

NEW YORK STATE SUPREME COURT
NEW YORK COUNTY

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SOFIA QUINTANAR, :

Plaintiff, :

v. :

NEW YORK STATE OFFICE OF THE :

ATTORNEY GENERAL, JAMES FOR NY, :

LETITIA JAMES, in her individual capacity, and :

IBRAHIM KHAN, in his individual capacity, :

Defendants. :

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SUMMONS

Plaintiff designates
NEW YORK COUNTY
as the place of trial


The basis of venue is:
CPLR § 503(a)

To the above-named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on counsel for Plaintiff within twenty (20) days after service of this summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: December 15, 2022
New York, New York

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**NEW YORK STATE SUPREME COURT
NEW YORK COUNTY**

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SOFIA QUINTANAR,	:	
	:	
Plaintiff,	:	Index No.
	:	
v.	:	
	:	<u>COMPLAINT</u>
NEW YORK STATE OFFICE OF THE	:	
ATTORNEY GENERAL, JAMES FOR NY,	:	
LETITIA JAMES, in her individual capacity, and	:	<u>Jury Trial Demanded</u>
IBRAHIM KHAN, in his individual capacity,	:	
	:	
Defendants.	:	
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Plaintiff Sofia Quintanar (“Plaintiff” or “Quintanar”) by and through her attorneys, Wigdor LLP, as and for her Complaint against Defendants New York State Office of the Attorney General (the “Office of the AG”), James for NY (the “James Campaign”), Letitia James (“Attorney General James”) and Ibrahim Khan (“Khan”) (collectively, “Defendants”) alleges as follows:

PRELIMINARY STATEMENT

1. On November 17, 2021, Ibrahim Khan, long-time Chief of Staff for Attorney General Letitia James and one of the most powerful men in New York state politics, sexually assaulted Sofia Quintanar, a former Deputy Press Secretary for Attorney General James, at a political fundraising event. Khan was at the event with Attorney General James, who was slated to give a speech. Quintanar was at the event to network and find a new position in politics or government.

2. During the event, Khan, who had been Quintanar’s boss when she worked for Attorney General James, requested that the two speak alone outside the venue. While there, Khan placed his hand on Quintanar’s shoulder and forcibly kissed her, shoving his tongue down

her throat. Stunned, Quintanar pushed Khan back with both hands, asking, “Aren’t you married? Don’t you have kids? What are you doing?” Khan ignored Quintanar’s objection and, once again, moved forward to forcibly kiss Quintanar, who had to step back to avoid Khan. Upset and afraid, Quintanar went back inside, hoping she would be safe inside the crowded venue. But Khan persisted, sitting next to Quintanar, trying to whisper in her ear and following her around.

3. For months, Quintanar was too afraid to report the incident because of Khan’s high profile and his power within New York Democratic politics. Quintanar feared that Khan could end her career in politics and government. Quintanar was not aware of any other victims at the time that she was assaulted and assumed it might have been a one-off incident that she should keep to herself.

4. But, over time, Quintanar learned that she may not have been Khan’s first victim. She discovered that in 2017 Khan had been accused of sexually assaulting a female co-worker when he was Chief of Staff for then Public Advocate James. Quintanar also learned that Khan sexually assaulted a female AG colleague.

5. In the fall of 2022, Quintanar finally gathered the courage to tell a mentor that Khan sexually harassed her and her female AG colleague. While Attorney General James opened an investigation into Khan and substantiated Quintanar’s allegations, she never terminated Khan’s employment following the results of the independent investigation, nor did her office answer questions about consequences following Quintanar’s substantiated claim. Rather Attorney General James permitted Khan to resign and to release a public statement in which he took a victory lap for his time working at the Office of the AG.

6. Defendants’ conduct violated, *inter alia*, 42 U.S.C. § 1983, *et seq.*; the New York State Human Rights Law (“NYSHRL”), N.Y. Exec. Law § 290 *et seq.*; and the New York City

Human Rights Law (“NYCHRL”), N.Y.C. Admin. Code § 8-101 *et seq.* Moreover, Khan is liable for assault and battery. Finally, Attorney General James and the James Campaign are liable for negligent, hiring, retention and supervision of Khan. Plaintiff seeks all available declaratory, injunctive and monetary relief.

JURISDICTION AND VENUE

7. The Court has jurisdiction over this matter pursuant to Civil Practice Law and Rules (“CPLR”) § 301 because Defendants reside in New York.

8. Venue is proper in this County pursuant to CPLR § 503(a) because Defendant New York State Office of the Attorney General is located in New York County, New York.

PARTIES

9. Plaintiff Quintanar is a former employee of the Office of the AG.

10. Defendant Office of the AG is New York State’s chief legal bureau. According to its website, it “serves as the guardian of the legal rights of the citizens of New York.”

11. Defendant James is the New York State Attorney General. She resides in Brooklyn, New York.

12. Defendant James for NY is Defendant James’s campaign arm operating in New York State and registered with the State Board of Elections.

13. Defendant Khan was, at all relevant times, a close advisor to Attorney General James. He was Attorney General James’s Chief of Staff when she was Public Advocate, her Campaign Manager when she ran for Attorney General and, since her victory, her Chief of Staff at the Office of the AG. He resides in Queens County, New York.

FACTUAL ALLEGATIONS

I. Background

14. Quintanar is an accomplished campaign worker and political communications expert. She earned a B.A. in Political Science and French from Drew University. After three years working for the Office of the General Counsel at accounting firm KPMG, LLP, Quintanar embarked on a career in politics. She worked as Director of Communications for the New York State Legislature and advised several successful campaigns.

15. In 2020, Quintanar applied to work for Attorney General James. After several rounds of interviews, including an interview with Attorney General James herself, Quintanar was hired as Deputy Press Secretary.

16. In that role, Quintanar successfully managed a day-to-day portfolio involving some of the most sensitive topics at the AG's office, including all press releases and media requests for several of the office's sub-departments. Quintanar monitored news stories across the state; translated press releases into Spanish and worked with Spanish-language media; organized press conferences; and served as a key speechwriter for Attorney General James's numerous appearances at government functions and community events.

17. Quintanar first met Khan during one of her initial interviews. Kahn became one of her supervisors. He was a member of a three-person committee, informally referred to as "Exec," that monitored press releases and the office's external communications to ensure they were on message and accurately reflected the positions of Attorney General James.

18. In or about July 2021, Quintanar was offered a unique opportunity as Communications Director for the campaign of Buffalo Mayor Byron Brown. Although he was the incumbent, Brown had lost the Democratic primary and was running for reelection as a write-

in candidate. Quintanar saw this as a once in a lifetime opportunity to work on a write-in campaign that could succeed. As Brown's Communications Consultant, Quintanar would be responsible for all campaign-side communications with the local, state and national press corps, which became interested in the race. Quintanar accepted the position and helped Brown win reelection.

19. While Quintanar knew this was the best move for her career, she regretted having to leave her job at the Office of the AG. She had enjoyed the work and, because this opportunity had come up so suddenly, was only able to give one-and-a-half weeks' notice before leaving.

II. Khan Sexually Assaults Quintanar

20. After Brown's successful campaign, Quintanar once again began networking to look for work in the political sphere.

21. Quintanar was highly employable, owing to the notoriety of Brown's campaign and its ultimate success.

22. She also began working as an independent contractor and was testing the waters for eventually forming her own company, Peak Public Relations, which would offer communications advice to campaigns and politicians.

23. On Wednesday, November 17, 2021, Quintanar attended a fundraiser at the Someday Bar on Atlantic Avenue in Brooklyn with her friend, Jane Doe 1.

24. Quintanar viewed the event as an opportunity to gain recognition for her recent win and connect to a new campaign or government job.

25. For those in the political sphere, and especially for solo contractors like Quintanar, this kind of networking is essential because campaigns are short, and professionals like Quintanar often leverage a successful campaign stint to find subsequent work. In short, the

event gave her an opportunity to network and potentially connect with influential people who could hire her or contract for her work.

26. The event represented a “who’s who” of Brooklyn Democratic politics. For instance, when Quintanar arrived at the venue, she immediately noticed that Attorney General James was present, flanked by her state-paid security detail, who Quintanar also recognized from her time working for Attorney General James. Attorney General James also gave a speech about her recently announced run for Governor of New York State.

27. Khan was also in attendance. This was unsurprising because his role as Attorney General James’s Chief of Staff brought him to many parts of the state to help spread the influence of Attorney General James’s Office, raise its profile and build its network. He also served as a *de facto* advisor and agent of the James Campaign, a common dual role in the political world.

28. After a few minutes, Khan, Quintanar and Jane Doe 1 struck up a conversation at the bar.

29. This was an especially good connection for Quintanar because, at the time, Attorney General James was viewed as a frontrunner for New York Governor. Khan, therefore, was not only Quintanar’s former boss, but he could also give her entrée to future work—either with the James Campaign or the Office of the AG. Quintanar also knew that Khan had connections to an elite political consulting and lobbying organization affiliated with Attorney General James, MirRam.

30. Their conversation at first was pleasant. Khan had heard about the success of the Brown campaign and congratulated Quintanar, who mentioned that she was once again in the market for a job.

31. The two also discussed the sexual harassment scandal that had forced Andrew Cuomo to resign as Governor a few months prior.

32. Quintanar then aired a topic that had been on her mind since leaving the Office of the AG, telling Khan she was sorry to have left on such short notice. Khan responded that he understood that the Brown campaign had presented a rare opportunity for Quintanar and that he did not blame her for leaving.

33. After speaking for a few minutes, Khan bought drinks for both Quintanar and Jane Doe 1.

34. At some point, Khan said he needed to spend time with his boss, Attorney General James. He told Quintanar, "I'll come find you later."

35. Khan returned later to resume his conversation with Quintanar, who again repeated that she was sorry to have left Attorney General James's office so abruptly. Khan reiterated his sentiment from earlier in the evening, saying, "I totally get it."

36. At this point, Khan suggested it was too loud inside the venue and asked Quintanar to "go outside." Quintanar agreed, hoping to continue their professional discussion.

37. Once the two stepped outside and were alone, they continued their conversation about politics. The conversation took a sudden turn when Khan rested the weight of his hand on Quintanar's shoulder, and shoved his face forward aggressively to kiss her, without saying a word. He then stuck his tongue down her throat, still holding her shoulder.

38. Stunned, Quintanar put both hands against Khan's chest and pushed him away.

39. "Aren't you married?" she asked Khan. "Don't you have kids? What are you doing?"

40. Khan ignored Quintanar's objection and, without saying a word, leaned in, once again, to kiss Quintanar against her will.

41. Quintanar was compelled to step backward to avoid being forcibly kissed a second time.

42. Afraid of what Khan would do next, Quintanar proposed they "go back inside" where she hoped to be safe among the crowd.

43. After reentering the venue, Quintanar immediately rejoined Jane Doe 1, who was sitting at a table with a small group.

44. Khan followed Quintanar and sat next her.

45. According to Jane Doe 1, Khan was inappropriate with Quintanar.

46. It was apparent to Jane Doe 1 that Khan was making Quintanar very uncomfortable, while Quintanar was trying to be polite. Quintanar, trying to get away from Khan, gave Jane Doe 1 a "save me" look.

47. At some point, Jane Doe 1 asked Quintanar if she was ok. Quintanar replied that she would explain later.

48. The two women (Quintanar and Jane Doe 1) tried to move around the venue to avoid Khan. But he continued to follow them.

49. Jane Doe 1 eventually was able to extricate Quintanar from the situation by saying, "we have to go."

50. On the way back to Jane Doe 1's apartment where Quintanar had planned to spend the night, Quintanar told Jane Doe 1 about Kahn's sexual assault.

51. Quintanar was extremely upset. While crying, she told Jane Doe 1 that she had hoped Khan would provide her with career advice and potential work connections. Jane Doe 1 comforted and hugged Quintanar.

52. The next day, Khan twice tried to call Quintanar, but she did not pick up and instead, via text, arranged a phone call. She eventually spoke to him, hoping he would apologize. He did not. Rather, he asked only whether Quintanar had gotten home safely.

III. Quintanar Learns About Khan's Pattern of Sexual Abuse

53. Over time, Quintanar learned that she may not have been Khan's only victim.

54. A few days after the fundraiser, Quintanar had brunch with Jane Doe 1 and a political contact ("John Doe") who was present at the fundraiser.

55. The three discussed various issues of mutual interest in state politics. After a while, Khan became a topic of conversation.

56. Quintanar mentioned that she had seen Khan acting "sketchy." John Doe responded that it was an "open secret" that Khan was "sketchy."

57. John Doe revealed that when Khan served as Chief of Staff for then Public Advocate James, the New York Post published an article detailing an allegation that Khan had sexually assaulted another woman, but the article had subsequently disappeared under mysterious circumstances.¹

58. Quintanar, however, opted not to make a formal complaint about Khan. Like many women in a similar position, she was afraid that Khan would use his influence to damage her career. She also worried that an accusation could backfire, and that Khan could falsely claim

¹ Attorney General James has been aware of these allegations about Khan for years. Then Public Advocate James's office responded to the report by labeling the accuser a liar.

that the interaction had been consensual. Finally, she worried that, without further corroboration, for instance without more substantiation about the kinds of rumors John Doe had heard, she would simply not be believed.

59. In August of 2022, Quintanar learned of yet another victim. Quintanar revealed to a former female colleague (“Jane Doe 2”) what Khan did to her at the fundraiser. Jane Doe 2 revealed that Khan had sexually assaulted her as well during Jane Doe 2’s time working for the Office of the AG.

60. Quintanar asked Jane Doe 2 whether she had heard about the New York Post article that had disappeared. Jane Doe 2—who also worked for then Public Advocate James—said she had, and confirmed to Quintanar that there had been an article, and that it now no longer existed.

IV. Khan Is Permitted to “Resign” From His Position

61. In September 2022, Quintanar learned that the James Campaign was looking for someone to handle press and communications strategy.² One of Quintanar’s mentors suggested that Quintanar would be perfect for the job.

62. Quintanar expressed interest in the position, though she was anxious that it would require her to work with Khan who, as a trusted advisor to Attorney General James, would undoubtedly have to interact with Quintanar on a regular basis.

63. Still ambivalent about the situation and unwilling to risk coming forward, Quintanar did not yet disclose to her mentor Khan’s assault. Nevertheless, Quintanar was under

² In December 2021, Attorney General James abandoned her run for Governor and decided to seek a second term as Attorney General.

a cloud as she waited to hear back about this opportunity, knowing it could put her back in touch with Khan.

64. An indirect and unofficial application of the kind Quintanar made through her mentor is not uncommon in the political world, where most jobs are filled by word of mouth through personal networks. The James Campaign operated in the same way and, upon information and belief, fills most of its job openings through unofficial networks and indirect applications.

65. Shortly thereafter, Quintanar learned that Khan had personally interfered with her application. Khan told the James Campaign that, while he did not mind working with Quintanar, he believed Quintanar did not get along well enough with another high-level government aide, effectively killing the opportunity for Quintanar.

66. It thus became clear to Quintanar that Khan occupied a central role in a wide network of campaigns and politicians for whom Quintanar could work, and she could not continue reliving the stress and trauma of Khan's assault every time she encountered him, which she assuredly would.

67. In late September 2022, Quintanar told her mentor that Khan had assaulted her at the fundraiser and that he also assaulted Jane Doe 2 while she was employed by Attorney General James.

68. Quintanar's mentor urged Quintanar to come forward and offered to tell Attorney General James's Campaign manager. Quintanar agreed.

69. On October 2, 2022, Quintanar learned from Deputy Attorney General Serena Longley that Attorney General James had opened an investigation into Khan's conduct.

70. On October 10, 2022, Quintanar spoke at length to attorneys from an outside law firm hired to conduct the investigation. Quintanar spoke to the investigators for more than an hour, explaining what Khan did to her.

71. Upon information and belief, the investigators also interviewed Jane Doe 2 about Khan.

72. As Thanksgiving approached, Quintanar became increasingly anxious about the results of the investigation.

73. On November 22, 2022, she sent an email to the investigators, asking, “Just want to follow up about this. Has the investigation concluded and is there any type of determination? I know this week is kind of crazy with the week being short but would appreciate a response.”

74. Quintanar did not get a substantive response. Rather, she was told to “expect” to “receive further information early next week.”

75. But “early next week” came and went without any word from the investigators.

76. So, on December 1, 2022, Quintanar reached out again by email, asking for an update (“Just following up here”).

77. Once again, she did not receive a substantive response. She was again told to wait because, according to the investigators, “[a] lot of people have been out with COVID following the Thanksgiving holiday.”

78. On November 22, 2022—the same day the investigators refused to provide Quintanar with an update—Attorney General James permitted Khan to resign from his position, while being paid through the end of the year, making it appear as if Khan was leaving his post naturally before the start of Attorney General James’s next term in office.

79. Khan was permitted to submit a resignation statement intended to hide his unlawful conduct: “As our four-year term in office comes to an end, I am writing to inform you of my decision to resign my position as chief of staff in order to pursue an opportunity in the private sector. My resignation will take effect on December 31, 2022.”

80. Upon information and belief, the Office of the AG also made misleading statements to the press about Khan, stating that he was on vacation or with a sick relative when, in fact, he had been suspended for nearly two months while being investigated for sexually harassing Quintanar and Jane Doe 2.

81. Indeed, to deflect press attention, the Office of the AG dismissed the serious – and substantiated – allegations against Khan as mere rumors, telling the Washington Post, “The rumor mill that the [W]ashington [P]ost is creating is pretty low for you guys.”

82. On December 2, 2022, Quintanar finally received a call from Deputy AG Longley telling her that the investigation had concluded and that her claims against Khan had been substantiated. But Quintanar was kept in the dark when she asked about the consequences of the investigation.

83. Only later that day did she learn from press reports that Attorney General James permitted Khan to resign without formally revealing the reasons for his departure.

84. This was not the first time Attorney General James had permitted a person accused of sexual misconduct to quietly resign.

85. In 2019, her office allowed Enny Pichardo, a Deputy in the press office, to resign under similar circumstances. Pichardo was accused of inappropriately touching female staff members and commenting on their bodies, including their legs and buttocks. “He would talk about sex out loud in the office.” Pichardo was permitted to resign “in lieu of termination.”

FIRST CAUSE OF ACTION
Violation of 42 U.S.C. § 1983
Against Defendants Letitia James and Ibrahim Khan

86. Plaintiff hereby repeats, reiterates, and re-alleges the preceding paragraphs as though set forth fully herein.

87. By the actions described above, Defendants Attorney General James and Khan, acting under color of the laws of New York State, deprived Quintanar of equal protection of the laws and of her right to due process under the law, both in violation of the Fourteenth Amendment of the United States Constitution.

88. As a direct and proximate result of the unlawful conduct, Plaintiff has suffered, and continues to suffer, monetary and/or other economic harm for which she is entitled an award of monetary damages and other relief.

89. As a direct and proximate result of the unlawful conduct, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to, humiliation, embarrassment, stress and anxiety, and self-confidence, and emotional pain and suffering for which she is entitled to an award of monetary damages and other relief.

90. Defendants' discriminatory actions were willfully negligent, reckless or committed with a conscious or reckless disregard of Plaintiff's rights.

SECOND CAUSE OF ACTION
Discrimination and Retaliation in Violation of NYSHRL
Against all Defendants

91. Plaintiff hereby repeats, reiterates, and re-alleges the preceding as though set forth fully herein.

92. By the actions described above, Defendants discriminated against Plaintiff based on her sex, sexually harassed her and retaliated against her.

93. As a direct and proximate result of the unlawful conduct, Plaintiff has suffered, and continues to suffer, monetary and/or other economic harm for which she is entitled to an award of monetary damages and other relief.

94. As a direct and proximate result of the unlawful conduct, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to, humiliation, embarrassment, stress and anxiety, loss of self-confidence, and emotional pain and suffering for which she is entitled to an award of monetary damages and other relief.

95. Defendants' discriminatory actions were willfully negligent, reckless or committed with a conscious or reckless disregard of Plaintiff's rights.

THIRD CAUSE OF ACTION

**Discrimination and Retaliation in Violation of the NYCHRL
*Against Defendants James for NY, Letitia James and Ibrahim Khan***

96. Plaintiff hereby repeats, reiterates, and re-alleges the preceding paragraphs as though set forth fully herein.

97. By the actions described above, Defendants discriminated against Plaintiff based on her sex, sexually harassed her, and retaliated against her.

98. As a direct and proximate result of the unlawful conduct, Plaintiff has suffered, and continues to suffer, monetary and/or other economic harm for which she is entitled an award of monetary damages and other relief.

99. As a direct and proximate result of the unlawful conduct, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering for which she is entitled to an award of monetary damages and other relief.

100. Defendants' discriminatory actions were willfully negligent, reckless or committed with a conscious or reckless disregard of Plaintiff's rights.

FOURTH CAUSE OF ACTION
Negligent Hiring, Supervision and Retention
Against Defendants Letitia James and James for NY

101. Plaintiff hereby repeats, reiterates, and re-alleges the preceding paragraphs as though set forth fully herein.

102. The Defendants hired, supervised and retained Ibrahim Khan in spite of his known propensity to sexually harass and to commit sexual assaults and batteries.

103. Defendants had a duty as Khan's employers and supervisors to take action to prevent Khan from causing harm based on his known propensity to sexually harass and to commit sexual assaults and batteries.

104. Defendants acted unreasonably and breached their duty of care towards Plaintiff by failing to act despite Khan's known propensities.

105. As a direct and proximate result of Defendants' negligence and gross negligence, Plaintiff has suffered, and continues to suffer, monetary and/or other economic harm for which she is entitled an award of monetary damages and other relief.

106. As a direct and proximate result of the unlawful conduct, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering for which she is entitled to an award of monetary damages and other relief.

107. Defendant's actions were negligent and grossly negligent.

FIFTH CAUSE OF ACTION
Assault and Sexual Battery
Against Ibrahim Khan

108. Plaintiff hereby repeats, reiterates, and re-alleges the preceding paragraphs as though set forth fully herein.

109. By the actions described above, Defendant Khan intentionally put Plaintiff in fear of an imminent unwanted touch and subjected Quintanar to unwanted and nonconsensual touching, including by forcing Quintanar to kiss him.

110. As a direct and proximate result of the unlawful conduct, Plaintiff has suffered, and continues to suffer, monetary and/or other economic harm for which she is entitled to an award of monetary damages and other relief.

111. As a direct and proximate result of the unlawful conduct, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering for which she is entitled to an award of monetary damages and other relief.

112. Defendant's actions were intentional and taken in conscious disregard of Plaintiff's rights.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that the Court enter judgment in her favor and against Defendants, containing the following relief:

A. A declaratory judgment that the actions, conduct and practices of Defendants complained of herein violate the laws of the State of New York and the City of New York;

B. An injunction and order permanently restraining Defendants and their partners, officers, owners, officials, agents, successors, employees and/or representatives, and any and all

persons acting in concert with and/or on behalf of them, from engaging in any such further unlawful conduct, including the policies and practices complained of herein;

C. An award of damages against Defendants, or any jointly or severally liable entity or person, in an amount to be determined at trial, plus prejudgment interest, to compensate Plaintiff for all monetary and/or economic damages;

D. An award of damages against Defendants, or any jointly or severally liable entity or person, in an amount to be determined at trial, plus prejudgment interest, to compensate Plaintiff for all non-monetary and/or compensatory damages, including, but not limited to, compensation for her physical injuries, mental anguish, psychological harm, and emotional distress;

E. An award of punitive damages and any applicable penalties in an amount to be determined at trial;

F. Prejudgment interest on all amounts due;

G. An award of fees and costs that Plaintiff has incurred in this action, as well Plaintiff's reasonable attorneys' fees and costs to the fullest extent permitted by law; and,

H. Such other and further relief as the Court may deem just and proper.


JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues of fact and damages stated herein.

Dated: December 15, 2022
New York, New York

Respectfully submitted,

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By: 

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