

- Professing to Ms. Parekh that he is **“in love with her.”**
 - Telling Ms. Parekh that **“I want to fuck you.”**
 - Asking Ms. Parekh if she **“ever wondered what it’s like to be with a Black guy?”**
 - Asking Ms. Parekh if she **“ever thought of being with me?”**
 - Telling Ms. Parekh: **“I want to stick my dick up your ass.”**
 - Asking Ms. Parekh if she **“ever had anal sex?”**
 - Telling Ms. Parekh: **“I want to fuck you in the asshole.”**
 - Telling Ms. Parekh: **“I want to get with you.”**
 - Telling Ms. Parekh that she **“looked hot.”**
 - Calling Ms. Parekh at very late hours and highly inappropriate times without any work-related reason and attempt to draw her into sexual conversations.
 - Calling Ms. Parekh to let her know that his **“wife is out of town”** and asking her to **“meet up.”**
 - Asking Ms. Parekh to introduce him to **“hot women”** even though it was well known that he is married with children.
 - Kissing Ms. Parekh’s face without her consent at business development events in front of professional colleagues.
 - Telling Ms. Parekh that other women have **“more game than you.”**
 - Accusing Ms. Parekh of being **“just jealous”** when she asked him to stop making sexual remarks about women.
3. Though Dentons is doubtlessly aware that the anti-discrimination laws in place

are intended to *encourage* women to speak out about these abuses and that there has been a broad societal push towards empowering women, when Ms. Parekh raised complaints about this conduct to her supervisor and to Human Resources, she was simply told **“do not discuss this with anyone else inside or outside the firm.”** In effect, Dentons attempted to silence Ms. Parekh

and prevent her from seeking outside advice or counsel. Mr. Delane may be a significant business generator in Dentons' Venture Technology Group – he is treated like a partner of the firm – but that does not permit him to harass and demean women.

4. LegalWeek, a legal industry news publication, recently conducted a survey showing that approximately 64 percent of female lawyers have experienced sexual harassment in the workplace, and more than 50 percent experience sexual harassment on multiple occasions.¹ Dentons, the largest law firm in the world, which generates more than \$2 billion in revenue annually – and more than \$1 million in profits per partner² – attempts to hold itself out as an industry “leader” in the movement towards gender equality.

5. But Dentons is not a leader in gender equality – quite the opposite. Dentons' own website has a page concerning “What’s different about Dentons” which includes a section about the firm’s leadership. According to Dentons’ website, its Global Board consists of 34 members, only three of whom are women (approximately nine percent), and its Global Management Team consists of 20 members, only two of whom are women (10 percent).³ This simply does not constitute diversity at the upper, decision-making levels. Even looking just within the Venture Technology Group where Ms. Parekh has worked with Mr. Delane – out of approximately 121 partners, only 21 are women (17 percent).

6. Given the lack of female representation at the firm’s highest levels, including at management decision-making positions, it is unfortunately not surprising that an environment has been created where Mr. Delane has been emboldened to sexually harass women and where

¹ Available at: <http://www.legalweek.com/sites/legalweek/2017/10/13/nearly-two-thirds-of-female-lawyers-have-experienced-sexual-harassment-at-work-research-finds/>

² Available at: <https://www.thelawyer.com/exclusive-dentons-global-turnover-jumps-by-66-2-per-cent-to-2-12bn-in-2015-2/>

³ Available at: <https://www.dentons.com/en/whats-different-about-dentons/led-by-lawyers-who-listen>

complaints about his misconduct have been “swept under the rug” rather than dealt with firmly and definitively.

7. Ms. Parekh hopes to send a message to not only Dentons, but to all law firms, that the legal profession must embrace women as equals and not treat them as objects. Moreover, the public – including Dentons’ wealthy corporate clients – should demand genuine leadership and accountability from the legal profession. Accordingly, Ms. Parekh brings this action for injunctive and monetary relief for Defendants’ violations of the New York State Human Rights Law, *N.Y.S. Exec. Law §§ 290 et seq.* and New York City Human Rights Law, *N.Y. City Admin. Code §§ 8-101 et seq.*

JURISDICTION AND VENUE

8. Pursuant to New York Civil Practice Law and Rules (“CPLR”) § 301 and/or § 302, this Court has jurisdiction over Defendants because they are residents of and/or authorized to do business in New York State.

9. The Court also has jurisdiction over Defendants as the unlawful employment practices and events in which they are alleged to have participated and which gave rise to the claims herein occurred in New York County, New York.

10. Venue is proper in this county pursuant to CPLR § 503, as Plaintiff resides in New York County.

11. Plaintiff will also file a Charge of Discrimination (the “Charge”) with the Equal Employment Opportunity Commission (“EEOC”) alleging unlawful retaliation in violation of Title VII of the Civil Rights Act of 1964 (“Title VII”). Upon issuance of a Notice of Right to Sue or other adjudication of the Charge, Plaintiff shall be commencing an action in the United States District Court for the Southern District of New York under Title VII.

12. Following commencement of this action, a copy of this Complaint will be served both on the New York City Commission on Human Rights and the Office of the Corporation Counsel of the City of New York, thereby satisfying the notice requirements of the New York City Administrative Code.

PARTIES

13. Plaintiff Krunali Parekh is a female Business Development Specialist at Dentons. Ms. Parekh is a resident of the city of New York. At all relevant times, Ms. Parekh met the definition of an “employee” under all applicable statutes.

14. Defendant Dentons US LLP is a Delaware foreign registered limited liability partnership with its principal place of business at 1221 Avenue of the Americas in New York County, New York. At all relevant times, Dentons met the definition of an “employer” of Plaintiff under all applicable statutes.

15. Defendant Alton Delane is a male Managing Director in Dentons’ Venture Technology Group who directly supervises Ms. Parekh and has authority over the terms and conditions of Ms. Parekh’s employment. At all relevant times, Mr. Delane met the definition of “employer” under all relevant statutes.

FACTUAL ALLEGATIONS

I. Background

16. Ms. Parekh has an impressive professional background, having worked in key marketing positions for several top law firms over the past 12 years.

17. Ms. Parekh holds a Bachelor of Science from Auburn University, where she majored in Business Administration with a concentration in Marketing.

18. After college, Ms. Parekh went on to receive her Master’s degree in Corporate and Organization Communications from Northeastern University.

19. Over the last six years, Ms. Parekh has specialized in marketing and business development for large law firms, including Kilpatrick Townsend & Stockton LLP, Waller Lansden Dortch & Davis LLP and Sidley Austin LLP.

20. In October 2016, Ms. Parekh began her employment at Dentons as a Business Development Specialist for the Corporate Practice Group, later taking on work for Venture Technology as well.

21. Ms. Parekh is in the exclusive position of serving a “dual” role, meaning her time is intended to be split between the Corporate and Venture Technology Groups.

22. In this role, Ms. Parekh is responsible for developing pitch and collateral materials for the Corporate and for Venture Technology Practice Groups along with assisting Alton Delane – a Managing Director in Dentons’ Venture Technology Group – in managing the marketing budget for Venture Technology Practice Group.

23. Ms. Parekh also manages various marketing campaigns, such as the Meatpacking District street banner campaign and Dentons’ “Fire escape” chat series.

24. In addition to her ‘behind the scenes’ work for Dentons, Ms. Parekh also represents Dentons in her capacity as a community outreach liaison with Dentons’ community partners such as VentureOut, Entrepreneur Roundtable Association, TriNet and Founders Network. Ms. Parekh’s primary role is to plan and manage the 70+ events and sponsorships that the Venture Technology Group hosts for their clients and potential clients on an annual basis. This includes key events, such as Dentons’ Picasso client event in Barcelona and the Venture Capital Luncheon at Eleven Madison Park.

25. Since starting at Dentons, Ms. Parekh has worked tirelessly with the administrative staff on developing targeted guest lists, logistics, invitations, site management, speakers, visual presentations and follow-up for Dentons' key client events.

26. In Ms. Parekh's most recent formal review, Ms. Parekh was evaluated as meeting or exceeding all expectations by her supervisors, and has received overwhelmingly positive reviews throughout her tenure.

II. Ms. Parekh is Subjected to a Barrage of Sexual Harassment

27. Mr. Delane is Ms. Parekh's direct supervisor for her work in the Venture Technology Group. Within a year of her employment at Dentons, Mr. Delane – who is married with three children – zeroed in on Ms. Parekh as a target for sexual harassment.

28. Upon information and belief, Ms. Parekh is just one of multiple women who Mr. Delane has harassed.

29. On or about September 27, 2017, Mr. Delane and Ms. Parekh attended a networking event for the Meatpacking Business Improvement District at a bar near the Dentons Venture Tech Centre.

30. While at this event, Mr. Delane became visibly heavily intoxicated.

31. Later that evening, Ms. Parekh's professional friend who works in the legal industry called her because she wanted to meet, and Ms. Parekh thereafter told Mr. Delane she was leaving to see her friend. Mr. Delane followed her to a bar nearby.

32. There, Mr. Delane was completely oblivious to the fact that Ms. Parekh and her friend were attempting to keep the conversation professional, and he began to try to flirt with Ms. Parekh and her friend.

33. Mr. Delane then inappropriately touched Ms. Parekh's friend's leg and she pushed him away.

34. Mr. Delane, undeterred, then turned to Ms. Parekh and put his hands on her waist.

35. Ms. Parekh, mortified, pushed his hands away the best she could as well.

36. Ms. Parekh did her best to avoid Mr. Delane's advances the rest of the evening.

37. Ms. Parekh felt extremely violated and humiliated.

38. Mr. Delane continued to force his way into their conversation, complaining that he had just been "rejected" by another woman.

39. Ms. Parekh and her friend, clearly disinterested in hearing about Mr. Delane's attempted extramarital exploits, tried to change the conversation.

40. Later that evening, Ms. Parekh and her friend saw Mr. Delane so inebriated that he lost consciousness and fell to the floor in the middle of the bar.

41. Mr. Delane was physically removed by the bar's security, and put in an Uber home.

42. After leaving the bar, Ms. Parekh called her Corporate Group Supervisor, Ashley Tenney, and complained about Mr. Delane's sexually harassing conduct.

43. Ms. Tenney did nothing to address or escalate Ms. Parekh's complaint.

44. Ms. Parekh later learned that Mr. Delane was so intoxicated that he was unable to leave the Uber on his own, and the driver had to call the police to remove Mr. Delane from the taxi and escort him into his home.

45. Mr. Delane recounted this episode to Ms. Parekh, including that his wife was livid with him, apparently thinking it was a "hilarious" story.

46. The next day at work, Ms. Parekh spoke to Mr. Delane and he acknowledged the inappropriateness of his behavior towards Ms. Parekh, likely in the hope that it would prevent Ms. Parekh from informing others.

47. Ms. Parekh made it clear to Mr. Delane that his behavior the prior evening made her uncomfortable, but said that she ultimately forgave him.

48. However, Ms. Parekh did not feel that a mere “apology” remedied sexually harassing conduct and only said she accepted his apology given that Mr. Delane was her supervisor and he had power and control over her career.

49. Unfortunately, despite Mr. Delane’s promises, his sexually charged behavior towards Ms. Parekh did not cease.

50. On or about November 30, 2017, without Ms. Parekh’s permission, Mr. Delane kissed her on the forehead after the Dentons’ holiday party at Valbella.

51. Ms. Parekh backed away, making it clear that she was not interested in Mr. Delane’s affections, and certainly was not interested in being kissed anywhere by him.

52. Ms. Parekh was also extremely embarrassed as this was witnessed by her co-workers also at the event.

53. On or about December 5, 2017, Ms. Parekh and Mr. Delane were attending a holiday party for CSC, a document storage vendor.

54. At this party, Mr. Delane asked Ms. Parekh to introduce him to the “hot women” at the party.

55. Ms. Parekh refused, and stepped back when he began talking to another woman, as she did not want to be complicit in Mr. Delane’s predatory behavior.

56. On or about April 19, 2018, Mr. Delane attended the U.S. Partners' Meeting in Dallas, Texas.

57. While at the meeting with all of Dentons' partners, Mr. Delane became very drunk and called Ms. Parekh.

58. During this conversation, Mr. Delane asked Ms. Parekh that she check her email. When Ms. Parekh checked her email, she saw that Mr. Delane had taken a picture of one of Dentons' clients (a client represented by partner Walter Van Dorn) from behind, and sent it to Ms. Parekh, commenting over the phone that the client was **"hot"** and had a **"nice ass."**

59. During this meandering conversation, Mr. Delane told Ms. Parekh, **"I want to get with you."**

60. Mr. Delane also told Ms. Parekh that Reva Grover, a business contact with TriNet, **"has more game than you,"** and **"brings it,"** implying that Ms. Grover was more sexual and flirtatious than Ms. Parekh.

61. Ms. Parekh told Mr. Delane that she thought this was extremely inappropriate, and that he should refrain from making such comments. Mr. Delane responded that Ms. Parekh was **"just jealous."**

62. On or about April 21, 2018, Mr. Delane returned from Dallas and called Ms. Parekh from the airport, asking her to meet him at a sushi restaurant for a debriefing on the relevant matters that were discussed at the Partners' meeting.

63. When Ms. Parekh arrived, she sat at the bar with Mr. Delane and he proceeded to **grab her waist and her buttocks** without her consent. Ms. Parekh had to physically separate herself from him and distance herself so that he would not touch her again.

64. After the meal, Mr. Delane asked Ms. Parekh if he could walk her to her apartment. Ms. Parekh declined. On his way home, Mr. Delane spoke with Ms. Parekh on the phone and told her that she “**looked hot**” and that his wife was “**out of the house**” visiting a relative in New Jersey. Ms. Parekh did not take the bait to ask him any questions about this quite obvious insinuation.

65. This was not the only time that Mr. Delane called Ms. Parekh while his wife was out of town or away. Mr. Delane told Ms. Parekh that his wife is a nurse, and would often work late nights. Mr. Delane would often call Ms. Parekh when his wife left their home for her shift – often very late into the evening – at times using the pretense that he had work-related topics to discuss, only to then steer the conversation to sexual innuendo, comments about her body and looks and his desire to “meet up.”

66. On or about April 27, 2018, Ms. Parekh was tasked with running one of Dentons’ high profile client events, the Venture Capital Group event at Eleven Madison Park. The event was an opportunity for Dentons attorneys to network with potential clients, and Mr. Delane and Ms. Parekh were in attendance.

67. After the meet-and-greet portion of the event ended, the attorneys and clients all sat down waiting for their lunch to be served. Ms. Parekh made her way to another area of the restaurant to grab something to eat, since she did not have a seat at the actual event given her role. After she left that area, Ms. Parekh received a barrage of calls from Mr. Delane. Ms. Parekh, afraid to answer her phone given that she was concerned that Mr. Delane was intoxicated, decided to finish her lunch and call Mr. Delane after the lunch was finished.

68. After five missed calls in a short period of time from Mr. Delane, Ms. Parekh finally called Mr. Delane back, only to learn that he wanted to meet up after the event to “talk” – as expected there was no business reason to call her repeatedly throughout the event.

69. Mr. Parekh did not meet with Mr. Delane after the event, though he proceeded to call her seven additional times, despite her having made clear that she was not interested in speaking to him or meeting with him, particularly given her concern that he was intoxicated.

70. At this point, Ms. Parekh realized that Mr. Delane would never change his conduct unless she escalated her complaints.

71. Ms. Parekh called Ms. Tenney, and complained *again* about Mr. Delane’s sexually harassing conduct.

72. Ms. Tenney then brought Ms. Parekh’s complaint to the attention of Dentons’ Human Resources Department.

73. On or about May 9, 2018, Ms. Parekh was called to a meeting with Jill Maganza-Ruiz (U.S. Human Resources Director) and Leslie Pinkham (Human Resources Manager) to discuss her complaints about Mr. Delane.

74. At this meeting, Ms. Parekh became nervous that pursuing complaints of harassment would lead to retaliation and that nothing would be done to help her, and this sentiment was reinforced when Ms. Maganza-Ruiz and Ms. Pinkham informed Ms. Parekh that she was not permitted to discuss the allegations with *anyone else inside or outside the firm*.

75. Ms. Parekh interpreted this as a direction that she should not even seek representation by counsel, and that the goal of this meeting was to silence her from speaking out about sexual harassment rather than providing a safe forum in which she could speak freely.

76. Mr. Parekh was completely taken aback by this directive in light of the #MeToo movement, and the fact that Dentons has had other members of the firm accused of sexual misconduct.

77. Ms. Parekh, terrified that Dentons did not want to deal with Mr. Delane's behavior or address her concerns, told Ms. Maganza-Ruiz and Ms. Pinkham that she had spoken with Mr. Delane and that she was not interested in pursuing her complaint further.

78. Ms. Parekh informed a Dentons associate attorney shortly after this meeting with Human Resources that Mr. Delane had been inappropriately touching her and that Human Resources had instructed her not to discuss the harassment with anyone. The associate responded that Mr. Delane's behavior was inappropriate, and something had to be done about it.

III. Despite Ms. Parekh's Complaints, Sexual Harassment Continues Unabated

79. Only two days later, on May 11, 2018, Ms. Parekh was out with her coworkers at a happy hour event, when she saw Mr. Delane.

80. At the event, Mr. Delane began flirting with one of Dentons' young female associates, and touched this associate's waist.

81. The female associate rebuffed Mr. Delane's advances and tried to push him away.

82. Mr. Delane also told this associate, for whatever reason, that he drinks a bottle of whiskey every night.

83. Ms. Parekh and her friends tried to distance themselves from Mr. Delane for the rest of the evening.

84. However, after Mr. Delane left the bar and while he was on his way home, he called Ms. Parekh to tell her she was a "hoochie mama."

85. On Friday, May 18, 2018, Mr. Delane called Ms. Parekh at approximately 9:00 p.m., well after business hours.

86. Mr. Delane again said that his wife was away and that he “needed” to talk to Ms. Parekh.

87. Mr. Delane kept Ms. Parekh on the phone for approximately three hours, during which time he made highly inappropriate and sexually charged comments, including but not limited to:

- Professing that he was **in love with her**;
- Telling her that he “**wanted to fuck**” with her;
- Asking her if she “**ever wondered what it’s like to be with a Black guy**” [Mr. Delane is African American]; and
- Asking her if she “**ever thought of being with me?**”

88. Every time Ms. Parekh tried to tell Mr. Delane that she needed to leave or that she needed to get off the phone, he ignored her and continued talking.

89. Ms. Parekh, scared to hang up on her supervisor, stayed on the phone with Mr. Delane until *midnight*, when she garnered the courage to hang up.

90. Only four days later, on May 22, 2018, Ms. Parekh received another call from Mr. Delane, begging her to meet him after a Capital Markets Group event Mr. Delane attended because they needed to “talk.” Ms. Parekh reluctantly agreed and met Mr. Delane.

91. Mr. Delane, clearly drunk again, said she looked attractive and that he felt there was a mutual sexual attraction between them – completely disregarding Ms. Parekh’s numerous very clear attempts to send the opposite message.

92. Perhaps attempting to persuade her, Mr. Delane told Ms. Parekh that he wanted to “put her on a pedestal.”

93. Mr. Delane became angry when Ms. Parekh denied that there was any mutual attraction, and placed his face very close to her face and began raising his voice.

94. Ms. Parekh told Mr. Delane that she felt uncomfortable and that he was making her nervous.

95. Mr. Delane apologized, but then continued to raise his voice and get uncomfortably close to Ms. Parekh's face throughout the evening.

96. Later that night, Mr. Delane told Ms. Parekh, "**I want to stick my dick up your ass,**" asked if she "**ever had anal sex**" and said, "**I want to fuck you in the asshole.**"

97. Ms. Parekh asked him to stop, to which Mr. Delane responded by asking her to sit on his lap. Ms. Parekh declined and told him she was leaving the event.

98. Mr. Delane asked Ms. Parekh if he could go with her to her apartment, to which she said no and left.

99. Nevertheless, Mr. Delane called Ms. Parekh multiple times that evening close to midnight – finally Ms. Parekh called him back to let him know she was going to sleep and promptly hung up the phone.

100. Ms. Parekh complained about Mr. Delane's harassing comments to another associate, who responded by acknowledging that the behavior was inappropriate. The associate agreed that something should be done about Mr. Delane's behavior.

101. Despite Ms. Parekh's complaints of sexual harassment being escalated to Human Resources nearly *two weeks* prior to this incident, it appeared to Ms. Parekh that nothing was done to stymie Mr. Delane's campaign of sexual harassment.

IV. Dentons Responds to Ms. Parekh's Complaints By Attempting to Keep Her Quiet

102. Thereafter, on May 31, 2018, Ms. Parekh filed a protected complaint – through her counsel – detailing substantial allegations of sexual harassment.

103. Despite doubtlessly being informed of Ms. Parekh's complaint, on June 1, 2018 at 9:40 p.m., Mr. Delane texted Ms. Parekh the word "Refinery," which is the name of a bar near Ms. Parekh's apartment.

104. Ms. Parekh believes this was a clear attempt of Mr. Delane to draw her into a conversation about her complaint. Ms. Parekh did not respond.

105. Dentons has since informed Ms. Parekh that it does not believe there is any reason to believe the workplace is unsafe for her, despite being informed of all the allegations of sexual harassment contained herein.

106. Upon information and belief, on June 6, 2018, Dentons spoke to numerous witnesses in connection with Ms. Parekh's allegations of sexual harassment.

107. Upon information and belief, during these meetings, many of Ms. Parekh's allegations of sexual harassment against Mr. Delane were confirmed.

108. During these meetings, it was confirmed that another female employee was also sexually harassed and/or subjected to inappropriate conduct by Mr. Delane.

109. During these meetings, Dentons directed the witnesses not speak with Ms. Parekh or anyone else about the allegations against Mr. Delane.

110. This was not surprising to Ms. Parekh, as Ms. Parekh's meeting with Human Resources made it clear that it was less concerned with addressing sexual harassment and more concerned with ensuring that Ms. Parekh stopped talking about it.

111. By directing employees not to discuss the allegations of sexual harassment with Ms. Parekh or anyone else, Dentons has sought to further isolate Ms. Parekh and create an environment where witnesses would feel uncomfortable supporting Ms. Parekh and where other victims would be deterred from coming forward.

FIRST CAUSE OF ACTION
Discrimination in Violation of NYSHRL
Against All Defendants

112. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation as contained in each of the preceding paragraphs as if fully set forth herein.

113. By the conduct described above, Defendants have discriminated against and/or permitted and/or acquiesced to the discrimination of Plaintiff on the basis of her gender in violation of the NYSHRL by subjecting her to sexual harassment and a hostile work environment, creating and/or acquiescing to a hostile work environment and failing to address complaints of gender discrimination.

114. As a direct and proximate result of Defendants' unlawful discriminatory conduct and harassment in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress for which she is entitled to an award of monetary damages and other relief, to the greatest extent permitted by law.

SECOND CAUSE OF ACTION
Discrimination in Violation of the NYCHRL
Against All Defendants

115. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation as contained in each of the preceding paragraphs as if fully set forth herein.

116. By the actions described above, among others, Defendants have discriminated against and/or permitted and/or acquiesced to the discrimination of Plaintiff on the basis of her

gender in violation of the NYSHRL by subjecting her to sexual harassment and a hostile work environment, creating and/or acquiescing to a hostile work environment and failing to address complaints of gender discrimination.

117. As a direct and proximate result of Defendants' unlawful discriminatory conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress for which she is entitled to an award of monetary damages, to the greatest extent permitted under law, in addition to reasonable attorneys' fees and costs.

118. Defendants' unlawful discriminatory actions constitute malicious, willful and wanton violations of NYCHRL for which Plaintiff is entitled to an award of punitive damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that the Court enter judgment in her favor and against Defendants for 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 order that Defendants engage in injunctive measures aimed at remedying the unlawful conduct described herein so that other employees will not be subject to the same unlawful conduct;
- C. An award of damages against Defendants, in an amount to be determined at trial, plus interest, to compensate Plaintiff for all monetary and/or economic damages;
- D. An award of damages against Defendants, in an amount to be determined at trial, plus interest, to compensate for all non-monetary and/or compensatory damages, including, but not limited to, compensation for Plaintiff's emotional distress;
- E. An award of punitive damages in an amount to be determined at trial;
- F. Prejudgment interest on all amounts due;

- G. An award of Plaintiff's reasonable attorneys' fees and costs; 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: June 11, 2018
New York, New York

Respectfully submitted,

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