

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
TWENTY-FIRST JUDICIAL CIRCUIT
STATE OF MISSOURI

JAMIE GALATI and KEITH TACKITT,)
as Next Friend on behalf of their minor)
daughter M.T and in their individual)
capacities,)

Plaintiffs,)

v.)

Cause No.)

GREAT CIRCLE)

Serve:)
BCRA Co.)
221 Bolivar St. Suite 101)
Jefferson City, MO 65101)

and)

SPECIAL SCHOOL DISTRICT OF ST.)
LOUIS COUNTY, MISSOURI)
EDUCATIONAL FACILITIES AUTHORITY)

Serve:)
Jeff Haug)
2110 Clayton Road)
St. Louis, MO 63131)

Defendants.)

JURY TRIAL DEMANDED

PETITION

Plaintiffs Jamie Galati (“*Galati*”) and Keith Tackitt (“*Tackitt*”) (collectively “*Parents*”), both individually and on behalf of their minor daughter, M.T. (“*M.T.*”) (collectively “*Plaintiffs*”), bring this claim under common law and the Missouri Human Rights Act, R.S.Mo. §213.010, *et seq.*, for discrimination based on disability by Defendant Great Circle (“*Great Circle*”) and Special School District of St. Louis County, Missouri Educational Facilities Authority (“*SSD*”) (collectively “*Defendants*”). In support of their Petition, Plaintiffs state the following:

GENERAL ALLEGATIONS

1. Galati is an adult female who is a parent of M.T. and a resident of St. Louis County.
2. Tackitt is an adult male who is a parent of M.T. and a resident of St. Louis County.
3. M.T. is a minor child and a resident of St. Louis County.
4. M.T. is a minor child with disabilities. Her disabilities include an Autism Spectrum Disorder (“ASD”) diagnosis, Depression, Encopresis, Tourette’s Syndrome, and Obsessive Compulsive Disorder (“**OCD**”).
5. M.T.’s disabilities are physical and mental impairments that substantially limit M.T.’s major life activities, such as learning, managing her emotions, interacting with others, toileting, and caring for herself.
6. Great Circle is a private school for individuals with disabilities.
7. Great Circle offers services to the public in exchange for tuition.
8. Great Circle is a place of public accommodation under R.S.Mo. §213.010 (16).
9. SSD provides special education services to students in a variety of placements.
10. SSD is a place of public accommodation under R.S.Mo. §213.010 (16).
11. Venue in this Court is proper because the allegations that gave rise to this action occurred in St. Louis County, Missouri.
12. On April 25, 2022, Plaintiffs filed a charge of discrimination against Defendants with the Missouri Commission on Human Rights (“**MCHR**”), alleging disability discrimination and retaliation.
13. Plaintiffs received notice of the right to sue from the MCHR on December 28, 2022. See Exhibit 1 and Exhibit 2 attached hereto.
14. This action is filed within two years of the discriminatory conduct and within 90 days of receipt of the right to sue letters. Plaintiffs have complied with the administrative exhaustion

requirements of the Missouri Human Rights Act as stated in R.S.Mo. §213.075.

FACTUAL ALLEGATIONS

15. Orchard Farm School District, M.T.'s district at the time, paid for M.T. to attend Great Circle from September 2015 until April 2020.

16. During that time, M.T. enjoyed school and participated in her education.

17. M.T. made progress and had few emotional and physical outbursts.

18. M.T.'s progress flatlined when Great Circle implemented exclusively remote instruction in April 2020 due to the Covid-19 Pandemic.

19. Due to her disabilities, M.T. could not participate in or benefit from remote instruction. As a result, M.T. was denied the benefit of an education during the seven-month period of exclusive remote instruction.

20. M.T.'s exclusion from school caused her to regress significantly and caused her problematic behaviors to escalate.

21. Great Circle's exclusive remote instruction continued until November 2020, when Great Circle began a hybrid instruction schedule for students, which allowed M.T. to receive two days of in-person instruction a week.

22. M.T.'s in-person instruction, though limited, was successful.

23. M.T. made progress and did not experience a recurrence of aggressive behaviors.

24. On February 3, 2021, Great Circle changed M.T.'s schedule to 100% virtual instruction due to alleged "staffing issues."

25. In fact, Great Circle shut down due to verified incidences of child abuse committed by members of its residential staff.

26. M.T. could not access virtual education due to her disabilities, and the change to online learning once again excluded M.T. from the benefit of an education because of her

disabilities.

27. As a result, M.T. did not attend school from February 3, 2021, until March 16, 2021.

28. M.T. and her family moved M.T. from the Orchard Farm School District to the Hazelwood School District at the end of February 2021.

29. At the time, SSD took over the management of M.T.'s education services.

30. On March 16, 2021, SSD enrolled M.T. at Ackerman School, another private school in Florissant, MO.

31. Before M.T. attended Ackerman School, the administration assured Parents at they were fully staffed and could meet M.T.'s needs.

32. However, Ackerman was not fully staffed and could not support M.T.'s various disabilities.

33. The staff at Ackerman repeatedly locked M.T. in an empty classroom, called 911, or removed M.T. from class for the behaviors she exhibited due to her disabilities.

34. During the approximately two months she was enrolled at Ackerman, M.T. spent very few full days in school.

35. In May 2021, SSD unenrolled Ackerman and did not enroll her in another school, which excluded her from an education because of her disabilities.

36. After M.T. spent months at home without an education, SSD sent her back to Great Circle when it re-opened in August 2021.

37. Because SSD denied M.T. the benefit of participating in her education for months, the problematic behaviors that stemmed from her disabilities escalated significantly.

38. Great Circle responded to these behaviors by excessively and improperly physically restraining M.T. and secluding her.

39. From August 2021 to November 2021, M.T. attended school at Great Circle for

approximately 30 days.

40. In those 30 days, Great Circle physically restrained M.T. over 111 times.

41. Each incident of restraint involved 5-7 members of Great Circle staff holding M.T. down until they deemed her sufficiently calm.

42. Dates for improper holds include but are not limited to

- August 23, 2021, from 1:05 to 1:08,
- August 23, 2021, from 1:08 to 1:11,
- August 23, 2021, from 1:11 to 1:35;
- August 30, 2021, from 9:41 to 9:51,
- August 30, 2021, at 9:54-10:00,
- August 30, 2021, from 10:03 to 10:11;
- August 31, 2021, from 12:21 to 12:27;
- September 1, 2021, from 1:44 to 1:49;
- September 1, 2021, from 10:41 to 10:48;
- September 13, 2021, from 9:33 to 9:36;
- September 13, 2021, from 9:38 to 10:04;
- September 14, 2021, from 9:30 to 10:06;
- September 21, 2021, from 10:10 to 10:15;
- September 21, 2021, from 10:30 to 10:40;
- October 5, 2021, from 10:33 to 10:38; and
- October 5, 2021, from 10:38 to 10:43.

43. In doing so, Great Circle physically punished M.T. for exhibiting symptoms of her disability.

44. After M.T. began attending Great Circle in August 2021, Great Circle staff

repeatedly requested that Parents pick M.T. up from school early or keep her home for several days a week.

45. Great Circle took issue with the severity of M.T.'s disabilities.

46. In October 2021, Maggy Aubchon, Great Circle's Interim Director of Special Education, and Kaysi Rinks, Great Circle's Associate Director of Special Education for Great Circle, repeatedly asked Parents to reduce M.T.'s hours at Great Circle.

47. Per federal and state law, Great Circle cannot reduce M.T.'s educational minutes outside a formal meeting with SSD and the members of M.T.'s team.

48. When Parents refused to reduce M.T.'s minutes at Great Circle, the school retaliated by discharging M.T. from the school altogether, effective December 3, 2021.

49. After December 3, 2021, SSD did not know what to do with M.T.

50. SSD's program lacked a continuum of educational placement options for students with disabilities that manifest severe behaviors. As such, SSD's programming discriminates against students based on the severity and type of their disability.

51. Because of the discriminatory apportionment of SSD's programming, SSD had nowhere to send M.T. after her retaliatory discharge from Great Circle.

52. Despite knowing that M.T. cannot access virtual education because of her disabilities, SSD returned M.T. to 100% virtual instruction.

53. Parents reminded SSD that M.T. could not participate in virtual learning because of her disabilities. However, SSD refused to accommodate M.T.'s disabilities and ceased serving her on or about December 3, 2021.

54. Because of SSD and Great Circle's actions, M.T. and her parents were isolated at home without support for months.

55. M.T. experienced frequent and daily bouts of boredom, stress, anxiety, depression,

and behavioral outbursts.

56. M.T. also showed severe regression in skills she previously acquired.

57. Parents advised SSD of M.T.'s continued deterioration after SSD excluded her from any school setting, but SSD refused any and all requests to accommodate M.T.

58. By January 2022, M.T.'s pediatrician told M.T.'s parents they were concerned that M.T. was showing signs and behaviors indicating that she suffered from PTSD.

59. M.T.'s pediatrician believes that these signs and behaviors indicating PTSD stems directly from M.T. losing access to regular educational services from April 2020 to the present and the excessive, improper, and repeated physical restraints used on M.T. often multiple times a day, while she was attending Great Circle from August to November of 2021.

60. Defendants excluded M.T. from receiving an education because of the severity of her disabilities.

61. Defendants denied M.T. the opportunity to gain the same educational benefits as non-disabled students due to her disability.

62. There are approximately 174 school days offered per year in Missouri.

63. In two years, M.T. only attended an estimated 75 days, some of which were only partial days, because Defendants failed to accommodate M.T.'s disabilities to enable her to attend class and access the programs and services offered therein.

64. Because Defendants prevented M.T. from benefiting from their programs and services, Plaintiffs suffered immensely.

65. M.T.'s exclusion from school caused an increase in severe behaviors and regression in skills.

66. The behaviors escalated to such a degree that Parents sought intervention from emergency services on approximately 12 occasions from December 2021 to the present.

67. M.T.'s lack of access to SSD and Great Circle's programs and services dysregulated her, which caused her to harm herself, lash out and harm her parents, and damage property.

68. As a result of M.T. lashing out and injuring herself and others, Parents sought medical treatment for their injuries.

69. M.T. was transported to the ER for treatment on at least six occasions in November and December 2021.

70. In 2020, Plaintiffs lost their family home to a flood. The home Plaintiffs began living in April of 2020 is in shambles due to M.T. lashing out and causing property damage.

71. Parents' extensive renovations on the home have all been destroyed.

72. Because M.T. was not in school, Galati had to reduce her work schedule to be with M.T. during the day.

COUNT I: DISABILITY DISCRIMINATION IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT AGAINST DEFENDANTS

73. Plaintiffs incorporate by reference the allegations in the foregoing paragraphs as if fully set forth herein.

74. At all relevant times, Great Circle was a place of public accommodation under R.S.Mo. §213.010 (16).

75. At all relevant times, SSD was a place of public accommodation under R.S.Mo. §213.010 (16).

76. M.T. 's conditions of ASD, Depression, Encopresis, and Tourette's Syndrome significantly impact her major life activities, including but not limited to learning, managing her emotions, interacting with others, toileting, and caring for herself.

77. M.T. is disabled under the Missouri Human Rights Act, R.S.Mo. §213.010, *et. seq.*

78. At all relevant times, as described in more detail above, Great Circle discriminated

against M.T. due to her disabilities in that Great Circle excluded M.T. from receiving an education because of the severity of her disabilities.

79. At all relevant times, as described above, SSD discriminated against M.T. due to her disabilities in that SSD excluded M.T. from receiving an education because of the severity of her disabilities.

80. Great Circle denied M.T. the opportunity to gain the same educational benefits as non-disabled students due to her disability.

81. SSD denied M.T. the opportunity to gain the same educational benefits as non-disabled students due to her disability.

82. Great Circle's actions were undertaken maliciously or in reckless disregard for M.T.'s right to be free from discrimination.

83. SSD's actions were undertaken maliciously or in reckless disregard for M.T.'s right to be free from discrimination.

84. Given Great Circle's willful and malicious conduct, Plaintiffs will seek leave of Court to file a claim for punitive damages at the appropriate time as outlined by R.S. Mo. § 510.261.

85. Given SSD's willful and malicious conduct, Plaintiffs will seek leave of Court to file a claim for punitive damages at the appropriate time as outlined by R.S. Mo. § 510.261.

86. As a direct and proximate result of the above-described acts, M.T. has suffered and will continue to suffer pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life. M.T. also has been and will continue to be prevented from performing her daily activities and obtaining the full enjoyment of life. M.T. also has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in their favor and against Great Circle and SSD, awarding emotional distress damages, compensatory damages, pre-and post-judgment interest, and attorney's fees and costs, as well as any other relief this Court deems may be just and proper.

COUNT II: RETALIATION IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT AGAINST DEFENDANTS

87. Plaintiffs incorporate by reference the allegations in the foregoing paragraphs as if fully set forth herein.

88. At all relevant times, Great Circle was a place of public accommodation under R.S.Mo. §213.010 (16).

89. At all relevant times, SSD was a place of public accommodation under R.S.Mo. §213.010 (16).

90. Parents'advocacy for M.T., including their requests for accommodation and complaints of discrimination, was a motivating factor in Great Circle's exclusion of M.T. from receiving an education.

91. Parents'advocacy for M.T., including their requests for accommodation and complaints of discrimination, was a motivating factor in SSD's exclusion of M.T. from receiving an education.

92. Parents'advocacy for M.T., including their requests for accommodation and complaints of discrimination, was a motivating factor in Great Circle's denial for M.T. to receive the opportunity to gain the same educational benefits as non-disabled

93. Parents'advocacy for M.T., including their requests for accommodation and complaints of discrimination, was a motivating factor in SSD's denial for M.T. to receive the opportunity to gain the same educational benefits as non-disabled

94. Great Circle's actions were undertaken maliciously or in reckless disregard for M.T.'s right to be free from discrimination.

95. SSD's actions were undertaken maliciously or in reckless disregard for M.T.'s right to be free from discrimination.

96. Given Great Circle's willful and malicious conduct, Plaintiffs will seek leave of Court to file a claim for punitive damages at the appropriate time as outlined by R.S. Mo. § 510.261.

97. Given SSD's willful and malicious conduct, Plaintiffs will seek leave of Court to file a claim for punitive damages at the appropriate time as outlined by R.S. Mo. § 510.261.

98. As a direct and proximate result of the above-described acts, M.T. has suffered and will continue to suffer pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life. M.T. also has been and will continue to be prevented from performing her daily activities and obtaining the full enjoyment of life. M.T. also has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in their favor and against Great Circle and SSD, awarding emotional distress damages, compensatory damages, pre-and post-judgment interest, and attorney's fees and costs, as well as any other relief this Court deems may be just and proper.

COUNT III: ASSAULT AGAINST DEFENDANTS

99. Plaintiffs incorporate by reference the allegations in the foregoing paragraphs of this Complaint as if fully set forth herein.

100. On multiple occasions, employees and/or agents of Defendants escalated situations and employed the use of improper holds.

101. The use of the improper holds, without warning and without a way to egress, caused M.T. to experience apprehension of immediate physical injury.

102. As a direct result of Defendants' conduct described herein, M.T. suffered damages, including apprehension, fear, concern for M.T.'s own safety, and physical injury.

103. The actions of Defendants as described above were carried out in bad faith and with malice, and done with actual, wanton intent to cause injury, such that punitive damages should be awarded to punish Defendants and to deter them, as well as other similarly-situated individuals, from engaging in similar conduct in the future, in an amount to be determined by a jury.

104. Given Defendants' willful and malicious conduct, Plaintiffs will seek leave of the Court to file a claim for punitive damages at the appropriate time as outlined by R.S. Mo. § 510.261.

WHEREFORE, Plaintiffs pray for judgment in favor against all Defendants for compensatory damages, attorneys' fees, expenses, costs, and for any other relief this Court deems just and appropriate.

COUNT IV FALSE IMPRISONMENT AGAINST DEFENDANTS

105. Plaintiffs incorporate by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

106. Defendants intentionally restrained and confined M.T. against M.T.'s will when they took M.T. into improper holds, put her in seclusion, and detained M.T.

107. Neither M.T. nor her parents consented to Defendants' actions in removing and confining M.T. in the manner described above, nor in any manner whatsoever.

108. There was no lawful justification for Defendants to restrain and confine M.T. in the manner described above.

109. As a direct and proximate result of M.T.'s false imprisonment by Defendants, M.T. suffered damages including physical injury, emotional trauma, great concern for M.T.'s own safety,

fear, apprehension, depression, anxiety, consternation, and emotional distress.

110. Defendants' actions in causing the false imprisonment of M.T., as described above, were carried out with an evil motive and/or reckless indifference and conscious disregard for M.T.'s rights.

111. Given Defendants' willful and malicious conduct, Plaintiffs will seek leave of the Court to file a claim for punitive damages at the appropriate time as outlined by R.S. Mo. § 510.261.

WHEREFORE, Plaintiffs pray for judgment in favor against all Defendants for compensatory damages, attorneys' fees, expenses, costs, and for any other relief this Court deems just and appropriate.

COUNT V INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AGAINST DEFENDANTS

112. Plaintiffs incorporate by reference the allegations in the foregoing paragraphs of this Complaint as if fully set forth herein.

113. By improperly holding and secluding M.T., Defendants committed acts that rose to the level of extreme or outrageous conduct that goes beyond the possible bounds of decency so as to be regarded as atrocious and utterly intolerable in a civilized community.

114. Defendants' actions were intentional or, at best, reckless.

115. Such actions by Defendants have caused M.T. severe emotional distress and have caused a regression in her behavior, as described above.

116. The regression in M.T.'s behavior causes her to lash out and physically injure herself, others, and property.

117. Defendants' sole motivation was to cause emotional distress to Plaintiffs

118. As a direct result of the conduct of Defendants described herein, M.T. suffered damages including emotional trauma, great concern for M.T. own safety; fear, apprehension,

depression, anxiety, consternation, and emotional distress; lost time; loss of educational opportunity; and loss of faith in society.

119. As a direct result of the conduct of Defendants described herein, Galati and Tackitt suffered damages including emotional trauma, great concern for their own, as well as their daughter's safety; fear, apprehension, depression, anxiety, consternation, and emotional distress; lost time; loss of educational opportunity; and loss of faith in society.

120. Defendants' actions, as described above, were carried out in bad faith and with malice and done with actual, wanton intent to cause injury.

121. Given Defendants' willful and malicious conduct, Plaintiffs will seek leave of the Court to file a claim for punitive damages at the appropriate time as outlined by R.S. Mo. § 510.261.

WHEREFORE, Plaintiffs pray for judgment in favor against all Defendants for compensatory damages, attorneys' fees, expenses, costs, and for any other relief this Court deems just and appropriate.

COUNT VI: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS AGAINST ALL DEFENDANTS

122. Plaintiffs incorporate by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

123. Alternative to Count V, above, by improperly holding and secluding M.T., Defendants realized or should have realized that their conduct posed an unreasonable risk to M.T.

124. Further, M.T. was reasonably in fear for her own person because of the Defendants' actions and suffered emotional distress or mental injury that is medically diagnosable and sufficiently severe to be medically significant as a result of the Defendants' actions.

125. The regression in M.T.'s behavior causes her to lash out and physically injure herself, others, and property.

126. Defendants' sole motivation was to cause emotional distress to Plaintiffs

127. As a direct result of the conduct of Defendants described herein, M.T. suffered damages including emotional trauma, great concern for M.T. own safety; fear, apprehension, depression, anxiety, consternation, and emotional distress; lost time; loss of educational opportunity; and loss of faith in society.

128. Defendants' actions, as described above, were carried out in bad faith and with malice and done with actual, wanton intent to cause injury.

129. Given Defendants' willful and malicious conduct, Plaintiffs will seek leave of the Court to file a claim for punitive damages at the appropriate time as outlined by R.S. Mo. § 510.261.

WHEREFORE, Plaintiffs pray for judgment in favor against all Defendants for compensatory damages, attorneys' fees, expenses, costs, and for any other relief this Court deems just and appropriate.

COUNT VII BATTERY AGAINST ALL DEFENDANTS

130. Plaintiffs incorporate by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

131. During the process of being unnecessarily held and in seclusion, M.T. suffered battery at the hands of Defendants.

132. Namely, Defendants' physically aggressive tactics caused intentional and offensive bodily harm to M.T.

133. As a direct result of the conduct of Defendants described herein, M.T. suffered damages including emotional trauma, great concern for M.T. own safety; fear, apprehension, depression, anxiety, consternation, and emotional distress; lost time; loss of educational opportunity; and loss of faith in society.

134. Defendants' actions, as described above, were carried out in bad faith and with

malice and done with actual, wanton intent to cause injury.

135. Given Defendants' willful and malicious conduct, Plaintiffs will seek leave of the Court to file a claim for punitive damages at the appropriate time as outlined by R.S. Mo. § 510.261.

WHEREFORE, Plaintiffs pray for judgment in favor against all Defendants for compensatory damages, attorneys' fees, expenses, costs, and for any other relief this Court deems just and appropriate.

COUNT VIII NEGLIGENT SUPERVISION AGAINST DEFENDANTS

136. Plaintiffs incorporate by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

137. Defendants knew or should have known of their employees not being properly trained in de-escalating situations with disabled students such as M.T.

138. Defendants trained or should have trained their employees in de-escalating situations with disabled students such as M.T.

139. Defendants' negligent act or omission was the proximate cause of the injuries sustained by M.T. at the hands of Defendant's employees.

140. Defendants owed to M.T. a duty to supervise their employees to use ordinary care to protect M.T. against unreasonable risks to harm.

141. Defendants breached said duty owed to M.T.

142. Defendants' breach of said duty to M.T. was the proximate cause of M.T.'s PTSD and regression.

143. M.T. suffered a serious mental injury and other damages as a result of Defendants' acts and omissions.

WHEREFORE, Plaintiffs pray for judgment against Defendant for compensatory damages in an amount which is fair and reasonable, plus costs of this action, attorney's fees, and such other

relief as the Court deems fair and appropriate under the circumstances.

COUNT IX RESPONDEAT SUPERIOR AGAINST ALL DEFENDANTS

144. Plaintiffs incorporate by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

145. Defendants knew or should have known of their employees doing improper holds and not being properly trained to de-escalate situations with disabled students such as M.T.

146. Defendants hired and retained their employees

147. Defendants' negligent act or omission was the proximate cause of the brutal and conscious shocking injury sustained by M.T. at the hands of Defendants employees.

148. Defendants owed to M.T. a duty to supervise their employees and to use ordinary care to protect M.T. against unreasonable risks to harm.

149. Defendants breached said duty owed to M.T.

150. Defendants' Supervisor personnel were deliberately indifferent to the unconstitutional acts and acted with reckless disregard to the protections of M.T. in that there was a failure to train and control their employees who caused the M.T.'s injury.

151. Defendants' breach of said duty to M.T. was the proximate cause of M.T.'s injury and regression.

152. M.T. suffered a serious mental injury and other damages as a result of Defendants' acts and omissions.

WHEREFORE, Plaintiffs pray for judgment against Defendants for compensatory damages in an amount which is fair and reasonable, plus costs of this action, attorney's fees, and such other relief as the Court deems fair and appropriate under the circumstances.

JURY DEMAND

153. Plaintiffs request a trial by jury on all issues triable by jury.

Respectfully submitted,



Sarah Jane Hunt #63899

Nicole A. Matlock, #66894

Michelle Faron, # 68058

Kennedy Hunt, P.C.

4500 West Pine Blvd.

St. Louis, MO, 63108

314-872-9041 telephone

314-872-9043 fax

sarahjane@kennedyhuntlaw.com

nmatlock@kennedyhuntlaw.com

michelle@kennedyhuntlaw.com

Attorneys for Plaintiffs