

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

02-74164

MARILYN D. McGEE,

Case No.

GEORGE CARAM STEEH

Plaintiff,

Hon.

MAGISTRATE JUDGE KOMIVES

-v-

SCHOOLCRAFT COMMUNITY
COLLEGE, CAROL M. STROM,
MARY BREEN, BRIAN D. BRODERIC,
RICHARD J. DeVRIES, PATRICIA
WATSON, STEPHEN C. RAGAN,
GREGORY J. STEMPIEN, RICHARD W. McDOWELL,
JOHN B. TOMEY, LOUIS A. REIBLING,
SHARON A. BRAUN, CHERYL D. HAWKINS,
ROBERT F. PEARCE, NANCY M. VANDEWIELE-
MILLIGAN, KIMBERLY SHERWOOD, GLACIER HILLS
NURSING CENTER, LINNA ATKINS, RAINBOW
REHABILITATION CENTER and THERESE MENSAH,
jointly and severally,

Defendants.

Attorney James S. Banks (P10406), Attorney for the Plaintiff.
1575 E. Lafayette, Ste. 212
Detroit, Michigan 48207
(313) 393-2670

U.S. DIST. COURT
EASTERN DISTRICT OF MICHIGAN
DETROIT, MICHIGAN
2002 OCT 18 P 2 50
FILED

INTRODUCTION

This is an action for violations of the First and Fourteenth Amendments of the Constitution of the United States, violation of 42 U.S.C. § 1983, violation of The Ku Klux Klan Act ~ 42 U.S.C. § 1985(3), and the common law torts of injurious falsehood and misrepresentation, defamation, invasion of privacy (false light), misfeasance (breach of duty), nonfeasance (breach of duty), interference with prospective economic advantage, infliction of severe emotional distress, civil conspiracy, and breach of contract.

COMPLAINT AND JURY DEMAND

There is no civil action between these parties arising out of the same transaction or occurrence as alleged in the complaint pending in this Court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a judge, nor do I know of any other civil action not between these parties, arising out of the same transaction or occurrence as alleged in this complaint that is either pending or was previously filed and dismissed, transferred, or otherwise disposed of after having been assigned to a judge in this Court.

NOW COMES Plaintiff Marilyn D. McGee, by and through her attorney, James S. Banks, stating for her Complaint as follows:

Parties

1. That Defendant Schoolcraft Community College is a public body established under the Constitution and laws of the State of Michigan. Its main office and campus is located at 18600 Haggerty Road, Livonia, Michigan 48152.
2. That Defendant Carol M. Strom (hereinafter "The Board") was a publicly elected officer of the State of Michigan and is being named individually and in her official capacity as Chairperson of the Board of Trustees of Schoolcraft Community College during the period of 1996 through 1999. On information and belief, The Board has offices at 18600 Haggerty Road, Livonia, Michigan 48152.
3. That Defendant Mary Breen (hereinafter "The Board") was a publicly elected officer of the State of Michigan and is being named individually and in her official capacity as Vice Chairperson of the Board of Trustees of Schoolcraft Community College during the period of 1996 through 1999.
4. That Defendant Brian D. Broderic (hereinafter "The Board") was a publicly elected officer of the State of Michigan and is being named individually and in his official capacity as Secretary of the Board of Trustees of Schoolcraft Community College during the period of 1996 through 1999.
5. That Defendant Richard J. DeVries (Hereinafter "The Board") was a publicly elected officer of the State of Michigan and is being named individually and in his official capacity as of Treasurer the Board of Trustees of Schoolcraft Community College during the period of 1996 through 1999.
6. That Defendant Patricia Watson (hereinafter "The Board") was a publicly elected officer of the State of Michigan and is being named individually and in her official capacity as a member of the Board of Trustees of Schoolcraft Community College during the period of 1996 through 1999.
7. That Defendant Stephen C. Ragan (hereinafter "The Board") was a publicly elected officer of the State of Michigan and is being named individually and in his official capacity as a member of the Board of Trustees of Schoolcraft Community College during the period of 1996 through 1999.
8. That Defendant Gregory J. Stempien (hereinafter "The Board") was a publicly elected officer of the State of Michigan and is being named individually and in his official capacity as a member of the Board of Trustees of Schoolcraft Community College during the period of 1996 through 1999.
9. That Defendant Richard W. McDowell (hereinafter "McDowell") was an employee of a public body of the State of Michigan and is being named individually and in his official capacity as President of Schoolcraft Community College during the period of 1996 through 1999. On information and belief, McDowell has offices at 18600 Haggerty Road, Livonia, Michigan 48152.
10. That Defendant John B. Tomey (hereinafter "Tomey") was an employee of a public body of the State of Michigan and is being named individually and in his official capacity as Dean of Student Services of Schoolcraft Community College during the period of 1996 through 1999. On information and belief Tomey has offices at 18600 Haggerty Road, Livonia, Michigan 48152.

11. That Defendant Louis A. Reibling (hereinafter "Reibling") was an employee of a public body of the State of Michigan and is being named individually and in his official capacity as Dean of Instruction of Schoolcraft Community College during the period of 1996 through 1999. On information and belief Reibling has offices at 18600 Haggerty Road, Livonia, Michigan 48152.

12. That Defendant Sharon A. Braun (hereinafter "Braun") was an employee of a public body of the State of Michigan and is being named individually and in her official capacity as Director of College Centers at Schoolcraft Community College during the period of 1999. On information and belief Braun has offices at 1751 Radcliff Street, Garden City, Michigan 48135.

13. That Defendant Cheryl D. Hawkins (hereinafter "Hawkins") was an employee of a public body of the state of Michigan and is being named individually and in her official capacity as Certified Occupational Therapy Program Coordinator at Schoolcraft College during the period of September, 1998 through 1999. On information and belief Hawkins has offices at 1751 Radcliff Street, Garden City, Michigan 48135.

14. That Defendant Robert F. Pearce (hereinafter "Pearce") was an employee of a public body of the State of Michigan and is being named individually and in his official capacity as Associate Director of College Centers at Schoolcraft Community College during the period of 1997 through 1999. On information and belief Pearce has offices at 1751 Radcliff Street, Garden City, Michigan 48135.

15. That Defendant Nancy M. Vandewiele-Milligan (hereinafter "Vandewiele-Milligan") was an employee of a public body of the State of Michigan and is being named individually and in her official capacity as Certified Occupational Therapy Assistant Program Director at Schoolcraft Community College during the period of 1996 through September, 1998. On information and belief, Vandewiele-Milligan had offices at 1751 Radcliff Street, Garden City, Michigan 48135.

16. That Defendant Kimberly Sherwood (hereinafter "Sherwood") was an employee of Schoolcraft Community College, a public body of the State of Michigan, and is being named individually and in her official capacity as former clinical fieldwork "mentor" to the Plaintiff at Rainbow Rehabilitation Center clinical fieldwork assignment during the fall semester of 1997. On information and belief, Sherwood resides at 2448 Yost Blvd., Ann Arbor, Michigan.

17. That Defendant Glacier Hills Nursing Center (hereinafter "Glacier Hills") was a Certified Occupational Therapy Clinic that, on information and belief, was acting under contract as a clinical training facility for Schoolcraft Community College, a public body of the State of Michigan, during the period of 1996 through 1999 and is located at 1200 Earhart Road, Ann Arbor, Michigan 48105.

18. That Defendant Linna Atkins (hereinafter "Atkins") was an employee of a Michigan corporation that, on information and belief, was acting under contract as a clinical training facility for Schoolcraft College, a public body of the State of Michigan, during the period of 1996 through 1999 and is being named individually and in her official capacity as Director of Occupational Therapy at Glacier Hills Nursing Center during the period of 1996 through 1999. On information and belief, Atkins offices at 1200 Earhart Road, Ann Arbor, Michigan 48105.

19. That Defendant Rainbow Rehabilitation Center is a Certified Occupational Therapy Clinic that, on information and belief, was acting under contract as a clinical training facility for Schoolcraft College, a public body of the State of Michigan, during the period of 1996 through 1999 and is located at 5570 Whittaker Road, Ypsilanti, Michigan 48197.

20. That Defendant Therese Mensah (hereinafter "Mensah") was an employee of a Michigan corporation that, on information and belief, was acting under contract as a clinical training facility for Schoolcraft Community College, a public body of the State of Michigan, and is being named individually and in her official capacity as Clinical Instructor to the Plaintiff during her