

**NORTH CAROLINA INDUSTRIAL COMMISSION**  
**I.C. File No.**

CHRISTOPHER SODERLUND )  
                                  Plaintiff )  
                                  ) )  
v. ) )  
                                  ) )  
UNIVERSITY OF NORTH CAROLINA )  
SCHOOL OF THE ARTS (*FKA* North )  
Carolina School of the Arts) and THE )  
UNIVERSITY OF NORTH CAROLINA )  
                                  Defendants )

**COMPLAINT**

**FILED**  
SEP 29 2021  
**COPACIC Clerk**

NOW COMES the Plaintiff, complaining of Defendants and alleges and says as follows:

**INTRODUCTION**

1. This case arises from the sexual abuse and exploitation that Plaintiff Christopher Soderlund suffered as a minor while a student entrusted to the purported oversight, care and supervision of the faculty, staff and administration at the University of North Carolina School of the Arts. For many, many years, the administrators at the University of North Carolina School of the Arts knew or should have known of the dangerous culture permitting and condoning the sexual abuse and exploitation of students attending the school. Despite this knowledge, the administrators at the University of North Carolina School of the Arts turned a willful blind eye to the egregious conduct suffered by so many of the school’s students, specifically including the Plaintiff. Despite their clear knowledge of this horrific abuse and exploitation of minor students, the Defendants failed to take any reasonable steps to protect Plaintiff and other students similarly situated from the danger of being sexually abused and exploited by members of the faculty, staff and/or administration at the school.

## PARTIES AND JURISDICTION

2. Plaintiff Christopher Soderlund (hereinafter “Christopher” and/or “Plaintiff”) is a citizen and resident of Boise, Idaho. His mailing address is in care of Lanier Law Group, 6518 Airport Center Drive, Greensboro, NC 27409.

3. At all times relevant to the sexual abuse and exploitation alleged herein, Christopher was a minor student at the University of North Carolina School of the Arts and relied upon and was dependent upon the faculty, staff and administrators of the school to provide for his care, safety and supervision. The negligent conduct alleged herein occurred at or near the campus of the University of North Carolina School of the Arts located at 1533 South Main Street, Winston-Salem, North Carolina 27127 and occurred during the years 1983 – 1986.

4. Defendant University of North Carolina School of the Arts (formerly known as the North Carolina School of the Arts) (hereinafter referred to as “UNCSA” and/or “the school” or collectively with Defendant University of North Carolina as “Defendants”) is a state institution and/or agency and is a constituent institution of the University of North Carolina system, with its principal place of business located in Winston-Salem, Forsyth County, North Carolina.

5. The North Carolina Industrial Commission (NCIC) has personal jurisdiction over Defendant UNCSA in that at all times relevant hereto Defendant UNCSA conducted its business and activities in the state of North Carolina as an agency of the state.

6. The NCIC has subject matter jurisdiction over Plaintiff’s claims in that the claims arose under the substantive law of North Carolina.

7. Defendant University of North Carolina (hereinafter “UNC” and/or collectively with Defendant UNCSA as “Defendants”) is a state institution and/or agency with its principal place of business in Chapel Hill, Orange County, North Carolina. The UNC System is comprised of

seventeen (17) institutions located throughout the state of North Carolina. The UNC System mission statement provides: The University of North Carolina is a public, multi-campus university dedicated to the service of North Carolina and its people. It encompasses the 17 diverse constituent institutions and other educational, research, and public service organizations. Each shares in the overall mission of the University. That mission is to discover, create, transmit, and apply knowledge to address the needs of individuals and society. This mission is accomplished through instruction, which communicates the knowledge and values and imparts the skills necessary for individuals to lead responsible, productive, and personally satisfying lives; through research, scholarship, and creative activities, which advance knowledge and enhance the educational process; and through public service, which contributes to the solution of societal problems and enriches the quality of life in the State. In the fulfillment of this mission, the University shall seek an efficient use of available resources to ensure the highest quality in its service to the citizens of the State.

8. The NCIC has personal jurisdiction over Defendant UNC in that at all times relevant hereto Defendant UNC conducted its business and activities in the state of North Carolina as an agency of the state.

9. The NCIC has subject matter jurisdiction over Plaintiff's claims in that the Defendants are state agencies and/or institutions and the claims arose under the substantive law of North Carolina.

10. The employees and/or agents of Defendant UNCSA who were negligent in their actions and/or failures to act to protect the minor students entrusted to their protection and care as alleged herein, said negligence being a proximate cause of the Plaintiff's injuries as alleged herein, include but are not limited to: Robert C. Suderburg (deceased), Lawrence Hart

(deceased), Jane Elizabeth Milley, Philip Nelson (deceased), Robert Lindgren (deceased), Larry Alan Smith, William Tribby, Peggy Dodson, Susan McCullough, Diane Markham, William Pruitt (deceased), Alan Rust, Robert Hickok (deceased), Duncan Noble (deceased), Richard Kuch (deceased), Melissa Lawrence, Mabel Robinson, Richard Gain and other administrators including Vice Chancellors, Associate Vice Chancellors, Deans and Associate Deans to be determined through discovery in this matter.

### **FACTUAL BACKGROUND**

11. Defendant UNCSA was founded in 1963 and opened its doors to students in 1965 as the nation's first public arts conservatory.

12. From its inception, Defendant UNCSA offered middle school, high school and college age students specialized training in the performing and visual arts. When it first began operating, Defendant UNCSA's middle and high school was the country's only state-supported boarding school for the arts.

13. From its beginning, Defendant UNCSA actively recruited boys and girls as young as 12 years old to come live at Defendant UNCSA to study ballet, modern dance and other disciplines.

14. In addition to its duty and obligation to provide its young students with education and training in their chosen artistic disciplines, Defendant UNCSA had a duty and obligation to provide these young boys and girls with a safe and secure environment in which they could learn and grow.

15. Despite the clear obligation to the boys and girls who chose to attend the school, some faculty, staff and the administrators of Defendant UNCSA instead allowed there to develop a culture of sexual abuse and exploitation of the young students in its care. Upon information

and belief, this dangerous culture of accepted sexual abuse and exploitation continued for two decades or more and negatively impacted potentially hundreds of students, including Plaintiff.

16. As one prominent former UNCSEA student has been quoted as saying: the school was “a cesspool of sexual abuse that took place behind walls and closed doors, with little chance of help for young people as there was nowhere to go for help . . . it was like shooting fish in a barrel for predators.”

17. Throughout the 1970s and 1980s (and likely beyond), some faculty and the administrators at Defendant UNCSEA -- despite their clear knowledge and understanding of the sexual exploitation and abuse of minor students that was occurring -- unconscionably allowed this egregious and outrageous conduct to continue without taking any steps to intervene. Examples of the sexual exploitation and abuse that the school’s administrators condoned, and on some occasions participated in, are both troubling and horrifying.

18. In the 1970s and 1980s, the dance department at Defendant UNCSEA was home of two of the most openly notorious faculty members – Richard Kuch (deceased) and Richard Gain.

19. Kuch and Gain made no secret of their efforts to groom boys as young as 12 and 13 years old with the full and open intent of engaging in sexual activity with these adolescent students.

20. Kuch and Gain, under the guise of dance instruction, constantly and repeatedly groped, fondled or otherwise touched in a sexual manner many of the students in their care. Further, they constantly subjected these young students to grossly inappropriate sexual comments, often telling the middle school age boys and girls that they would never fully develop as artists until they started having sex.

21. Kuch and Gain's exploitation of minor students was so widely known that among UNCSA students, faculty and administrators they were called "Crotch" and "Groin."

22. Kuch and Gain lived together on a rural property in the community of East Bend, outside of Winston-Salem. Kuch and Gain would refer to their property as "The Farm," but among UNCSA students, some faculty and administrators, the Kuch and Gain property was known to be the location where Kuch and Gain would lure minor students for sexual exploitation. As such, UNCSA students, some faculty and administrators referred to the Kuch and Gain property as "The Fuck Farm."

23. The sexual abuse and exploitation inflicted upon minor students at the school by Kuch and Gain was not only known by students, faculty, staff and administrators at the school, but sadly was known among many of the members of the dance community nationwide.

24. One former faculty member went to then-Vice Chancellor Bill Pruitt and told Pruitt that UNCSA was having trouble recruiting young male dancers to their program because of the reputations and conduct of modern dance instructors Richard Kuch and Richard Gain. Vice Chancellor Pruitt was specifically told that dance instructors around the country, in an attempt to protect their young students, refused to recommend UNCSA to their gifted young male dancers because it was widely known that Kuch and Gain would try to groom those young boys for sexual abuse and exploitation. This former faculty member told Bill Pruitt that he could no longer teach male ballet technique or other dance curriculum for boys/men because he could not recruit young male students. Some members of the dance community around the country referred to Kuch and Gain as those two "sickos." Pruitt did nothing to address this widely known sexual abuse and exploitation.

25. The culture of condoning sexual abuse was not limited to the dance department. For example, at one point in time the then-Dean of the Drama Department had a practice called, "Freshman Friday," where all the male freshman students had to go into his office where he fondled them, causing an erection, to see how hard they would get. This Dean contended that it was understood that you could not be a successful drama student if you could not get sufficiently hard.

26. At one point in time, in the film school there was a group of graduate students who called themselves the "vagina hunters." They sought out 13-year-old female students in order to take their virginity. Upon information and belief the then Dean of Students was made aware of this information and ignored and/or condoned it.

27. Sexual relationships between faculty members and high school age students were widely known by UNCSCA administrators who condoned such sexual exploitation. If a male faculty member had sex with a minor student that resulted in the young girl getting pregnant the only help the school might offer would be to provide the young girl with information about getting an abortion.

28. At all relevant times Defendant UNCSCA, through its agents, employees and/or representatives knew or should have known of the repeated and ongoing sexual abuse and exploitation of its students and despite this knowledge failed to act or otherwise intervene to protect its students from these sexual predators who populated the faculty and/or administration.

29. At all relevant times it was reasonably foreseeable to Defendant UNCSCA, through its agents, employees and /or representatives that this repeated and ongoing sexual abuse and exploitation of students purportedly under its care and supervision would likely result in injury to the victims of this abuse and exploitation, including injury to the Plaintiff and others.

30. Defendant UNCSEA, through its agents, employees and/or representatives, consciously and recklessly disregarded their knowledge of the repeated and ongoing sexual abuse and exploitation of its students and the dangerous culture regarding such conduct that existed at the institution.

31. Defendant UNCSEA, through its agents, employees and/or representatives, knew or should have known that its negligent, reckless, and outrageous conduct and ignoring, condoning and or perpetuating the culture of sexual abuse and exploitation of its students would inflict severe emotional and psychological distress, as well as personal physical injury, on those students who were abused or exploited, including Plaintiff, who did in fact suffer severe emotional and psychological distress and personal physical injury as a result of this wrongful conduct.

#### **FACTS SPECIFIC TO PLAINTIFF CHRISTOPHER SODERLUND**

32. Kuch and Gain were Christopher's dance teachers at UNCSEA. Kuch was the assistant dean of the modern dance department. Gain was a faculty member in the modern dance department.

33. In the summer of 1983, at age 15, Christopher attended summer school at UNCSEA's high school and was admitted to the regular term of the high school beginning September 1983.

34. Christopher was a ballet major. Duncan Noble was the assistant dean of the ballet department under the dean of the dance department, Robert Lindgren.

35. In the winter of 1983 Christopher auditioned for and was chosen for the spring musical revue choreographed and directed by the Kuch and Gain.



36. Kuch and Gain awed the impressionable young Christopher with their accomplishments, including having been Martha Graham dancers and Broadway performers. Gain boasted that he had performed with the Joffrey Ballet and the New York City Ballet.

37. Kuch and Gain convinced Christopher that, based upon their contacts and reputation in the dance community, they could advance and promote the careers of their favored students, possibly him.

38. Kuch and Gain also convinced Christopher that one bad word from them and he would not be able to find a job anywhere.

39. Kuch and Gain, especially Gain, paid substantial attention to Christopher. They made him feel unique and talented, and thus gained Christopher's trust, respect, confidence and adoration. Gain developed a close, personal relationship with Christopher outside of the classroom, acting as a mentor, confidante and friend.

40. Kuch and Gain told students, including Christopher, and even boys and girls as young as 13 that dancing was sexual expression and that they would be better dancers if they were sexually active.

41. Kuch and Gain instructed many male dance students during Christopher's class that they could "loosen them up" by performing sexual acts with them, and, thereby, improve their performance and career chances.

42. Prior to Easter 1984, when Christopher was only 16 years old, Gain took the impressionable young aspiring dancer to Kuch and Gain's house, where he served Christopher alcohol and then engaged in sexual relations with him.

43. Gain repeated the seduction of Christopher on other occasions, during which Christopher detached himself emotionally, physically and intellectually from what was happening.

44. Christopher trusted Gain, did not understand that what Gain was doing was wrong, feared losing Gain's friendship and guidance, and was afraid that if he resisted Gain that Kuch and Gain would retaliate by adversely affecting Christopher's grades, the performances in which he wished to participate, and his opportunity for a successful dance career.

45. Kuch was aware of and witnessed and assisted Gain's seduction of Christopher. Kuch assisted and encouraged Gain by serving Christopher alcohol and encouraging Christopher to engage in sexual acts with Gain.

46. Kuch made sexual advances towards Christopher at "The Farm" and at the school.

47. Kuch and Gain often graphically described to Christopher many other occasions in which they had had sexual relations with other male dance students, leading Christopher to believe that this was an acceptable practice.

48. Kuch intentionally humiliated Christopher during classes and rehearsals making suggestive remarks to him in front of other students and by publicizing that Christopher and Gain were engaged in a sexual relationship.

49. Christopher believed that if he did not submit to Kuch's abuse and harassment that he would retaliate by adversely affecting his grades, the performances in which he wished to participate, and his dreams for a successful dance career.

50. As a result of Kuch and Gain's publication and public humiliation of Christopher, art students in Christopher's dormitory created graphic cartoons in the bathroom and showers depicting Kuch and Gain sodomizing him. The students mocked him by drawing blood and

semen spewing out of Christopher's cartoon back side. The students used glue as the semen to create a three dimensional visual. It traumatized Christopher then and still does to this day.

51. Arthur Ballard, a member of UNCSA's faculty, told Christopher that he knew of his sexual relationship with Gain. He never offered Christopher any assistance with regard to the abuse and exploitation being perpetrated by Kuch and Gain.

52. During the spring performance of 1984, Kuch and Gain severed their sexual relationship with Christopher and, thereafter, belittled him. They convinced Christopher that he was unworthy of esteem both personally, physically and as a dancer.

53. As a result of Kuch and Gains' ridicule, Christopher became emotionally unstable and began a cycle of self-destructive behavior which involved over-eating, drinking and smoking.

54. In the spring of 1984, Christopher's academic grades were excellent. He went before the entire ballet faculty (called a "jury") for his artistic evaluation. His artistic evaluations were good and there was no indication from any of his teachers or members of the faculty that he would not be invited back for the regular fall term. UNCSA's custom and practice of inviting back the students who have high academic standing and pass the artistic jury evaluation created a reasonable expectation that Christopher would be invited back for the regular fall term. It was significant to Christopher's professional career that he complete his education at UNCSA.

55. Near the end the school year in 1984, Duncan Noble, then the assistant dean of the ballet department, informed Christopher that he knew of Christopher's sexual relationship with Kuch and Gain.

56. Noble did not use his position as an assistant dean to prevent further sexual abuse or to have Kuch and Gain disciplined or to assist Christopher with the abuse he was suffering.

57. Instead, Noble told Christopher that he, too, thought he would have had sex with him by the end of the school year and told Christopher that he was not being invited back for the fall semester. Noble gave Christopher no further opportunity for a fair and reliable procedure to determine whether he was worthy of continuing as a student at UNCSA. His decision was arbitrary, capricious and tainted by his own conflict of interest.

58. As a result of Kuch and Gains' abuse, exploitation, denigration, rejection and abandonment of Christopher, combined with the staff, faculty and administration's knowledge of and apparent and horrific tolerance of the violence being done to his body and soul, Christopher became emotionally vulnerable, he loathed and blamed himself, he felt worthless and began a cycle of self-destructive behavior which involved over-eating, drinking alcohol and smoking cigarettes.

59. Christopher was distraught that he was not being invited back to the ballet department and he did not want to lose his opportunity for education at UNCSA.

60. Christopher requested of Kuch and Gain that he be transferred to the modern dance department. Kuch reluctantly transferred him to the modern dance department for the summer semester, indicating that he would be under intense scrutiny.

61. During that summer school session, Kuch made sexual advances towards Christopher. Christopher rebuffed all of his advances.

62. Kuch and Gain continued to torment Christopher by flirting with him one moment and then in the next moment making disparaging comments about him being fat and unattractive. They compared him unfavorably to other male dancers. They indicated that the other boys were more attractive to them both as dancers and as sexual partners.

63. Kuch and Gains' actions so upset Christopher that he contemplated suicide.

64. Diane Markham, a teacher in the Modern Dance Department, knew of Gain's sexual relationship with Christopher. During the summer session of 1984, Christopher discussed with Markham the details of Kuch and Gain's scrutiny of him and their unjustified negative comparisons between him and other male dance students. Diane Markham did not indicate that there was anything wrong with Gain having had sex with Christopher, and she told Christopher that there was nothing she could do about Kuch and Gain's unjustified treatment of him in the department.

65. Christopher reported what was happening to him to his dance teachers Mabel Robinson and Melinda Lawrence. He sought their comfort, compassion and care. The teachers indicated at various times to him words to the effect of: "The administration knows and does nothing. We can do nothing to help you." They also confirmed that Christopher would experience casting couches in the "real dance world."

66. Because of the open sexual relationships between teachers and students at UNCSCA and because of the failure of the school's agents, administrators and faculty members to report, investigate, discipline, bring charges against, express outrage to Kuch and Gain or any other teacher having sex with a student, or in any other way assist Christopher and other minor students from sexual exploitation and seduction by faculty members, Christopher believed that such activity was an acceptable and normal part of studying at UNCSCA.

67. At the end of the summer session, Kuch refused to invite Christopher back to UNCSCA for his junior year of high school. Kuch gave Christopher no opportunity to be judged by the faculty or any other fair and reliable procedure for determining whether he was worthy of continuing his education at UNCSCA.

68. Upon information and belief, Gain convinced Kuch not to invite Christopher back for the regular fall term. The actions of Gain were arbitrary, capricious and tainted by his conflict of interest.

69. As a direct and proximate result of the actions of Kuch and Gain, Christopher continued his self-destructive behavior of drinking, smoking and over-eating.

70. Christopher returned for a summer session of high school when he was 18 years old in 1986. He believed he needed to earn the respect and praise of Kuch and Gain.

71. Kuch verbally abused Christopher and made comments to Christopher about being an "old flame." Gain did not speak to Christopher and acted as if nothing had ever happened.

72. Christopher discussed with Gigi Buffington, a guest teacher in the Modern Dance Department and with Diane Markham the continuing abuse and harassment he suffered. Christopher explained to Ms. Buffington about Gain's prior sexual relationship with him. Neither Ms. Markham nor Ms. Buffington indicated that Gain's sexual relationship with the Christopher was wrong, nor did they offer Christopher any help.

**FIRST CLAIM FOR RELIEF:**  
**NEGLIGENT RETENTION AND SUPERVISION**  
**AGAINST DEFENDANTS UNCSA and UNC**

73. Plaintiff refers to and hereby realleges and incorporates by reference all previous paragraphs of this Complaint.

74. Defendant UNCSA had a duty to take reasonable steps to protect Plaintiff from foreseeable harm when he was in their care, custody, control and under their supervision as a student attending UNCSA.

75. When hiring and/or retaining and/or utilizing employees, agents and/or

representatives, Defendant UNCSCA owed Plaintiff a duty to act as an ordinary, prudent and reasonable employer, supervisor and/or principal of the faculty, staff and administrators with whom Plaintiff and other students would be interacting with and relying upon for a safe and protected environment in which he and other students could learn and grow.

76. The Defendant UNCSCA had a duty and an obligation to take reasonable steps to prevent any and all members of its faculty and staff and any of its administrators from using the tasks, premises, job title, job responsibilities and/or the instrumentalities of his/her position to target, groom, and sexually abuse students in their care and entrusted to them, including Plaintiff.

77. Defendant UNCSCA had a duty to have in place policies and procedures that would prohibit adult faculty, staff and administrators from engaging in any form of sexual contact with any student at the school, specifically including Plaintiff. Defendant UNCSCA had a further duty and obligation to see that those policies and procedures were implemented, followed and enforced.

78. Defendant UNCSCA had a duty to have in place policies and procedures that would prohibit adult faculty, staff and administrators from engaging in any type, kind and/or form of sexual abuse or exploitation of at the school, specifically including Plaintiff. Defendant UNCSCA had a further duty and obligation to see that those policies and procedures were implemented, followed and enforced.

79. Defendant UNCSCA negligently and recklessly breached each of the foregoing duties by failing to exercise reasonable care and by failing to take any action of any kind to prevent its faculty, staff and administrators from engaging in sexual contact with and/or sexually abusing and/or exploiting the students entrusted to their care and supervision, including Plaintiff.

80. Defendant UNCSCA, acting and/or failing to act by and through its administrators,

negligently and recklessly breached each of the foregoing duties by participating in, condoning and/or encouraging an institutional culture that permitted sexual abuse and exploitation of the minor students entrusted to its care and supervision, including the Plaintiff.

81. In breaching these duties Defendant UNCSCA failed to create a safe and secure environment for Plaintiff and other students entrusted to its supervision and in their care, custody, and control, and instead created a dangerous culture and environment that ignored, condoned and/or encouraged sexual abuse and exploitation of its students. In breaching these duties, Defendant UNCSCA created a real and foreseeable risk that Plaintiff and other students would be sexually abused and/or exploited.

82. As a direct and proximate result of the above-described negligence of Defendant UNCSCA, Plaintiff has suffered and continues to suffer physical, mental and emotional injuries and has incurred and continues to incur medical and other expenses and the Plaintiff has incurred a loss of wages and income and suffered a loss of earning capacity causing him to continue to incur lost earnings in the future and the inability to earn wages at his full potential all damages in an amount to be determined by a jury, but in any event, in an amount in excess of twenty-five thousand dollars (\$25,000.00).

83. The acts and/or omissions of Defendant UNCSCA as alleged herein are imputed to Defendant UNC through the doctrine of agency and/or *respondeat superior*.

**SECOND CLAIM FOR RELIEF:**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**  
**AGAINST DEFENDANTS UNCSCA and UNC**

84. Plaintiff refers to and hereby realleges and incorporates by reference all previous paragraphs of this Complaint.



85. As alleged above, Defendant UNCSEA's actions and/or failures to act related to Plaintiff were negligent.

86. These negligent acts or failures to act did, in fact, cause Plaintiff severe emotional distress.

87. Defendant UNCSEA knew or should have known, and it was reasonably foreseeable that, Defendant UNCSEA's conduct would cause the Plaintiff severe emotional distress.

88. Defendant UNCSEA knew of should have known and it was reasonably foreseeable that the failure of the employees, administrators and/or agents of Defendant UNCSEA to properly supervise and to intervene and stop the sexual abuse and exploitation of its students, including Plaintiff, when it was or should have been clear that such harmful conduct was occurring would cause the Plaintiff severe emotional distress.

89. As a result of Defendant UNCSEA's negligent conduct, Plaintiff has sought professional medical treatment.

90. As a proximate and foreseeable result of the negligence of Defendant UNCSEA as alleged herein, Plaintiff endured pain, suffering, mental anguish, and suffered from severe emotional distress and will continue to endure pain, suffering, mental anguish, and suffer from severe emotional distress in the future.

91. As a direct and proximate result of the above-described negligence of Defendant UNCSEA, Plaintiff has suffered and continues to suffer physical, mental and emotional injuries and has incurred and continues to incur medical and other expenses and the Plaintiff has incurred a loss of wages and income and suffered a loss of earning capacity causing him to continue to

incur lost earnings in the future and the inability to earn wages at his full potential all damages in an amount in excess of twenty-five thousand dollars (\$25,000.00).

92. The acts and/or omissions of Defendant UNCSCA as alleged herein are imputed to Defendant UNC through the doctrine of agency and/or *respondeat superior*.

WHEREFORE, Plaintiff respectfully prays the Court as follows:

1. That Plaintiff have and recover of Defendants an amount in excess of twenty-five thousand dollars (\$25,000.00);
2. That Plaintiff be awarded attorney's fees, pre-judgment interest and costs as allowed by law; and
3. For all such other and further relief as the Court may deem just and proper.

This the 29<sup>th</sup> day of September, 2021.

**LANIER LAW GROUP, P.A.**

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*Appearing Pro Hac Vice – Motions Pending*  
  
*Attorneys for Plaintiff*

VERIFICATION

I, Christopher Soderlund, have reviewed the allegations made in this Complaint, and to those allegations of which I have personal knowledge, I believe them to be true. As to those allegations of which I do not have personal knowledge, I rely on information and I believe them to be true.

Christopher Soderlund Date: 9/24/25  
Christopher Soderlund  
Claimant  
Email: mojoworksid@gmail.com

Sworn to and subscribed before me,  
this the 24 day of September, 2021.

Megan J Johnson  
Notary Public

Megan J Johnson  
Printed Name

My Commission expires: 7/24/25

