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KING COUNTY  
SUPERIOR COURT CLERK  
SEATTLE, WA

ROBERT H. ALSDORF

SUPERIOR COURT OF THE STATE OF WASHINGTON FOR  
KING COUNTY

CHRIS REHFIELD, a single person,

Plaintiff,

v.

CORPORATION OF THE CATHOLIC  
BISHOP OF YAKIMA, a sole  
corporation, JOHN THOLEN, a single  
person,

Defendants.

)  
)  
99-2-08691-1 SEA  
) NO.

) PLAINTIFF'S  
) COMPLAINT FOR DAMAGES

Chris Rehfield, through his counsel, T. Jeffrey Keane and Rodihan & Keane, for  
complaint against defendants allege as follows:

*1.0 PARTIES*

1.1 Plaintiff. Chris Rehfield is a single person who at all material times  
resided in Yakima County, Washington.

1           1.2    Defendant. The Corporation of the Catholic Bishop of Yakima  
2 (hereafter "Yakima Diocese"), is a corporation organized under the laws of the State of  
3 Washington, whose principal place of business is Yakima, Washington. The Yakima  
4 Diocese does business in King County, Washington.  
5

6           1.3    Defendant. John Tholen has, at all material times, resided in Yakima  
7 County, Washington.  
8

## 9                                   2.0    *VENUE AND JURISDICTION*

10           This court has jurisdiction over the parties because at all relevant times the  
11 defendants resided in or did business in Washington State, including King County,  
12 Washington. Venue is properly laid in this court.  
13

## 14                                   3.0    *FACTS*

15           3.1    Chris Rehfield was a parishioner in Holy Redeemer parish, in Yakima,  
16 throughout the 1960's. During that time he met defendant Tholen.  
17

18           3.2    Defendant Tholen was incardinated by and worked under the authority of  
19 the Yakima Diocese. He was, at various times, a parish assistant, a hospital chaplain,  
20 and an assistant pastor at Holy Redeemer. During the time he was an assistant at Holy  
21 Redeemer, he met the members of the Rehfield family, including Chris Rehfield.  
22

23           3.3    Upon information and belief, plaintiff alleges that prior to the time  
24 defendant Tholen was assigned to Holy Redeemer parish, and prior to the time he met  
25 plaintiff, and notwithstanding his vow of chastity, during the time after his ordination  
26 defendant Tholen had engaged in sexual activity. The fact that defendant Tholen had  
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