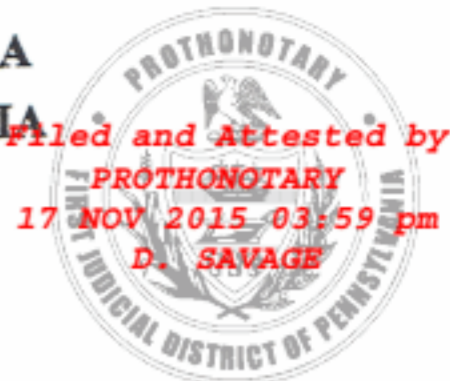


FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
COURT OF COMMON PLEAS OF PHILADELPHIA



MARC J. FRUMER, ESQUIRE
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ATTORNEY FOR PLAINTIFF

ASHLEY STAMM-NORTHUP
A/K/A DANICA DILLON



Plaintiff

vs.

JOSHUA JAMES DUGGAR
A/K/A JOSH DUGGAR



Defendant

COURT OF COMMON PLEAS
COUNTY OF PHILADELPHIA
CIVIL DIVISION

TERM

NO.

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association
Lawyer Referral
and Information Service
One Reading Center
Philadelphia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascantar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion De Licenciados
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ATTORNEY FOR PLAINTIFF

ASHLEY STAMM-NORTHUP
A/K/A DANICA DILLON
[REDACTED] Plaintiff

vs.

JOSHUA JAMES DUGGAR
A/K/A JOSH DUGGAR
[REDACTED] Defendant

COURT OF COMMON PLEAS
COUNTY OF PHILADELPHIA
CIVIL DIVISION

TERM

NO.

COMPLAINT - CIVIL ACTION

I. Introduction.

1. Plaintiff, Ashley Stamm-Northup, age 28, D.O.B. January 4, 1987, is a married mother of two small children. She is a resident of San Diego, California. Plaintiff is also known as Danica Dillon.

2. Defendant, Joshua James Dugger, age 27, D.O.B. March 3, 1988, is a resident of Reformer's Unanimous Men's School of Discipleship in Rockford, Illinois. Defendant is also known as Josh Duggar.

II. Defendant committed a battery upon the Plaintiff twice.

3. All previous paragraphs are incorporated herein.

4. Defendant approached Plaintiff, on or about March 12, 13, & 14, 2015, at The Gold Club, a “gentlemen’s club” and bar, located at 1416 Chancellor Street in Philadelphia, additionally, on or about April 17 & 18, 2015, at the Creekside Cabaret.

5. Plaintiff was the featured performer at The Gold Club on this particular evening. Plaintiff is a movie actress in both adult and mainstream films. Plaintiff is also a model and spokesperson for several companies. Her employment includes making public appearances as well as acting. On this particular night she was the featured performer and was advertised as such.

6. During her appearance, Defendant requested Plaintiff for several “lap dances” for which he paid the club approximately \$600.

7. After her performance at The Gold Club, Defendant continued to pursue Plaintiff, following her to the DoubleTree Hotel where she was staying.

8. Defendant then propositioned Plaintiff for consensual sex. Defendant paid Plaintiff \$1,500 for her company.

9. Once inside the Plaintiff’s hotel room, Defendant manhandled Plaintiff and physically assaulted her to the point of causing her physical and emotional injuries. Indeed, Plaintiff felt as if she were being raped by the Defendant. This was not part of any agreement and clearly exceeded the scope of any consent by the Plaintiff.

10. Defendant intended to cause such harmful and offensive contact with the Plaintiff and directly, through his tortious actions and conduct caused Plaintiff to suffer severe emotional and physical injuries.

11. Defendant subsequently attempted to “apologize” for the tortious battery he inflicted upon the Plaintiff. This apology occurred at the Creekside Cabaret. However, his motive for his “apology” was to deceive Plaintiff into another private meeting with her where he engaged in identical tortious conduct causing Plaintiff to suffer severe emotional and physical damages.

12. As a direct result of Defendant’s actions, Plaintiff has suffered serious emotional and physical damages. She is currently being treated by a psychiatrist for severe anxiety, similar to post-traumatic stress disorder (“PTSD”), and has suffered physical injuries as well. Further, Plaintiff has been unable to work in her chosen field as a direct consequence of Defendant’s actions.

WHEREFORE, Plaintiff demands that Defendant be found liable for intentional battery of Plaintiff and requests damages in excess of \$500,000 be imposed upon Defendant.

III. Defendant caused intentional emotional distress via his outrageous tortious conduct upon Plaintiff.

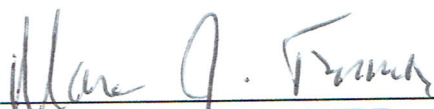
13. All previous paragraphs are incorporated herein.

14. As previously stated above, Defendant engaged in violent and outrageous conduct causing severe emotional distress to Plaintiff. Plaintiff has suffered severe emotional and physical injuries due to Defendant’s violent and outrageous conduct.

15. As a direct result of Defendant’s actions, Plaintiff has suffered considerable emotional and physical damages. Plaintiff is currently being treated for severe anxiety similar to PTSD by a psychiatrist due to Defendant’s violent and outrageous conduct. Further, Plaintiff has been unable to work in her chosen field as a direct consequence of Defendant’s actions.

WHEREFORE, Plaintiff demands that Defendant be found liable for intentional infliction of emotional distress due to his outrageous and violent conduct towards Plaintiff and further, Plaintiff requests damages in excess of \$500,000 be imposed upon Defendant.

Respectfully submitted,



MARC J. FRUMER, ESQUIRE
Counsel for Plaintiff
Ashley Stamm-Northup

VERIFICATION

The undersigned verifies that the statements made in the foregoing pleading are true and correct to the best of his belief and understands that false statements herein are made subject to the penalties of 18 Pa.C.S. 4904, relating to unsworn falsification to authorities.

Date: Nov. 17, 2015

Marc J. Frumer
MARC J. FRUMER, ESQUIRE