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Electronically FILED by Superior Court of California, County of Los Angeles 10/15/2026 3:13 PM David W. Slayton, Executive Officer/Clerk of Court, By P. Diaz, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

DALLIS DICKERSON, a minor, by and through his Guardian ad Litem, MARIANNE SUTTON,

Plaintiff,

v.

OAKS CHRISTIAN SCHOOL, and DOES 1 through 50, inclusive,

Defendants.

Case No. 26VECV06036

COMPLAINT FOR DAMAGES:

1. NEGLIGENCE
2. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
3. VIOLATION OF THE UNRUH CIVIL RIGHTS ACT (Cal. Civ. Code § 51, et seq.);

DEMAND FOR JURY TRIAL

COME NOW plaintiff DALLIS DICKERSON, a minor, by and through his Guardian ad Litem, MARIANNE SUTTON ("Plaintiff"), for causes of action against defendant OAKS CHRISTIAN SCHOOL ("OAKS CHRISTIAN" or the "School") and DOES 1 through 50, inclusive (collectively "Defendants"), and each of them, who complain and allege as follows:

INTRODUCTION

1. Dallis Dickerson ("DALLIS") was a Black child who came to Oaks Christian School to learn and to grow. Instead, over the course of his sixth-grade year, DALLIS was subjected to relentless racial harassment, bullying, and physical assault in an environment that Oaks Christian — despite full knowledge and repeated warnings — allowed, and by its repeated inaction actively encouraged, to persist.

2. Throughout the 2024-2025 academic year, students repeatedly called DALLIS the

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N-word to his face. One student in particular, a minor identified herein as "STUDENT 1" directed the slur at DALLIS as a form of sustained and targeted racial torment, declared in front of an entire class that DALLIS's nickname should be "Niggerson," and was known to carry a knife on campus. Oaks Christian imposed no discipline of any kind.

3. When DALLIS and his family reported the abuse, Oaks Christian did nothing. It placed DALLIS in the same classroom as his primary harasser. When DALLIS reported the "Niggerson" incident, his own teacher accused him of lying, in front of his peers. When another student physically assaulted DALLIS at lunch, Oaks Christian confirmed the assault on video and still imposed no meaningful discipline.

4. None of this was new to Oaks Christian. As recently as 2020, more than 8,100 alumni signed a public petition documenting Oaks Christian's pervasive racism, and Oaks Christian publicly acknowledged its failures and promised "racial healing." Oaks Christian is presently a defendant in active civil litigation brought by another Black student who endured strikingly similar racial abuse. Nothing changed. DALLIS was ultimately forced to leave Oaks Christian, and he continues to carry the psychological harm of Oaks Christian's failures to this day.

GENERAL ALLEGATIONS

5. Plaintiff DALLIS DICKERSON is, and at all relevant times was, a minor child and a resident of the County of Los Angeles, State of California. DALLIS brings this action by and through his Guardian ad Litem, MARIANNE SUTTON.

6. At all relevant times, DALLIS was a minor student enrolled at, and under the care, custody, control, and supervision of, Oaks Christian School.

7. Defendant OAKS CHRISTIAN SCHOOL is, and at all relevant times was, a private school authorized to do, and doing, business in the County of Los Angeles, State of California, with its principal campus located at 31749 La Tienda Drive, Westlake Village, California 91362. At all relevant times, Oaks Christian was responsible for the administration, operation, maintenance, supervision, and oversight of its campus, its employees and agents, and its students, including DALLIS.

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8. The true names and capacities, whether individual, corporate, associate, or otherwise, of defendants DOES 1 through 50, inclusive, are unknown to Plaintiff, who therefore sues these defendants by such fictitious names. Plaintiff will amend this Complaint to allege their true names and capacities when they have been ascertained. Plaintiff is informed and believes, and on that basis alleges, that each of the fictitiously named defendants is responsible in some manner for the conduct, occurrences, and injuries alleged herein.

9. At all relevant times, and upon information and belief, each of the defendants, including each of the Doe defendants, was the agent, servant, and/or employee of each of the remaining defendants, and in doing the things alleged herein was acting within the course and scope of such agency and employment, and with the knowledge, consent, authority, ratification, and/or permission of each of the remaining defendants.

10. Venue is proper in the County of Los Angeles pursuant to Code of Civil Procedure section 395(a) because Oaks Christian operates and does business in the County of Los Angeles, and the injuries to DALLIS occurred within the County of Los Angeles.

FACTS COMMON TO ALL CAUSES OF ACTION

11. Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as though fully set forth herein.

Oaks Christian's Well-Documented History of Systemic Racism

12. The racial harassment and institutional indifference DALLIS endured did not occur in a vacuum. It is the latest chapter in a long, documented pattern of racial abuse and institutional failure at Oaks Christian.

13. On or about June 4, 2020, more than 8,100 Oaks Christian alumni signed a petition titled "Black Oaks Christian Alumni and Allies Against Racism." The petition and its comments documented pervasive racism and discrimination experienced by Black students at Oaks Christian — inflicted by both faculty and fellow students — spanning years and multiple graduating classes. Alumni described deep and lasting psychological scars, with one writing, "I don't want my alma mater to scar Black and Brown people the way it scarred me." Faculty members were described as having admitted they "didn't want to get fired" when confronted with racism, revealing a culture

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of institutional self-protection over student welfare.

14. In response to the petition, on or about June 11, 2020, Oaks Christian's President and Head of School, Robert T. Black, issued a written statement acknowledging Oaks Christian's failures and committing to meaningful reform. He promised to hire a Director of Diversity, to enhance the School's anti-harassment and anti-discrimination policies, and to bring about "racial healing on our campus and in our community," expressing the School's "desire to acknowledge where we have been wrong."

15. Those commitments proved hollow. Oaks Christian is presently a defendant in active civil litigation brought by another Black student who attended the School during the 2021–2024 school years and endured strikingly similar racial abuse, including the repeated use of the N-word by students; a mock "slave auction" conducted in the school cafeteria in which students openly debated the Black plaintiff's worth as a commodity; students using a "whip sound" application in the plaintiff's presence while pretending to whip him as a slave; students notifying the plaintiff of a specific date and time at which they intended to lynch him; and faculty who used racial slurs in the classroom without consequence.

16. As DALLIS's experience makes painfully clear, nothing changed.

DALLIS's Experience at Oaks Christian

17. While enrolled at Oaks Christian, DALLIS was subjected to relentless racial harassment, bullying, and physical assault in an environment that Oaks Christian allowed — and, by its repeated inaction, actively encouraged — to persist.

Pervasive Use of Racial Slurs and Intimidation by a Known Aggressor

18. Throughout DALLIS's sixth-grade year, DALLIS was subjected to a constant and pervasive campaign of racial harassment centered on the repeated use of the N-word. The slur was used openly, frequently, and without any consequence — so normalized within Oaks Christian's campus culture that students employed it casually, without apparent recognition of the devastating harm they were inflicting on their Black classmate.

19. One student in particular, STUDENT 1, emerged as a primary and persistent aggressor. STUDENT 1 repeatedly directed the N-word at DALLIS to his face — deliberately, in

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a targeted manner, and as a form of racial torment. Other students joined in, using the slur freely and widely in DALLIS's presence.

20. The harassment reached a particularly troubling level during a school-sponsored field trip to the Zoo. Rather than providing a supervised and safe educational environment, Oaks Christian allowed the excursion to become an occasion for escalating racial abuse. Emboldened by the absence of meaningful supervision or accountability, STUDENT 1 continued to direct the slur at DALLIS and compared DALLIS to a statue of an animal, and other students followed. The behavior was constant and widespread, and it occurred in a setting for which Oaks Christian bore full supervisory responsibility.

21. Compounding the danger, STUDENT 1 was known to carry a knife on campus during this period. This was not a secret. Oaks Christian imposed no discipline on STUDENT 1 for carrying a weapon on school grounds — just as it imposed no discipline for his sustained racial harassment of DALLIS. The message communicated to DALLIS, and to every other student observing, was unambiguous: at Oaks Christian, there are no consequences for racial harassment, bullying, and intimidation, at least not when the victim is Black.

22. DALLIS and his family reported all of this to Robert T. Black and other faculty members. Oaks Christian did nothing. STUDENT 1 faced no discipline of any kind, and the harassment continued unabated.

Faculty Disbelief, Physical Assault, and Social Isolation

23. Rather than taking steps to protect DALLIS — including the elementary measure of separating him from his primary harasser — Oaks Christian placed DALLIS and STUDENT 1 next to each other in the same music class. The predictable result was further abuse.

24. In one particularly egregious incident during music class, students were discussing nicknames. STUDENT 1 openly declared that DALLIS's nickname should be "Niggerson." This was said in the classroom, in the presence of other students. Rather than holding STUDENT 1 accountable, or even asking the students what had happened, music teacher Alicia Langness accused DALLIS of "lying" in front of his peers. DALLIS received no apology — not from STUDENT 1, not from Ms. Langness, and not from the Oaks Christian administration. He was

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instead left to sit in the same class as his tormentor, now also branded a liar by his own teacher for having the courage to report the abuse.

25. This response — disbelieving and blaming the Black student, while excusing the conduct of his non-Black aggressor — is precisely the pattern documented by Oaks Christian alumni in 2020 and alleged in the pending civil litigation against the School.

26. During this same period, other students turned against DALLIS, deepening his isolation. In a separate incident, a female student physically assaulted DALLIS during lunch — striking him in the head, taking his lunch, and deliberately pouring out his water. When this was reported to the School, Oaks Christian confirmed via video footage that the assault occurred just as DALLIS had reported. Despite having video evidence, Oaks Christian's response was merely to bring the student in, speak with her, and advise her not to do it again. No meaningful disciplinary consequences followed.

Oaks Christian's Failure to Respond to Repeated Parental Intervention

27. DALLIS's parents made repeated, good-faith efforts to work collaboratively with Oaks Christian to address the racial harassment their son was enduring. They met directly with Vice Principal Tamara Kuku and offered specific, practical, and constructive suggestions: convening students in small groups to address the behavior directly; communicating clearly to students that demeaning and racist language would not be tolerated; and contacting the parents of offending students to notify them that their children's conduct had serious consequences.

28. These were not extraordinary demands. They were the baseline steps any responsible educational institution should have taken without being asked. Oaks Christian took no meaningful action on any of them.

Improper Remarks Regarding Sierra Canyon

29. When DALLIS's parents explored enrolling him at Sierra Canyon — a step made necessary by Oaks Christian's sustained failure to protect their son — Robert T. Black sought to dissuade them from doing so. Rather than acknowledging Oaks Christian's failures or expressing concern for DALLIS's wellbeing, Mr. Black raised moral objections and "integrity" concerns about Sierra Canyon, including disparaging remarks regarding "Gay issues." This conduct

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reflected the same institutional self-interest over student welfare that has characterized Oaks Christian's response to racism throughout this matter.

Oaks Christian Violated Its Own Written Policies

30. Oaks Christian's conduct violated the very written policies it holds out to students and families. Oaks Christian's Racial Unity Policy states that the School "strives to provide an environment free of inappropriate treatment of individuals due solely to race, ethnicity, skin color, or national origin," and that the School "does not tolerate inappropriate introduction or discussion of race/ethnicity in the classroom environment or on the campus."

31. Oaks Christian's handbook further provides that "Oaks Christian School will not tolerate harassment or bullying of any kind," and guarantees that all students will be treated "in ways that convey respect and consideration for individuals regardless of race," expressly prohibiting "epithets," name-calling, ridicule, mockery, insults, stereotyping based on skin color or ethnicity, and threats or intimidation based on race. Oaks Christian violated each and every one of these commitments with respect to DALLIS — repeatedly, over multiple school years, and with full institutional awareness.

32. As a direct result of Oaks Christian's sustained failure to protect him, DALLIS was forced to withdraw from Oaks Christian School and now attends a different school. Oaks Christian's conduct, and its refusal to address the racial harassment, bullying, and assault DALLIS endured, drove him from the educational community his family had chosen and entrusted with his care, and the emotional and developmental harm he suffered continues to affect him.

FIRST CAUSE OF ACTION

NEGLIGENCE

(Against All Defendants)

33. Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as though fully set forth herein.

34. Oaks Christian and DOES 1 through 50 had a special relationship with DALLIS, a minor child entrusted to their care, custody, and control. By virtue of that relationship, and their assumption of responsibility for the education, safety, and supervision of DALLIS, Oaks Christian

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and DOES 1 through 50 owed DALLIS a duty to exercise ordinary care for his safety and wellbeing, including a duty to supervise and control the conduct of their students, faculty, and staff; to adequately hire, train, retain, and supervise their faculty and staff; to enforce their own written policies; to maintain a safe educational environment; and to protect DALLIS from reasonably foreseeable harm, including racial harassment, bullying, intimidation, and physical assault by other students.

35. Oaks Christian and DOES 1 through 50 had actual and constructive notice of the harassment, bullying, and assault DALLIS was enduring, through DALLIS's own direct reports to his teachers, multiple meetings between his family and school leadership, observations of faculty and staff who witnessed the conduct firsthand, and the School's own well-documented institutional history of racial abuse.

36. Oaks Christian and DOES 1 through 50 breached their duty of care to DALLIS, and were negligent and careless, in numerous respects, including, without limitation, by: (a) failing to investigate and respond to reports of racial harassment and bullying; (b) failing to impose any discipline on STUDENT 1 for his sustained racial harassment of DALLIS or for carrying a knife on campus; (c) placing DALLIS in the same classroom as his known harasser rather than separating them; (d) accusing DALLIS of lying when he reported racial abuse, rather than investigating the conduct of his aggressor; (e) failing to impose any meaningful discipline on the student who physically assaulted DALLIS at lunch, despite confirming the assault on video; (f) failing to implement the specific, constructive measures DALLIS's parents proposed to Vice Principal Kuku; (g) failing to adequately hire, train, supervise, and retain faculty and staff who witnessed racist conduct and did nothing to stop it; and (h) failing to maintain and enforce adequate anti-harassment, anti-bullying, and anti-discrimination policies and procedures.

37. Had Oaks Christian and DOES 1 through 50 exercised reasonable care and taken reasonable steps to supervise their students and staff, enforce their policies, and protect DALLIS, the harassment, bullying, and assault DALLIS endured would have been prevented.

38. As a direct and proximate result of the negligence of Oaks Christian and DOES 1 through 50, and each of them, DALLIS has suffered and continues to suffer severe emotional

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distress, mental anguish, humiliation, loss of confidence, social withdrawal, loss of educational opportunity, and lasting developmental harm, and has incurred and will incur expenses for treatment, counseling, and related care, all in amounts to be proven at trial.

SECOND CAUSE OF ACTION

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(Against All Defendants)

39. Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as though fully set forth herein.

40. The conduct of Oaks Christian and DOES 1 through 50, and each of them, was extreme and outrageous and exceeded all bounds of that which is usually tolerated in a civilized community. Oaks Christian occupied a position of authority and trust over DALLIS, a Black minor child in its care, and abused that relationship. With full knowledge that DALLIS was being subjected to sustained racial dehumanization — including having the N-word directed at his face, being branded "Niggerson" in a classroom, being compared to an animal, and being physically assaulted — Oaks Christian and DOES 1 through 50 tolerated, condoned, ratified, and thereby encouraged that conduct; disbelieved and blamed DALLIS when he reported it, including through music teacher Alicia Langness accusing him of "lying" in front of his peers; placed DALLIS in the same classroom as his known tormentor; declined to discipline his aggressors even after confirming a physical assault on video; and ignored the repeated, specific pleas of DALLIS's family to intervene.

41. Oaks Christian and DOES 1 through 50 engaged in this conduct with the intention of causing, or with reckless disregard of the probability of causing, DALLIS to suffer severe emotional distress, knowing that DALLIS was present and was a child particularly vulnerable to emotional distress.

42. As a direct and proximate result of the extreme and outrageous conduct of Oaks Christian and DOES 1 through 50, and each of them, DALLIS suffered and continues to suffer severe emotional distress, including suffering, anguish, fright, horror, nervousness, grief, anxiety, worry, shock, humiliation, and shame, requiring treatment and counseling. The conduct of

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Defendants was a substantial factor in causing DALLIS's severe emotional distress.

43. The extreme and outrageous conduct alleged herein was committed, authorized, and/or ratified by officers, directors, and managing agents of Oaks Christian — including its President and Head of School, Robert T. Black, and its Vice Principal, Tamara Kuku — who had actual knowledge of the racial harassment, bullying, and assault DALLIS was enduring, exercised substantial discretionary authority over Oaks Christian's policies and its response (or non-response) to that conduct, and nonetheless tolerated, condoned, and ratified it.

44. The conduct of Oaks Christian and DOES 1 through 50, and each of them, was despicable and was carried out with malice, oppression, and/or a conscious and reckless disregard for the rights, safety, and wellbeing of DALLIS. Plaintiff is therefore entitled to recover exemplary and punitive damages against Defendants.

THIRD CAUSE OF ACTION

VIOLATION OF THE UNRUH CIVIL RIGHTS ACT

(Cal. Civ. Code § 51, et seq.)

(Against All Defendants)

45. Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as though fully set forth herein.

46. The Unruh Civil Rights Act provides that "all persons within the jurisdiction of this state are free and equal, and no matter what their sex, race, color, religion, ancestry, national origin, disability, medical condition, genetic information, marital status, sexual orientation, citizenship, primary language, or immigration status are entitled to the full and equal accommodations, advantages, facilities, privileges, or services in all business establishments of every kind whatsoever." Cal. Civ. Code § 51(b).

47. DALLIS, a Black student, is a member of a protected class under the Unruh Civil Rights Act.

48. Oaks Christian is a "business establishment" within the meaning of the Unruh Civil Rights Act. As a private school, Oaks Christian provides instruction and educational services to students and their families, actively markets and advertises its services to attract and enroll

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prospective families, charges tuition for admission, and promotes and sells tickets to plays, athletic events, and other events open to the general public. By hosting and promoting these public-facing activities, Oaks Christian invites participation from the broader community, consistent with the characteristics of a business establishment.

49. Oaks Christian denied DALLIS full and equal accommodations, advantages, facilities, privileges, and services, and the full and equal benefit of his education, on the basis of his race, under two independent theories. First, Oaks Christian intentionally treated DALLIS — and other Black students — demonstrably less favorably than non-Black students, including by imposing no discipline on non-Black aggressors while effectively requiring DALLIS to silently tolerate their abuse. Second, Oaks Christian maintained deliberate indifference to a racially hostile environment of which it had full and repeated notice.

50. Each discrete act of racially discriminatory treatment constitutes a separate violation of the Unruh Civil Rights Act, which provides for statutory damages of no less than $4,000 per violation, in addition to actual damages and attorney's fees. Cal. Civ. Code § 52. Given the volume and duration of the discriminatory conduct DALLIS endured, Oaks Christian's exposure under this statute is substantial.

51. As a direct and proximate result of Oaks Christian's violations of the Unruh Civil Rights Act, DALLIS has suffered emotional distress, mental anguish, loss of educational opportunity, and other damages, including treatment and counseling costs, in amounts to be proven at trial, together with statutory damages, attorney's fees, and costs as provided by Civil Code section 52.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as follows:

1. For all available general and non-economic damages, according to proof;

2. For all available special and economic damages, including past and future expenses for medical care, psychological treatment, and counseling, and for loss of educational opportunity, according to proof;

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3. For statutory damages under the Unruh Civil Rights Act, Civil Code section 52, in an amount no less than $4,000 for each violation;

4. For exemplary and punitive damages against Defendants, according to proof;

5. For attorney's fees and costs of suit as permitted by law, including under Civil Code section 52;

6. For prejudgment and post-judgment interest as permitted by law; and

7. For such other and further relief as the Court deems just and proper.

DATED: October 14, 2026 PANISH | SHEA | RAVIPUDI LLP

By: _____
Robert S. Glassman
Attorneys for Plaintiff

DEMAND FOR JURY TRIAL

Plaintiff hereby demands trial by jury as to all causes of action and all forms of relief.

DATED: October 14, 2026 PANISH | SHEA | RAVIPUDI LLP

By: _____
Robert S. Glassman
Attorneys for Plaintiff

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