truth of the



statements and/or negligently. The November 21 Statement was defamatory and/or defamatory per se.

41. As set forth above, and in the alternative, Mr. Cosby's authorized attorneys, agents, servants, and/or employees, acting within the scope of their authority, published the November 21 Statement. They did so with reckless disregard for the truth of the November 21 Statement and/or negligently. The November 21 Statement was defamatory and/or defamatory per se.

42. Mr. Cosby's November 21 Statement was printed, published, circulated and distributed to news outlets nationwide and was read by Ms. Ruehli's family, friends, neighbors, world-wide colleagues of her husband, and others.

43. In making the false and defamatory statements, Mr. Cosby held Ms. Ruehli up to public scorn and ridicule, injured her good name and reputation, and caused her severe emotional distress.

44. In making the false and defamatory statements, Mr. Cosby acted with hatred, hostility, ill will or evil motive.

45. Mr. Cosby is liable for the damages his statements have caused and continue to cause, including enhanced compensatory damages.

**WHEREFORE**, Plaintiff Kristina Ruehli respectfully requests that the Court grant her the following relief:

1. After trial, enter judgment for the Plaintiff and award her damages in an amount to be determined at trial, including attorney's fees, costs and interest; and
2. Grant such other relief as the Court deems just and equitable.

**JURY DEMAND**

Plaintiff Kristina Ruehli hereby demands a trial by jury on all claims so triable.

KRISTINA RUEHLI,

By her attorneys,

/s/ Megan C. Deluhery

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Dated: November \_\_, 2015

4835-0416-8234, v. 4

JS 44 (Rev. 12/12)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Kristina Ruehli

(b) County of Residence of First Listed Plaintiff Hampden  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Megan C. Deluhery, Esq., BBO#655564  
Carole Cooke, Esq., BBO# 646000  
One Federal, St., Boston, MA 02110 P:617 720-2626

**DEFENDANTS**

William Cosby, Jr.

County of Residence of First Listed Defendant Hampden  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 2 U.S. Government Defendant
- 3 Federal Question (U.S. Government Not a Party)
- 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                                       |                                       |   |                            |                            |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
|   | PTF                                   | DEF                                   |   | PTF                        | DEF                        |
| Citizen of This State                   | <input type="checkbox"/> 1            | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2            | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other  <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act  <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157  <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark  <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))  <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

**V. ORIGIN** (Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from Another District (specify)
- 6 Multidistrict Litigation

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:  
Civil defamation suit.

**VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint:  
JURY DEMAND:  Yes  No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE Mark G. Mastroianni

DOCKET NUMBER 14-cv-30211

DATE  
11/09/2015

SIGNATURE OF ATTORNEY OF RECORD

*Megan C. Deluhery*

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

1. Title of case (name of first party on each side only) Kristina Ruehli v. William H. Cosby, Jr.

2. Category in which the case belongs based upon the numbered nature of suit code listed on the civil cover sheet. (See local rule 40.1(a)(1)).

- I. 410, 441, 470, 535, 830\*, 891, 893, 895, R.23, REGARDLESS OF NATURE OF SUIT.
- II. 110, 130, 140, 160, 190, 196, 230, 240, 290,320,362, 370, 371, 380, 430, 440, 442, 443, 445, 446, 448, 710, 720, 740, 790, 820\*, 840\*, 850, 870, 871.
- III. 120, 150, 151, 152, 153, 195, 210, 220, 245, 310, 315, 330, 340, 345, 350, 355, 360, 365, 367, 368, 375, 385, 400, 422, 423, 450, 460, 462, 463, 465, 480, 490, 510, 530, 540, 550, 555, 625, 690, 751, 791, 861-865, 890, 896, 899, 950.

\*Also complete AO 120 or AO 121. for patent, trademark or copyright cases.

3. Title and number, if any, of related cases. (See local rule 40.1(g)). If more than one prior related case has been filed in this district please indicate the title and number of the first filed case in this court.

See note on Civil Action Cover Sheet - Green et al v. Cosby

4. Has a prior action between the same parties and based on the same claim ever been filed in this court?

YES  NO

5. Does the complaint in this case question the constitutionality of an act of congress affecting the public interest? (See 28 USC §2403)

YES  NO

If so, is the U.S.A. or an officer, agent or employee of the U.S. a party?

YES  NO

6. Is this case required to be heard and determined by a district court of three judges pursuant to title 28 USC §2284?

YES  NO

7. Do all of the parties in this action, excluding governmental agencies of the United States and the Commonwealth of Massachusetts ("governmental agencies"), residing in Massachusetts reside in the same division? - (See Local Rule 40.1(d)).

YES  NO

A. If yes, in which division do all of the non-governmental parties reside?

Eastern Division  Central Division  Western Division

B. If no, in which division do the majority of the plaintiffs or the only parties, excluding governmental agencies, residing in Massachusetts reside?

Eastern Division  Central Division  Western Division

8. If filing a Notice of Removal - are there any motions pending in the state court requiring the attention of this Court? (If yes, submit a separate sheet identifying the motions)

YES  NO

(PLEASE TYPE OR PRINT)

ATTORNEY'S NAME Megan C. Deluhery, BBO# 655564

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