# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

JOSEPH JEAN-CHARLES, aka JEAN-CHARLES JOSEPH,

Plaintiff,

VS.

DOUGLAS PERLITZ, et al.,

Defendants

Civ. A. No. 3:11-CV-00614 (JCH)

#### **DEFENDANT PAUL E. CARRIER'S MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendant Father Paul E. Carrier, S.J. moves this Court to dismiss Counts 2, 7, 9 and 10 of Plaintiff's Complaint for the reasons set forth in the accompanying memorandum.

## Respectfully submitted,

PAUL E. CARRIER, S.J.

By his attorneys:

#### November 16, 2011

/s/ Erin R. Woelker

Gene S. Winter, ct05137
Erin R. Woelker, ct27552
ST. ONGE STEWARD JOHNSTON & REENS LLC 986 Bedford St.
Stamford, Conn. 06905
(203) 324-6155
gwinter@ssjr.com; ewoelker@ssjr.com

Timothy P. O'Neill (phv04968)
Theodore J. Folkman (phv04969)
Amanda Moger Rettig (phv04967)
MURPHY & KING, P.C.
One Beacon St.
Boston, Mass. 02108
(617) 423-0400
tpo@murphyking.com
tjf@murphyking.com
amr@murphyking.com

### CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2011, a copy of the foregoing Defendant Paul E. Carrier's Motion to Dismiss was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

11-16-201

Carrie A. Csizmadia