



1 coping with the trauma of learning about Stephen's illness and worrying about my moral and legal  
2 responsibility. I have urged Stephen multiple times to seek proper treatment for pedophilia. I am  
3 particularly afraid of what may happen if he does not seek treatment, because he may be working or  
4 interacting with children in connection with his employment. I know that he has used a 12-step  
5 model for sex addiction, and that he was also seeing a "sexual dysfunction" therapist. However, he  
6 has refused to seek proper help or hospitalization for his predilection towards children. He has  
7 insisted that my concerns are unfounded.

8 5. I am also afraid of the potential consequences that Stephen's behavior may have for  
9 me, including risking my reputation and livelihood. I also fear that I may potentially face civil (or  
10 even criminal) liability for Stephen's actions. In December 2012, I received two letters from a man  
11 who identified himself as the husband of one of Stephen's three aforementioned victims. He berated  
12 me for my cowardice in not turning Stephen in to the police. He then called me on the phone and  
13 threatened to bring a civil lawsuit against me for Stephen's assaults. Again, I do not know how  
14 many more victims there may be, and whether they may also be considering filing suit.

15 6. In order to protect myself from being unfairly damaged by Stephen's conduct, I  
16 request that the Court bifurcate the issue of Stephen's liability. I ask that the Court allocate to  
17 Stephen the potential liability for any and all damages in connection with Stephen's sexual assaults  
18 or other sexual abuse, known or unknown, and order that Stephen shall save, indemnify, pay, and  
19 hold me harmless in connection with any and all claims, demands, debts, liabilities, liens, charges,  
20 losses, obligations, promises, acts, agreements, representations, costs, expenses (including, without  
21 limitation, attorneys' fees), damages, suits, actions and causes of action (in law, equity or otherwise)  
22 of whatever kind or nature that arise from his aforementioned conduct.

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