

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

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LORNA BEACH-MATHURA,

Plaintiff,

-against -

**ERIC ADAMS, CITY OF NEW YORK,
TRANSIT BUREAU OF THE NEW YORK POLICE
DEPARTMENT (f/k/a. NEW YORK TRANSIT POLICE
DEPARTMENT),
NEW YORK POLICE DEPARTMENT GUARDIANS
ASSOCIATION, UNKNOWN ENTITY XYZ-1,
UNKNOWN ENTITY XYZ-2, and
UNKNOWN ENTITY XYZ-3,**

Defendants.
-----X

Index No.:

SUMMONS WITH NOTICE

VENUE

New York County

Where the Actions
Complained of Occurred

TO THE ABOVE-NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED and required to serve upon Plaintiff's attorney, at the address stated below, a notice of appearance or demand for a complaint.

If this Summons with Notice was personally served upon you in the State of New York, the notice of appearance or demand for complaint must be served within twenty (20) days after such service of the Summons with Notice, excluding the date of the service. If this Summons with Notice was not personally delivered to you within the State of New York, the notice of appearance or demand for complaint must be served within thirty (30) days after service of this Summons with Notice is completed as provided by law.

PLEASE TAKE NOTICE THAT the nature of this action is sexual assault, battery and employment discrimination on the basis of Plaintiff's gender and sex, retaliation, hostile work environment and intentional infliction of emotional distress in violation of the New York State

Human Rights Law, the New York City Human Rights Law, the New York Penal Code, and the Victims of Gender Motivated Violence Protection Act. Plaintiff was sexually assaulted by Defendant Eric Adams in New York, New York in 1993 while they both worked for the City of New York.

Plaintiff's claims are timely under the Adult Survivors Act. This action is timely because it falls under the Adult Survivors Act and is brought during the one-year time period set forth in the Adult Survivors Act (CPLR 214-j). The claims brought here allege intentional and negligent acts and omissions for physical, psychological, and other injuries suffered as a result of conduct that would constitute sexual offenses as defined by § 130 of the New York Penal Law committed against a person who is eighteen years of age or older. Such claims have been revived by CPLR 214-j and may be commenced between November 24, 2022, and November 24, 2023.

The relief sought is: an amount to be determined at trial but in no event less than Five Million Dollars (\$5,000,000.00) together with attorneys' fees and interest thereon.

PLEASE TAKE FURTHER NOTICE that if you do not serve a notice of appearance or demand for a complaint within the applicable time limitation stated above, a judgment will be entered against you, by default, for the sum of Five Million Dollars (\$5,000,000.00) together with interest, attorneys' fees and the costs and disbursements of this action.

The action will be heard in the Supreme Court of the State of New York, in and for the County of New York. The basis for the venue is where the actions complained of occurred.

**Dated: New York, New York
November 22, 2023**

GODDARD LAW PLLC
Attorneys for Plaintiff

By: *Ms Megan S. Goddard*
Megan S. Goddard, Esq.

**39 Broadway, Suite 1540
New York, New York 10006
(646) 964-1178
Megan@goddardlawnyc.com**

TO:

**ERIC ADAMS
Office of the Mayor
City Hall
New York, New York 10007**

**CITY OF NEW YORK
100 Church Street
New York, New York 10007**

**TRANSIT BUREAU OF THE NEW YORK POLICE
DEPARTMENT (f/k/a NEW YORK TRANSIT POLICE
DEPARTMENT)
One Police Plaza
Police Plaza Path
New York, New York 10038**

**GUARDIAN ASSOCIATION OF THE NEW YORK CITY POLICE DEPARTMENT
P.O. Box 87
Peck Slip Station, New York New York**

**UNKNOWN ENTITY XYZ-1
Address Unknown**

**UNKNOWN ENTITY XYZ-2
Address Unknown**

**UNKNOWN ENTITY XYZ-3
Address Unknown**