

CAUSE NO. _____

JANE DOE I AND JANE DOE II,	§	IN THE CIRCUIT CIVIL COURT OF
<i>Plaintiffs,</i>	§	
	§	
v.	§	DUVAL COUNTY, FLORIDA
	§	
BRANDON MCMANUS and the	§	
JACKSONVILLE JAGUARS, LLC,	§	_____ JUDICIAL DISTRICT
	§	
<i>Defendants.</i>	§	JURY TRIAL DEMANDED

PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND

Plaintiffs Jane Doe I and Jane Doe II complain of Defendants BRANDON MCMANUS and the JACKSONVILLE JAGUARS, LLC (hereinafter "Defendants") and, for cause of action, respectfully show this Honorable Court the following:

I. INTRODUCTION

- Jane Doe I and Jane Doe II work as flight attendants for Atlas Air Worldwide Holdings, and were regular crewmembers on privately booked flights for National Football League ("NFL") teams. Both women previously enjoyed staffing NFL flights, and found the players to be, for the most part, respectful and kind. On September 28, 2023, however, the Jacksonville Jaguars, LLC (hereinafter "Jaguars") chartered a plane from Jacksonville, Florida to London, England. The flight was staffed by Jane Doe I and Jane Doe II. During this transatlantic flight, Jaguars kicker Brandon McManus sexually assaulted both Plaintiffs. This case seeks damages in excess of one million dollars against the Defendants for the reprehensible conduct described in more detail below.

II. PARTIES

2. Jane Doe I is a resident of Harris County, Texas.
3. Jane Doe II is a resident of Harris County, Texas.
4. Defendant Brandon McManus was a resident of Duval County, Florida at all times relevant to this suit. He may be served at 3181 NE 31st Ave, Lighthouse Point, FL 33064, or wherever he may be found.
5. Defendant Jacksonville Jaguars, LLC is, and has been at all times relevant to this suit, a for-profit company doing business in Duval County, Florida. Defendant Jaguars may be served at 1 TIAA BANK FIELD DRIVE, JACKSONVILLE, FL, 32202.

III. JURISDICTION AND VENUE

6. This court has jurisdiction over this matter because the damages in question exceed the minimum jurisdiction of this court.
7. Venue is proper in Duval County because Defendant McManus resided in Duval County at all times relevant to this suit.
8. Venue is proper in Duval County because Defendant Jacksonville Jaguars, LLC conducts business in Duval County, Florida.

IV. FACTUAL BACKGROUND

9. The NFL is no stranger to scandal, especially when it comes to offenses against women. Despite a pervasive advertising campaign to the contrary, many of its players have been accused of committing heinous sexual crimes and transgressions. The NFL's failure to properly address this undeniable culture of sexual harassment and violence against women led to the preventable and disgraceful sexual misconduct towards Plaintiffs at the hands of Defendant Brandon McManus.
10. Defendant McManus played kicker for the Jacksonville Jaguars at all times relevant to this

suit. He is currently under contract with the Washington Commanders. Defendant McManus holds himself out on social media to be a devoted husband and father, but his conduct behind the scenes is consistent with the NFL's pattern of sexual assault against women.

11. Based on information and belief, McManus is approximately 6'3" tall. Plaintiff Jane Doe I is 5'3" and Plaintiff Jane Doe II is 5'2". Each time he violated Plaintiffs, they were not only physically incapable of avoiding the attacks, but in fear for their safety if they attempted to struggle with a large, drunk, athletic man.
12. On September 28, 2023, Plaintiffs staffed a flight to the United Kingdom that was privately booked for the Jaguars. The flight quickly turned into a party as Defendant McManus and a number of his teammates disregarded the flight attendants' personal space, air travel safety, and federal law.
13. Defendant McManus himself spent the 8-hour flight roaming the plane, and even entered the crewmember-only galley multiple times. Defendant McManus recruited three flight attendants (not the Plaintiffs) to the party, passing out \$100 bills to encourage them to drink and dance inappropriately for him. Based on information and belief, the three flight attendants drinking and dancing with Defendant McManus no longer work for Atlas Air Worldwide Holdings.
14. Throughout the course of the flight, Plaintiffs smelled marijuana smoke coming from the plane's restrooms.
15. Plaintiffs did not participate in any inappropriate conduct and wanted no part of it.

JANE DOE I

16. Despite her professional behavior, Defendant McManus repeatedly targeted Jane Doe I. It

was almost as if McManus targeted Jane Doe I *because* it was obvious she wanted no part in the activities.

17. Defendant McManus first cornered Jane Doe I when the pilot indicated that turbulence required seatbelts for all individuals on the plane. When Jane Doe I belted herself into her designated jump-seat, Defendant McManus got up, sat next to her and began talking to her.
18. At this time, Jane Doe I had already observed Defendant McManus drinking with and sexualizing the other flight crew, and was very uncomfortable with McManus's presence near her. Despite her obvious discomfort, Defendant McManus leaned in to kiss Jane Doe I. She quickly put her hand up to block herself from Defendant McManus's attempted unwanted advances. She firmly told Defendant McManus to go away, and he did in fact leave her alone for a short period of time.
19. Jane Doe I spent the rest of the flight trying to avoid Defendant McManus while still performing her job duties. Despite this, Defendant McManus sought Jane Doe I out repeatedly.
20. On two separate occasions, Defendant McManus grabbed Jane Doe I and "grinded" on her. Each time, she could feel his erect penis through his clothes as he rubbed himself on her. Both incidents were unprovoked, unwanted, and reprehensible.
21. The first time McManus assaulted Jane Doe I, she was standing in an aisle and serving the flight's first meal service to other passengers. Jane Doe I was holding a food tray that required the use of both of her hands, and she could not move suddenly without spilling the contents of the tray.
22. As McManus was grinding against her, Jane Doe I froze and made eye contact with another Jaguars player, who looked ashamed of his teammate's behavior. McManus eventually

stopped and walked away.

23. Defendant McManus's second assault on Jane Doe I occurred during the flight's second meal service. Defendant McManus came up behind her, grabbed her tightly by the waist, and rubbed his clothed but erect penis on her multiple times. Yet again, Jane Doe I could not move away because she was standing in a small aisle and was carrying a large tray.

JANE DOE II

24. Defendant McManus also targeted Jane Doe II when she was occupied with job duties and unable to move away from his violative conduct. When Jane Doe II was serving the flight's second meal service, Defendant McManus approached her from behind, grabbed her waist, and "grinded" on her.
25. As was the case with Jane Doe I, Jane Doe II could not move away or push McManus away because she was shuffling down a galley aisle and carrying a full service tray.
26. Like Jane Doe II, she could feel Defendant McManus's erect penis through his clothes as he rubbed himself on her. When Jane Doe II turned around and confronted Defendant McManus, he simply smirked and walked away. She was humiliated and embarrassed.
27. Each time Defendant McManus violated Plaintiffs, he waited until they were engaged in a job duty that made evading his attacks difficult.
28. Each time Defendant McManus violated Plaintiffs, they felt deeply humiliated. The sexual misconduct occurred in front of Plaintiffs' professional peers and in front of high-profile clients. Plaintiffs felt severely anxious, ashamed, and terrified that their careers were at risk.
29. On the return flight, Jane Doe II remained in the aircraft's second story to avoid Defendant McManus.

30. As a result of Plaintiffs' first and last flight with the Jacksonville Jaguars, Plaintiffs have experienced severe mental anguish and career disruption. Specifically, Plaintiffs have experienced extreme feelings of anxiety and suspicion when engaging with male clients in their job duties. Plaintiffs have been removed from the "core crew" that staffs Jaguars flights, something both Plaintiffs worked hard to achieve.

V. CAUSES OF ACTION

A. Count One – Assault and Sexual Assault by Defendant Brandon McManus

31. Plaintiffs hereby incorporate by reference the paragraphs above as if fully set forth herein. Plaintiffs re-allege each aforementioned allegation as if fully incorporated below.

32. Defendant McManus intentionally or knowingly caused physical contact with Plaintiffs when Defendant McManus knew, and should have known, that Plaintiffs would regard such contact as offensive. As a proximate result of the assault, Plaintiffs have suffered damages described herein.

B. Count Two – Intentional Infliction of Emotional Distress by Defendant Brandon McManus

33. Plaintiffs re-allege each aforementioned allegation as if fully incorporated below.

34. Defendant McManus engaged in conduct to Plaintiffs that is extreme and outrageous so as to exceed the bounds of decency in a civilized society. Namely, he caused Plaintiffs to experience mental suffering by forcing unwanted touching.

35. Defendant McManus engaged in this conduct intentionally, knowingly, and willfully.

36. Defendant McManus's conduct proximately caused injury to Plaintiffs. Plaintiffs have sustained and will sustain pain and suffering and psychological and emotional distress, mental anguish, embarrassment, and humiliation.

37. Accordingly, Plaintiffs are entitled to recovery against defendants for the damages proximately caused by Defendant McManus's conduct in an amount to be determined at trial.

C. Count Three Negligence and Gross Negligence by Defendant Jacksonville Jaguars

38. Plaintiffs hereby incorporate by reference the paragraphs above as if fully set forth herein. Plaintiffs re-allege each aforementioned allegation as if fully incorporated below.

39. Defendant Jacksonville Jaguars, through its ownership and management of its professional athletic team, owed Plaintiff the duty of ordinary care. This duty required Defendant Jacksonville Jaguars to exercise a degree of care, skill, supervision and diligence ordinarily possessed and used by professional athletic teams under the same or similar circumstances. The Jacksonville Jaguars violated the duty of care owed to Plaintiffs in the following respects:

- a. Failing to properly hire Defendant McManus;
 - b. Failing to properly train Defendant McManus about inappropriate sexual contact with flight staff;
 - c. Failing to adequately supervise Defendant McManus's conduct with flight staff;
 - d. Failing to create and implement policies and procedures for hiring, training, supervising, and retaining qualified employees;
 - e. Failing to adopt policies and procedures for protecting flight staff from sexual misconduct by its employees;
 - f. Failing to create a safe environment for staff serving the team; and
 - g. Failure to enforce a zero-tolerance policy related to inappropriate behavior.
40. The above cited acts and omissions by Defendant Jaguars amount to gross negligence because, when viewed objectively from the standpoint of the Jacksonville Jaguars, such

acts and omissions involved an extreme degree of risk, considering the probability and magnitude of potential harm, of which Defendant Jaguars had knowledge.

41. Defendant Jaguars' negligence and gross negligence was a proximate cause of Plaintiffs' injuries, and their injuries were the foreseeable result of such gross negligence.

VI. DAMAGES

42. As a direct and proximate result of Defendants' acts and omissions described above, Plaintiffs have incurred the following damages:

- a. Conscious physical and mental pain and suffering, and anguish, past and future;
- b. Loss of enjoyment of life and peace of mind, past and future;
- c. Reasonable and necessary medical, counseling, psychiatric, therapeutic and related expenses, past and future;
- d. Loss of earnings and earning capacity; and
- e. Such other damages that will be shown at trial.

43. Plaintiffs seek any and all damages to which they may be entitled. Plaintiffs also seek exemplary damages in an amount within the jurisdictional limits of the Court.

VII. REQUEST FOR JURY TRIAL

Plaintiffs hereby demand trial by jury on all issues so triable as of right in this matter.

VIII. PRAYER

For the aforementioned reasons, Plaintiffs pray for judgment against Defendants for actual damages, exemplary damages, pre- and post-judgment interest as allowed by law, all costs of Court; and all such other and further relief, at law and in equity, to which Plaintiffs may be justly entitled.

Respectfully submitted,

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