

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF KENTUCKY
LOUISVILLE DIVISION
(Electronically filed)

Civil Action No. 3:21-cv-612-RGJ

Jury Trial Requested

MATTHEW SCHRENGER

PLAINTIFF

v.

COMPLAINT

ERIKA SHIELDS, in her
official capacity as POLICE
CHIEF OF THE
LOUISVILLE METRO
POLICE DEPARTMENT,
LOUISVILLE METRO
POLICE DEPARTMENT
AND GREG FISCHER, IN HIS
OFFICIAL CAPACITY AS
MAYOR OF THE CITY OF
LOUISVILLE, CITY OF
LOUISVILLE, KY

DEFENDANTS

DEFENDANTS.

SERVE:

Erika Shields
633 W. Jefferson Street
Louisville, KY 40202

And

Greg Fischer
527 W. Jefferson Street
Louisville, KY 40202

I. **INTRODUCTION**

In this case, Plaintiff Matthew Schrenger brings this complaint against Defendants for violation of his constitutional and civil rights. A quiet, off-duty prayer, on a public sidewalk, resulted in Schrenger being immediately suspended for over four months, stripped of his police powers, and placed under investigation.

II. **JURISDICTION AND VENUE**

1. A majority of the claims in this action involve a substantial federal question including claims arising under the First and Fourteenth Amendments to the United States Constitution, brought pursuant to 42 U.S.C. § 1983. This Court has jurisdiction over the instant matter pursuant to 28 U.S.C. §§ 1331 and 1343.
2. On or about June 21, 2021, Officer Schrenger filed a charge with the Equal Employment Opportunity Commission (“EEOC”) identifying conduct by the Louisville Metro Police Department (“LMPD”) in violation of 42 U.S.C. § 2000e et seq. Subsequently, the EEOC issued a right to sue notice on or about July 7, 2021, which was subsequently received by Schrenger. This lawsuit having been filed within 90 days of Schrenger’s receipt of the right to sue notice, all statutory requirements for exhaustion of administrative remedies have been satisfied pertaining to his claims under 42 U.S.C. § 2000e et seq. This court has jurisdiction over these claims pursuant to 28 U.S.C. § 1331.
3. Schrenger also brings statutory claims under the Kentucky Civil Rights Act, KRS 344 et seq., and under Kentucky common law. This court has supplemental jurisdiction over these claims as provided by 28 U.S.C. §1367(a), as these Kentucky law claims form part of the same case or controversy as the federal claims.

4. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b)(1) and (2) because the Defendants reside in this District and a substantial part of the events or omissions giving rise to Plaintiff's claims occurred in this District.
5. This Court is authorized to grant Plaintiff's prayer for relief regarding costs, including a reasonable attorney's fee, pursuant to 42 U.S.C. § 1988 and 42 U.S.C. § 2000e-5(k).

III. STATEMENT OF FACTS

6. On Saturday morning, February 20, 2021, at approximately 6:00 a.m., well before sunrise, Officer Matthew Schrenger of the LMPD joined his father for private prayer on a public sidewalk. Schrenger was not on duty at the time of the prayer.
7. The sidewalk was located outside of the EMW Women's Surgical Center, an abortion clinic.
8. Schrenger's prayer that morning was in support of the lives ended by abortion. His prayer came from his long-held, sincere religious beliefs.
9. EMW's security video, purportedly of Schrenger and his father, shows two nondescriptly dressed men, walking slowly up and down the sidewalk, primarily in the dark, alternatingly wearing a small 40 Days for Life sign.
10. 40 Days for Life is a well-respected, internationally coordinated, 40-day campaign that aims to end abortion through peaceful prayer and fasting in front of abortion businesses.
11. 40 Days for Life operates on an expressed discipline of avoiding all protesting or hostile engagement of any kind. Its participants are required to focus solely on prayer, as did Schrenger in this case.

12. The abortion business had not yet opened for the day. Consequently, there were no other people around except one individual at the very beginning of Schrenger's prayer, and a few who arrived as Officer Schrenger was leaving. The streets were largely empty of traffic during the predawn prayer on a Saturday morning.
13. LMPD subsequently accused Schrenger of "protesting" at the abortion clinic. Schrenger consistently and emphatically denied "protesting." Rather, he walked quietly and prayed quietly.
14. On the same morning, after Schrenger's off-duty prayer, Schrenger reported for his shift with the LMPD. Upon information and belief, LMPD officials were notified of Schrenger's prayer at the abortion clinic soon after he arrived for work.
15. That same day, Schrenger was locked out from his computer as well as from his car computer. Still during the same day, his police car also was taken away from him, and he was removed from the patrol schedule.
16. Schrenger was suspended that same morning, and he was stripped of his police powers during the time his off-duty prayer was supposed to be investigated.
17. LMPD wrongly accused Schrenger of violating LMPD Standard Operating Procedures (SOPs) and Kentucky law. As is immediately apparent, none of the allegedly violated SOPs or law were remotely intended to prohibit off-duty prayer of this nature. The plain language of the SOPs does not prohibit Schrenger's conduct whatsoever.
18. LMPD Chief Erika Shields herself publicly admitted she did not believe that Schrenger's conduct was clearly prohibited. When questioned about the Schrenger matter at a meeting of the Louisville Metro Council's Oversight and Audit Committee on March 2, 2021, Chief

Shields stated, “[A]s an employer, it’s not black and white. And the policies have to be written in such a manner so that the subjectivity is taken away.”

19. Under these circumstances, where Schrenger’s conduct admittedly was not clearly prohibited, there should have been no suspension and no investigation.
20. Officer Schrenger is a 13-year LMPD veteran, with multiple commendations, and without any significant previous complaint against him. He has four young children to support. He is the sort of officer LMPD easily could have talked to, if LMPD found his off-duty prayer activities to be inappropriate.
21. Instead, LMPD apparently preferred to punish Schrenger unofficially by deliberately extending his suspension period, knowing the stress caused by having his career and livelihood dangling on the outcome of a protracted investigation.
22. When asked during the Louisville Metro Council’s Oversight and Audit Committee on March 2, 2021, whether the investigation would “drag on forever,” LMPD Chief Shields stated: “There’s no reason that this [investigative] file should take any time at all.”
23. Yet even as of that date, nearly two weeks after the off-duty prayer at issue, LMPD had not bothered even to interview Schrenger, despite his inquiries. In fact, LMPD did not get around to interviewing him until March 18, 2021 two weeks after Chief Shields publicly admitted that there is no reason the investigation should take any time at all.
24. The facts were never seriously in dispute. Schrenger was fully cooperative during the investigatory process, and readily admitted he had prayed on a public sidewalk while off duty. A security videotape of the entire “incident” had been publicized by the abortion clinic nearly immediately after it happened.

25. Upon information and belief, no additional investigatory steps apparently were taken following the interview on March 18, 2021.
26. Nonetheless, LMPD purposefully delayed concluding the inactive “investigation” for nearly another three months after the March 18 interview, despite two separate letters on behalf of Schrenger during that time, expressly indicating the personal harm the unnecessary delay was causing Schrenger.
27. Not until a letter dated June 15, 2021, did LMPD Chief Shields officially inform Schrenger that none of the allegations against him had been sustained. Instead of verbally informing him of that outcome or emailing him, Chief Shields solely relied on the slower mail method, further extending the delay.
28. Schrenger’s police powers inexplicably were not restored until June 29, 2021, two weeks after the June 15, 2021 letter, and more than four months, plus a week, after Schrenger’s suspension because of off-duty prayer.
29. While Schrenger did not engage in any political protest on duty or while displaying his uniform, he was treated very differently than other similarly situated LMPD officers who undeniably had engaged in true political protest and activism on issues of which LMPD officially approved.
30. Within a relatively close time proximity to Schrenger’s early morning, off-duty prayer, other LMPD officers publicly marched -- while in uniform, apparently while on-duty—in an LGBT parade and in Black Lives Matter protests. Upon information and belief, LMPD officers’ participation in some or all of these uniformed marches was done at the encouragement of the LMPD.

31. Open-records requests to LMPD revealed these other officers were not investigated, suffered no suspension and, in fact, no discipline whatsoever.
32. It is readily apparent that LMPD's actions against Schrenger were not due to some purported violation of the SOPs, but was retaliation and discrimination because of his prayer and sincerely held religious beliefs.
33. Without police powers, Schrenger was no longer able to work other jobs to supplement his police income. Off-duty work is a well-known and accepted practice throughout law enforcement and condoned by LMPD. Although he received some LMPD pay, he was not able to take advantage of overtime opportunities, nor was he able to continue his approved, uniformed, off-duty jobs.
34. LMPD's decision to suspend Schrenger caused him harm including loss of pay, humiliation, embarrassment, anger, and mental anguish. He sought counseling while on suspension. Schrenger has lost much of his job satisfaction, due to LMPD's purposeful mistreatment of him, despite his many years of loyal and exemplary service.
35. The various decisions causing harm to Officer Schrenger were made by Police Chief Shields, or by a subordinate acting on her behalf and ratified by Chief Shields as the final policymaker for the LMPD.
36. The decisions made by Chief Shields, as described above, were made in concert with Mayor Fischer, or adopted or ratified by him, as the final policymaker for the City of Louisville.

IV. CAUSES OF ACTION

COUNT I
VIOLATION OF THE FREE EXERCISE CLAUSE OF THE FIRST AMENDMENT TO
THE UNITED STATES CONSTITUTION
(42 U.S.C. § 1983)

37. Plaintiff hereby realleges and adopts all allegations set forth above.

38. The Free Exercise Clause of the First Amendment to the United States Constitution, as applied to the states by the Fourteenth Amendment, prohibits Defendants from abridging Plaintiff's rights to free exercise of religion.

39. The Defendants subjected the Plaintiff to suspension and related mistreatment, because the Plaintiff, while off duty, engaged in quiet prayer on a public sidewalk in front of an abortion clinic.

40. The Defendants targeted the Plaintiff's right to freely exercise his religion.

41. The Defendants' actions in violation of the Plaintiff's First Amendment rights were performed under the color of state law.

42. The Defendants' actions were not narrowly tailored to further a compelling interest.

43. The Defendants' actions were not the least restrictive means of furthering any hypothetical compelling interest.

44. The Defendants' actions caused damage to the Plaintiff.

COUNT II
VIOLATION OF THE FREE SPEECH CLAUSE OF THE FIRST AMENDMENT TO
THE UNITED STATES CONSTITUTION
(42 U.S.C. § 1983)

45. Plaintiff hereby realleges and adopts all allegations set forth above.

46. The Free Speech Clause of the First Amendment to the United States Constitution, as applied to the states by the Fourteenth Amendment, prohibits Defendants from abridging Plaintiff's right to speech.
47. The Plaintiff's right to speak freely and honestly is fully protected even if the Defendants disapprove of the Plaintiff's pro-life views. The central role of the First Amendment is to protect the right of individuals to speak of their beliefs and views, particularly when the government disapproves.
48. On February 20, 2021, the Plaintiff was praying on a public sidewalk, a traditional public forum to which the First Amendment applies.
49. The Plaintiff's speech at issue was in the form of prayer, walking back and forth in front of an abortion clinic, periodically carrying a sign that read, "40 Days for Life."
50. The Plaintiff was not working as a policeman at the time of the speech at issue and was not displaying his police uniform.
51. The Plaintiff was speaking as a private citizen.
52. The speech involved was not part of the Plaintiff's official job duties.
53. To the extent the Plaintiff's speech concerned abortion, his speech was about a matter of public concern.
54. The Plaintiff's speech, in itself, did not promote any inefficiencies in the delivery of police services.
55. The Defendants suspended the Plaintiff for more than four months from his job duties expressly because of the Plaintiff's pro-life and religious speech as described above.
56. The Defendants' attempt to censor the Plaintiff's speech was based on the content of that speech and on its viewpoint.

57. The Defendants' actions were not narrowly tailored to further a compelling interest.

58. The Defendants' actions in violation of the Plaintiff's First Amendment rights were performed under the color of state law.

59. The Defendants' actions caused damage to the Plaintiff.

COUNT III
VIOLATION OF THE EQUAL PROTECTION CLAUSE OF THE FOURTEENTH
AMENDMENT TO THE UNITED STATES CONSTITUTION.
(42 U.S.C. § 1983)

60. Plaintiff hereby realleges and adopts all allegations set forth above.

61. The Equal Protection Clause of the Fourteenth Amendment to the United States Constitution prohibits any state from denying the protection of laws to any person within its jurisdiction.

62. Under the Equal Protection Clause, the government is required to treat similarly situated individuals in a similar manner.

63. The Equal Protection Clause places strict limits on the government's ability to infringe fundamental constitutional rights of all classes of persons.

64. The Defendants treated the Plaintiff substantially different than it treated other similarly situated LMPD officers who spoke or acted publicly on matters of public concern.

65. The Defendants treated the Plaintiff substantially different than it treated other similarly situated LMPD officers based on the Plaintiff's exercise of his religion.

66. The Defendants treated the Plaintiff substantially different than it treated other similarly situated LMPD officers based on the Plaintiff's pro-life speech.

67. The Defendants' suspension and mistreatment of the Plaintiff as described above placed a substantial burden on the Plaintiff's exercise of his fundamental First Amendment rights to Free Exercise and Free Speech, or substantially deterred the exercise of those rights.
68. The Defendants' actions were not narrowly tailored to further a compelling interest
69. The Defendants' actions caused damage to the Plaintiff.

COUNT IV
VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964 AS AMENDED.
(42 U.S.C. § 2000e et seq.)

70. Plaintiff realleges and adopts all allegations set forth above.
71. Schrenger is devoutly religious and an excellent highly qualified police officer.
72. Because of his religious beliefs, Defendants suspended Schrenger causing him to lose substantial amounts of pay, and inflicting other harm on him.
73. Chief Shields, Mayor Fischer, and other LMPD decision makers were well-aware of Schrenger's religious beliefs when they made the decision to suspend him.
74. Defendants' treatment of Schrenger was substantially less-favorable than other similarly situated LMPD officers, causing Schrenger significant harm.
75. Defendants conduct, as set forth above, violated Officer Schrenger's rights under Title VII of the Civil Rights Act of 1964, as amended, set forth in 42 U.S.C. §§ 2000e et seq.

COUNT V
VIOLATION OF THE KENTUCKY CIVIL RIGHTS ACT
(KRS 344 et seq.)

76. Plaintiff realleges and adopts all allegations set forth above.
77. Defendants conduct, as set forth above, violated the Kentucky Civil Rights Act.

COUNT VI
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

78. Plaintiff realleges and adopts all allegations set forth above.

79. Defendants conduct, as set forth above, constitutes intentional infliction of emotional distress, under Kentucky law.

V. PRAYER FOR RELIEF AND DEMAND FOR JURY TRIAL

Wherefore, Plaintiff Matthew Schrenger, by counsel, respectfully prays for the following relief from this Court:

- A. Trial by jury on all issues so triable;
- B. Judgment in favor of Matthew Schrenger on all claims;
- C. Judgment awarding Matthew Schrenger damages in an amount to be determined;
- D. Judgment awarding Mathew Schrenger punitive damages;
- E. Judgment awarding back pay and front pay in amounts to be determined;
- F. Judgment awarding recovery of attorney fees in an amount to be determined;
- G. Other legal and equitable relief as appropriate, including costs as allowed by law and pre- and post-judgment interest, in the maximum amount allowed by law.

Respectfully submitted,

s/Blaine R. Blood

Blaine R. Blood, Esq. (#91363)
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Louisville, KY 40241

Matthew F. Heffron
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Thomas More Society
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*Attorneys for Plaintiff Matthew
Schrenger*

JS 44 (Rev. 04/21)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Matthew Schrenger

(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

DEFENDANTS

Louisville Metro Police Department, City of Louisville, Chief Erika Chields, Mayor Greg Fischer

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF DEF, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal codes and descriptions.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District (specify), 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 42 U.S.C. 1983, 42 U.S.C. 2000e et seq. Brief description of cause:

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: [X] Yes [] No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE: October 4, 2021 SIGNATURE OF ATTORNEY OF RECORD: s/ Blaine R. Blood

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the

Matthew Schrenger

Plaintiff

v.

Louisville Metro Police Department, et al

Defendant

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Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

Louisville Metro Police Department
c/o Chief Erika Shields
633 W. Jefferson Street
Louisville, KY 40202

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the

Matthew Schrenger

Plaintiff

v.

Louisville Metro Police Department, et al

Defendant

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Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

Chief Erika Shields in her official capacity
633 W. Jefferson Street
Louisville, KY 40202

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the

Matthew Schrenger

Plaintiff

v.

Louisville Metro Police Department, et al

Defendant

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Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

City of Louisville
c/o Mayor Greg Fischer
527 W. Jefferson Street
Louisville, KY 40202

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the

Matthew Schrenger

Plaintiff

v.

Louisville Metro Police Department, et al

Defendant

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Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

City of Louisville
c/o Mayor Greg Fischer
527 W. Jefferson Street
Louisville, KY 40202

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk