

11/19/2025

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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF VENTURA**

D.M. and L.K., on behalf of their daughter
JANE DOE,
Plaintiffs,

v.

SIMI VALLEY UNIFIED SCHOOL
DISTRICT,
Defendant.

Case No.: 2025CUCR054429

Division:

COMPLAINT FOR DAMAGES

- 1. HARASSMENT AND DISCRIMINATION IN AN EDUCATIONAL INSTITUTION
(VIOLATION OF CAL. EDUC. CODE § 220)**
- 2. DELIBERATE INDIFFERENCE
(VIOLATION OF TITLE IX)**
- 3. NEGLIGENCE**

DEMAND FOR JURY TRIAL

1 Plaintiffs D.M. and L.K, on behalf of their daughter Jane Doe (“Ms. Doe”), allege as
2 follows:

3 **PARTIES, JURISDICTION, AND VENUE**

4 1. Jane Doe is a citizen and resident of the State of California.

5 2. Plaintiff and Next Friend D.M. is a citizen and resident of California and the father
6 of Jane Doe.

7 3. Plaintiff and Next Friend L.K. is a citizen and resident of California and the mother
8 of Jane Doe.

9 4. Defendant Simi Valley Unified School District (“SVUSD” or the “District”) is a
10 public entity in Ventura County, California, operating under the laws of the State of California.

11 5. Defendant SVUSD receives, on average, over 20 million USD per year in federal
12 funding and is thus subject to Title IX of the Education Amendments of 1972 (“Title IX”).

13 6. Simi Valley High School (“SVHS” or the “School”) is a member institution of the
14 SVUSD.

15 7. This Court has jurisdiction over this action under Cal. Educ. Code § 220 and 20
16 U.S.C. § 1681 et seq.

17 8. Venue is proper in this county under Code of Civ. Proc. § 395.5 because a
18 substantial part of the events and omissions giving rise to the claims occurred in this county.

19 **INTRODUCTION**

20 9. This California Education Code and Title IX civil rights action arises from a
21 school’s steadfast refusal to address the severe and repeated sexual harassment and bullying of one
22 of its most vulnerable students, leading to acute emotional distress, nightmares, suicidal thoughts,
23 and actions forcing the parents to remove their child entirely from SVUSD.

24 10. Despite receiving no less than eight reports from Jane Doe and her parents of sexual
25 harassment and bullying from other students while on campus, SVHS refused to use SVUSD’s
26 disciplinary procedures to address the harassment. Rather, SVHS concluded that Jane Doe was the
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1 problem. The School then went on to ignore further reports and sit idly by, while Jane Doe became
2 isolated, depressed and suicidal. Therapy was not enough for Jane Doe to safely remain at school,
3 and, to protect her wellbeing, Jane’s parents had no other choice than to homeschool her for the
4 remainder of the school year. They then had to transfer her out of SVUSD entirely.

5 11. This lawsuit seeks to hold the District accountable for its failures to comply with
6 its responsibilities to Jane Doe in response to her and her parents’ reports of abuse and harassment.

7 **TITLE IX**

8 12. Title IX, more formally known as Title IX of the Educational Amendments of 1972,
9 was enacted to prevent students’ denial of educational opportunities due to a school’s
10 discrimination against them based on their gender.

11 13. Schools such as SVHS are obligated to enforce Title IX and all other federal civil
12 rights laws in exchange for the sizeable money received from the federal government for their
13 programs. Enforcement is not optional, and private causes of action such as these are authorized.

14 14. In the context of sexual harassment or abuse, discrimination occurs if a school
15 ignores actual notice of gender-based harassment.

16 15. More specifically, when a school receives a report of harassment perpetrated by
17 one of its students against another that is so severe that it negatively affects the student’s education,
18 the school must respond by investigating the harassment, remedying the effects on the victim, and
19 preventing the harassment from recurring. The school must take measures to prevent the
20 harassment from recurring not only by making accommodations for the victim, but also by
21 addressing, rectifying, and disciplining the actions of the perpetrating student.

22 16. This requirement specifically includes the use of grievance procedures in place at
23 the school to stop the harassment.

24 **CALIFORNIA EDUCATION CODE**

25 17. California has codified the same protections and requirements as Title IX in the
26 California Education Code. California law requires schools to investigate reports of such
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1 harassment and makes liable a school that is deliberately indifferent to such harassment. The code
2 provides, “No person shall be subjected to discrimination on the basis of ... gender ... [or] sexual
3 orientation ... in any program or activity conducted by an educational institution that receives, or
4 benefits from, state financial assistance or enrolls pupils who receive state student financial aid.”
5 Educ. Code § 220.

6 18. Additionally, California requires special provisions for instances of bullying.
7 Codified into the Safe Place to Learn Act, Educ. Code § 234 *et seq.*, and otherwise known as Seth’s
8 Law, California Law requires that all public schools:

9 a. Adopt a strong anti-bullying policy that specifically spells out prohibited
10 bases for bullying, including sexual orientation and gender identity/gender expression.

11 b. Adopt a specific process for receiving and investigating complaints of
12 bullying, including a requirement that school personnel intervene if they witness bullying.

13 c. Publicize the anti-bullying policy and complaint process, including posting
14 the policy in all schools and offices.

15 d. Post on the district website materials to support victims of bullying.

16 **GENERAL ALLEGATIONS**

17 19. Jane Doe is currently an 12th grade student now attending school in a neighboring
18 school district to SVUSD.

19 20. Jane’s parents enrolled her at SVHS in 2023 for her sophomore school year after
20 an exceptionally challenging set of events in her life.

21 21. Several months prior to attending SVHS, Jane Doe was raped repeatedly by a local
22 area man, Alessandro Cotrufo, who threatened that he would kill her and her parents should she
23 ever tell anyone. *See People v Alessandro Cotrufo*, Superior Court, Ventura County, Case No.
24 2023021448. Mr. Cotrufo told Jane Doe that he had 32 victims and was the “next Ted Bundy” but
25 that, unlike Ted Bundy, he would get away with it. He told her that he would kill her and take her
26 to the mountains where she would never be found, and he would kill her family as well. Bravely,
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1 Jane did not keep his secret, and Cotrufo was arrested and charged with the rape right before the
2 start of the 2023 school year. Jane was understandably vulnerable and on edge as a result of these
3 crimes and the ongoing court dates. Jane and her parents were hoping that a fresh start at SVHS
4 would help her.

5 22. Jane’s parents alerted SVHS officials to their daughter’s situation, the criminal
6 case, and any special needs that she might require due to her recovery and her constant fear of
7 retaliation from the assailant. By that time, Jane had already undergone inpatient treatment and
8 intensive outpatient treatment to address the trauma she suffered because of Mr. Cotrufo. Jane had
9 worked hard to get to a place where she was able to continue her education when she began her
10 sophomore year at SVUSD. Though she did have significant anxiety about starting in a new school,
11 she was also excited about getting a fresh start at SVHS. School had always been a source of
12 enjoyment for Jane, and she was looking forward to the semester.

13 23. Other than facing some difficulty when setting up her Independent Education Plan
14 (“IEP”), Jane’s first month at SVHS was without incident. Jane focused on her studies and was
15 glad to be in a new environment. She had hopes that the school could be like a second family to
16 her, and aspired to run cross-country and engage in other extracurricular activities.

17 24. On September 23, 2023, however, Jane’s fresh start abruptly ended. While in the
18 SVHS parking lot, a car came racing across the lot directly at her, as if the driver intended to run
19 her over. Jane immediately thought this was someone related to Mr. Cotrufo who intended to make
20 good on his threats to kill her should she ever disclose being raped. The vehicle stopped just short
21 of hitting her. The driver was an SHVS student. She left school that day shaken and unsure whether
22 the student, whom she hardly knew, was associated with her assailant and whether she was in danger
23 returning to SVHS. The matter was reported to SVHS, but Jane and her family were told that the
24 school does not, or cannot, control what happens in its parking lot.
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1 25. Jane presumed that she was mistaken about any connection with her assailant and
2 moved forward, focusing on her studies and making friends at SVHS.

3 26. Later in her first semester, however, Jane started receiving unwanted attention
4 from several other students. A young man named K.B., whom she hardly knew, began spreading
5 an odd and obviously false rumor that Jane had sex with another student *during math class, in the*
6 *classroom*, a rumor that the math teacher would eventually dispel. Following the start of this
7 rumor, K.B. and his friends began a regular pattern of verbal harassment and bullying of Jane,
8 calling her a “slut,” a “whore,” a “dyke,” and other gender-based insults and slurs. Jane did not
9 understand why these students were suddenly attacking her and had renewed concern that there
10 was a connection to her criminal assailant. Most of the time, she tried to ignore the comments as
11 when she tried to stand up for herself, it only made the harassment worse.

12 27. The harassment and bullying had a significant impact on Jane, and by early
13 December 2023, had become a daily experience that Jane could not escape. Every day at school
14 was miserable, and once she got home she would cry in her room. She also began to suffer from
15 nightmares about the harassment and bullying she would face at school. Jane became flooded with
16 depression and anxiety, and her mental state while at school worsened quickly.

17 28. Before the end of the semester, Jane started having suicidal thoughts, going as far as
18 devising a plan for how she would commit suicide. One day in December 2023, Jane posted an
19 Instagram message saying goodbye to her friends and family and apologizing for what she was about
20 to do. Jane’s mother, who was at an appointment with one of her younger daughters at the time
21 Jane made the post, was alerted of this post by one of Jane’s friends. Jane’s mother rushed home
22 to find Jane alive and safe, but severely depressed and mentally fragile. Several of Jane’s friends
23 reported the incident to SVHS, as they were deeply concerned for her safety.

24 29. Jane’s parents were understandably terrified. Jane described to her parents the
25 bullying and harassment she was subjected to by a few fellow students at SVHS. Jane’s parents
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1 considering I have never met him in my life and have had no interactions with him besides the
2 sexual harassments. I just want to feel safe on campus.”

3 33. SVHS failed to take any immediate action in response to the incident. It was only
4 after repeated requests from Jane’s parents that the school did anything at all. When it finally
5 responded, the Vice Principal chose *not* to discipline any of the male students who had surrounded
6 and harassed Jane on February 8. Instead, he decided to discipline Jane, solely because she
7 acknowledged striking one of the boys while attempting to break free from a circle of roughly
8 fifteen male students. SVHS never interviewed the two uninvolved student witnesses, and Jane is
9 unaware whether the school interviewed *any* other students about the incident.

10 34. The same students had also spread the false rumor that Jane had sex with a male
11 student *during* her math class and *in* the math classroom. Jane was subjected to constant harassing
12 and taunting comments from this group of students about the rumored conduct. This incident was
13 also reported to SVHS administrators, who appeared increasingly impatient with Jane’s continued
14 reports—as if she were responsible for causing the incidents themselves, rather than reporting the
15 underlying misconduct.

16 35. Jane’s parents also reported this rumor to SVHS. Yet again, the school took no
17 immediate action, and Jane continued to be harassed and bullied over the rumor for two weeks
18 before SVHS responded. After that two-week delay, Vice Principal Annette Babakhanian
19 informed Jane’s father that the school would begin an investigation. SVHS stated that it
20 interviewed 28 students from the class, but its inquiry focused solely on whether the rumor—that
21 Jane was having sex during math class—was true. The school did not investigate who started the
22 obviously false rumor or the harassment Jane endured because of it. Only four of the 28 students
23 claimed the rumor was true. The math teacher, who was present during the class and could have
24 immediately dispelled the rumor, was never interviewed; she later confirmed that the rumor was
25 plainly untrue. When eventually asked much later, the teacher strongly refuted the suggestion that
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1 there was any truth to the rumor, saying that absolutely there was no way that such behavior
2 happened and adding that Jane was an excellent student in his class.

3 36. Jane’s parents asked an education attorney to contact the School and implore them
4 to conduct a Title IX investigation into the situation, but no investigation occurred. Jane’s parents,
5 growing frustrated with SVHS’s inaction and fearing for their daughter’s mental and physical
6 health, emailed the School principal themselves to ask for a Title IX investigation, both into the
7 constant sexual harassment of their daughter as well as into the School administration for not
8 addressing the repeated reports of sexual harassment. Nothing ever came of that complaint, which
9 remains unresolved. No procedure was implemented, no grievance process was initiated, and no
10 investigation of the incident was undertaken by either of the Defendants.

11 37. Jane’s parents met with Principal Baxter as well as Assistant Superintendent Jerry
12 Block who told them that, while they could fill out a Title IX form, nothing was going to come of
13 it as this was “Not really a Title IX matter.” Based upon Principal Baxter and Assistant
14 Superintendent Block’s representation, Jane’s parents found it pointless to fill out the form.

15 38. Instead of conducting an investigation, the SVUSD began providing employees to
16 act as “shadows” to follow Jane around. Although the shadows ostensibly narrowed the
17 opportunities for bullying to occur while she was in the hallways between classes, they were
18 humiliating for Jane and ostracized her from her peers even more. But the “shadows” were not
19 always present and did not sit in the classrooms, so the harassing students just reserved their
20 behavior until the shadows were no longer present. Despite the shadows, the constant verbal
21 harassment (moaning, sex-based slurs and name calling, etc.) continued. Beyond being ineffective
22 at stopping the harassment, the shadows themselves made matters worse. Their presence suggested
23 that Jane was a “problem student” who needed to be escorted to and from class, which only
24 increased her visibility and made her an even greater target for bullying, as students mocked her
25 for having shadows.
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1 wellbeing into a downward spiral. Jane was becoming depressed, anxious, and angry with the
2 world.

3 48. At this point, the harassment continued on a daily basis. On March 13, 2024, Jane
4 was going to lunch with her friends when they ran into the same group of girls from the February
5 29, 2024, incident. One of the girls called out her name and called her a “slut” and a “whore” and
6 threatened to “jump” her, referring to an act of physical violence. Jane reported this incident to SVHS
7 in writing. SVHS noted that they “looked at the camera,” but took no further action and did not
8 interview anyone. The harassing students seemed to become more and more emboldened each time
9 the School did nothing in response to reports.

10 11 49. Jane’s mental health continued to deteriorate with each day she continued to attend
12 SVHS. The school that she thought would be her fresh start following her rape had become her
13 worst nightmare. Though her assailant was now convicted in the criminal court and sentenced to
14 prison, the constant attacks from the students at school combined with the lack of support from
15 SVHS had worn her down to a breaking point.

16 50. Jane’s academic performance had also deteriorated during her time at SVHS. Her
17 ability to focus in her classes, to study, and to perform well on her assignments and exams had
18 suffered because of the harassment from her peers and SVHS’s failure to support her.

19 51. On May 7, 2024, Jane’s parents attended an IEP meeting at SVHS. While
20 discussing the bullying and harassment that Jane received from the other students, one of the
21 school’s special education teachers noted that this kind of gender-based harassment and harassing
22 language seemed to be a regular problem at the school.

23 24 52. Jane again became suicidal due to the harassment and bullying she faced at SVHS
25 and expressed her suicidality to her parents on May 9 and 10, 2024. Both Jane’s therapist and
26 psychiatrist indicated in writing that Jane needed to finish the school year at home due to “current
27 stressors in the school environment.” Her therapist indicated clearly that Jane is “getting worse due

1 to the school environment that has become increasingly hostile and triggering for [Jane,] which is
2 worsening her symptoms.” The therapist recommended Jane leave school and study from home.

3 53. At a meeting with Jane’s parents and the school, SVHS Special Education Programs
4 director, Kendall Forrester, confirmed that SVHS believed that Jane’s struggles at school were her
5 fault and the result of her own actions.

6 54. SVHS repeatedly refused to investigate reports of sexual harassment or institute its
7 own grievance procedures.

8 55. An administrator of SVUSD had even told Plaintiffs that the sexual harassment and
9 bullying Jane Doe was facing at SVHS was not likely a Title IX matter. This statement was
10 severely inaccurate and represented the systemic shortfalls within and throughout the District
11 regarding SVUSD’s failure to acknowledge, investigate, and redress student reports of sexual
12 harassment.

13 56. Jane’s parents decided that they could not send her back to SVHS and home
14 schooled her for the remainder of the semester. Over the summer break, they enrolled Jane in a
15 different school situated in a different district, where she is still currently enrolled. Jane has had
16 no disciplinary issues since leaving SVHS.

17 57. In addition to being difficult to find on SVUSD’s website, Defendant’s Title IX
18 policy is not compliant with federal regulations as it does not describe any grievance process for
19 students making a complaint. Neither is there any process spelled out in the Simi Valley High
20 School Student Handbook. These issues once again demonstrate SVUSD’s systemic and district-
21 wide shortfalls with respect to providing resolution of Title IX violations.

22 58. Seth’s Law requires that School Districts adopt and publish an anti-bullying policy
23 that provides a procedure for receiving complaints, investigating complaints, resolving complaints,
24 appealing and providing a timeline for resolution of such complaints.

1 59. Contrary to the requirements of Seth’s Law, SVUSD’s policy only provides a
2 procedure for receiving complaints.

3 60. SVUSD’s failure to provide a timeline for the resolution of such complaints and its
4 failure to provide procedures for investigating, resolving, or appealing such complaints is a
5 systemic deficiency in the District’s procedures for addressing student reports and complaints of
6 harassment and bullying.

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8 61. Additionally, despite the requirement to provide the policy to students, parents, and
9 faculty, the anti-bullying policy is very difficult to find on the District website and it is completely
10 absent from the Student Handbook.

11 **COMPLIANCE WITH THE CALIFORNIA GOVERNMENT CLAIMS ACT**

12 62. Plaintiff has pleaded herein state law claims against SVUSD for a pattern of
13 deliberate indifference and negligence over a period of time from February, 2024 through the end
14 of the semester which ended June 7, 2024.

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16 63. Plaintiffs submitted a timely claim within six months of the harassment under the
17 Government Claims Act to SVUSD from then-Plaintiff’s counsel Adam Wasserman.

18 64. SVUSD sent a letter to Plaintiff’s current counsel indicating that the notice had
19 insufficient detail to determine the validity of the claim.

20 65. Plaintiffs responded by submitting further details in support of the claim.

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22 66. SVUSD failed to further respond to that complaint.

23 **THE CALIFORNIA UNIFORM COMPLAINT PROCEDURE**

24 67. Plaintiffs submitted a District-provided “Verified Claim Form” for “Damages to
25 Person or Property” to SVUSD on or around November 20, 2024. The form was a signed, written
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1 statement alleging SVUSD’s and SVHS’s violation of federal and state laws regarding
2 discrimination, harassment, and bullying in schools.

3 68. On or around November 29, 2024, counsel for Plaintiffs also sent a letter to the
4 SVUSD Superintendent, Dr. Hani Youssef, describing the general nature of Jane Doe’s
5 discrimination claims against SVUSD and to see if SVUSD had any interest in resolving the
6 underlying civil claims before filing suit on behalf of Plaintiffs.

7 69. On or around December 10, 2024, the Associate Superintended for SVUSD, Ron
8 Todo, sent a letter acknowledging receipt of Plaintiffs’ claim. The December 10th letter also
9 notified Plaintiffs that their verified claim form failed to comply with Cal. Gov. Code § 910 for
10 failure to provide the dates, place, and other circumstances of the occurrence(s) that give rise to
11 Jane Doe’s claims.

12 70. On or around December 26, 2024, counsel for Plaintiffs sent SVUSD an additional
13 document detailing the pattern of discrimination and/or harassment Jane Doe faced at SVHS and
14 listing the dates, times, and circumstances of each instance of discrimination and/or harassment.

15 71. To date, SVUSD has not sent any communication to Plaintiffs or Plaintiffs’ counsel
16 providing notice of any investigation, findings, or outcome of the claims presented, whether they
17 prepared a written decision, or appraising the Plaintiffs of their right to file a complaint.

18 72. Further, as indicated above, SVUSD’s failures in acknowledging, investigating,
19 and redressing student complaints of sexual harassment and/or and bullying were systemic in
20 nature and could not have been resolved through an administrative proceeding.

21 73. Regardless, because Plaintiffs D.M. and L.K. were forced to remove Jane from
22 SVHS and the SVUSD altogether in June 2024 due to the Defendant’s inaction and failure to
23 protect Jane, and since Jane no longer attends a school situated in the SVUSD, it would be
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1 impossible for Plaintiffs to resolve their claims against the Defendant through UCP administrative
2 proceedings.

3 **FIRST CAUSE OF ACTION**
4 **HARASSMENT IN AN EDUCATIONAL INSTITUTION**
(VIOLATION OF CALIFORNIA EDUCATION CODE § 220)

5 74. Plaintiffs re-allege and re-incorporate by reference all of the preceding allegations
6 in paragraphs 1-73, *supra*.

7 75. Defendants had actual knowledge of sex-based harassment and bullying against
8 Jane Doe during the 2023-24 school year as Jane and her parents repeatedly reported the conduct
9 of the bullying students.

10 76. The gender-based sexual harassment and bullying described above was severe,
11 pervasive, and offensive as it affected her studies, her mental health, forced her to change classes,
12 resort to homeschooling, and ultimately to leave SVHS and the SVUSD completely.

13 77. The harassment had a negative impact on Jane's education as her studies and grades
14 suffered, her ability to focus on her classes suffered, she was involuntarily transferred to other
15 classes, and she eventually had to leave the school entirely.

16 78. Defendant was deliberately indifferent to the gender-based harassment and bullying
17 Jane faced by failing to investigate reports of peer-based harassment, failing to utilize a grievance
18 procedure to address the harassment and prevent its recurrence, and even going so far as to retaliate
19 against Jane for reporting instances of gender-based harassment.

20 79. The deliberate indifference shown by SVHS caused a severe impact to Jane's
21 education, resulting in lower grades, forced her to change classes, and ultimately forced her to
22 abandon her education at SVHS altogether.

23 80. Jane also suffered severe emotional distress, increased therapy needs, and increased
24 needs for therapeutic medication to cope with the hostile educational environment at SVHS.

SECOND CAUSE OF ACTION
DELIBERATE INDIFFERENCE – TITLE IX
(VIOLATION OF 20 U.S.C. § 1681 et seq.)

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3 81. Plaintiffs re-allege and re-incorporate by reference all of the preceding allegations
4 in paragraphs 1-80, supra.

5 82. Defendants had actual knowledge of sex-based harassment and bullying against
6 Jane Doe during the 2023-24 school year as Jane and her parents repeatedly reported the conduct
7 of the bullying students.

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9 83. The gender-based sexual harassment and bullying described above was severe,
10 pervasive, and offensive as it affected her studies, her mental health, forced her to change classes,
11 resort to homeschooling and ultimately to leave her studies at SVHS completely.

12 84. The harassment had the effect of having a negative impact on Jane’s education as
13 her studies and grades suffered, her ability to focus on her classes suffered, she was involuntarily
14 transferred to other classes, and eventually had to leave the school entirely.

15 85. Defendant was deliberately indifferent to the gender-based harassment and bullying
16 by failing to investigate reports of peer-based harassment, failing to utilize a grievance procedure
17 to address the harassment and prevent its recurrence, and even going so far as to retaliate against
18 Jane for reporting instances of gender-based harassment.

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20 86. The deliberate indifference shown by SVHS caused a severe impact to Jane’s
21 education, resulting in lower grades, forced her to change classes, and ultimately forced her to
22 abandon her education at SVHS altogether.

23 87. Jane also suffered severe emotional distress, increased therapy needs, and increased
24 needs for therapeutic medication to cope with the hostile educational environment at SVHS to
25 cope with the hostile educational environment at SVHS.

THIRD CAUSE OF ACTION
NEGLIGENCE

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3 88. Plaintiffs re-allege and re-incorporate by reference all of the preceding allegations
4 in paragraphs 1-87, *supra*.

5 89. Defendants owed a duty of care to Jane Doe as a minor student in the care of SVHS,
6 SVUSD, and the employees thereof.

7 90. Defendants had actual knowledge of sex-based harassment and bullying against
8 Jane Doe during the 2023-24 school year as Jane and her parents repeatedly reported the conduct
9 of the bullying students.

10 91. It was reasonably foreseeable that the harassing students at SVHS presented a
11 significant risk of harm to Jane upon receipt of multiple reports from Jane and her parents, both
12 orally and in writing, concerning the harassing students' conduct.

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14 92. The Defendants negligently breached the duty of care owed to Jane by failing to
15 take reasonable steps to prevent the harassing students from continuing to sexually harass and
16 bully Jane at school.

17 93. The Defendants' failure to implement policies and procedures to protect Jane from
18 the severe sexual harassment and bullying resulted in the continuation and escalation of such
19 sexual harassment and bullying.

20 94. As a result of the Defendants' negligence, Jane has suffered injuries and damages,
21 including but not limited to, severe negative impacts on her education, severe emotional distress,
22 increased therapy needs, increased needs for therapeutic medication to cope with the hostile
23 education environment at SVHS, and damages incurred as a result of Jane being forced to leave
24 SVHS and be homeschooled for the remainder of the 2024 spring semester before leaving the
25 SVUSD altogether.
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PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment as follows:

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1. For compensatory damages in an amount to be determined by proof at trial;
 2. For costs of this suit;
 3. For pre and post judgment interest as provided by law;
 4. For reasonable attorneys' fees and costs as provided by statute; and
 5. For such other and further relief as the Court deems just and proper.

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DEMAND FOR JURY TRIAL

Plaintiffs D.M. and L.K., on behalf of their daughter Jane Doe, hereby demand trial by jury on all claims and causes of action so triable.

DATED: November 19, 2025

Respectfully submitted,

HOQ LAW, APC

By: /s/ Laboni Hoq

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