COMMONWEALTH OF MASSACHUSETTS TRIAL COURT OF THE COMMONWEALTH

HAMPSHIRE, SS:		SUPERIOR COURT DEPARTMENT CIVIL ACTION NO. HSCV2014-00239A
CONNOR SILVERNAIL fka CONNOR SYMINGTON and CHERYL SILVERNAIL Plaintiffs))))	CONNOR SILVERNAIL'S AFFIDAVIT IN SUPPORT OF A SPECIAL MOTION TO DISMISS
VS.)	
TIMOTHY SYMINGTON)	
Defendant)	
)	

I, Connor Silvernail, do depose and state as follows:

- 1. I am an individual with a current address of 245 Northwest Road, Westhampton, Massachusetts 01027 and am a Plaintiff in this case.
- 2. On or about December 22, 2014, I filed a complaint with the Hampshire Superior Court alleging sexual abuse and emotional distress by the Defendant.
- 3. I have experienced sexual and psychological abuse from the Defendant from 2002 to 2004 as follows:
- 4. I was made to sleep with the Defendant in the same bed while only wearing my underwear.
- 5. The Defendant would hug me and press his genitals on my back and buttocks.
- 6. The Defendant would expose himself to me after showers or in bed and encourage me to touch his genitals.
- 7. I was photographed wearing only my underwear on numerous occasions.
- 8. I felt shame, embarrassment, fear, anxiety, helplessness, nightmares, trouble sleeping, no appetite, lethargy, irritability, anger and trouble focusing on school.
- 9. I have had reoccurring images of a sexual nature that have manifested into bodily pain.

- 10. I was in counseling for years to deal with these issues.
- 11. I have experienced severe mental and emotional trauma as a result of Defendant's conduct.
- 12. Since 2004, I have had no contact with the Defendant.

The foregoing facts are based on my knowledge, information and belief and insofar as based upon same, I believe them to be true.

Signed this 30th day of July, 2015 under the pains and penalties of perjury.

Connor Silvernail

COMMONWEALTH OF MASSACHUSETTS

Berkshire, SS.

July <u>30</u>, 2015

On this 30 th day of July, 2015, before me, the undersigned notary public, personally appeared, connor Silvernail, proved to me through satisfactory evidence of identification, which was 6 mm to be the person whose name is signed on the preceding or attached documents, and acknowledged to me that he signed it voluntarily for its stated purpose.

Notary Public

My Commission Expires:



COMMONWEALTH OF MASSACHUSETTS TRIAL COURT OF THE COMMONWEALTH

HAMPSHIRE, SS:	SUPERIOR COURT DEPARTMENT CIVIL ACTION NO. HSCV2014-00239A
CONNOR SILVERNAIL fka CONNOR SYMINGTON and CHERYL SILVERNAIL))) CHERYL SILVERNAIL'S AFFIDAVIT IN SUPPORT OF
Plaintiffs) A SPECIAL MOTION TO DISMISS
vs.	
TIMOTHY SYMINGTON)
Defendant)))

I, Cheryl Silvernail, do depose and state as follows:

- 1. I am an individual with a current address of 245 Northwest Road, Westhampton, Massachusetts 01027 and am a Plaintiff in this case.
- 2. On or about May 16, 2002, I was divorced from Defendant and have lived in fear over the Defendant's anger and rage towards me and the children.
- 3. I had two children with the Defendant during our marriage.
- 4. I am the biological mother of Connor Silvernail.
- 5. In 1997, Connor was diagnosed with Asperger's Disorder.
- 6. I became aware of a pattern of sexual and psychological abuse that the Defendant had engaged in during unsupervised visitations with Connor from 2002 to 2004.
- 7. After the allegations were revealed, I took the necessary steps to protect Connor and enroll him in treatment programs.
- 8. On or about June 11, 2004, after the allegations surfaced, the Court entered an order suspending all visits with Defendant.
- 9. Connor has had no further contact with the Defendant.

- 10. Connor has engaged in inappropriate sexual behaviors towards others as a result of Defendant's abuse.
- 11. I have witnessed Connor exhibit shame, embarrassment, fear, anxiety, heart palpitations, helplessness, nightmares, trouble sleeping, bedwetting, lack of appetite, lethargy, speech issues, irritability, anger and stunted academic progress.
- 12. I continue to work with Connor to address the scars of abuse and have dedicated a significant portion of my time dealing with his traumas
- 13. I have experienced severe mental and emotional trauma as a result of Defendant's conduct to Connor.
- 14. I have witnessed Connor exhibit physical manifestations of pain as a result of the trauma caused by Defendant's conduct.

The foregoing facts are based on my knowledge, information and belief and insofar as based upon same, I believe them to be true.

Signed this 30th day of July, 2015 under the pains and penalties of perjury.

Cheryl Silvernail

COMMONWEALTH OF MASSACHUSETTS

Berkshire, SS.

July 30, 2015

"HILLIAM HALL

On this 30 th day of July, 2015, before me, the undersigned notary public, personally appeared Cheryl Silvernail, proved to me through satisfactory evidence of identification, which was held the way the signed on the preceding or attached documents, and acknowledged to me that she signed it voluntarily for its stated purpose.

Notary Public

My Commission Ex