

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

CHRISTINE VON DER HAAR,)
)
 Plaintiff,)
)
 v.) No. 1:14-cv-247 JMS-DML
)
 UNITED STATES, *et al.*)
)
 Defendants.)

STATEMENT OF CLAIMS

COMES NOW Plaintiff, by her counsel, and pursuant to the approved Case Management Plan in this case, hereby provides the following statement of the claims that she intends to prove at trial:

1. The detention of the plaintiff described in her operative complaint, without cause or reasonable suspicion, constituted an unreasonable seizure in violation of the Fourth Amendment. This claim is made pursuant to *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971).
2. The actions of the defendants, resulting in the erroneous detention of, and injury to, Dr. Von Der Haar, caused plaintiff to suffer false imprisonment, causing damages, and the United States is therefore liable under the Federal Tort Claims Act.

WHEREFORE, the plaintiff respectfully provides her statement of the claims that she intends to prove at trial, and requests all proper relief.

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Certificate of Service

I hereby certify that on December 15, 2014, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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