

DOCKET NO.: DBD-CV25-6055202-S	:	SUPERIOR COURT
RIDGEFIELD LITTLE LEAGUE PARENTS ASSOCIATION, AS CLASS REPRESENTATIVE OF THE PARENTS OF RIDGEFIELD NATIONAL LITTLE LEAGUE	:	J.D. OF DANBURY  AT DANBURY
v.	:	
RIDGEFIELD NATIONAL LITTLE LEAGUE; LITTLE LEAGUE BASEBALL, INCORPORATED d/b/a LITTLE LEAGUE INTERNATIONAL, INC.;	:	SEPTEMBER 15, 2025
KEVIN PORTANOVA, THOMAS LANSSEN; JEFFREY AUDEVARD; PHILLIP BODENSTAB; ANNA COCKERILLE; DAVID DEUSER; FREDDIE ERAZO; JAY GRIFFIN; STEPHEN HANNA; ANDREW HELLER; CASEY HUTCHINGS; AARON JACOBSTEIN; JOHN JOHNSON; ALEX LERITZ; KATE LOEWENGART; FREDERICK MARSHALL; ROBERT MARTZLOFF; CHRISTOPHER MCGRATTY; AMY PFLAUM; GREGORY PFLAUM; MEGHAN RAYMOND; MICHAEL SCERRA; SCOTT SOLOFF and EMILY VANNINI	:	

**MEMORANDUM OF LAW IN OPPOSITION  
TO MOTION TO DISMISS**

**I. Introduction**

Plaintiff has filed this instant action seeking to address the ongoing safety violations and the fraudulent and deceptive practices of the Ridgefield National Little League. In response to Plaintiff's action, Defendant Little League Baseball, Incorporated has moved to dismiss for lack of jurisdiction.

Defendant Ridgefield National Little League ("RNLL") is an organization organized pursuant to a constitution (Dkt. 101.00) organized under the auspices of Little League Baseball, Incorporated. ("Little League"). Plaintiff Ridgefield Little League Parents Association (the "Parents Association") is a voluntary organization pursuant to Conn. Gen. Stat. §52-76. Its

members are Daniel Neiditch (“Mr. Neiditch”) and Harry Hess (“Mr. Hess”) (Affidavit of Daniel Neiditch “Neiditch Aff.” ¶ 3; Affidavit of Harry Hess “Hess Aff.” ¶ 3). Mr. Hess resides at 156 Haviland Road, Ridgefield, CT 06877. The Neiditch family and the Hess family have had sons who participated in RNLL (Neiditch Aff. ¶ 4; Hess Aff. ¶ 4).

Mr. Neiditch is a coach and community leader. After witnessing RNLL’s refusal to follow federal safety requirements and refusal to honor the commitments in its own safety manual, Mr. Neiditch spoke out and agreed with Mr. Hess to take legal action to protect children (Neiditch Aff. ¶ 5). Mr. Neiditch has a long record of service to children and communities. His philanthropy spans decades and touches countless lives:

- He has raised millions of dollars for children’s hospitals, cancer research, and disaster relief effort.
- He has partnered with Habitat for Humanity and other housing organizations to provide homes and opportunities for vulnerable families.
- He has supported youth education and mentorship programs, ensuring children from underserved backgrounds have access to tutoring, school supplies, and safe after-school spaces.
- His contributions have been recognized nationwide – including being honored to throw out the ceremonial first pitch at six Major League Baseball stadiums, each time in support of charitable causes benefiting children and local communities.
- He has worked directly with organizations combating homelessness among children and veterans, ensuring no family is left behind.

Neiditch Aff. ¶ 17.

This Complaint is composed of three causes of action. The only cause of action directed at Little League seeks injunctive relief against Little League to prevent further safety violations and violations of Little League and RNLL rules.

## **II. Factual Background**

Daniel Neiditch and Harry Hess are the members of the Plaintiff (Neiditch Aff. ¶ 3; Hess Aff. ¶ 3). The Neiditch family and the Hess family have had children in the RNLL in the past season (Neiditch Aff. ¶ 4; Hess Aff. ¶ 4). During the 2025 season, Mr. Neiditch became aware that coaches are required by federal law to have mandatory training for child abuse awareness. During the Spring season, many, if not most, of the coaches did not have this training (Neiditch Aff. ¶ 6). See Exhibit A. Indeed, on page 4 of RNLL’s Memorandum of Law in Support of Motion to Dismiss (the “RNLL Memo”), it admits that even now, it does not have 100% compliance and that it continues to violate federal law 34 U.S.C. §20341.<sup>1</sup> Pursuant to 34 U.S.C. §20341(a)(9), each of the RNLL coaches are “covered individuals.” Pursuant to 34 U.S.C. §20341(h), all of the coaches must receive periodic training in the obligation to report, as well as in the identification of abused and neglected children. During the 2025 Spring season, many of the coaches had received no such training (Neiditch Aff. ¶ 6). See Exhibit A. When Mr. Neiditch raised the issue to RNLL, RNLL belatedly began requiring this training (Neiditch Aff. ¶ 8), but according to Mr. Portanova’s own affidavit (¶ 11), compliance is still less than 100%.

As set forth above, in ¶¶ 13-19 of the Complaint, Plaintiff makes the following allegations:

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<sup>1</sup> Mr. Neiditch has heard from several parents in other Little League Chapters that failure to have the required abuse training is not limited to RNLL, but is a problem in many other Chapters (Neiditch Aff. ¶ 7).

13. For the period from 2019 through May 2025, RLL and the Board Members failed to ensure compliance with this statutory requirement.

14. In RLL's 2023 Safety Manual for Managers and Coaches (the "Safety Manual") which is published on RLL's website,<sup>2</sup> it states on page 5 that all AAA and Majors managers and coaches must become certified in CPR and AED.

15. Defendants made this representation with the intent to induce the parents of participants in RLL to rely upon these representations.

16. RLL's 2023 Safety Manual also explicitly promises the following:

"All managers and coaches in all divisions are also required to attend RLL's annual First Aid Training & Safety Clinic. Dr. Angelo Ciminiello will make a safety presentation... We will also spend time with a trainer from the Positive Coaching Alliance..."

"All managers and coaches are also required to attend the RLL Coaches' Clinics... which covers the proper instruction of players; focusing on skill development, running an effective practice, and exercises."

The Safety Manual also represents:

"RLL invested in automated external defibrillators as an added measure of safety in the event of any emergency. With this investment, RLL has required that the managers of all AAA & Majors teams must become CPR/AED certified in order to be prepared in the event of an emergency. Training, through the American Heart Association, results in a two-year certification. RLL subsidizes the cost of this training for our volunteers."

17. In actuality, most managers and coaches did not have CPR or AED certification and the Defendants took no steps to ensure that they obtained them. Indeed, Defendants failed to ensure that the American Heart Association training described in their own Safety Manual was ever even offered to the managers and coaches.

18. One coach, when discussing his own lack of CPR training said, "Agree, I would have gotten it done in the class if they offered it. Once they canceled, slipped my mind and never got it."

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<sup>2</sup> The Safety Manual has not been updated since 2023.

19. In 2025, the First Aid Training & Safety Clinic and Positive Coaching Alliance sessions did not take place as promised.

RNLL and Little League do not contest any of these allegations. Indeed, Mr. Portanova in his affidavit at ¶ 11 admits not all coaches have CPR and AED training. Mr. Portanova admits that one team has no coaches with these certifications. Nevertheless, RNLL continues to this day to tell parents through its Safety Manual that all Majors and AAA coaches have these certifications when each of the board members, and certainly Mr. Portanova know that these statements are untrue. This is false and deceptive advertising. The only reason RNLL finally partially complied with federal law concerning abuse training, to the extent that it did, is because Mr. Neiditch informed RNLL of its failure to comply with federal law (Neiditch Aff. ¶ 9).

In ¶¶ 20-24 of the Complaint, the Plaintiff alleges the following violation of Little League rules and RNLL's own rules.

20. Pursuant to Little League Rule 9.03(d) (a national rule applicable to all little league games), in any game in which the umpires are not adults, the local little league must assign an adult as Game Coordinator. If this requirement is not met, Little League Rules do not permit the game to be played. Despite this rule, RLL almost never assigned Game Coordinators.

21. Pursuant to Little League Rule 9.03(d), the Game Coordinator must be present throughout the game, must oversee the conduct of players, managers, and coaches, and have the sole authority to determine whether play should be suspended due to inclement weather or field conditions. This rule is necessary to ensure the safety of the players.

22. Indeed, RLL's own counsel has admitted that many RLL games proceeded without Game Coordinators and youth umpires in express violation of Little League rules.

23. Pursuant to RLL's AAA Division Rules of Play, no new inning may start more than one hour and forty-five minutes after the beginning of the game. Pursuant to these rules, the one hour and forty-five minute rule applies to playoff games as well. Nevertheless, one Board member, Mr. McGratty unilaterally decided during the season that he had the authority to change the rules.

24. Despite the one hour and forty-five minute rule, during a playoff game, Defendant McGratty changed the rule to include a full six innings.

Nowhere in the RNLL Memo is there any factual denial or refutation of these allegations. Indeed, as shown in Mr. Pastore's own letter of June 18, 2025 (Exhibit B, ¶ 4), he acknowledged that RNLL did not follow Little League rules regarding Adult Game Coordinators.

Mr. Neiditch and Mr. Hess simply wish to see the RNLL run safely in accordance with Little League rules and RNLL's own rules (Neiditch Aff. ¶ 11; Hess Aff. ¶ 6). They also seek to require RNLL to be truthful with parents so that they can make informed choices about their own children's safety.

### **III. Argument**

#### **A. Plaintiff Has The Legal Capacity To Sue**

Little League claims that Plaintiff is a fictitious entity which lacks capacity to sue. Little League correctly notes that Plaintiff is not a corporation, limited liability company or other registered entity. Connecticut law, however, recognizes other types of entities which do not require registration. One such example is a voluntary association as set forth in Conn. Gen. Stat. §52-76. Pursuant to Conn. Gen. Stat. §52-76 "Any number of persons associated together as a voluntary association, not having corporate powers, but known by a distinguishing name, may sue..."

Plaintiff clearly meets this statutory standard. Little League claims that in order to sue, a voluntary association must meet the three part test of Hunt v. Washington State Apple Advertising Commission, 432 U.S. 333, 343 (1977). The Connecticut Supreme Court adopted this test in Conn. Ass'n of Not-For-Profit Providers for the Aging v. Dept. of Soc. Services, 244

Conn. 378, 386-87 (1998). The test requires that (1) at least one member of the association have standing to sue in his or her own right; (2) the interests it seeks to protect are germane to the organization's purpose; and (3) the claims asserted and relief requested do not require the participation of individual members. Id. Here, Mr. Neiditch and Mr. Hess are both parents of Little League players and thus both have standing despite the arguments advanced by Little League. Indeed, our Supreme Court has noted that associational standing depends on substantial measure on the type of relief requested. "If in a proper case the association seeks a declaration, injunction or some other form of prospective relief, it can reasonably be supposed that the remedy, if granted, will inure to the benefit of those members of the association actually injured." Conn. Ass'n of Not-For-Profit Providers for the Aging v. Dept. of Soc. Services, 244 Conn. at 386-387.

Here, the principal claim is for injunctive relief to require a permanent injunction requiring RNLL and Little League to enforce federal law and their own rules and regulations. Complaint ¶ 35. This is precisely the type of relief which will benefit all of the members of the Parents Association. Thus, the Plaintiff clearly has standing to assert the claims in the First Count against Little League.

Little League next asserts that Plaintiff is not a proper class action plaintiff. Practice Book §9-7 requires: (1) that the class is so numerous that joinder of all members is impracticable, (2) there are question of law or fact common to the class; (3) the claims or defenses of the representative parties are typical of the claims or defenses of the class; and (4) the representative parties will fairly and adequately protect the interests of the class. This evaluation is premature as Plaintiff has not yet filed a motion for class certification. Moreover, the Court will retain subject matter jurisdiction even if class certification is denied. Indeed, the

principal relief sought, the injunctive relief sought in the First Count, may not require class certification.

In any event, class certification is warranted.

In determining whether to certify a class under our rules of practice, a trial court must follow a two step process. “First, a court must ascertain whether the four prerequisites to a class action, as specified in *Practice Book* § 9-7, are satisfied. These prerequisites are: (1) numerosity – that the class is too numerous to make joinder of all members feasible; (2) commonality – that the members have similar claims of law and fact; (3) typicality – that the [representative] plaintiffs’ claims are typical of the claims of the class; and (4) adequacy of representation – that the interests of the class are protected adequately.” (Internal quotation marks omitted.) *Artie’s Auto Body, Inc. v. Hartford Fire Ins. Co.*, 287 Conn. 208, 213-14, 947 A.2d 320 (2008).

If these prerequisites have been met, the court then proceeds to the second step and evaluates “whether the certification requirements of *Practice Book* § 9-8 are satisfied. These requirements are: (1) predominance – that questions of law or fact common to the members of the class predominate over any questions affecting only individual members; and (2) superiority – that a class action is superior to other available methods for the fair and efficient adjudication of the controversy . . . . Because our class certification requirements are similar to those embodied in *rule 23 of the Federal Rules of Civil Procedure*, and our jurisprudence governing class actions is relatively undeveloped, we look to federal case law for guidance in construing the provisions of *Practice Book* §§ 9-7 and 9-8.” (Footnote omitted; internal quotation marks omitted.) *Id.*, 214-15.

The burden is on the party moving for class certification to establish that the requirements of *Practice Book* §§ 9-7 and 9-8 have been met, and the trial court should undertake “a rigorous analysis” to ensure that class certification is appropriate. (Internal quotation marks omitted.) *Standard Petroleum Co. v. Faugno Acquisition, LLC*, 330 Conn. 40, 48, 191 A.3d 147 92018); accord *Rodriguez v. Kaiaffa, LLC*, *supra*. 337 Conn. 256; *Collins v. Anthem Health Plans, Inc.*, 275 Conn. 309, 320-21, 880 A.2d 106 (2005). In conducting its analysis, the trial court must accept the substantive allegations in the complaint but may go beyond the pleadings when determining whether the requirements for class certification have been satisfied. *Collins v. Anthem Health Plans*,

*Inc., supra. 321.* Class certification does not depend on “whether the . . . plaintiffs have stated a cause of action or will prevail on the merits, but rather whether the requirements of [the class action rules] are met.” (Internal quotation marks omitted.” *Id.* Although a trial court has broad discretion in determining whether to certify a class action, it should resolve all doubts regarding the propriety of class certification in favor of certification. *Id.*

#### A Predominance and Superiority

The dispute in the present case centers on the predominance and superiority requirements, which we have described as “intertwined . . . .” (Internal quotation marks omitted.) *Rodriguez v. Kaiaffa, LLC, supra. 337 Conn. 280.* “[T]he fundamental purpose of the predominance inquiry is to determine whether the economies of class action certification can be achieved . . . without sacrificing procedural fairness or bringing about other undesirable results.” (Internal quotation marks omitted.) *Collins v. Anthem Health Plans, Inc., supra. 275 Conn. 329.* This inquiry substantially encompasses the superiority analysis because the fundamental purpose of the superiority requirement is to ensure that a class action is the most “fair and efficient” means of resolving the case. *Practice Book § 9-8 (3).* Because these two requirements overlap, “[i]f the predominance criterion is satisfied, courts generally will find that the class action is a superior mechanism even if it presents management difficulties.” *Collins v. Anthem Health Plans, Inc., supra. 347.* Conversely, if the predominance requirement is not satisfied, a class action likely will not be the superior mechanism to resolve the dispute between the parties due to “the management difficulties posed by the individual questions . . . .” (Internal quotation marks omitted.) *Id.* In the present case, the fulfillment of these two requirements depends on the prevalence of class-wide issues, and, therefore, we consider these requirements together. See, e.g., *Rodriguez v. Kaiaffa, LLC, supra. 277.*

Class-wide issues predominate over individualized issues “if resolution of some of the legal or factual questions that qualify each class member’s case as a genuine controversy can be achieved through generalized proof, and if these particular issues are more substantial than the issues subject only to individualized proof.” (Emphasis omitted; internal quotation marks omitted.) *Collins v. Anthem Health Plans, Inc., supra. 275 Conn. 329.* The focus is on whether class-wide issues have “a direct impact on every class member’s effort to establish liability . . . .” (Internal quotation marks omitted.) *Id., 330.* If the plaintiffs cannot establish liability without introducing “a great deal of

individualized proof or argu[ing] a number of individualized legal points to establish most or all of the elements of their individual[ized]claims, such claims are not suitable for class certification . . . .” (Internal quotation marks omitted.) *Id.*; accord *Rodriguez v. Kaiaffa, LLC, supra. 337 Conn. 279*; *Standard Petroleum Co. v. Faugno Acquisition, LLC, supra. 330 Conn. 60-61*; *Artie’s Auto Body, Inc. v. Hartford Fire Ins. Co., supra. 287 Conn. 215-16*.

The need for individualized proof to adjudicate defenses or to establish the amount of damages to which each class plaintiff is entitled does not necessarily defeat class certification. See, e.g., *Standard Petroleum Co. v. Faugno Acquisition, LLC, supra. 330 Conn. 71*; *Collins v. Anthem Health Plans, Inc., supra. 275 Conn. 330*. “The existence of special defenses, which may or may not be subject to common proof, is merely another factor to be considered in [the predominance] assessment.” *Standard Petroleum Co. v. Faugno Acquisition, LLC, supra. 71*. With respect to damages, class certification is appropriate if the plaintiffs can rely on “plausible statistical or economic methodologies to demonstrate impact on a class-wide basis. . . . Particularly [when] damages can be computed according to some formula, statistical analysis, or other easy or essentially mechanical methods, the fact that damages must be calculated on an individual basis is no impediment to class certification.” (Citation omitted; internal quotation marks omitted.) *Collins v. Anthem Health Plans, Inc., supra. 331*; see also *Roach v. T.L. Cannon Corp., 778 F.3d 401, 408 (2d Cir. 2015)* (“it remains the black letter rule that a class may obtain certification under [r]ule 23 (b) (3) [of the Federal Rules of Civil Procedure] when liability questions common to the class predominate over damages questions unique to class members” (internal quotation marks omitted)).

To determine whether class-wide issues of law or fact predominate in any given case, the trial court must undertake a three part inquiry. “First, the court should review the elements of the causes of action that the plaintiffs seek to assert on behalf of the putative class. . . . Second, the court should determine whether generalized evidence could be offered to prove those elements on a class-wide basis or whether individualized proof will be needed to establish each class member’s entitlement to monetary or injunctive relief. . . . Third, the court should weigh the common issues that are subject to generalized proof against the issues requiring individualized proof in order to determine which predominate. . . . Only when common questions of law or fact will be the object of most of the efforts of the litigants and the court will the

predominance test be satisfied.” (Citations omitted; internal quotation marks omitted.” Collins v. Anthem Health Plans, Inc., supra. 275 Conn. 331-32.

Collier v. Adar Hartford Realty, LLC, 349 Conn. 822, 835 (2024)

Here, there are hundreds of parents of children in RNLL (Neiditch Aff. ¶ 14). They all have the same safety interests for their children. Mr. Neiditch and Mr. Hess as the members of the Parents Association have a representative interest and they adequately represent the class. Moreover, the facts are essentially the same for all parents of children in the RNLL. While a determination of class certification is premature at this juncture, Plaintiff has a valid basis upon which to seek certification.

**B. Plaintiff Has Standing To Sue**

Little League claims that Plaintiff lacks standing because it lacks a claim of actual injury. Little League relies principally on Andross v. Town of West Hartford, 285 Conn. 309, 324 (2008). This reliance is misplaced. Plaintiff has suffered two forms of actual injury. First, their children are exposed to unnecessary safety risks to which RNLL has falsely represented its safety precautions. This situation is analogous, albeit at a far lower degree of risk, to that of any NFL football player with regards to the risk of CTE. Courts did not require each player to have actually suffered CTE to have suffered an actual injury. More importantly, the requirement of actual injury in the cases cited by Little League concern claims for damages. Plaintiff is not seeking damages in its negligence cause of action. Plaintiff is seeking injunctive relief to prevent future injury to the children. Accordingly, the cases cited by Little League do not apply.

Here, the purpose of the injunction Plaintiff seeks is to prevent the preventative and unnecessary tragic injuries to children. Surely, it would be nonsensical to require actual injured children to require such an injunction. Plaintiff would expect Little League to wish to do all in

its power to ensure that no children suffer unnecessary injury. Plaintiff merely seeks to require RNLL to follow federal law, Little League Rules, its own rules, and its promises to parents. Plaintiff is an association of parents. It clearly has standing to assert the claims of parents.

**PLAINTIFFS  
RIDGEFIELD LITTLE LEAGUE  
PARENTS ASSOCIATION, AS  
CLASS REPRESENTATIVE OF  
THE PARENTS OF RIDGEFIELD  
NATIONAL LITTLE LEAGUE**

By:

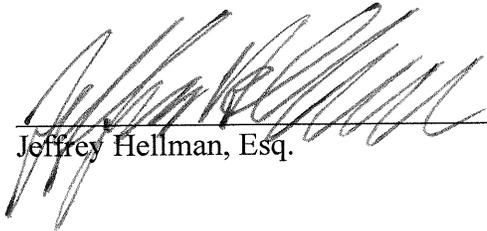
  
\_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

This is to certify that the foregoing has been sent by electronic mail on September 15, 2025 to the following:

Joseph M. Pastore III  
Melissa Rose McClammy  
Paul Fenaroli  
Pastore LLC  
4 High Ridge Park, 3<sup>rd</sup> Floor  
Stamford, CT 06905  
[jpastore@pastore.net](mailto:jpastore@pastore.net)  
[mmcclammy@pastore.net](mailto:mmcclammy@pastore.net)  
[pfenaroli@pastore.net](mailto:pfenaroli@pastore.net)

By:



Jeffrey Hellman, Esq.

# EXHIBIT A

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**From:** Tom Lansen <tlansen@gmail.com>  
**Sent:** Monday, May 5, 2025 11:22 AM  
**To:** safety ridgefieldlittleleague.org; Kevin Portanova; rtb ridgefieldlittleleague.org; Freddy Erazo; Gmail; McGratty, Christopher (KBW-New York 7th Ave); Mikey Scerra; Andy Heller; JAY GRIFFIN; Meghan Raymond; Emily Vannini  
**Subject:** [EXTERNAL] Re: Urgent must be complete the New Adult Abuse Awareness - Mandatory by everyone involved with Ridgefield Little League

Division Directors,

Can you each please find a few minutes today to send a very clear email to any of your coaches that have not met these requirements to do so ASAP, and remind them that they may not take the field with their teams until this is done. The fields are closed today, so no time like the present!

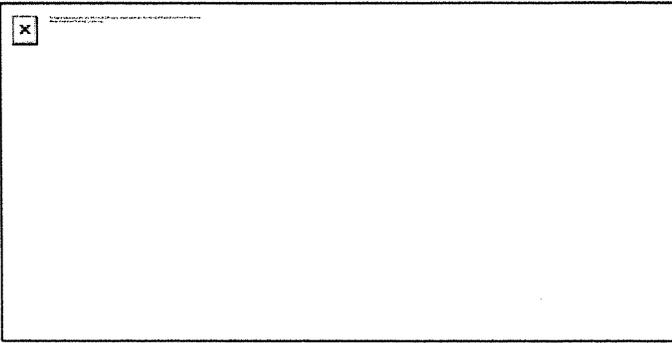
Thanks,  
Tom

On Sun, May 4, 2025 at 8:47 PM safety ridgefieldlittleleague.org <safety@ridgefieldlittleleague.org> wrote:

**If your name is not on this list below, then you have not completed the New Adult Abuse Awareness course. (Mandatory for everyone) without **this you will not be able to volunteer, coach or be on the RLL board.****

The New Adult Abuse Awareness Certification—a brief, 30-minute online course.

1. Use the following link to create an account and complete the training: Abuse Awareness <https://www.littleleague.org/university/articles/abuse-awareness-training-course/>
2. Submit your completion certificate to [safety@ridgefieldlittleleague.org](mailto:safety@ridgefieldlittleleague.org).



The safety and well-being of all participants in the Little League® program continues to be paramount, and it is on all of us to do our part to provide a fun, memorable, and safe experience each year. **With the requirement of all volunteers to complete Abuse Awareness training each year**, we are proud to announce the launch of the new Little League Abuse Awareness Course.

This course, which serves as a replacement for the programs previously available through third-party organizations like USA Baseball, is custom to the Little League program and provides an easier learning experience for our volunteers. **Required to be completed by all volunteers each year**, this course is available as part of the training and education courses at [LittleLeague.org/Training](http://LittleLeague.org/Training), making signing up for the course even easier for our volunteers.

### **Why This Matters**

These certifications ensure a **safe, supportive environment** for players and volunteers, reinforcing our commitment to the Ridgefield Little League community. Your participation is essential.

Thank you for your dedication and cooperation! Please feel free to reach out with any questions at **203-443-9733**.

**Best regards,** Scott Soloff Safety Director, Ridgefield Little League 📞 203-443-9733

### **Coaches and volunteers that completed the course:**

Dan	Agius
Adam	Amin
Megan	Azcona
Gary	Belmonte
Keegan	Binford
Jeffrey	Burns
Steven	Bussiere
Francesco	Chieffalo
Michael	Circelli
John	Craig
John	Dering
Tom	Dosdall
Freddy	Erazo

Dan	Farrand
Kevin	Fox
Jay	Griffin
Sean	Haddad
Dave	Halbreich
Stephen	Hanna
Jonathan	Hayner
Robert	Heck
Casey	Hutchings
Thomas	Katechis
Frank	Kessler
Matt	Komosinski
Thomas	Lansen
Dean	Lasalandra
Scott	Loftus
John	Lucchesi
Jay	Marcarello
Blaise	McNamee
Matt	McNulty
John	Murphy
David	Murphy
Tommy	Norton
Craig	O'Connell
Derek	O'Donnell
Andy	Pambianchi
Brian	Pastore
Corey	Patrick
Gregory	Pflaum
Patrick	Poats
Kevin	Portanova
Michael	Principi
Tim	Rice
Steven	Rodriguez
Sean	Sambus
Michael	Scerra
Brian	Silston
Anthony	Simpson
Matt	Smith
Scott	Soloff
Nayden	Stoyanov
Aaron	Teitelbaum
Emily	Vannini
Bryan	Vannini
Kristin	Ward
Michael	Weir
Christopher	Williamson

Josh  
Daniel

Lowney  
Hafford

5:55



Francesco

Tue, Jun 17 at 12:06 PM

I know we didn't get a chance to finish our convo. I'm sorry you had to go through that. Hopefully they make changes next year with all the feedback they received.

Congratulations on winning it all. The kids must have been super pumped.

Also didn't know a game coordinator needed to be present with kid umpires. That would have changed outcome of my game and likely putting us as the first seed. Hopefully they incorporate them for seeding and playoff games next year.

Sorry had a business call to answer. Thank you! That's a shame them not following little league USA rules or RLL rules was the cause of your team losing. It is also child endangerment and breach of duty for not following these important rules.

5:56



Francesco

I'm sure they will make changes next year. A lot of my kids parents are upset about the game. I know they will reach out and provide feedback to the league. I'm happy that all my kids really enjoyed the season and want to come back to play again. I did my part in making it a fun, safe environment and developed their baseball skills a little more.

I owe you a drink for winning it all. lol

Sorry Max Murphy, good kid. Sam Murphy was on my team and also a great kid.

Congrats again Dan

Thank you my friend! They need to make sure coaches have their up to date cpr next year. The fact you and others didn't have it done shows the incompetency of this league! Drinks on me :)

Agree, I would have gotten it done in the class if they offered it. Once they canceled, slipped my mind and never got to it. I'm trained, just not certified anymore since it expired.

Sounds good, I owe you, since you beat RWK.



10/20/2020



# EXHIBIT B

Pastore

Joseph M. Pastore III  
Chairman

Pastore LLC  
4 High Ridge Park, 3rd Floor  
Stamford, CT 06905  
203.658.8454 tel  
203.717.5550 fax  
jpastore@pastore.net

June 18, 2025

VIA E-MAIL

Roman V. Gambourg, Esq.,  
Counsel on Demand by Gambourg & Read  
1 World Trade Center  
85th Floor  
New York, NY 10007  
212-937-7788  
[rg@glegalgroup.com](mailto:rg@glegalgroup.com)

**Re: Response to Notice of Intent to File Litigation**

Dear Mr. Gambourg:

We write in response to your correspondence dated June 16 and 17, 2025, issued on behalf of the self-styled Ridgefield Little League Parent Action Association (“RLLPAA”), which purports to put the volunteer Board Members of Ridgefield Little League (“RLL”) on notice of an impending lawsuit. We are in the process of being retained by RLL and the individual members of its Board (“our clients”) targeted by your client.

Your letter is riddled with conclusory accusations, inflammatory rhetoric, and legally unsupportable claims. We reserve all rights and remedies in the event your client proceeds with what appears to be a specious and vexatious litigation campaign. We all hope that your client will realize that resolving these issues in court is inappropriate and does little to promote the development of high quality and kind young people - which should be the goal of all involved in Little League.

Again, to be clear, we represent our clients and thus the points made below reflect their version of the applicable rules and salient facts. We now respond to each allegation in turn:

## **1. Pitch Count Dispute and Alleged Retaliation**

We understand that the claim that a child was knowingly placed in harm’s way due to a pitch count manipulation is factually incorrect and wholly without merit. We understand that the Board addressed the pitch count concern immediately upon receiving Mr. Neiditch’s message. The issue turned out to be a clerical error, promptly investigated and closed. Mr. Neiditch was informed of the resolution, and we understand that no retaliation occurred. To characterize a clerical discrepancy as evidence of child endangerment is reckless and undermines your client’s credibility.

## **2. Playoff Game Timing and Claims of Endangerment**

The assertion that allowing untimed playoff games constitutes child endangerment is both frivolous and absurd. RLL's rule requiring six full innings in playoff games has been in place for years, and we understand that predates the current Board. It is fully permissible under Little League International rules and has never been treated as a safety concern. All other coaches accepted the policy without incident. Mr. Neiditch was the sole dissenting voice and did not engage respectfully. His conduct—not the policy—created disruption. To now frame this long-standing rule as an act of "child endangerment" is not only groundless but grossly mischaracterizes RLL's practices and motives. This rule is in place to make sure that all the games can be played. It has nothing to do with whether a healthy child cannot be on a field for more than two hours.

## **3. Electronic Equipment and Alleged "Fabrication" of Rules**

We understand that your accusation that RLL "fabricated" equipment violations is demonstrably false. The incident in question involved reports from multiple observers regarding the improper use of communication devices by coaches during a AAA championship game. Rule 3.17 of the Little League Rulebook explicitly prohibits such conduct. Board members acted to de-escalate the issue and directed umpires not to eject anyone, prioritizing the children's experience. It is your client—not RLL—who ignored the rules and then cast blame when held accountable.

## **4. Game Coordinator Presence**

RLL is a volunteer-run organization. While we understand that RLL strives to assign adult Game Coordinators to every applicable game, occasional gaps occur due to availability. Contrary to your exaggerated claims, this is not a willful safety violation but a logistical limitation common to virtually every youth sports league. Game Coordinators were present at all playoff and championship games, though not always in a visibly marked capacity. Your attempt to turn the absence of a volunteer into a civil rights violation is frankly outrageous.

## **5. Suspension and Selective Enforcement**

We understand that the Board responded to a serious complaint regarding Mr. Neiditch's conduct toward a youth umpire. We understand that RLL followed its by-laws, and a special meeting was held. Mr. Neiditch was invited to speak. The outcome—far more lenient than what could have been imposed—was imposed only after due process and careful consideration. We understand that your insinuation that this was retaliatory or selectively enforced is flatly incorrect. We have been told that the only person in this incident who behaved inappropriately toward a minor was your client.

June 18, 2025

Page 3

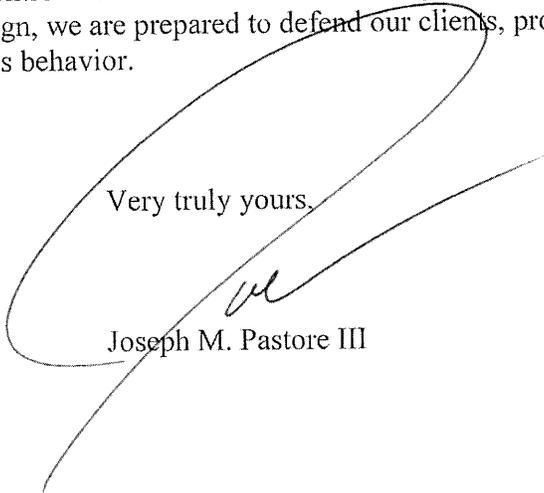
## 6. Claims of Corruption, Self-Dealing, and Civil Rights Violations

These sweeping allegations are baseless, inflammatory, and unsupported by any facts. The Board is composed entirely of unpaid volunteers who dedicate substantial time to the league. There is no evidence of corruption, fraud, or civil rights violations. The notion that civil rights were violated by enforcing game rules or requiring compliance with coaching certifications is not only legally unsound—it is frivolous on its face.

We note your client's apparent intention to pursue litigation without any genuine interest in compromise or constructive engagement. The threats of public exposure, personal liability, and punitive demands are specious, frivolous, and vexatious, and appear designed to harass and intimidate well-meaning community volunteers. Should your client proceed down this path, we are fully prepared to respond with appropriate legal measures and to expose the factually incorrect and unfounded nature of these claims in any forum.

Accordingly, I strongly urge your client to reconsider his path forward. My own son was a talented baseball player and our family had our own issues as well with baseball leaders from time to time. We chose to conduct ourselves with dignity and integrity, and afford grace to those we disagreed with there. We did this in part because the life lessons you are trying to teach children in Little League go beyond baseball. Baseball is a game of failure. The best players fail 70% of the time. Teaching children how to handle adversity and failure is one of the greatest lessons of the sport, as I am sure your client is aware. I strongly suggest your client focus on resolving disputes amicably, conducting himself as a gentleman, and sharing the valuable life lessons with children that it does not always go your way. He should teach children that if you conduct yourself with kindness and class, controversies tend to resolve well. If, however, he elects to continue his scorched earth campaign, we are prepared to defend our clients, protect their rights, and hold him accountable for his behavior.

Very truly yours,



Joseph M. Pastore III

cc: Paul Fenaroli, Esq.  
Colleen Foley, Esq.  
Brian Koralewski

DOCKET NO.: DBD-CV25-6055202-S	:	SUPERIOR COURT
RIDGEFIELD LITTLE LEAGUE	:	J.D. OF DANBURY
PARENTS ASSOCIATION, AS CLASS	:	
REPRESENTATIVE OF THE PARENTS OF	:	AT DANBURY
RIDGEFIELD NATIONAL LITTLE LEAGUE	:	
v.	:	
RIDGEFIELD NATIONAL LITTLE LEAGUE;	:	SEPTEMBER 11, 2025
LITTLE LEAGUE BASEBALL, INCORPORATED	:	
d/b/a LITTLE LEAGUE INTERNATIONAL, INC.;	:	
KEVIN PORTANOVA, THOMAS LANSSEN;	:	
JEFFREY AUDEVARD; PHILLIP BODENSTAB;	:	
ANNA COCKERILLE; DAVID DEUSER;	:	
FREDDIE ERAZO; JAY GRIFFIN; STEPHEN	:	
HANNA; ANDREW HELLER; CASEY	:	
HUTCHINGS; AARON JACOBSTEIN;	:	
JOHN JOHNSON; ALEX LERITZ; KATE	:	
LOEWENGART; FREDERICK MARSHALL;	:	
ROBERT MARTZLOFF; CHRISTOPHER	:	
MCGRATTY; AMY PFLAUM; GREGORY	:	
PFLAUM; MEGHAN RAYMOND; MICHAEL	:	
SCERRA; SCOTT SOLOFF and EMILY	:	
VANNINI	:	

**AFFIDAVIT OF DANIEL NEIDITCH**

I, Daniel Neiditch being duly sworn, hereby depose and state:

1. I currently reside at 16 Wheeler Road, North Salem, New York 10560.
2. I am over the age of eighteen (18) years, believe in the obligation of an oath and make this affidavit of my own knowledge.
3. Harry Hess and I are members of Ridgefield Little League Parents Association.
4. My family has had children in the RNLL in the past season.
5. After witnessing RNLL's refusal to follow federal safety requirements and refusal to honor the commitments in its own safety manual, I spoke out and agreed with Mr. Hess to take legal action to protect children.

6. During the 2025 season, I became aware that RNLL coaches are required by federal law to have mandatory training for child abuse awareness. During the Spring season, many, if not most, of the coaches did not have this training.

7. I have heard from several parents in other Little League Chapters that failure to have the required abuse training is not limited to RNLL, but is a problem in many other Chapters.

8. When I raised the issue to RNLL, RNLL belatedly began requiring this training.

9. The only reason RNLL finally partially complied with federal law concerning abuse training, to the extent that it did, is because I informed RNLL of its failure to comply with federal law.

10. I am not motivated by malice.

11. I simply wish to see the RNLL run safely in accordance with Little League rules and RNLL's own rules.

12. While many families from North Salem, New York have been permitted to enroll their children in fall ball, my children are not permitted to enroll.

13. In the RNLL Memo, RNLL makes references to emails sent from an email address [rllpaa2025@gmail.com](mailto:rllpaa2025@gmail.com). None of the members of the Plaintiff use this mail address.

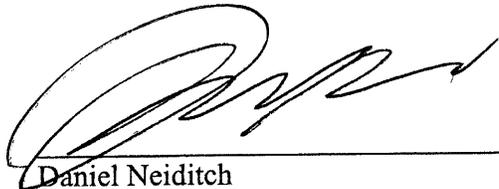
14. There are hundreds of parents of children in RNLL.

15. False statements made by RNLL in its own safety publications and on its website caused me, a member of the Parents Association to sign my child up with RNLL.

16. Even after numerous letters about this issue and this Complaint, the false representations stating that all AAA and Majors coaches are certified in CPR and AED remain on RNLL's website.

17. My philanthropy spans decades and touches countless lives:

- I have raised millions of dollars for children’s hospitals, cancer research, and disaster relief effort.
- I have partnered with Habitat for Humanity and other housing organizations to provide homes and opportunities for vulnerable families.
- I have supported youth education and mentorship programs, ensuring children from underserved backgrounds have access to tutoring, school supplies, and safe after-school spaces.
- My contributions have been recognized nationwide – including being honored to throw out the ceremonial first pitch at six Major League Baseball stadiums, each time in support of charitable causes benefiting children and local communities.
- I have worked directly with organizations combating homelessness among children and veterans, ensuring no family is left behind.



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Daniel Neiditch

On this 11<sup>th</sup> day of September, 2025 did appear Daniel Neiditch remotely by Zoom before me the undersigned Notary Public and after administration of an oath he did swear and affirm the truth of the foregoing affidavit.



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Notary Public  
My Commission Expires:

<p><b>CHRISTEN HORAN</b> Notary Public, State of Connecticut My Commission Expires : December 31, 2029</p>
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DOCKET NO.: DBD-CV25-6055202-S

SUPERIOR COURT

RIDGEFIELD LITTLE LEAGUE  
PARENTS ASSOCIATION, AS CLASS  
REPRESENTATIVE OF THE PARENTS OF  
RIDGEFIELD NATIONAL LITTLE LEAGUE

J.D. OF DANBURY

AT DANBURY

v.

RIDGEFIELD NATIONAL LITTLE LEAGUE;  
LITTLE LEAGUE BASEBALL, INCORPORATED  
d/b/a LITTLE LEAGUE INTERNATIONAL, INC.;  
KEVIN PORTANOVA, THOMAS LANSER;  
JEFFREY AUDEVARD; PHILLIP BODENSTAB,  
ANNA COCKERILLE; DAVID DEUSER;  
FREDDIE ERAZO; JAY GRIFFIN; STEPHEN  
HANNA; ANDREW HELLER; CASEY  
HUTCHINGS; AARON JACOBSTEIN;  
JOHN JOHNSON; ALEX LERITZ; KATE  
LOEWENGART; FREDERICK MARSHALL;  
ROBERT MARTZLOFF; CHRISTOPHER  
MCGRATTY; AMY PFLAUM; GREGORY  
PFLAUM; MEGHAN RAYMOND; MICHAEL  
SCERRA; SCOTT SOLOFF and EMILY  
VANNINI

SEPTEMBER 6, 2025

**AFFIDAVIT OF HARRY HESS**

I, Harry Hess being duly sworn, hereby depose and state:

1. I currently reside at 156 Haviland Road, Ridgefield, CT 06877.

2. I am over the age of eighteen (18) years, believe in the obligation of an oath and

make this affidavit of my own knowledge.

3. Daniel Neiditch and I are members of Ridgefield Little League Parents

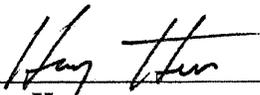
Association

4. My family has had children in the RNLL in the past season.

5. I am not motivated by malice.

6. I simply wish to see the RNLL run safely in accordance with Little League rules and RNLL's own rules.

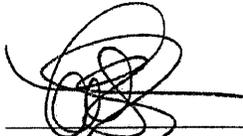
7. In the RNLL Memo, RNLL makes references to emails sent from an email address rlpaa2025@gmail.com. None of the members of the Plaintiff use this mail address.

  
\_\_\_\_\_  
Harry Hess

STATE OF CT  
COUNTY OF Fairfield

ss: City of Ridgely

On this 6th day of September, 2025 did appear Harry Hess before me the undersigned Notary Public and after administration of an oath he did swear and affirm the truth of the foregoing affidavit.

  
\_\_\_\_\_  
Notary Public  
My Commission Expires

LISA MICALIZZI  
Notary Public  
Connecticut  
My Commission Expires May 31, 2030