

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ALIVIA SHERMAN, a minor by and through  
CARA SHERMAN, her parent and natural  
guardian, ADIAH SILER, a minor by and  
through MARY MCCAULEY SILER, her  
parent and natural guardian, individually and on  
behalf of all other similarly situated individuals,

Plaintiffs,

v.

THE UNITED STATES SOCCER  
FEDERATION, INC. and US YOUTH  
SOCCER ASSOCIATION, INC.,

Defendants.

Civil Action No. 2:18-CV-709

**JURY TRIAL DEMANDED**

**ELECTRONICALLY FILED**

**CLASS ACTION COMPLAINT**

Plaintiffs Alivia Sherman, a minor, by and through Cara Sherman, her parent and natural Guardian, and Adiah Siler, a minor, by and through Mary McCauley Siler, her parent and natural Guardian, individually and on behalf of all other similarly situated individuals, by and through their undersigned counsel allege and state the following in support of their claims against Defendants The United States Soccer Federation, Inc. and US Youth Soccer Association, Inc.

**PRELIMINARY STATEMENT**

1. This is a class action brought by the Representative Plaintiffs as a result of the failure of the Defendants, as herein referenced, to protect the Representative Plaintiffs and all of the other similarly situated individuals and members of the Class, and/or reduce the

number of soccer-induced concussion injuries resulting from Defendants' failure to mandate necessary and proper headgear as a compulsory item of players' equipment.

**PARTIES**

2. Representative Plaintiff Alivia Sherman is a minor female and resident of the Commonwealth of Pennsylvania who currently participates in youth soccer throughout the Mid-Atlantic Region of the United States of America.

3. Representative Plaintiff Cara Sherman is the parent and natural guardian of Alivia Sherman and is an adult citizen of the Commonwealth of Pennsylvania.

4. Alivia Sherman has suffered soccer-induced concussions during play and is at increased risk, particularly as a minor, of latent brain injuries caused by repeated head impacts or the accumulation of sub-concussive hits in her soccer career.

5. Representative Plaintiff Adiah Siler is a minor female and resident of the Commonwealth of Pennsylvania who currently participates in youth soccer throughout the Mid-Atlantic Region of the United States of America.

6. Representative Plaintiff Mary McCauley Siler is the parent and natural guardian of Adiah Siler and is an adult citizen of the Commonwealth of Pennsylvania.

7. Adiah Siler has suffered soccer-induced concussions during play and is at increased risk, particular as a minor, of latent brain injuries caused by repeated head impacts or the accumulation of sub-concussive hits in her soccer career.

8. Defendant United States Soccer Federation, Inc ("USSF" or "U.S. Soccer") is the governing body of soccer in all forms in the United States.

9. USSF has its principal place of business in Chicago, Illinois at the "U.S. Soccer House," 1801 South Prairie Avenue, Chicago, Illinois.

## **JURISDICTION**

10. USSF is subject to specific and general personal jurisdiction in the Western District of Pennsylvania; as described herein, USSF exerts tremendous authority over all aspects of soccer throughout the United States and regulates American soccer.

11. Moreover, USSF has consistently staged and promoted soccer events in this District.

12. Defendant U.S. Youth Soccer Association, Inc. (“USAYSA”) identifies itself as the largest member of the USSF and its national office is located at 9220 World Cup Way, Frisco, Texas 75033.

13. USAYSA is subject to specific and general jurisdiction in the Western District of Pennsylvania; USAYSA conducts tournaments throughout this district and it maintains numerous member clubs throughout the Commonwealth of Pennsylvania; each club is in turn is composed of numerous teams; USAYSA recognizes the vast number of Pennsylvania soccer players under its control, stating that “US Youth Soccer is made up of 55 member State Associations; one in each state, and two in California, New York, Ohio, Pennsylvania and Texas.”

14. This Court has subject matter jurisdiction over this case under 28 U.S.C. § 1332(d)(2) because (i) the aggregate value of the amount in controversy exceeds the sum or value of \$5,000,000.00, (ii) there is minimal diversity of citizenship between Plaintiffs and Defendants, and (iii) the Class consists of more than 100 members.

15. This Court has personal jurisdiction over Defendants because they intentionally avail themselves of the rights and privileges of conducting business in the Commonwealth of Pennsylvania, have continuous and systematic contacts with the Commonwealth of

Pennsylvania, and the injuries giving rise to the claims herein occurred in the Commonwealth of Pennsylvania.

16. Venue is proper in this district pursuant to 28 U.S.C. § 1391 as the events and conduct giving rise to the claims occurred in this District, and because Defendants: (i) are authorized to conduct business in this District and have intentionally availed themselves of the laws and markets within this District through the promotion, marketing, distribution, and sale of their programs and services in this District, (ii) do considerable business in this District, and (iii) are subject to personal jurisdiction in this District.

#### **FACTUAL BACKGROUND**

17. Over 24 million Americans play soccer and over 1.7 million females are registered with U.S. Soccer.

18. As the number of soccer players continues to increase, the risk of serious injuries from concussions and repetitive head injuries has become increasingly recognized.

19. Despite this, Defendants have failed to adopt and enforce Laws of the Game that would reduce the risk of preventable injuries resulting from concussions and repetitive head injuries.

20. Defendants have failed to mandate and enforce the use of protective headgear for youth girl soccer players to prevent and/or reduce concussive symptoms and/or injuries.

21. There is substantial evidence that young people may be more susceptible to damage resulting from repetitive concussive and sub-concussive brain trauma.

22. In younger children, the long-term effects of brain trauma can become apparent years after injury, as normal developmental milestones are disrupted.

23. Players who do *not* wear protective soccer headgear are 2.65 times more likely to suffer a concussion than those who do.

24. USSF and USAYSA have adopted “Laws of the Game” that set forth compulsory equipment for players as: a shirt with sleeves, shorts, socks, shinguards, and footwear.

25. Protective headgear is permitted, so long as the headgear is of a certain color, appearance and material, and is not dangerous to other players. Such headgear, however, is not required.

### **CLASS ACTION ALLEGATIONS**

26. Plaintiffs bring this action pursuant to Federal Rule of Civil Procedure Rule 23(b)(3) on behalf of themselves and a Class defined as follows:

**Class:** All current or former female youth soccer players at any time who competed for a team relying on rules promulgated by Defendants.

27. Certification of Plaintiffs’ claims for class-wide treatment is appropriate because Plaintiffs can prove the elements of their claims on a class-wide basis using the same evidence as would be used to prove those elements in individual actions alleging the same claims.

28. **Numerosity:** The members of the Class are so numerous that individual joinder of all members of the Class is impracticable; the exact number of the members of the Class is unknown and not available to Plaintiffs at this time, but it is clear that individual joinder is impracticable.

- a. On information and belief, thousands of female youth soccer players fall into the definition of the Class and Members of the Class can be identified through Defendants’ records.

- b. Members of the Class may be notified of the pendency of this action by recognized and approved notice dissemination methods, which may include United States mail, electronic mail, Internet postings, and/or published notice.

29. **Commonality and Predominance:** There are several questions of law and fact common to the claims of Plaintiffs and the Class, and those questions predominate over any questions that may affect individual members. Common questions for the Class include, but are not limited to the following:

- a. Whether Defendants engaged in the conduct as alleged herein;
- b. Whether Defendants owed a duty to Plaintiffs and the Class;
- c. Whether Defendants breached that duty;
- d. Whether Defendants failed to mandate protective headgear;
- e. Whether Plaintiffs and members of the Class are at increased risk of injury as a result of Defendants' breach; and
- f. Whether Plaintiffs and the Class are entitled to equitable relief, including, but not limited to, medical monitoring and other injunctive relief.

30. **Typicality:** Plaintiffs' claims are typical of the claims of other members of the Class, as Plaintiff and other members sustained damages arising out of the wrongful conduct of Defendants based upon the same negligent conduct.

31. **Adequacy of Representation:** Plaintiffs are adequate representatives of the Class because their interests do not conflict with the interests of the members of the Class they seek to represent and they will fairly and adequately protect the interests of the Class; Plaintiffs have retained counsel competent and experienced in complex litigation and class

action matters. Plaintiffs intend to prosecute this action vigorously and the interests of the Class will be fairly and adequately protected by Plaintiffs and their counsel.

32. **Predominance and Superiority:** Class proceedings are superior to all other available methods for the fair and efficient adjudication of this controversy, as joinder of all members is impracticable.

- a. The damages suffered by the individual members of the Class may be relatively small in comparison to the burden and expense of individual prosecution of the complex litigation necessitated by Defendants' actions.
- b. It would be virtually impossible for the members of the Class to obtain effective relief from Defendants' misconduct on an individual basis. Even if members of the Class themselves could sustain such individual litigation, it would not be preferable to a class action, because individual litigation would increase the delay and expense to all parties due to the complex legal and factual controversies presented in this Complaint.
- c. By contrast, a class action presents far fewer management difficulties and provides the benefits of single adjudication, economy of scale, and comprehensive supervision by a single court.
- d. Economies of time, effort, and expense will be fostered and uniformity of decisions will be ensured.
- e. The costs of medical monitoring to be incurred by Plaintiffs and members of the Class are relatively small compared to the burden and expense that would be required to individually litigate their claims against Defendants, so it would

be impracticable for members of the Class to individually seek redress for Defendants' wrongful conduct.

- f. Even if members of the Class could afford individual litigation, the court system could not.
- g. Individualized litigation creates a potential for inconsistent or contradictory judgments, and increases the delay and expense to all parties and the court system.
- h. By contrast, the class action device presents far fewer management difficulties, and provides the benefits of single adjudication, economy of scale, and comprehensive supervision by a single court.

**COUNT I – NEGLIGENCE**

33. Plaintiffs hereby incorporate the above paragraphs as though set forth fully within.

34. At all relevant times, each Defendant had a duty toward Plaintiffs and the Class to supervise, regulate, monitor, and provide reasonable and appropriate rules to minimize the risk of injury to the players.

35. Defendants knew or should have known that their actions or inaction in light of the rate and extent of concussions reported and made known to Defendants would cause harm to players in both the short- and long-term.

36. Defendants breached the duty of due care they owed to Plaintiffs and the Class, both generally and in the following particular respects:

- a. In failing to educate players and their parents concerning concussion safety and prevention;



- b. In failing to educate players and parents about equipment known to reduce concussive symptoms and/or injuries;
- c. In failing to require players wear headgear as to reduce concussive symptoms and/or injuries;
- d. In failing to warn players and parents of the unreasonable risk of not wearing headgear;
- e. In failing to rely upon up-to-date research regarding concussion risk and prevention;
- f. In discouraging the use of headgear for the purpose of preventing concussive symptoms and/or injuries;
- g. In failing to properly research concussion prevention when Defendants knew or should have known concussion research is constantly progressing;
- h. In failing to promulgate rules and regulations to adequately address the dangers of repeated concussions and accumulation of subconcussive hits, as to reduce short- and long-term injuries;
- i. In concealing and misrepresenting pertinent facts concerning concussion prevention equipment;
- j. In failing to adopt rules and reasonably enforce those rules to minimize the risk of players suffering debilitating concussions; and
- k. Other acts of negligence or carelessness that may materialize during the pendency of this action.

37. It was reasonable and foreseeable to Defendants that their failures would flow downstream to the Rules and Laws of the Game enacted by other organizations.

38. Plaintiffs and the Class relied upon the guidance, expertise, and instruction of Defendants in understanding risks associated with the serious and life-altering medical issue of concussive and sub-concussive risk in soccer.

39. At all times, Defendants had superior knowledge of material information regarding the effect of repeated traumatic head injuries and available equipment to reduce those injuries, but refused or otherwise failed to mandate the equipment as compulsory equipment.

40. At all times pertinent hereto, Defendants knew or should have known that discouraging protective headgear use would hinder players from wearing protective headgear, despite the undeniable medical benefits of such use.

41. At all times pertinent hereto, Defendants failed to recognize the nation-wide initiative to inform and educate league members about concussion prevention.

42. The Plaintiffs individually and the Class members play soccer and are at risk due to Defendants' breaches.

43. As a result of the foregoing, the Plaintiffs and the Class have an improper risk of injury caused by the misconduct of the Defendants.

44. Moreover, Plaintiffs have no adequate remedy at law in that monetary damages cannot fully compensate them for the risk of long-term physical and economic losses due to concussions and sub-concussive injuries resulting from Defendants' failure to mandate necessary protective headgear.

45. Instead, Plaintiffs are in need of medical monitoring as a remedy for Defendants' negligence where permitted under state law.

**COUNT II – BREACH OF VOLUNTARY UNDERTAKING**

46. At all relevant times, each Defendant voluntarily assumed a duty toward Plaintiffs and the Class to supervise, regulate, monitor, and provide reasonable and appropriate rules to minimize the risk of injury to the players.

47. Defendants acted carelessly and negligently in fulfilling their assumed duties as the regulatory bodies for soccer and soccer players, including Plaintiffs and the Class.

48. In addition, Defendants knew or should have known that their action or inaction in light of the rate and extent of concussions reported and made known to Defendants would cause harm to players in both the short- and long-term.

49. Defendants knew that through the reach of the Laws of the Game they had the power to direct and influence how the greater community treats concussion management issues and by publication of the Laws of the Game assumed a duty to protect Plaintiffs and the Class.

50. Defendants had an independent assumed and voluntary duty to enact and enforce Laws of the Game that properly protect players.

51. Defendants were careless and negligent by breaching their assumed and voluntary duty of due care for the benefit of the Plaintiffs and the Class, both generally and in the following particular respects as set forth above and summarized below:

- a. In failing to educate players and their parents concerning concussion safety and prevention;
- b. In failing to educate players and parents about equipment known to reduce concussive symptoms and/or injuries;

- c. In failing to require players wear headgear as to reduce concussive symptoms and/or injuries;
- d. In failing to warn players and parents of the unreasonable risk of not wearing headgear;
- e. In failing to rely upon up-to-date research regarding concussion risk and prevention;
- f. In discouraging the use of headgear for the purpose of preventing concussive symptoms and/or injuries;
- g. In failing to properly research concussion prevention when Defendants knew or should have known concussion research is constantly progressing;
- h. In failing to promulgate rules and regulations to adequately address the dangers of repeated concussions and accumulation of subconcussive hits, as to reduce short- and long-term injuries;
- i. In concealing and misrepresenting pertinent facts concerning concussion prevention equipment;
- j. In failing to adopt rules and reasonably enforce those rules to minimize the risk of players suffering debilitating concussions; and
- k. Other acts of negligence or carelessness that may materialize during the pendency of this action.

52. It was reasonable and foreseeable to Defendants that their failures would flow downstream to the Rules and Laws of the Game enacted by other organizations.

53. Plaintiffs individually and the Class members play soccer and are at risk due to Defendants' breaches.

54. As a result of the foregoing, the Plaintiffs and the Class have an improper risk of injury caused by the misconduct of the Defendants.

55. Moreover, Plaintiffs have no adequate remedy at law in that monetary damages cannot fully compensate them for the risk of long-term physical and economic losses due to concussions and sub-concussive injuries. Instead, Plaintiffs are in need of medical monitoring as a remedy for Defendants' negligence where permitted under state law.

### **COUNT III – FRAUDULENT CONCEALMENT**

56. Plaintiffs on behalf of themselves and the proposed class, repeats and realleges all preceding paragraphs as if fully set forth herein.

57. Defendants have known that concussions, sub-concussive hits, and repeated blows to the head can cause neurological injury.

58. Scientific and medical studies have shown the existence of TBI as a result of contact sports as far back as the 1920s in boxing.

59. Increased technology and medical advances since that date have added to the composite of neuroscience research regarding concussions.

60. Defendants passively issued guidelines about the existence of concussions but underplayed the dangers of neurological injury.

61. On information and belief, through a concealment of these material facts, Defendants created a false belief held by the Plaintiff that: a) concussions and sub-concussive hits were not as dangerous as they actually are; and b) they would be cared for in the event of the injury out of the duty that the Defendants had to the Plaintiff.

62. Further, Defendants had a duty to warn their members about the dangers of concussions and the equipment available to prevent concussion injuries.

63. Defendants failed in this duty and/or falsely represented the effects of neurological injury and the impact it could play in the future lives of players.

64. On information and belief, Defendants failed in this duty and/or falsely represented the effects of protective headgear in substantially reducing concussions and concussion symptoms in Plaintiffs and the Class.

65. On information and belief, this concealment of material facts directly led to Plaintiffs' exposure to danger after suffering a concussion.

66. These material facts on concussion research could have prevented many players from suffering soccer-induced concussions.

67. Defendants' knowledge, concealment of that knowledge and/or intentional blindness, and ineffectual efforts to promote a culture of player-safety all contributed to the injuries sustained by Plaintiffs and putative Class.

68. Plaintiffs, individually and on behalf of the Class, seek actual damages for Defendants' fraudulent concealment, as well as interest, reasonable attorneys' fees, expenses, and costs.

### **REQUEST FOR RELIEF**

69. WHEREFORE, Plaintiffs individually and on behalf of the Class, request that the Court enter an Order providing for the following relief:

- a. Certify this case as a class action on behalf of the Class defined above, appoint Plaintiffs as Class Representative, and appoint their counsel as Class Counsel;

- b. Declare that Defendants' actions, as set out above, constitute negligence and fraudulent concealment;
- c. Award all economic, monetary, actual, consequential, compensatory, and punitive damages caused by Defendants' conduct, including without limitation damages for past, present, and future medical expenses, and other out of pocket expenses;
- d. Award Plaintiff and the Class their reasonable litigation expenses and attorneys' fees;
- e. Award Plaintiff and the Class pre- and post-judgment interest, to the extent allowable;
- f. Enter injunctive and/or declaratory relief as is necessary to protect the interests of Plaintiffs and the Class; and
- g. Award such other and further relief as equity and justice may require.

Respectfully submitted,

J. MURPHY FIRM

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*Counsel for Plaintiffs*



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 ALIVIA SHERMAN, a minor by and through CARA SHERMAN, her parent and natural guardian, individually and on behalf of all other similarly situated individuals, ADIAH SILER, a minor by and through MARY MCCAULEY SILER, her parent and natural guardian, individually and on behalf of all other similarly situated individuals, (b) County of Residence of First Listed Plaintiff Lackawanna (EXCEPT IN U.S. PLAINTIFF CASES) (c) Attorneys (Firm Name, Address, and Telephone Number) Matthew T. Logue, Esquire Quinn Logue, LLC 200 First Ave. Third Floor Pittsburgh, PA 15222 (412) 765-3800 Joseph P. Murphy The J. Murphy Firm 310 Grant St. Suite 3309 Pittsburgh, PA 15219 (412) 521-2000 Scott Michael Hare 437 Grant St., Suite 1806 Pittsburgh, PA 15219 (412) 338-8632

DEFENDANTS UNITED STATES SOCCER FEDERATION, and UNITED STATES OF AMERICA YOUTH SOCCER ASSOCIATION, INC. County of Residence of First Listed Defendant Cook (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) (For Diversity Cases Only) PTF DEF Citizen of This State X 1 1 Incorporated or Principal Place of Business In This State Citizen of Another State 2 2 Incorporated and Principal Place of Business In Another State Citizen or Subject of a Foreign Country 3 3 Foreign Nation 4 4 5 5 6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only) CONTRACT 110 Insurance 120 Marine 130 Miller Act 140 Negotiable Instrument 150 Recovery of Overpayment & Enforcement of Judgment 151 Medicare Act 152 Recovery of Defaulted Student Loans (Excludes Veterans) 153 Recovery of Overpayment of Veteran's Benefits 160 Stockholders' Suits 190 Other Contract 195 Contract Product Liability 196 Franchise TORTS PERSONAL INJURY 310 Airplane 315 Airplane Product Liability 320 Assault, Libel & Slander 330 Federal Employers' Liability 340 Marine 345 Marine Product Liability 350 Motor Vehicle 355 Motor Vehicle Product Liability 360 Other Personal Injury 362 Personal Injury - Medical Malpractice PERSONAL INJURY 365 Personal Injury - Product Liability 367 Health Care/Pharmaceutical Personal Injury Product Liability 368 Asbestos Personal Injury Product Liability 370 Other Fraud 371 Truth in Lending 380 Other Personal Property Damage 385 Property Damage Product Liability PRISONER PETITIONS Habeas Corpus: 463 Alien Detainee 510 Motions to Vacate Sentence 530 General 535 Death Penalty Other: 540 Mandamus & Other 550 Civil Rights 555 Prison Condition 560 Civil Detainee - Conditions of Confinement FORFEITURE/PENALTY 625 Drug Related Seizure of Property 21 USC 881 690 Other LABOR 710 Fair Labor Standards Act 720 Labor/Management Relations 740 Railway Labor Act 751 Family and Medical Leave Act 790 Other Labor Litigation 791 Employee Retirement Income Security Act IMMIGRATION 462 Naturalization Application 465 Other Immigration Actions BANKRUPTCY 422 Appeal 28 USC 158 423 Withdrawal 28 USC 157 SOCIAL SECURITY 861 HIA (1395ff) 862 Black Lung (923) 863 DIWC/DIWW (405(g)) 864 SSID Title XVI 865 RSI (405(g)) FEDERAL TAX SUITS 870 Taxes (U.S. Plaintiff or Defendant) 871 IRS—Third Party 26 USC 7609 OTHER STATUTES 375 False Claims Act 376 Qui Tam (31 USC 3729(a)) 400 State Reapportionment 410 Antitrust 430 Banks and Banking 450 Commerce 460 Deportation 470 Racketeer Influenced and Corrupt Organizations 480 Consumer Credit 490 Cable/Sat TV 850 Securities/Commodities/Exchange 890 Other Statutory Actions 891 Agricultural Acts 893 Environmental Matters 895 Freedom of Information Act 896 Arbitration 899 Administrative Procedure Act/Review or Appeal of Agency Decision 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only) X 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 - Transfer 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 USC 1332 Brief description of cause: Negligence, Fraudulent Concelment, Breach of Voluntary Undertaking

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: X Yes No

VIII. RELATED CASE(S) IF ANY (See instructions): JUDGE DOCKET NUMBER

DATE May 25, 2018 SIGNATURE OF ATTORNEY OF RECORD /s/ Matthew T. Logue

FOR OFFICE USE ONLY RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

JS 44A REVISED June, 2009  
IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
THIS CASE DESIGNATION SHEET MUST BE COMPLETED

**PART A**

This case belongs on the (  Erie  Johnstown  Pittsburgh) calendar.

1. **ERIE CALENDAR** - If cause of action arose in the counties of Crawford, Elk, Erie, Forest, McKean, Venang or Warren, OR any plaintiff or defendant resides in one of said counties.
2. **JOHNSTOWN CALENDAR** - If cause of action arose in the counties of Bedford, Blair, Cambria, Clearfield or Somerset OR any plaintiff or defendant resides in one of said counties.
3. Complete if on **ERIE CALENDAR**: I certify that the cause of action arose in \_\_\_\_\_ County and that the \_\_\_\_\_ resides in \_\_\_\_\_ County.
4. Complete if on **JOHNSTOWN CALENDAR**: I certify that the cause of action arose in \_\_\_\_\_ County and that the \_\_\_\_\_ resides in \_\_\_\_\_ County.

**PART B** (You are to check ONE of the following)

1.  This case is related to Number \_\_\_\_\_ . Short Caption \_\_\_\_\_
2.  This case is not related to a pending or terminated case.

DEFINITIONS OF RELATED CASES:

**CIVIL:** Civil cases are deemed related when a case filed relates to property included in another suit or involves the same issues of fact or it grows out of the same transactions as another suit or involves the validity or infringement of a patent involved in another suit

**EMINENT DOMAIN:** Cases in contiguous closely located groups and in common ownership groups which will lend themselves to consolidation for trial shall be deemed related.

**HABEAS CORPUS & CIVIL RIGHTS:** All habeas corpus petitions filed by the same individual shall be deemed related. All pro se Civil Rights actions by the same individual shall be deemed related.

**PART C**

I. CIVIL CATEGORY (Select the applicable category).

1.  Antitrust and Securities Act Cases
2.  Labor-Management Relations
3.  Habeas corpus
4.  Civil Rights
5.  Patent, Copyright, and Trademark
6.  Eminent Domain
7.  All other federal question cases
8.  All personal and property damage tort cases, including maritime, FELA, Jones Act, Motor vehicle, products liability, assault, defamation, malicious prosecution, and false arrest
9.  Insurance indemnity, contract and other diversity cases.
10.  Government Collection Cases (shall include HEW Student Loans (Education), V A Overpayment, Overpayment of Social Security, Enlistment Overpayment (Army, Navy, etc.), HUD Loans, GAO Loans (Misc. Types), Mortgage Foreclosures, SBA Loans, Civil Penalties and Coal Mine Penalty and Reclamation Fees.)

I certify that to the best of my knowledge the entries on this Case Designation Sheet are true and correct

/s/ Matthew T. Logue

Date: May 25, 2018

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ATTORNEY AT LAW

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Class Action Against Two Youth Soccer Governing Bodies Questions Failure to Require Protective Headgear](#)

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