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**STATE OF MICHIGAN  
CIRCUIT COURT FOR THE COUNTY OF OAKLAND**

SAMANTHA LICHON,

Plaintiff,

v

MICHAEL MORSE, and  
MICHAEL J MORSE, P.C.,

Defendants.

Case No.:

Hon.

**2017-158919-CZ**

**JUDGE SHALINA KUMAR**

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GEOFFREY N. FIEGER (P30441)  
DONALD H. DAWSON, JR. (P29692)  
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**PLAINTIFF'S VERIFIED COMPLAINT AND JURY DEMAND**

There is no other civil action between these parties arising out of the same transaction or occurrence as alleged in this complaint pending in this court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a judge, nor do I know of any other civil action not between these parties arising out of the same transaction or occurrence as alleged in this complaint that is either pending, or was previously filed and dismissed, transferred, or otherwise disposed of after having been assigned to a judge in this court.

NOW COMES the Plaintiff, SAMANTHA LICHON, by and through her attorneys, Fieger, Fieger, Kenney & Harrington, P.C., and for her complaint against Defendants, states as follows:

COMMON ALLEGATIONS

1. At all relevant times, Plaintiff, SAMANTHA LICHON, resided in the City of Hazel Park, County of Oakland, State of Michigan.
2. At all relevant times, Defendant, MICHAEL MORSE, resided in the City of Huntington Woods, County of Oakland, State of Michigan.
3. At all relevant times, Defendant, MICHAEL J MORSE, P.C. (hereinafter, "MIKE MORSE LAW FIRM"), was a Michigan professional corporation located in the City of Southfield, County of Oakland, State of Michigan and conducts systematic business in Oakland County, State of Michigan.
4. At all relevant times, Defendant, MICHAEL MORSE, was the owner and agent of Defendant, MIKE MORSE LAW FIRM, who was at all times acting within the course and scope of his employment, and as a result, Defendant, MIKE MORSE LAW FIRM, is vicariously liable for the acts of Defendant, MICHAEL MORSE.
5. At all relevant times, Plaintiff, SAMANTHA LICHON, was an employee of Defendants, MICHAEL MORSE and MIKE MORSE LAW FIRM.
6. At all relevant times, Defendant, MICHAEL MORSE, owned, possessed, and/or controlled the premises of Defendant, MIKE MORSE LAW FIRM, where the acts described below were committed, located at 24901 Northwestern Hwy in the City of Southfield, County of Oakland, State of Michigan.
7. The events which are the subject matter of this Complaint occurred in Oakland County, Michigan.
8. Venue and jurisdiction are properly vested in this court.

9. The amount in controversy exceeds Fifteen Million (\$15,000,000.00) Dollars, exclusive of interest, costs and attorney's fees.

**FACTUAL ALLEGATIONS**

10. Plaintiff, SAMANTHA LICHON, incorporates by reference the previous allegations, as if restated word for word and paragraph by paragraph.

11. At all relevant times, Defendants, MIKE MORSE LAW FIRM and MICHAEL MORSE, employed Plaintiff, SAMANTHA LICHON, as a receptionist.

12. Plaintiff, SAMANTHA LICHON, began her employment with Defendants on September 28, 2015.

13. Throughout the course of her employment, Plaintiff, SAMANTHA LICHON, was continuously and periodically sexually harassed by Defendant, MICHAEL MORSE, who was owner and agent of Defendant, MIKE MORSE LAW FIRM.

14. The harassment included frequent and unwelcome comments and conduct of an offensive and sexual nature directed at Plaintiff, SAMANTHA LICHON, by Defendant, MICHAEL MORSE.

15. At all relevant times, and on multiple occasions, Defendant, MICHAEL MORSE, made inappropriate comments of an offensive and sexual nature toward Plaintiff, SAMANTHA LICHON, without invitation, permission, or inducement, on the premises of Defendant, MIKE MORSE LAW FIRM.

16. At all relevant times, and on multiple occasions, Defendant, MICHAEL MORSE, actually and physically touched Plaintiff, SAMANTHA LICHON's, body without invitation, permission, or inducement, on the premises of Defendant, MIKE MORSE LAW FIRM.

17. Defendant, MICHAEL MORSE, sexually assaulted Plaintiff, SAMANTHA LICHON, when he groped her breasts without invitation, permission, or inducement on multiple occasions.

18. Defendant, MICHAEL MORSE, sexually assaulted Plaintiff, SAMANTHA LICHON, when he approached her from behind, groped her breasts, and touched his groin to her rear while audibly stating sexual comments, including but not limited to, "you make me so hard," and "I want to take you into my office," which occurred on multiple occasions and was done without invitation, permission, or inducement.

19. Defendant, MICHAEL MORSE, sexually assaulted Plaintiff, SAMANTHA LICHON, on multiple occasions when he physically touched and wrapped his arms around her without invitation, permission, or inducement.

20. Defendant, MICHAEL MORSE, sexually harassed Plaintiff, SAMANTHA LICHON, when he, on multiple occasions, stated sexually motivated comments to SAMANTHA LICHON including but not limited to, "you make me so hard," "I want to take you into my office," "I can't wait to see you get wild," "I'm a good time," "do you still have your hooters shirt?", and invited her to his hotel room on December 12, 2015 via Facebook Messenger app.

21. Plaintiff, SAMANTHA LICHON, complained to her superiors at Defendant, MIKE MORSE LAW FIRM, and also to the Human Resources Department at Defendant, MIKE MORSE LAW FIRM, however no action was taken and the sexual assault and sexual harassment continued.

22. Plaintiff, SAMANTHA LICHON, was unresponsive to these unlawful sexual advances and actions by Defendant, MICHAEL MORSE, and was terminated on February 17, 2017.

23. On Monday, May 15, 2017, at approximately 5:16 p.m., Plaintiff, SAMANTHA LICHON, was contacted by Defendant, MIKE MORSE LAW FIRM, and/or Defendant, MICHAEL MORSE, by and through its agent, actual or ostensible, and/or employee, Derek Brackon, who is an attorney at MIKE MORSE LAW FIRM, who asked SAMANTHA LICHON if she was going to file suit against MICHAEL MORSE and pressured and/or coerced and/or intimidated and/or attempted to persuade SAMANTHA LICHON to not take any action against Defendants.

24. Defendant, MIKE MORSE LAW FIRM, knew or should have known, of Defendant, MICHAEL MORSE's, propensities to act in a manner which constitutes sexual harassment and had actual and/or constructive knowledge of Defendant, MICHAEL MORSE's, propensity to act in accordance with said conduct.

25. Plaintiff, SAMANTHA LICHON, made internal complaints against Defendant, MICHAEL MORSE, to Defendant, MIKE MORSE LAW FIRM's, Human Resource Department and/or her superiors on multiple occasions, and as such Defendant, MIKE MORSE LAW FIRM, had actual and/or constructive knowledge of Defendant, MICHAEL MORSE's, conduct and propensities.

26. Defendant, MIKE MORSE LAW FIRM, was aware that Defendant, MICHAEL MORSE, engaged in conduct constituting sexual harassment and sexual assault with other female employees, and had knowledge that MICHAEL MORSE was having sexual relations with a receptionist and had sexual relations with other female

employees in the past, and as such, Defendant, MIKE MORSE LAW FIRM, had actual and/or constructive knowledge of Defendant, MICHAEL MORSE's, conduct and propensities.

27. At all times relevant, Defendant, MIKE MORSE LAW FIRM, failed to take any remedial action regarding Plaintiff, SAMANTHA LICHON's, complaints of sexual harassment against Defendant, MICHAEL MORSE, and as such the sexual harassment and sexual assault continued.

28. Defendant, MIKE MORSE LAW FIRM, is vicariously liable for the actions of Defendant, MICHAEL MORSE, who is owner and agent of MIKE MORSE LAW FIRM, and who was at all times acting within the course and scope of his employment.

29. Defendants, MICHAEL MORSE and MIKE MORSE LAW FIRM, committed various acts of sexual harassment at the workplace, negligence, intentional and negligent infliction of emotional distress, and sexual assault and battery, all of which were committed within the County of Oakland, State of Michigan.

**COUNT I - WORKPLACE SEXUAL HARASSMENT**  
**VIOLATION OF ELLIOTT-LARSEN CIVIL RIGHTS ACT**  
**AGAINST DEFENDANTS, MICHAEL MORSE AND MIKE MORSE LAW FIRM**

30. Plaintiff, SAMANTHA LICHON incorporates by reference the previous allegations, as if restated word for word and paragraph by paragraph.

31. Plaintiff, SAMANTHA LICHON, was the subject of sexual harassment based on her sex.

32. Plaintiff, SAMANTHA LICHON, was an employee, and Defendants, MICHAEL MORSE and MIKE MORSE LAW FIRM, were her employer, covered by

and within the meaning of the Michigan Elliot-Larsen Civil Rights Act, MCL 37.2101 et seq.

33. At all relevant times, Plaintiff, SAMANTHA LICHON, was subjected to unwelcome sexual conduct and/or communication by Defendant, MICHAEL MORSE, who is owner and agent of Defendant, MIKE MORSE LAW FIRM.

34. Defendant, MICHAEL MORSE, performed unwelcome sexual advances, and/or requested sexual favors, and/or other verbal or physical conduct of a sexual nature toward Plaintiff, SAMANTHA LICHON, which were motivated by sexual desires and/or gratification.

35. Defendant, MICHAEL MORSE's, conduct toward Plaintiff, SAMANTHA LICHON, was unwelcome, unsolicited, not incited, and was in fact offensive and undesirable by SAMANTHA LICHON.

36. The behavior of Defendant, MICHAEL MORSE, was a continuous and/or a periodic problem which was pervasive and created an intimidating, hostile, offensive, and/or abusive working environment.

37. Defendant, MICHAEL MORSE, on multiple occasions, groped Plaintiff, SAMANTHA LICHON's, breasts without invitation, permission, or inducement.

38. Defendant, MICHAEL MORSE, on multiple occasions, approached Plaintiff, SAMANTHA LICHON, from behind, groped her breasts, and touched his groin to her rear while audibly stating sexual comments, including but not limited to, "you make me so hard," and "I want to take you into my office," without invitation, permission, or inducement.

39. Defendant, MICHAEL MORSE, on multiple occasions, touched and wrapped his arms around Plaintiff, SAMANTHA LICHON, without invitation, permission, or inducement.

40. Defendant, MICHAEL MORSE, on multiple occasions, stated sexually motivated comments to SAMANTHA LICHON including but not limited to, "you make me so hard," "I want to take you into my office," "I can't wait to see you get wild," "I'm a good time," "do you still have your hooters shirt?", and invited her to his hotel room on December 12, 2015 via Facebook Messenger app.

41. The behavior of Defendant, MICHAEL MORSE, substantially interfered with Plaintiff, SAMANTHA LICHON's, employment.

42. The actions of Defendant, MIKE MORSE LAW FIRM, by and through its owner and agent, Defendant, MICHAEL MORSE, were intentional.

43. Plaintiff, SAMANTHA LICHON, made internal complaints against Defendant, MICHAEL MORSE, to Defendant, MIKE MORSE LAW FIRM's, Human Resource Department and/or her superiors, but no action was taken and the sexual harassment continued.

44. Plaintiff, SAMANTHA LICHON, was unresponsive to these unlawful sexual advances and actions by Defendant, MICHAEL MORSE, and was terminated on February 17, 2017.

45. The actions of Defendant, MIKE MORSE LAW FIRM, by and through its owner and agent, Defendant, MICHAEL MORSE, in sexually harassing Plaintiff, SAMANTHA LICHON, constitutes sexual discrimination in violation of MCL 37.2101 et seq.



46. As a direct and proximate result of Defendant's unlawful actions against Plaintiff, SAMANTHA LICHON, as previously described, SAMANTHA LICHON has suffered injuries and damages, including but not limited to:

- a. Severe emotional and mental distress;
- b. Economic losses;
- c. Humiliation, grief, embarrassment;
- d. Loss of reputation and esteem in the community;
- e. Fright and shock;
- f. Inability to experience social pleasures and enjoyment;
- g. Physical manifestations including shaking of hands, nausea, increased anxiety, headaches, crying spells, nightmares, cold sweats, loss of appetite, sleeplessness and other physical manifestations;
- h. Loss of earning capacity;
- i. All additional injuries and damages discovered throughout the course of this litigation;

WHEREFORE, Plaintiff, SAMANTHA LICHON, demands judgment in excess of Fifteen Million (\$15,000,000.00) Dollars, or whatever amount the trier of fact finds the plaintiff to be entitled, along with an award of exemplary damages, including costs, interest and attorney's fees.

**COUNT II**  
**SEXUAL ASSAULT AND BATTERY**  
**AGAINST DEFENDANT, MICHAEL MORSE**

47. Plaintiff, SAMANTHA LICHON, incorporates by reference the previous allegations, as if restated word for word and paragraph by paragraph.

48. At all relevant times, and on multiple occasions, Defendant, MICHAEL MORSE, made intentional and unlawful threats to physically and inappropriately touch Plaintiff, SAMANTHA LICHON's, body in a sexual manner under circumstances that created in her a well-founded fear of imminent unlawful physical contact.

49. At all relevant times, and on multiple occasions, Defendant, MICHAEL MORSE, unlawfully and without consent actually and physically touched Plaintiff, SAMANTHA LICHON's, body, specifically, but not limited to, when he groped her breasts in a sexual manner.

50. At all relevant times, and on multiple occasions, Defendant, MICHAEL MORSE, unlawfully and without consent actually and physically touched Plaintiff, SAMANTHA LICHON's, body, specifically, but not limited to, when he touched his groin to her rear while stating comments such as "you make me so hard" and "I want to take you to my office."

51. At all relevant times, Defendant, MICHAEL MORSE, negligently, intentionally, and/or willfully or maliciously sexually assaulted Plaintiff, SAMANTHA LICHON.

52. Defendant, MICHAEL MORSE, knew or should have known, that his conduct was illegal and malicious and was a violation of the statutes and common laws of the State of Michigan.

53. As a result of Defendant, MICHAEL MORSE's, illegal, negligent, grossly negligent, intentional, and/or malicious conduct, MICHAEL MORSE breached the duties owed to Plaintiff, SAMANTHA LICHON, of not sexually assaulting a person, or touching, without consent, contrary to the laws and the rights of citizens in the State of Michigan.

54. Such assault and battery by Defendant, MICHAEL MORSE, as owner and agent of Defendant, MIKE MORSE LAW FIRM, was committed with the knowledge and consent of Defendant, MIKE MORSE LAW FIRM.

55. As a direct and proximate result of Defendant, MICHAEL MORSE's conduct, Plaintiff, SAMANTHA LICHON, suffered a sexual assault and battery.

56. As a direct and proximate result of Defendant, MICHAEL MORSE's, negligent and/or intentional actions and/or omissions, Plaintiff, SAMANTHA LICHON, has suffered and continues to suffer the following injuries and damages:

- a. Severe emotional and mental distress;
- b. Economic losses;
- c. Humiliation, grief, embarrassment;
- d. Loss of reputation and esteem in the community;
- e. Fright and shock;
- f. Inability to experience social pleasures and enjoyment;
- g. Physical manifestations including shaking of hands, nausea, increased anxiety, headaches, crying spells, nightmares, cold sweats, loss of appetite, sleeplessness and other physical manifestations;
- h. Loss of earning capacity;
- i. All additional injuries and damages discovered throughout the course of this litigation;

57. Defendant, MIKE MORSE LAW FIRM, knew or should have known, of Defendant, MICHAEL MORSE's, propensities to act in a manner which constitutes sexual harassment and had actual and/or constructive knowledge of Defendant, MICHAEL MORSE's, propensity to act in accordance with said conduct.

58. Plaintiff, SAMANTHA LICHON, made internal complaints against Defendant, MICHAEL MORSE, to Defendant, MIKE MORSE LAW FIRM's, Human Resource Department and/or her superiors on multiple occasions, and as such Defendant, MIKE MORSE LAW FIRM, had actual and/or constructive knowledge of Defendant, MICHAEL MORSE's, conduct and propensities.

59. Defendant, MIKE MORSE LAW FIRM, was aware that Defendant, MICHAEL MORSE, engaged in conduct constituting sexual harassment and sexual

assault with other female employees, and had knowledge that MICHAEL MORSE was having sexual relations with a receptionist and had sexual relations with other female employees in the past, and as such, Defendant, MIKE MORSE LAW FIRM, had actual and/or constructive knowledge of Defendant, MICHAEL MORSE's, conduct and propensities.

60. At all times relevant, Defendant, MIKE MORSE LAW FIRM, failed to take any remedial action regarding Plaintiff, SAMANTHA LICHON's, complaints of sexual harassment against Defendant, MICHAEL MORSE, and as such the sexual harassment and sexual assault continued.

61. Defendant, MIKE MORSE LAW FIRM, is vicariously liable for the actions of Defendant, MICHAEL MORSE, who is owner and agent of MIKE MORSE LAW FIRM, and who was at all times acting within the course and scope of his employment.

WHEREFORE, Plaintiff, SAMANTHA LICHON, demands judgment in excess of Fifteen Million (\$15,000,000.00) Dollars, or whatever amount the trier of fact finds the plaintiff to be entitled, along with an award of exemplary damages, including costs, interest and attorney's fees.

**COUNT III**  
**NEGLIGENT AND INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
**AGAINST DEFENDANTS, MICHAEL MORSE and MIKE MORSE LAW FIRM**

62. Plaintiff, SAMANTHA LICHON, incorporates by reference the previous allegations, as if restated word for word and paragraph by paragraph.

63. Defendant, MIKE MORSE LAW FIRM, by and through its owner and agent Defendant, MICHAEL MORSE, inflicted great emotional distress upon Plaintiff,

SAMANTHA LICHON, by way of his intentional and/or negligent facilitation of the aforementioned illegal and improper acts.

64. The aforementioned illegal and improper acts constitute extreme and outrageous conduct, which caused Plaintiff, SAMANTHA LICHON, to suffer severe injuries, including humiliation, indignity and injury to her psyche including, but not limited to the following, all of which shock the conscience of the community:

- a. Actually and physically touching the body of Plaintiff, SAMANTHA LICHON, in a sexual and offensive manner without invitation, permission, or inducement;
- b. Physically groping Plaintiff, SAMANTHA LICHON's, breasts on multiple occasions without invitation, permission, or inducement;
- c. Physically approached Plaintiff, SAMANTHA LICHON, from behind and touched his groin to her rear while making comments including but not limited to "you make me so hard" and "I want to take you into my office" which occurred on multiple occasions and without invitation, permission, or inducement;
- d. Physically wrapped his arms around Plaintiff, SAMANTHA LICHON's, body without invitation, permission, or inducement;
- e. Communicating inappropriate and threatening comments of an extremely offensive and sexual nature toward Plaintiff, SAMANTHA LICHON, without invitation, permission, or inducement;
- f. Stating to Plaintiff, SAMANTHA LICHON, comments including, but not limited to, "you make me so hard," "I want to take you into my office," "I can't wait to see you get wild," "I'm a good time," "do you still have your hooters shirt?", and an invitation to his hotel room on December 12, 2015 via Facebook Messenger app;
- g. Failing to take any remedial measures after Plaintiff, SAMANTHA LICHON, complained to Defendant, MIKE MORSE LAW FIRM's, Human Resource Department and/or her superiors;

- h. Failing to properly supervise Defendant, MICHAEL MORSE, and provide protection to Plaintiff, SAMANTHA LICHON, as is the duty of an employer to its employees;
- i. Failing to intervene on behalf of the Plaintiff, SAMANTHA LICHON, so as to prevent the egregious acts of Defendant MICHAEL MORSE;
- j. Assisting the perpetrator of a sexual assault in an attempt to cover up same;
- k. Pressuring and/or intimidating and/or attempting to persuade and/or coerce Plaintiff, SAMANTHA LICHON, to not file suit against Defendants by and through its agent, actual or ostensible, and/or employee, Derek Brackon, during the May 15, 2017, phone call to SAMANTHA LICHON at approximately 5:16 p.m.;
- l. Failing to provide a safe premise to its employees which is free of sexual predators;
- m. Failing to keep a safe premise, free of assault and battery upon its employees, especially such conduct as previously described committed by Defendant, MICHAEL MORSE, who is owner and agent of Defendant, MIKE MORSE LAW FIRM;
- n. Failing to have safeguards in place to prevent sexual assault by its employees;
- o. Failing to provide a safe work environment for its employees;
- p. All other breaches of duty identified by Defendants in deposition testimony and/or answers to interrogatories and/or all other discovery, all of which is hereby adopted by reference; and
- q. Any and all other breaches that become known through the course of litigation.

65. Defendant, MICHAEL MORSE, by and through his acts and/or omissions, inflicted emotional distress upon Plaintiff, SAMANTHA LICHON, by his unconsented

sexual assault and battery and his offensive and threatening comments of a sexual nature directed toward Plaintiff, SAMANTHA LICHON.

66. The conduct of Defendant, MICHAEL MORSE, was extreme, outrageous, and of a character not to be tolerated by a civilized society.

67. The conduct of Defendant, MICHAEL MORSE, would naturally and probably result in emotional distress.

68. As a direct and proximate result of the Defendant, MICHAEL MORSE's, actions, all of which constitute either negligent or intentional infliction of emotional distress, Plaintiff, SAMANTHA LICHON, has suffered the following injuries and damages:

- a. Severe emotional and mental distress;
- b. Economic losses;
- c. Humiliation, grief, embarrassment;
- d. Loss of reputation and esteem in the community;
- e. Fright and shock;
- f. Inability to experience social pleasures and enjoyment;
- g. Physical manifestations including shaking of hands, nausea, increased anxiety, headaches, crying spells, nightmares, cold sweats, loss of appetite, sleeplessness and other physical manifestations;
- h. Loss of earning capacity;
- i. All additional injuries and damages discovered throughout the course of this litigation;

69. Defendant, MIKE MORSE LAW FIRM, knew or should have known, of Defendant, MICHAEL MORSE's, propensities to act in a manner which constitutes sexual harassment and had actual and/or constructive knowledge of Defendant, MICHAEL MORSE's, propensity to act in accordance with said conduct.

70. Plaintiff, SAMANTHA LICHON, made internal complaints against Defendant, MICHAEL MORSE, to Defendant, MIKE MORSE LAW FIRM's, Human

Resource Department and/or her superiors, and as such had actual and/or constructive knowledge of Defendant, MICHAEL MORSE's, conduct and propensities.

71. At all times relevant, Defendant, MIKE MORSE LAW FIRM, failed to take any remedial action regarding Plaintiff, SAMANTHA LICHON's, complaints of sexual harassment against Defendant, MICHAEL MORSE.

72. Defendant, MIKE MORSE LAW FIRM, is vicariously liable for the actions of Defendant, MICHAEL MORSE, who is owner and agent of MIKE MORSE LAW FIRM, and who was at all times acting within the course and scope of his employment,

WHEREFORE, Plaintiff, SAMANTHA LICHON, demands judgment in excess of Fifteen Million (\$15,000,000.00) Dollars, or whatever amount the trier of fact finds the plaintiff to be entitled, along with an award of exemplary damages, including costs, interest and attorney's fees.

**COUNT IV**  
**NEGLIGENCE, GROSS NEGLIGENCE, WANTON AND**  
**WILLFUL MISCONDUCT**  
**DEFENDANTS, MICHAEL MORSE AND MIKE MORSE LAW FIRM**

73. Plaintiff, SAMANTHA LICHON incorporates by reference the previous allegations, as if restated word for word and paragraph by paragraph.

74. At all times relevant, Defendant, MICHAEL MORSE, who is owner and agent of Defendant, MIKE MORSE LAW FIRM, was acting within the scope and course of his employment, when he committed the previously described acts constituting negligence, gross negligence, and/or willful and wanton misconduct.

75. Defendants, MICHAEL MORSE, and Defendant, MIKE MORSE LAW FIRM, committed acts of negligence which include the following:



- a. Actually and physically touching the body of Plaintiff, SAMANTHA LICHON, in a sexual and offensive manner without invitation, permission, or inducement;
- b. Physically groping Plaintiff, SAMANTHA LICHON's, breasts on multiple occasions without invitation, permission, or inducement;
- c. Physically approached Plaintiff, SAMANTHA LICHON, from behind and touched his groin to her rear while making comments including but not limited to "you make me so hard" and "I want to take you into my office" which occurred on multiple occasions and without invitation, permission, or inducement;
- d. Physically wrapped his arms around Plaintiff, SAMANTHA LICHON's, body without invitation, permission, or inducement;
- e. Communicating inappropriate and threatening comments of an extremely offensive and sexual nature toward Plaintiff, SAMANTHA LICHON, without invitation, permission, or inducement;
- f. Stating to Plaintiff, SAMANTHA LICHON, comments including, but not limited to, "you make me so hard," "I want to take you into my office," "I can't wait to see you get wild," "I'm a good time," "do you still have your hooters shirt?", and an invitation to his hotel room on December 12, 2015 via Facebook Messenger app;
- g. Failing to take any remedial measures after Plaintiff, SAMANTHA LICHON, complained to Defendant, MIKE MORSE LAW FIRM's, Human Resource Department and/or her superiors;
- h. Failing to properly supervise and/or monitor Defendant, MICHAEL MORSE, and provide protection to Plaintiff, SAMANTHA LICHON, as is the duty of an employer to its employees;
- i. Failing to intervene on behalf of the Plaintiff, SAMANTHA LICHON, so as to prevent the egregious acts of Defendant MICHAEL MORSE;

- j. Assisting the perpetrator of a sexual assault in an attempt to cover up same;
- k. Pressuring and/or intimidating and/or attempting to persuade and/or coercing Plaintiff, SAMANTHA LICHON, to not file suit against Defendants by and through its agent, actual or ostensible, or employee, Derek Brackon, during the May 15, 2017, phone call to SAMANTHA LICHON at approximately 5:16 p.m;
- l. Failing to provide a safe premise to its employees which is free of sexual predators;
- m. Failing to keep a safe premise, free of assault and battery upon its employees, especially such conduct as previously described committed by Defendant, MICHAEL MORSE, who is owner and agent of Defendant, MIKE MORSE LAW FIRM;
- n. Failing to have safeguards in place to prevent sexual assault by its employees;
- o. All other breaches of duty identified by Defendants in deposition testimony and/or answers to interrogatories and/or all other discovery, all of which is hereby adopted by reference; and
- p. Any and all other breaches that become known through the course of litigation.

76. As a result of breaching each and every duty owed by Defendants, MICHAEL MORSE and MIKE MORSE LAW FIRM, as described above, Plaintiff, SAMANTHA LICHON, suffered damages and injuries as described herein.

77. At all times relevant, the conduct by Defendants, MICHAEL MORSE and MIKE MORSE LAW FIRM, as identified herein amounted to conduct so reckless as to have a substantial disregard whether injury should occur.

78. Defendant, MICHAEL MORSE, committed acts of negligence, gross negligence, willful and wanton misconduct against Plaintiff, SAMANTHA LICHON, as

described previously, which constituted conduct so reckless and egregious as to amount to gross negligence.

79. As a direct and proximate result of the acts and conduct referenced above, by Defendants MICHAEL MORSE and MIKE MORSE LAW FIRM, Plaintiff, SAMANTHA LICHON, suffered numerous injuries and damages, which include but are not limited to:

- a. Severe emotional and mental distress;
- b. Economic losses;
- c. Humiliation, grief, embarrassment;
- d. Loss of reputation and esteem in the community;
- e. Fright and shock;
- f. Inability to experience social pleasures and enjoyment;
- g. Physical manifestations including shaking of hands, nausea, increased anxiety, headaches, crying spells, nightmares, cold sweats, loss of appetite, sleeplessness and other physical manifestations;
- h. Loss of earning capacity;
- i. All additional injuries and damages discovered throughout the course of this litigation;

80. Defendant, MIKE MORSE LAW FIRM, is vicariously liable for the actions of Defendant, MICHAEL MORSE, who is owner and agent of MIKE MORSE LAW FIRM, and who was at all times acting within the course and scope of his employment.


WHEREFORE, Plaintiff, SAMANTHA LICHON demands judgment in excess of Fifteen Million (\$15,000,000.00) Dollars, or whatever amount the trier of fact finds the plaintiff to be entitled, along with an award of exemplary damages, including costs, interest and attorney's fees.

Respectfully Submitted,



GEOFFREY N. FIEGER (P30441)  
DONALD H. DAWSON, JR. (P29692)  
Fieger, Fieger, Kenney & Harrington P.C.  
Attorneys for Plaintiff  
19390 West Ten Mile Road  
Southfield, MI 48075  
(248) 355-5555

Dated: May 24, 2017



SAMANTHA LICHON

*I declare that the statements above are true to the best of my information, knowledge and belief.*

5/23/17

DATED

Received for Filing Oakland County Clerk 5/24/2017 12:09 PM

This case has been designated as an eFiling case. To review a copy of the Notice of Mandatory eFiling visit [www.oakgov.com/clerkrod/Pages/efiling](http://www.oakgov.com/clerkrod/Pages/efiling).

STATE OF MICHIGAN  
CIRCUIT COURT FOR THE COUNTY OF OAKLAND

SAMANTHA LICHON,

Plaintiff,

v

MICHAEL MORSE, and  
MICHAEL J MORSE, P.C.,

Defendants.

Case No.:

Hon.

2017-158919-CZ

JUDGE SHALINA KUMAR

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GEOFFREY N. FIEGER (P30441)  
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Attorneys for Plaintiff  
19390 West Ten Mile Road  
Southfield, MI 48075  
(248) 355-5555  
Fax: (248) 355-5148

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**DEMAND FOR JURY TRIAL**

NOW COMES the Plaintiff, SAMANTHA LICHON, by and through her attorneys FIEGER, FIEGER, KENNEY, & HARRINGTON, P.C., and hereby demands a trial by jury in the above captioned matter.

Respectfully Submitted,



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GEOFFREY N. FIEGER (P30441)  
DONALD H. DAWSON, JR. (P29692)  
Fieger, Fieger, Kenney & Harrington P.C.  
Attorneys for Plaintiff  
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Dated: May 24, 2017

*Samantha Lichon*

SAMANTHA LICHON

*I declare that the statements above are  
true to the best of my information,  
knowledge and belief.*

5/23/17

DATED

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