

HOURIGAN, KLUGER & QUINN
A PROFESSIONAL CORPORATION

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J.S., Parent and Natural Guardian of T.S.,

Plaintiff

vs.

JOSHUA JAMES RALSTON AND
TRUCKSVILLE VOLUNTEER FIRE
COMPANY,

Defendants

IN THE COURT OF COMMON PLEAS
LUZERNE COUNTY

CIVIL ACTION -LAW

JURY TRIAL DEMANDED

NO. *2018-5790*

FILED
PROthonotary
LUZERNE COUNTY
2018 MAY 23 PM 2:56

COMPLAINT

The Plaintiff, J.S., Parent and Natural Guardian of T.S., a minor, by and through her counsel, Hourigan, Kluger and Quinn, P.C. hereby complains against the above-named Defendants, averring as follows:

1. The Plaintiff, J.S., is an adult individual, and the Parent and Natural Guardian of the minor victim, T.S., who may be contacted through their counsel, Michelle M. Quinn Esquire and/or Michael A. Lombardo Esquire, c/o Hourigan, Kluger & Quinn, P.C., 600 Third Avenue, Kingston, PA.

2. Plaintiffs' names and addresses are not contained within this Complaint, so as to protect the privacy and identity of T.S., who incurred injuries and damages while a minor, due to the Defendants' negligence and recklessness.

3. Use of pseudonyms is done in good faith in order to avoid humiliation, embarrassment, additional psychological harm, and disruption or interference with the Plaintiffs. The Plaintiffs' identities will be made known to the Defendants by separate communication.

THE PARTIES

4. The Defendant, Joshua James Ralston, (hereinafter referred to as "Defendant Ralston") is an adult individual, and resident of the Commonwealth of Pennsylvania, with a date of birth of February 24, 1997. Based on information and belief, Defendant Ralston is currently incarcerated at the Luzerne County Correctional Facility, 99 Water Street, Wilkes Barre, Luzerne County, Pennsylvania, as a result of the events complained of instantly.

5. The Defendant, Trucksville Volunteer Fire Company, (hereinafter referred to as "Trucksville Fire") is a corporation or other jural entity having a principal place of business located at 11 Carverton Road, Trucksville, Kingston Township, Luzerne County, PA 18708.

6. The Defendant, Trucksville Fire, operates a fire company, providing typical fire/rescue services in and around the Back Mountain area of Luzerne County.

7. The Defendant, Trucksville Fire, is not in any way affiliated with any municipal corporation and/or government agency and/or political subdivision and, as such, is a stand-alone, independent, corporate entity, having its own, distinct and legal existence.

8. At all times relevant hereto, the employees/volunteers of the Defendant, Trucksville Fire, including but not limited to, the Defendant Ralston, were acting as the actual and/or apparent agents of the Defendant, Trucksville Fire.

OPERATIVE FACTS

9. The Plaintiff, T.S., was born on March 10, 2003, and at the time the events complained of instantly, was 13 years of age.

10. At all times relevant hereto, the Defendant, Trucksville Fire, established and operated a special so-called "Junior Membership" program, whereby children between the ages of 14 and 18 are permitted to join the fire company and participate in fire company-related activities, in an apprentice-like role.

11. Ostensibly, the expectation of the Junior Membership program is that the minors will gain knowledge and training in the fire service, so as to later participate as full, active members in the fire company, upon reaching the age of majority.

12. Despite the noble intention of this Junior Membership program, the reality is that the Defendant, Trucksville Fire's Junior Membership program was instituted without any research into the dangers and pitfalls of such a program, without consulting with any experts in the field, and without promulgating and/or enforcing any policies or procedures respective to minors' participation in the fire company.

13. Moreover, Defendant Trucksville Fire's Junior Membership Program was instituted without any thought given, nor any measures taken, to safeguard minors that may be participating in such a program from dangers that might befall them, including, but not limited to, the dangers of sexual predators / pedophiles.

14. Defendant, Trucksville Fire's Junior Membership program was allowed to operate without any monitoring and oversight whatsoever. Thus, an environment was created and fostered whereby minors, including the Plaintiff, T.S., were allowed to congregate at the quarters

of the Defendant, Trucksville Fire, and at other, off-premises, fire company sponsored activities, without appropriate monitoring and supervision.

15. In or around July of 2016, the minor Plaintiff, T.S., became aware of the Defendant, Trucksville Fire's, Junior Membership program, as several of her friends and acquaintances had participated in this program. Naturally, this caused T.S. to become interested in joining. T.S. sought the permission of her mother, the Plaintiff, J.S., to do so. J.S. believed that the Junior program would be an opportunity to develop civic-minded values in T.S., and allowed her to participate in the program.

16. Unfortunately, J.S., was unaware and, frankly, had no way of knowing that the Junior Membership program at Trucksville Fire was inadequate, completely unsupervised, and fostered an environment whereby adult members of the fire company were permitted unfettered access to children, which allowed them to prey on the children without consequence.

17. Of the few standards that were established for the Junior Membership program at Trucksville Fire, one was that no children under the age of 14 would be permitted to participate. Despite this rule, the Defendant permitted the minor, T.S., to participate in the Junior Membership program despite the fact that upon enrolling in 2016, she was only 13 years of age.

18. Despite the fact that she was only thirteen (13) years of age, and by Trucksville Fire's own rules, ineligible to participate in the Junior Membership Program, managing agents of the Defendant Trucksville Fire, including Chief Officers and high-ranking Administrative Officers, knowingly allowed T.S. to continue to participate in the Program in direct violation of one of the few rules/standards that they had promulgated for this Program.

19. At all times relevant hereto, Defendant Ralston, was a full, active adult member of the Defendant, Trucksville Fire. At the time of the events giving rise to this lawsuit, Ralston was 19 years of age.

20. Despite his relative young age and lack of experience in the fire service, the Defendant, Trucksville Fire, inexplicably bestowed upon Ralston a position of leadership and trust in the fire company, in that he was named to the position of Lieutenant.

21. In the fire service, the position of Lieutenant is a title of honor and respect typically given to a more-senior member of a fire company who, through years of training and experience, has demonstrated his or her worth as a viable firefighter, and upstanding member of the fire company.

22. Unfortunately, in the case of the Defendant, Trucksville Fire, they allowed the Defendant Ralston, to hold the position of Lieutenant despite the fact that he had limited, if any, experience as a firefighter, limited time as a member of the fire company, and had done nothing to establish that he was, or could be, an upstanding member.

23. Moreover, and at all times relevant hereto, Defendant, Trucksville Fire, failed to undertake any background investigation of Defendant Ralston and, specifically, failed to learn that he was a sexual predator / pedophile, with proclivities to sexually assault minor girls.

24. Thus, at all times relevant hereto, as a Lieutenant in the Trucksville Fire, Defendant Ralston held a position of leadership and trust, and, as such, should have been looking out for the best interests of the members of the Fire Company and, in particular, the vulnerable members of the Junior Membership Program, including the Plaintiff, T.S. Instead, Ralston abused that position of trust and leadership, and used it for his own means to gain access to and

manipulate the minor Plaintiff, T.S. Defendant, Trucksville Fire, allowed and permitted an environment in the Fire Company that paved the way for Ralston to proceed as such.

25. Moreover, as a purported leader of a fire company that operated a junior membership program, Defendant Ralston had a mandatory obligation to report any known, or suspected instances of child abuse, including sexual assault. In this instance, however, Defendant Ralston would himself be the abuser.

26. In or around July 2016, the Defendant, Trucksville Fire, permitted the minor Plaintiff, T.S., to begin service as a junior firefighter in the company, despite the fact that they knew she was only 13 years of age and, thus, under their own policies, was ineligible to serve as a junior member.

27. By allowing the minor Plaintiff, T.S., to be associated with the fire company, the Defendant Ralston, who at the time that T.S. joined was 19 years of age, would have unfettered, unsupervised access to her.

28. T.S.'s mother relied on the Defendant, Trucksville Fire, to provide a safe environment, free from sexual predators / pedophiles. Nevertheless, the Defendant, Trucksville Fire, failed to in any way supervise the contact between T.S. and Defendant Ralston.

29. At all times relevant hereto, there existed within the Defendant, Trucksville Fire, a veritable “boys club” comprised of the younger, male members of the Company, including the Defendant Ralston. These younger members, in addition to sharing an interest in the fire service, had a shared interest in sexual conquests of young females. Disturbingly, these members, including the Defendant Ralston, derived worth, acceptance, and machismo from each other by sharing stories of their sexual conquests. The Defendant, Trucksville Fire, by and through its other volunteers and managing agents, knew or should have known of the existence of this toxic

environment within its Fire Company, at and around the same time when the Fire Company operated the Junior Membership Program, in which T.S. was permitted to participate.

30. From July of 2016 until early 2017, the Defendant Ralston, regularly saw T.S. and had unfettered one-on-one access to her as a result of T.S.'s participation in the Defendant, Trucksville Fire's Junior Membership program. Through this shared connection, the Defendant Ralston would routinely arrange for one-on-one encounters with T.S., and would routinely accompany her to her home when no one else was around. Defendant, Trucksville Fire, by and through its members, agents, employees and/or volunteers, knew, or should have known, of the development of this relationship between T.S. and Defendant Ralston, yet took no effort to investigate the propriety of same.

31. Additionally, and within this same aforesaid time period of July of 2016 until early 2017, the Defendant Ralston used his position in the fire company to abuse the relationship with T.S. and gain her acceptance and trust.

32. In doing so, Defendant Ralston obtained access for himself of T.S.'s personal cell phone, and surreptitiously entered his contact information into the "Snapchat" application in the phone. Snapchat is a photo-sharing application, that also contains a chat feature. Conveniently for Ralston, the photo-sharing and chat features of this application are set up in such a way that the photos and chat conversations eventually "disappear" from view, thus providing the seemingly perfect means of communication for sexual predators / pedophiles, such as Ralston. This provided a means of entre for Defendant Ralston to begin communicating with T.S.

33. Through Defendant Ralson's use of the Snapchat application, and its text messaging feature, he began to communicate with T.S. and groom her for what would be his ultimate goal: perpetrating sexual assault upon her. Using this application, Ralston would begin

a disturbing and disgusting course of conduct by initiating sexually explicit conversations with T.S., sending explicit pictures through the application to her, and encouraging her to send sexually explicit photographs to him.

34. Shortly after grooming T.S. through the conduct set forth above, Defendant Ralston began sexually assaulting her.

35. Defendant Ralston used his position of authority and power as an adult firefighter and, later as a Lieutenant in the company, to manipulate and force T.S. to engage in this sexual abuse.

36. The Defendant, Trucksville Fire, did not have any policies, procedures, or systems in place for supervising or prohibiting one-on-one contact by their senior members and officers, including Defendant Ralston, and the junior members.

37. Moreover, despite the fact that the Defendant, Trucksville Fire, through its more senior members, officers and other leadership personnel knew or had reason to know of the aforesaid “boys club” environment that had developed within their Fire Company, failed to take any action to correct same and/or to protect the vulnerable junior members of the Fire Company, including the Plaintiff herein, T.S.

38. Moreover, upon information and belief, at a period of time in early 2017 after the first sexual assault of Defendant Ralston upon the minor T.S., but before he perpetrated his final act of assault upon her, Defendant Trucksville Fire became aware that another younger male member of the fire company had perpetrated a similar sexual assault¹ upon another Junior female member of the fire company. Upon information and belief, Senior members of the fire

¹ It should be noted that Plaintiff's counsel learned of the potential second (2nd) sexual assault while investigating the civil matter on behalf of the minor, T.S. Upon learning of this other incident, undersigned counsel did make immediate notification to Child Line, along with the appropriate law enforcement officials.

company, including its Chief Officers and high-ranking Administrative Personnel, knew or had reason to know of this other sexual assault involving another younger member of the fire company, and another Junior female member of the fire company. Despite knowledge of this other incident, no fire company officials took any action whatsoever.

39. Despite the fact that the Defendant Trucksville Fire through its more Senior Members, Officers and other leadership Personnel knew or had reason to know of this other sexual assault, the fire company failed to notify Child Line, as would be their obligation as mandatory reporters, failed to contact law enforcement, and failed to take any action to suspend their Junior Membership Program, or otherwise take actions which could have potentially served to uncover the relationship which had developed between T.S. and Ralston, and potentially protect T.S. from further sexual assaults by Ralston.

40. As a direct and proximate result of the Defendants' recklessness, negligence and/or carelessness, T.S. sustained severe-and-permanent injuries, all and some of which are permanent, as well as other personal injuries and damages which are not currently manifested but which will arise in the future including, but not limited to:

- a. Psychological injuries;
- b. Nightmares;
- c. Post-traumatic stress disorder;
- d. Anxiety and depression;
- e. Diminished childhood;
- f. Emotional trauma;
- g. Past pain and suffering;
- h. Future pain and suffering;

- i. Past mental anguish;
- j. Future mental anguish;
- k. Past medical expenses;
- l. Future medical expenses;
- m. Past and future loss of earnings and earning capacity;
- n. Past and future loss of life's pleasures;
- o. Incidental and other expenses; and
- p. All past and future non-economic damages recoverable under Pennsylvania Rule of Civil Procedure No. 223.3, and such other ills and injuries set forth in medical records which will be set forth and more fully described as the lawsuit continues.

COUNT I: NEGLIGENCE

**PLAINTIFF, J.S., PARENT AND NATURAL GUARDIAN OF T.S., vs. TRUCKSVILLE
VOLUNTEER FIRE COMPANY**

41. The Plaintiff, J.S., Parent and Natural Guardian of T.S., hereby incorporates Paragraphs 1-40, inclusive, of this Complaint as though the same were herein set forth at length.

42. The recklessness, negligence, and/or carelessness of the Defendant, Trucksville Volunteer Fire Company, for the conduct of their actual or apparent agents, servants, volunteers, and/or employees consisted of the following:

- A. Failing to observe and supervise the relationship between T.S. and the Defendant Ralston;
- B. Failing to have policies and procedures in place to require ongoing supervision and observation of the relationship between T.S. and the Defendant Ralston;
- C. Failing to have policies and procedures to require supervision and observation of T.S. and the Defendant, Ralston;

- D. In allowing T.S. to participate in the junior membership program despite the fact that, by their own policy, she was too young and ineligible to do so;
- E. In failing to have policies and procedures prohibiting adult members of the Fire Company from engaging in one-on-one visits with junior members;
- F. In failing to be in contact with T.S.'s mother, J.S., about the relationship between T.S. and the Defendant Ralston;
- G. In failing to adequately check the Defendant Ralston's background;
- H. In allowing the Defendant Ralston to ascend to the position of Lieutenant without any investigation of his background, his proclivities of sexual predation, or assessment of his skills and abilities to hold such a position;
- I. In failing to have policies and procedures in place to screen potential members for the possibility of being sexual predators;
- J. In failing to use due care under the circumstances;
- K. In failing to exercise proper caution in the operation of its junior membership program;
- L. In failing to adequately supervise its junior membership program;
- M. In failing to have policies and procedures and/or adequate policies and procedures, in effect relative to its junior membership program;
- N. In allowing the Defendant Ralston to serve as Lieutenant despite the fact that he was a sexual predator;
- O. In failing to discover the toxic environment that existed within its Fire Company whereby younger members of the Fire Company were preying on junior members;
- P. In placing a sexual predator in a position of leadership within the Fire Company;
- Q. In turning a blind eye to the predatory behavior of younger members of the Fire Company;
- R. In allowing adult members of the fire company to prey on younger female members of their Junior Membership Program;

- S. In ignoring known or suspected instances of sexual abuse of the younger members of the fire company
- T. In bestowing a position of leadership on an individual, namely Defendant Ralston, who had no leadership abilities whatsoever and, to the contrary, was a sexual predator/abuser;
- U. In facilitating Defendant Ralston's ability to sexually prey/assault young girls by placing him in a position of authority/leadership in their fire company;
- V. In ignoring its own established policy of not permitting minors under the age of 14 to participate in its Junior Membership Program;
- W. In failing and/or ignoring its own policies and procedures relative to the Junior Membership Program; and
- X. In failing to act and/or ignoring other known instances of sexual abuse.

WHEREFORE, the Plaintiff J.S. on behalf of the minor Plaintiff T.S. demands judgment against the Defendant Trucksville Volunteer Fire Company in an amount in excess of the amount requiring compulsory arbitration and any other legal and equitable relief as the Court deems appropriate.

COUNT II: NEGLIGENT SUPERVISION

PLAINTIFF, J.S., PARENT AND NATURAL GUARDIAN OF T.S., vs. TRUCKSVILLE VOLUNTEER FIRE COMPANY

43. The Plaintiff, J.S., Parent and Natural Guardian of T.S., hereby incorporates Paragraphs 1-42, inclusive, of this Complaint as though the same were herein set forth at length.

44. The Defendant Trucksville Fire knew or should have known of the need to supervise its members in their relationships with the junior members.

45. The Defendant Trucksville Fire knew or should have known that the Junior Membership program provided adult members of the fire company with extensive opportunities for one-to-one contact with potentially vulnerable children.

46. The negligence and recklessness of the Defendant, Trucksville Fire, for the conduct of their agents, servants, volunteers and/or employees in the supervision of the Defendant Ralston consisted of the following:

- A. Failing to use due care in supervising the Defendant Ralston's relationship with T.S.;
- B. Failing to contact T.S.'s mother to regularly check on the status of the relationship, if any, between the Defendant Ralston and T.S.;
- C. Failing to personally meet with T.S.'s mother and/or the Defendant Ralston;
- D. Failing to remain apprised of the types of activities that the Defendant Ralston was doing with young T.S., including one-on-one contact, and off-fire company-premises, non-sanctioned, meetings and encounters;
- E. Failing to prohibit its officers, including the Defendant Ralston, from having one-on-one and off-premises contact with young, vulnerable junior members;
- F. In failing to supervise the Defendant Ralston's visits with T.S.;
- G. In failing to prohibit its leadership personnel, including the Defendant Ralston, who they placed in a position of Lieutenant, from having sexual relations with its junior members, including the minor Plaintiff herein, T.S.;
- H. In allowing its officers, including the Defendant Ralston, to prey on junior members of the Fire Company despite the fact that it knew or should have known that he was a sexual predator; and
- I. In permitting and/or failing to discover that its members, including the Defendant Ralston, were exploiting the power dynamic inherent in the relationship between junior members, including T.S., and adult members of the fire company.

WHEREFORE Plaintiff J.S. on behalf of the minor Plaintiff T.S. demands judgment against the Defendant, Trucksville Volunteer Fire Company, in an amount in excess of the amount requiring compulsory arbitration and any other legal and equitable relief as the Court deems appropriate.

COUNT III: NEGLIGENT HIRING AND RETENTION

**PLAINTIFF, J.S., PARENT AND NATURAL GUARDIAN OF T.S., vs. TRUCKSVILLE
VOLUNTEER FIRE COMPANY**

47. The Plaintiff, J.S., Parent and Natural Guardian of T.S., hereby incorporates Paragraphs 1-46, inclusive, of this Complaint as though the same were herein set forth at length.

48. The Defendant, Trucksville Fire, knew or should have known at the establishment of the Junior Membership program, and T.S.'s involvement in the same, that T.S. and the other youths involved in the program were vulnerable to abuse.

49. The Defendant Trucksville Fire knew or should have known that, the presence of youths in or around the fire company and at fire company activities, would make involvement in the junior membership program enticing to pedophiles, and others seeking to abuse and exploit children.

50. The Defendant Trucksville Fire, owed a duty to exercise reasonable care in the selection and retention of its members and, in particular, its officers such as Defendant Ralston and, specifically, a duty to be on high lookout for possible pedophiles, and others seeking to abuse and exploit children.

51. The Defendant, Trucksville Fire, failed to exercise reasonable care in the selection of and retention of Defendant Ralston as a member and as a Lieutenant in their fire company by, among other things, the following:

- A. Failing to conduct a thorough background check of Defendant Ralston;
- B. Failing to contact appropriate references for the Defendant Ralston;
- C. Failing to contact parents of the children involved in the Junior Membership program to check on the status of their children's involvement;

- D. Failing to contact the children in the Junior Membership program to check on their status;
- E. Failing to conduct a thorough interview with the Defendant Ralston about his plans for his Lieutenant position;
- F. Failing to investigate whether Defendant Ralston had a sexual interest in young girls;
- G. Failing to use due care in the selection of the Defendant Ralston as a member and as a Lieutenant in the fire company;
- H. Failing to use due care in the retention of Defendant Ralston as a member and as a Lieutenant in the fire company;

WHEREFORE, Plaintiff J.S. on behalf of the minor Plaintiff T.S. demands judgment against the Defendant, Trucksville Volunteer Fire Company, in an amount in excess of the amount requiring compulsory arbitration and any other legal and equitable relief as the Court deems appropriate.

COUNT IV - BATTERY

PLAINTIFF, J.S., PARENT AND NATURAL GUARDIAN OF T.S. vs. JOSHUA JAMES RALSTON

52. The Plaintiff, J.S., Parent and Natural Guardian of T.S., hereby incorporate Paragraphs 1-51, inclusive, of this Complaint as though the same were herein set forth at length.

53. At all times relevant hereto the Defendant Ralston used his authority and power over a young T.S. to engage in sexual contact and sexual touching while knowing that she was vulnerable to this type of abuse due to the exploitation of the power dynamic inherent between an adult member and/or Lieutenant in the fire company, and a young junior member.

54. As a result of the Defendant's power and authority over T.S., specifically, the power imbalance inherent in the adult member and/or Lieutenant and junior member relationship, T.S. was not able and could not resist Defendant Ralston's sexual abuse.

55. T.S. was, at all relevant times, during the course of Defendant Ralston's abuse too young to consent to his sexual touching of her.

WHEREFORE, Plaintiff J.S. on behalf of the minor Plaintiff T.S. demands judgment against the Defendant Joshua James Ralston in an amount in excess of the amount requiring compulsory arbitration and any other legal and equitable relief as the Court deems appropriate.

COUNT V – NEGLIGENCE *PER SE*

PLAINTIFF, J.S., PARENT AND NATURAL GUARDIAN OF T.S., vs. JOSHUA JAMES RALSON

56. The Plaintiff, J.S., Parent and Natural Guardian of T.S., hereby incorporate Paragraphs 1-55, inclusive, of this Complaint as though the same were herein set forth at length.

57. Defendant Ralston in his role as adult member and/or lieutenant at the Defendant Trucksville Fire Company committed negligence *per se* by committing Statutory Sexual Assault (2 counts), in violation of Chapter 31, Title 18, Section 3122.1 of the Criminal Code of the Commonwealth of Pennsylvania, which was designed to protect someone in the position of T.S. and which sets forth the duty of care for people in the position of Defendant Ralston.

WHEREFORE Plaintiff J.S. on behalf of the minor Plaintiff T.S. demands judgment against the Defendant Joshua James Ralton, in an amount in excess of the amount requiring compulsory arbitration and any other legal and equitable relief as the Court deems appropriate

COUNT VI –VICARIOUS LIABILITY

PLAINTIFF, J.S., PARENT AND NATURAL GUARDIAN OF T.S., vs. TRUCKSVILLE VOLUNTEER FIRE COMPANY

58. The Plaintiff, J.S., Parent and Natural Guardian of T.S., hereby incorporate Paragraphs 1-57, inclusive, of this Complaint as though the same were herein set forth at length.

59. The Defendant, Trucksville Fire, as the operator of the aforesaid Junior Membership Program, was responsible for providing T.S. with a safe environment while she participated in the Junior Membership Program. The Defendant, Trucksville Fire, owed T.S. a non-delegable duty to provide for her safety and well-being.

60. The Defendant, Trucksville Fire, by and through the actions of their volunteer/agent, the Defendant Ralston, who groomed, molested and sexually assaulted T.S., failed to meet their non-delegable duty to provide for T.S.'s safety.

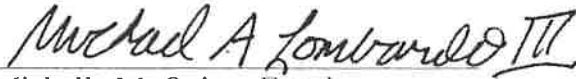
61. At all times relevant hereto, Defendant Ralston was a volunteer/agent of the Defendant Trucksville Fire when he groomed, molested, and sexually assaulted T.S.

62. Ralston's position in the Defendant Trucksville Fire provided him access to T.S. Further, Ralston's position provided him with an opportunity to groom and, ultimately, molest and sexually assault T.S. Ralston utilized his position in the fire company to gain access to T.S. and utilized his position as Lieutenant to ultimately seclude and sexually assault her.

63. The Defendant Trucksville Fire is vicariously liable for the actions of Ralston, as stated herein, because their conduct violated a non-delegable duty that the Defendants owed to T.S. and Ralston used his position and authority at Trucksville Fire to sexually assault T.S.

WHEREFORE Plaintiff J.S. on behalf of the minor Plaintiff T.S. demands judgment against the Defendant Trucksville Volunteer Fire Company, in an amount in excess of the amount requiring compulsory arbitration and any other legal and equitable relief as the Court deems appropriate

HOURIGAN, KLUGER & QUINN, P.C.

By: 
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