

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION**

DEAN BROWN,

Plaintiff,

Case No. -           -  
Hon.

v.

CENTRAL MICHIGAN UNIVERSITY,  
AARON HILT, in his personal and official capacity as  
Assistant Coach of Central Michigan University Baseball,  
JACOB SABOL in his official capacity as Head Coach  
of Central Michigan University Baseball,  
AMY FOLAN, in her official capacity as Athletic  
Director for Central Michigan University,

Defendants.

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Todd F. Flood (P58555)  
Katherine R. Kobiljak (P88156)  
Ryan E. Myers  
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There is no civil action between these parties arising out of the same  
transaction or occurrence as alleged in this Complaint pending in this Court,  
nor has any such action been previously filed and dismissed or transferred  
after having been assigned to a judge.

**COMPLAINT**

NOW COMES Plaintiff, DEAN BROWN (hereinafter, “Plaintiff” or “Dean”), by and through counsel, TODD F. FLOOD and FLOOD LAW, PLLC, and for his Complaint against Defendants, CENTRAL MICHIGAN UNIVERSITY (hereinafter, “Defendant CMU” or “CMU”), AARON HILT (hereinafter, “Defendant Hilt” or “Hilt”), JACOB SABOL (hereinafter, “Defendant Sabol” or “Sabol”), and AMY FOLAN (hereinafter, “Defendant Folan” or “Folan”), states as follows:

Plaintiff brings this action seeking damages based on violations of the First Amendment of the U.S. Constitution, Fourteenth Amendment of the U.S. Constitution, and 42 U.S.C. § 1983; and claims of Assault and Battery, Negligence, Negligent Hiring, and Intention Infliction of Emotional Distress (IIED).

## **INTRODUCTION**

This case involves an elaborate coverup perpetrated by Defendant CMU and its agents to protect a CMU baseball coach who assaulted a student-athlete. Defendant CMU and its agents wrongfully retaliated against one of their own student-athletes after he exercised his First Amendment right to speak out about an assault in an attempt to sweep the event under the rug and avoid accountability. Defendant CMU negligently employed, retained, and failed to supervise its pitching coach, Defendant Hilt. Without provocation, Defendant Hilt violently wound up his arm and drove his clenched fist into Dean’s chest with great force. Before this

unprovoked assault, Defendant CMU had dismissed parental and student concerns regarding Defendant Hilt. Following the assault, instead of taking disciplinary action against a coach who had physically assaulted a player, Defendant CMU actively attempted to conceal the assault, dismissing Plaintiff's reports despite corroboration from eyewitnesses who confirmed Defendant Hilt's assault was "out of the blue." Moreover, rather than protecting its student-athlete, Defendant CMU retaliated against Plaintiff for speaking out by indefinitely suspending him from the CMU Baseball team.

Dean, who has dedicated his entire life to furthering his baseball career, now finds himself displaced from what he worked so hard to achieve. As a direct result of Defendants' actions, Dean's career, reputation, and lifelong ambitions have been irreparably harmed. After suspension from one game, Dean was ostracized from the team without any notification and left wondering if he will ever be able to play again. After losing a full year of eligibility, Dean has now been forced to transfer to a new school and team where he will need to start building his career from scratch with one less year of eligibility ahead of him. While Dean continues to face the consequences of an assault that he was the victim of, the perpetrator, Defendant Hilt, remains employed by CMU and continues to avoid any kind of accountability for his actions.

## **PARTIES, JURISDICTION, AND VENUE**

1. Plaintiff Dean Brown was a student at and a baseball player for Central Michigan University and is a resident of Liberty Township, Ohio.

2. Defendant CMU is a public university located in Mount Pleasant in Isabella County, Michigan.

3. CMU receives federal funding.

4. Defendant Aaron Hilt is the assistant coach of the CMU Baseball Team. Defendant Hilt is a citizen of the State of Michigan and was acting under the color of state law and within the course and scope of his employment at CMU.

5. Defendant Jacob Sabol is the head coach of the CMU Baseball Team. Defendant Sabol is a citizen of the State of Michigan and was acting under the color of state law and within the course and scope of his employment at CMU.

6. Defendant Amy Folan is the Athletic Director for the CMU Athletics Department. Defendant Folan is a citizen of the State of Michigan and was acting under the color of state law and within the course and scope of her employment at CMU.

7. Plaintiff asserts the following claim against Aaron Hilt in his individual capacity:

- a. Assault and battery; and
- b. Intentional infliction of emotional distress.

8. Plaintiff asserts the following claims against Aaron Hilt in his official capacity:

- a. violation of due process and the right to bodily integrity under the Fourteenth Amendment to the U.S. Constitution, as enforced under 42 U.S.C. § 1983;
- b. Negligence; and
- c. Intentional infliction of emotional distress.

9. Plaintiff asserts the following claims against CMU, Jacob Sabol in his official capacity, and Amy Folan in her official capacity:

- a. violation of due process and the right to bodily integrity under the Fourteenth Amendment to the U.S. Constitution, as enforced under 42 U.S.C. § 1983;
- b. Violation of the First Amendment to the U.S. Constitution, as enforced under 42 U.S.C. § 1983;
- c. Negligence;
- d. Negligent hiring, and retention; and
- e. Intentional infliction of emotional distress.

10. This Honorable Court has jurisdiction over Plaintiff's federal claims pursuant to 28 U.S.C. §§ 1331 and 42 U.S.C. § 1983.

11. This Court has supplemental jurisdiction over Plaintiff's state law claims pursuant to 28 U.S.C. § 1367 as those claims arise out of the same facts as the federal claims and all claims are part of the same case or controversy.

12. Venue is proper as per 28 U.S.C. §1391(b)(1) in the Eastern District of Michigan, Northern Division as at least one defendant is a resident of the Eastern District of Michigan, and all Defendants are residents of the State of Michigan.

### **STATEMENT OF FACTS**

#### ***DEAN ASSAULTED BY DEFENDANT HILT***

13. On March 2, 2025, CMU was playing the last game in a four-game series against Western Kentucky University ("WKU").

14. After warming up, the pitchers were relaxed, telling jokes with each other and the pitching staff, aligned with the "Sunday fun day" mood that Defendant Hilt had encouraged the players to embody that day. However, according to eyewitnesses, Defendant Hilt took issue with Dean participating in the camaraderie and singled him out in front of the rest of the players to declare that he needed to be more focused.

15. The CMU pitchers then began their usual pre-game routine, which involved lining up in the "bullpen" to receive fist bumps from Defendant Hilt.

16. Dean was in the middle of the line standing shoulder to shoulder with teammates Jack Smith on his right and Jack Otis on his left.

17. When Defendant Hilt reached Dean, as Dean was slightly turned to the right talking to other teammates, he raised his fist, expecting the usual fist bump.

18. Upon information and belief, Defendant Hilt paused in front of Dean, looking at him “with disdain.”

19. Instead of the expected and usual fist bump, Defendant Hilt wound up and closed-fist punched Dean in the chest with significant force, which knocked the wind out of Dean, who fell backwards.

20. The surrounding teammates reacted with visible and audible confusion and concern.

21. The punch left a deep bruise on Dean’s chest, demonstrating the force with which he was struck. The bruise appeared as a fist-sized circle/oval-like shape, with deep red-ish and blue/purple color to it. The bruising was so pronounced that it was visible in photos afterwards.

22. Upon information and belief, an eyewitness to the incident stated that Defendant Hilt’s punch came out of nowhere and was thrown for no apparent reason.

23. Upon information and belief, Defendant Hilt had a reputation of excessive drinking and reckless behavior, making this incident one of many that made him viewed poorly in the eyes of many of the pitchers and other players on the team. For example, Defendant Hilt was known for having slept on the baseball field during a period of significant intoxication.

24. Due to the sheer number of eyewitnesses to the event, word spread quickly throughout the entire team that Defendant Hilt had punched Dean. This resulted in other players sharing messages, GIFs, and memes made in reference to the incident. In the photos shared in a CMU baseball group chat on Snapchat, multiple teammates edited images to show characters representing Dean, nicknamed “Ner,” being punched or hit by characters representing Defendant Hilt. **(Exhibit 1, messages, memes, and GIFs shared within the team group Snapchat).**

***DEAN’S REPORT TO DEFENDANT CENTRAL MICHIGAN UNIVERSITY REGARDING THE ASSAULT***

25. On March 3, 2025, Dean reported the incident to Defendant Sabol, the head coach of CMU Baseball.

26. Defendant Sabol seemed to already be aware of the incident, and informed Dean that Defendant Hilt wanted to speak with him.

27. Defendant Sabol had no additional contact with Dean after their meeting on March 3.

28. This was confirmed later that day, when Defendant Hilt texted Dean at 3:27 p.m., asking “What’s going on man? You free to meet at the field just to talk? Coach just let me know you stopped by,” and then asked to meet at 4 p.m. **(Exhibit 2, March 3, 2025, Dean’s Text Messages to and from Aaron Hilt).**

29. Dean met with Defendant Hilt at 4:15 p.m. at the baseball stadium for approximately one hour.

***DEFENDANT HILT'S EFFORT TO MINIMIZE DEAN'S COMPLAINT***

30. During the discussion, Defendant Hilt repeatedly downplayed the incident, calling the assault a "light punch." When Dean responded that "a light punch wouldn't leave a bruise," Defendant Hilt asked to see his chest, which Dean declined.

31. Defendant Hilt also attempted to justify his actions by saying that he thought the assault would be "funny" because Dean lifts weights and bench presses regularly.

32. Additionally, Defendant Hilt made many off-color comments during the meeting, including that Dean was "one of his favorites," that they were "boys," and that he had had a tough upbringing.

33. Throughout the conversation, Defendant Hilt repeatedly asked "are we good? Can we get over this?"

34. Defendant Hilt then sent a text to Dean's parents, Jason and Christine Brown (hereinafter referred to as "Jason" and "Christine"), asking "I wanted to reach out and see if you had a few minutes to get on the phone tonight?" (**Exhibit 3, Text message from Defendant Hilt to Jason and Christine Brown**) He then followed up with Dean to ask him to pass along the message to his parents. Jason and Christine never responded.

35. Defendant Hilt's demeanor at practice then noticeably changed. He repeatedly delivered emotional "bigger than baseball" speeches to the pitchers throughout the weeks following the assault.

36. Upon information and belief, Defendant Hilt is still employed by Central Michigan University.

***CENTRAL MICHIGAN UNIVERSITY'S RETALIATION AND COVER UP***

37. On March 17, 2025, Dean sent an email to Defendant Folan to report the incident without naming Defendant Hilt in the report.

38. Two days after his email to Defendant Folan, Dean pitched in his final game for CMU was on March 19, 2025; thereafter, he was benched and removed from the opportunity to play during the games. Prior to this incident, Dean had consistently pitched in every game series. Dean had also been voted hardest worker by his teammates during the fall offseason, demonstrating his work ethic and leadership abilities in contrast to his lack of playing opportunities given after the incident.

39. Defendant Folan responded on March 20, asking if Dean had spoken to a deputy.

40. On April 18, 2025, Dean sent teammate Liam Stumpf a Snapchat message that said, "time to die," the team's hype-up mantra they had adopted from the Guns n' Roses song "Welcome to the Jungle." This mantra had been frequently

used in team baseball social media posts and was made into a sticker by the CMU Athletic Trainer for the baseball team.

41. Instead of responding to the text in a familiar manner, Liam instead reported the text to the police as a threat.

42. Two police officers arrived at Dean's dormitory and questioned him about the snapchat message the next morning. Dean told officers that it was a team motto, and the officers left.

43. Afterwards, Brian Nolasco, Senior Associate AD of Institutional Support Services and Sport Administrator for Baseball, called Dean and informed him that he was suspended from that game.

44. Agents of Defendant CMU used Dean's Snapchat message as pretext to retaliate against him for speaking out against the assault that occurred by suspending him from the team.

45. From March 19, 2025, to sometime after April 18, 2025, due to Defendant's unwarranted and retaliatory benching, and ultimately suspending Dean from the team, Dean became extremely anxious and stressed, especially when having to remain near Defendant Hilt for extended periods of time during meetings, practices, workouts, and games. He considered finishing his season at the same time as the redshirt freshmen, meaning he was contemplating finishing the season early

in order to relieve himself of unnecessary stress, especially due to the fact that Defendants were benching him.

46. As Defendants retaliated against Dean and unjustly suspended him from the team, Dean began to feel extremely uneasy and unsafe, which convinced Jason and Christine to pack up his things and move him back to their home in Ohio.

47. Christine and Dean went to the stadium during the game for Dean to pick up his baseball gear, which took less than five minutes.

48. While at the stadium, another teammate was in the locker room, and informed Dean that teammate Trevor Busyn was also suspended from that game due to a TikTok post that said, “Free 12,” which was Defendant Hilt’s number.

49. After leaving the stadium, CMU Police called Christine and Dean to inform them that Dean should not have gone to the stadium and would not be allowed on stadium grounds until further notice.

50. The officer also informed Dean that he had been “pretty easy on him” during their dormitory visit that morning and said that they “could have checked his room” in a threatening manner.

51. Finally, the officer told Dean and Christine that his “time to die” text was being treated as a death threat, and a police report was in progress.

52. That night, Christine and Jason were both removed from a group messenger chat called GroupMe, used by the CMU Baseball parents to communicate.

***IMPACT OF DEFENDANT CMU'S RETALIATION AND COVERUP***

53. On April 23, 2025, Dean received a notice from the NIL Club, a fan-led, athlete-run community where student-athletes share exclusive content and earn income through fan subscriptions. The message stated that “someone from the Central Michigan Baseball Team reported that you’re not currently on the team,” and that as a result, he was removed from the NIL Club. **(Exhibit 4, NIL Notice).**

54. As of August 13, 2025, no one from CMU had informed Dean of any update to his status as a CMU Baseball player. Dean was left in the dark without any indication about if he would ever be allowed to return to CMU baseball.

55. Due to CMU’s coverup of the incident with Coach Hilt, Dean’s baseball career was put on hold, and he lost an entire year of eligibility to play college baseball.

56. Dean has since transferred to a junior college to continue playing baseball. Because of his treatment at CMU, Dean has now lost the opportunity to play D1 baseball, which is the highest collegiate level possible, and must now start over with a new baseball program that is not in the same division as CMU after having lost an entire year of eligibility.

57. Dean continues to experience intense anxiety and mental health regression, especially due to the fact that his future baseball career appears to be in question due to the Defendant's actions.

## CLAIMS FOR RELIEF

### **COUNT I: RETALIATION IN VIOLATION OF THE FIRST AMENDMENT UNDER 42 U.S.C. § 1983:**

*As to Defendant CMU, Defendant Sabol, and Defendant Folan in their  
official capacity*

58. Plaintiff incorporates the above allegations as though fully stated herein.

59. The First Amendment of the U.S. Constitution prohibits state actors from taking action against a person due to their protected speech.

60. § 1983 provides a statutory cause of action for the deprivation of federal rights, privileges, or immunities by those acting under color of state law. 42 U.S.C. § 1983.

61. Defendant CMU and its agents are state actors because Defendant CMU is a public university owned by the State of Michigan that receives funding from the state.

62. Plaintiff engaged in protected speech when he spoke directly with Defendant Hilt about the punch, reported the incident to Defendant Sabol, and sent an email on March 17, 2025, to Defendant Folan reporting the incident.

63. Because of Plaintiff's protected speech, Defendant CMU took action that negatively impacted and excluded Plaintiff, including but not limited to treating him differently at team practices, suspending him from games, removal from team group chats, removal from the NIL club, and barring Plaintiff from the baseball stadium.

64. As a direct and proximate result of Defendants' actions, Dean experienced significant mental anguish and distress, denied the benefits of the educational program he was enrolled in at CMU, denied the benefits of being an NCAA student athlete at CMU, experienced pain and suffering, emotional distress, and experienced significant emotional and behavioral regression.

65. Defendants are not entitled to qualified immunity because Dean's right to report a physical assault by a university employee and not be retaliated against for making the report was clearly established under the First Amendment of the United States Constitution at the time of their actions.

66. As a result, Dean has suffered injuries including but not limited to those detailed above at ¶¶14-58.

**COUNT II: VIOLATION OF BODILY INTEGRITY, 42 U.S.C. § 1983:**  
***As to Defendant CMU, Defendant Hilt, Defendant Sabol and Defendant Folan***  
***in their official capacity***

67. Plaintiff incorporates the above allegations as though fully stated herein.

68. Section 1983 provides a statutory cause of action for the deprivation of federal rights, privileges, or immunities by those acting under color of state law. 42 U.S.C. § 1983.

69. Defendants violated Dean's substantive due process right to personal security and bodily integrity by their discretionary conduct, which was deliberately indifferent to and callously disregarded the known risk that Defendant Hilt would engage in problematic and abusive conduct, resulting in the assault of Dean while at WKU that shocks the conscience, in violation of the Fourteenth Amendment to the United States Constitution, as enforced pursuant to 42 U.S.C. § 1983.

70. Defendant Hilt was acting under color of state law at all times in his interactions with Dean because coaching and advising athletes during games and practices were his official duties, and all of his interactions with Dean took place within the scope of his employment as an assistant coach.

71. At all relevant times all Defendants Sabol and Folan were acting under the color of state law as employees of CMU, a public university, including and not limited to:

- a. Organizing and coaching baseball games both at CMU and at other universities;
- b. Organizing and coaching baseball practices and training sessions;

- c. Overseeing the athletic department's daily schedule, maintenance, and communications;
- d. Supervising and directing transportation and educational benefits for student athletes; and
- e. Actions and decisions regarding school practices and procedures, both formal and informal; and in their conduct as public university employees and administrators.

72. Choosing to place student athletes in danger by assigning assaultive coaches serves no legitimate governmental purpose.

73. Declining to report or obstructing mandatory reports to law enforcement immediately serves no legitimate governmental purpose.

74. Defendants knew or clearly should have known that their actions created a substantial risk of serious harm to student athletes exposed to assaultive coaches, including Dean, and they accepted that risk.

75. Defendants' conduct was so egregious and outrageous that they shock the contemporary conscience and demonstrate Defendants' deliberate indifference to Dean's physical safety.

76. Defendants are not entitled to qualified immunity because Dean's right to not be physically assaulted by a university employee was clearly established under the Fourteenth Amendment at the time of their actions.

77. As a direct and proximate result of the Defendants' state-created danger in violation of the Fourteenth Amendment, Dean was physically assaulted. As a result of these constitutional violations, Dean has suffered injuries as discussed in ¶¶14-57, and will likely continue to suffer.

**COUNT III: ASSAULT AND BATTERY**  
*As to Defendant Hilt in his individual capacity*

78. Plaintiff incorporates the above allegations as though fully stated herein.

79. While in the bullpen, Defendant Hilt made an intentional and unlawful threat to do bodily injury to Dean by winding up before punching him in the chest.

80. While in the bullpen, Defendant Hilt made a voluntary, intentional, and unlawful act to cause bodily injury to Dean by winding up before punching him in the chest.

81. The threat to Dean was made under circumstances that created in him a well-founded fear of imminent peril.

82. Defendant Hilt had the apparent ability to carry out the act if not prevented.

83. The act was not prevented, and Defendant Hilt knowingly, willfully, and maliciously punched Dean in the chest.

84. As a direct and proximate result of Defendant's assault and battery of Dean, Dean suffered injury and damage, past, present, and future, including the following:

- a. pain, suffering, and emotional distress;
- b. humiliation, mortification, and embarrassment;
- c. fear of returning to his baseball team; and
- d. other injuries and damages and consequences that are found to be related to the assault and battery that develop or manifest themselves during the course of discovery and trial.

**COUNT IV: NEGLIGENCE**

***As to Defendant CMU, Defendant Hilt, Defendant Sabol and Defendant Folan in their official capacity***

85. Plaintiff incorporates the above allegations as though fully stated herein.

86. Defendants CMU, Hilt, Sabol, and Folan have a duty to properly create and maintain a safe community for student-athletes in which they are able to pursue their athletic and academic interests.

87. Defendant Hilt was acting in the scope of his employment at the time of the punch because he was participating in a common practice within the baseball team, greeting each player with a fist bump or other physical gesture.

88. Furthermore, Defendant Hilt had established a reputation with the players for having an excessive drinking habit, which resulted in the players and parents knowing that he had slept on the field in a period of excessive intoxication and otherwise behaving irresponsibly with the players.

89. Defendants failed to properly create and maintain a safe community for student-athletes in which they are able to pursue their athletic and academic interests.

90. At all times on and/or prior to March 2, 2025, Defendants' conduct was so reckless so as to demonstrate a substantial lack of concern for the safety of students and whether an injury resulted, thereby amounting to gross negligence and entitling Plaintiff to an award of exemplary damages.

91. Defendant's failure to properly create and maintain a safe community for student athletes caused Dean's physical injury and mental anguish.

92. As a direct and proximate result of Defendant's gross negligence, Dean suffered significant injuries.

**COUNT V: NEGLIGENT HIRING, SUPERVISION, AND  
RETENTION**

***As to Defendant CMU, Defendant Sabol and Defendant Folan in their  
official capacity***

93. Plaintiff incorporates the above allegations as though fully stated herein.

94. Defendants Sabol, Folan, and CMU owed a duty of care to their student athletes to protect them from harm by its employees.

95. Defendants knew or should have known of the particular unfitness, incompetence, or dangerous attributes of Defendant Hilt.

96. Defendants' conduct was so reckless and demonstrated a substantial lack of concern for the reasonably foreseen risks involved, thereby amounting to gross negligence.

97. Through Defendants' gross negligence in supervising Defendant Hilt, his dangerous attributes proximately caused Plaintiff's injuries.

98. As a direct, proximate, and foreseeable result of Defendant's conduct, Plaintiff was significantly injured.

99. The injuries suffered by Plaintiff were caused by Defendant's gross negligence and without any negligence on the part of Plaintiff.

**COUNT VI: INTENTIONAL INFLICTION OF EMOTIONAL  
DISTRESS:**

***As to Defendant Hilt in his individual and official capacity, and Defendant Sabol and Defendant Folan in their official capacity***

100. Plaintiff incorporates the above allegations as though fully stated herein.

101. Defendants engaged in extreme and outrageous conduct through the following actions, including and not limited to:

- a. Defendant Hilt assaulting Dean;
- b. Defendants CMU, Sabol, and Folan negligently supervising Defendant Hilt, thus resulting in his assault of Dean;

- c. Ignoring problematic behavior from Defendant Hilt and allowing him to continue coaching young adults;
- d. Negligently hiring staff that would break protocol and assault student athletes;
- e. Retaliating against Dean by sending the police to his dorm room and blocking him from entering the stadium for his belongings due to a “death threat,” knowing full well that Dean was reciting a team mantra;
- f. Not communicating with Dean and his parents after these problematic occurrences, letting him instead find out through third parties that he was being removed from the team;
- g. Furthering their retaliation by spreading rumors about Dean, thus poisoning the well for his future baseball career; and
- h. Demonstrating deliberate indifference to the physical and mental health of a student athlete in their care.

102. Defendants acted intentionally when they committed these outrageous acts.

103. Defendants intentionally caused Dean severe emotional distress by enabling physical abuse and emotional abuse as a result of reporting the physical assault he endured.

104. As a direct and proximate result of Defendants' intentional infliction of emotional distress, Dean was physically abused and experienced significant mental anguish and distress, denied the benefits of the educational program he was enrolled in at CMU, denied the benefits of being an NCAA student athlete at CMU, experienced pain and suffering, emotional distress, and experienced significant emotional and behavioral regression.

105. As a result, Dean has suffered injuries including but not limited to those detailed above at ¶¶14-58.

### **RELIEF REQUESTED**

106. Accordingly, Plaintiffs respectfully request this Honorable Court grant the following relief in accordance with 42 U.S.C. § 1983 and all other applicable federal and state laws:

107. As a direct and proximate result of the wrongful actions of Central Michigan University, Aaron Hilt, Jacob Sabol, Amy Folan, and their agents, Plaintiffs have suffered injuries as detailed herein and are entitled to:

- a. Compensatory damages, including and not limited to medical care, mental healthcare, and costs associated with such.
- b. Damages for physical and emotional distress, pain, suffering, inconvenience, mental anguish, anxiety, and loss of enjoyment of life;
- c. Exemplary damages;

- d. Punitive damages in light of Defendants' malice and reckless and callous indifference to the federally protected rights of others;
- e. Attorney fees and costs;
- f. Any and all other additional damages or remedies to be ascertained;
- g. An order of the Court for such other relief as the Court deems just and equitable.

Respectfully submitted,

**FLOOD LAW, PLLC**

By: /s/ Todd F. Flood  
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Dated: August 19, 2025

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
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DEAN BROWN,

Plaintiff,

Case No. -

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Hon.

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**DEMAND FOR JURY TRIAL**

Plaintiff, DEAN BROWN, Individually, by and through counsel, FLOOD LAW, PLLC, hereby demands a trial by jury in the above-captioned matter.

Respectfully submitted,

**FLOOD LAW, PLLC**

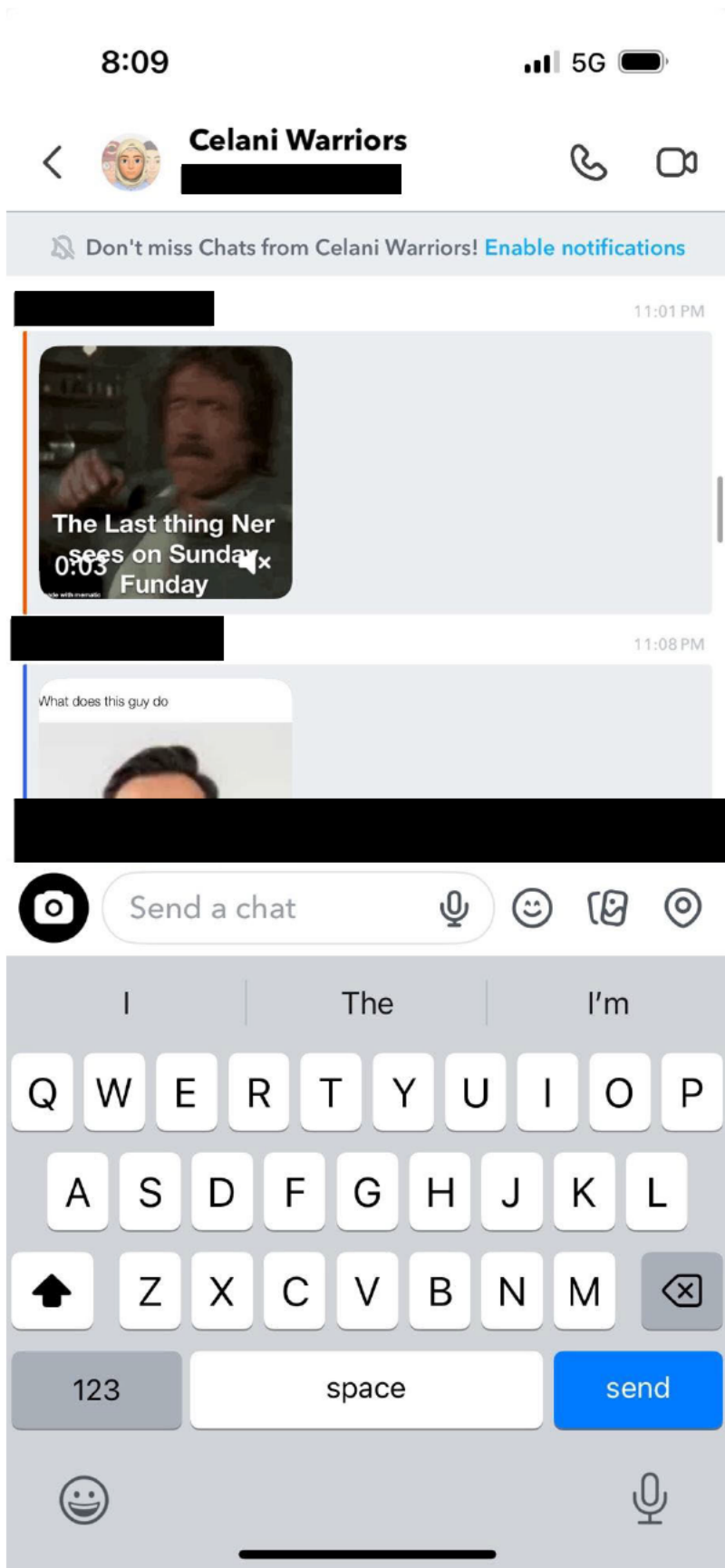
By:/s/ Todd F. Flood  
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Dated: August 19, 2025

# **EXHIBIT 1**



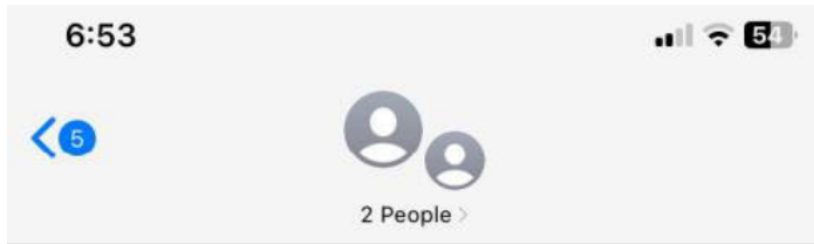




# **EXHIBIT 2**



# **EXHIBIT 3**



Text Message • SMS  
Mon, Mar 3 at 5:21 PM

██████████  
Mr. and Mrs. Brown,

This is Aaron Hilt. I wanted to reach out and see if you had a few minutes to get on a phone tonight?



I was able to talk with Dean today and wanted to reach out.



I put my son to bed around 7. So I'm free anytime around then. Let me know what it's best for you.

The sender and other recipients are not in your contact list.

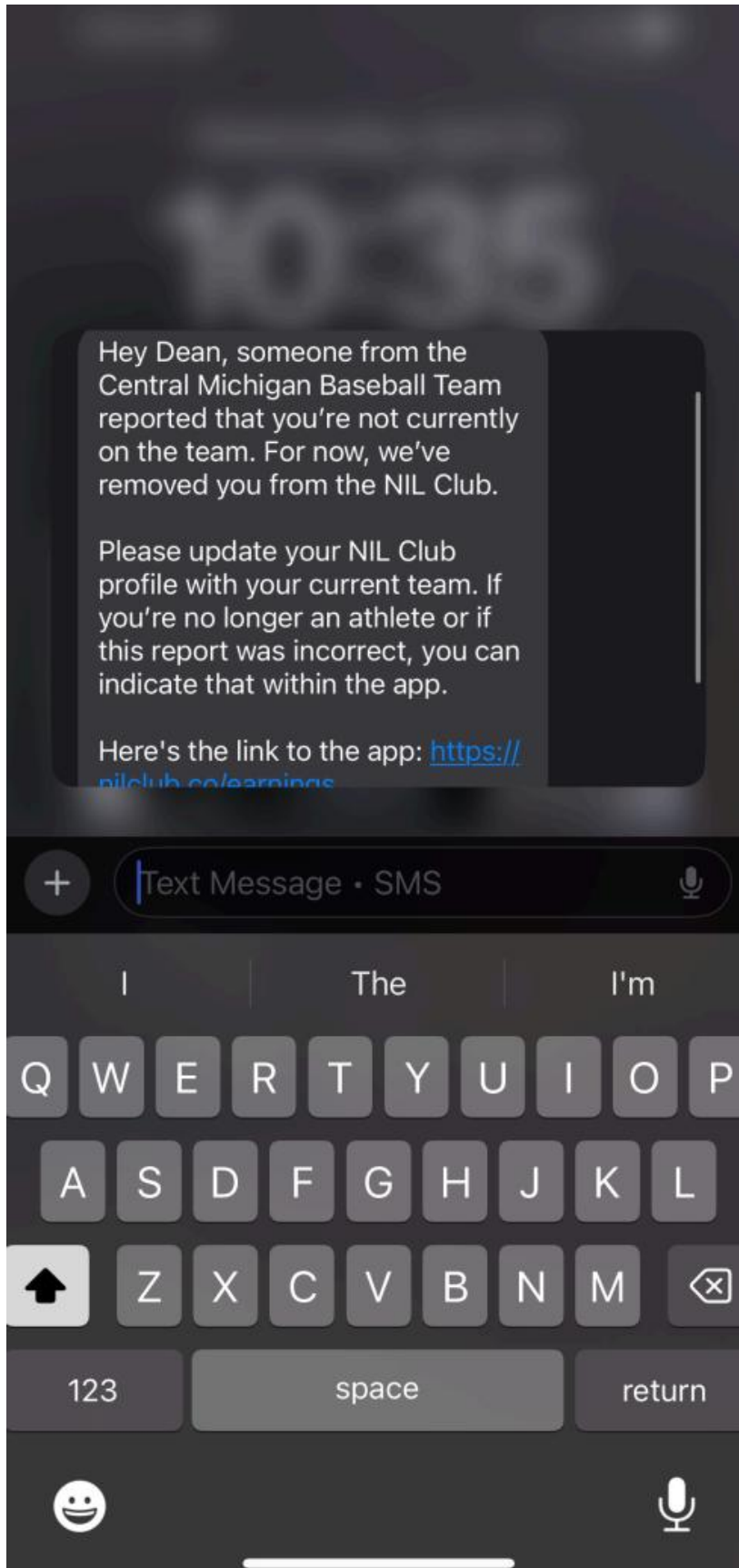
[Report Junk](#)



Text Message • SMS



**EXHIBIT 4**



**UNITED STATES DISTRICT COURT  
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**INDEX OF EXHIBITS**

Exhibit 1 – Messages, memes, and GIFs shared within the team’s group Snapchat  
Exhibit 2 – Dean’s text messages to and from Aaron Hilt  
Exhibit 3 – Text messages from Defendant Hilt to Jason and Christine Brown  
Exhibit 4 – NIL Notice