

IN THE CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE

JOHN DOE,

Plaintiff,

v.

CATHOLIC DIOCESE OF KNOXVILLE,
et al.,

Defendants.

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Case No. C-22-014622
Jury Demand

FILED
D. SUSANO III
CHARLES D. SUSANO
CLERK
2022 MAY -2 PM 4:24
KNOX COUNTY CIRCUIT
CIVIL SESSIONS
AND JUVENILE COURTS

MOTION TO STRIKE

Defendants Catholic Diocese of Knoxville and Richard F. Stika (“Defendants”), by and through counsel, pursuant to Tenn. R. Civ. P. 12.06, submit this Motion to Strike (“Motion”) certain allegations that are contrary to the rules of pleading as set forth in Plaintiff’s Complaint because they are inappropriately redundant, immaterial, impertinent and/or scandalous. The allegations at issue, and the legal grounds for each, are specifically set forth and addressed in Defendants’ concurrently filed Memorandum of Law in support of this Motion.¹

As set forth more fully therein, Defendants’ Motion should be granted because the improper and offensive material and allegations Defendants seek to have stricken from Plaintiff’s Complaint serve no legitimate purpose to achieve a better understanding of Plaintiff’s claim for relief or to perform any other useful purpose in promoting the just and efficient disposition of this litigation. Rather, these allegations seek only to confuse the issues before the Court, and the jury,

¹ The allegations Defendants request stricken are contained in Paragraphs 22, 23, 24, 61, 63, 64, 68, 70, 71, 72, 90, 97, 126, 148, 149, 150, 152, 153, 154, 155, 156 157, 158 and 163.

by an unnecessarily lengthy and verbose narrative that focuses not on the factual allegations pertinent to the causes of action asserted, but rather attempts to improperly sensationalize and denigrate the character and nature of the Defendants in the most unfavorable and immoral light possible. It is for these reasons that Defendants request that this Court exercise its discretionary authority under Tenn. R. Civ. P. 12.06 to strike these matters from Plaintiff's Complaint.

Dated: May 2, 2022.

RESPECTFULLY SUBMITTED:

BY: 

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NOTICE OF HEARING

This Motion is expected to be heard on July 29, 2022 at 9am in Knox County Circuit Court. If no response is timely filed and personally served, the Motion shall be granted and counsel or pro se litigant need not appear in Court at the time and date scheduled for the hearing.

CERTIFICATE OF SERVICE

I certify that on May 2, 2022, a true and correct copy of the foregoing document was furnished to the following via U.S. and/or Electronic Mail:

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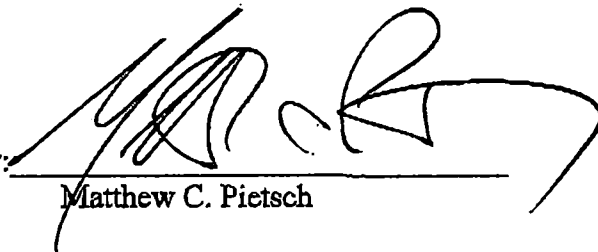
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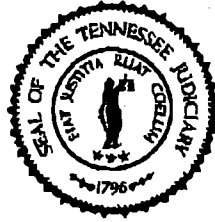
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**TENNESSEE COURTS
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