

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

JENNIFER KIPLEY,

Plaintiff,

v.

BROOKFIELD ASSET MANAGEMENT LLC,

Defendant.

Index No.:


SUMMONS

TO THE ABOVE-NAMED DEFENDANT:

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 the plaintiff's attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 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: March 25, 2026
New York, New York

GRUBIN LAW GROUP, P.C.

By: 

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TO: Brookfield Asset Management LLC
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New York, NY 10281

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

<p>JENNIFER KIPLEY,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>BROOKFIELD ASSET MANAGEMENT LLC,</p> <p style="text-align: center;">Defendant.</p>

Index No.:

COMPLAINT

JURY TRIAL DEMANDED

Plaintiff Jennifer Kipley (“Ms. Kipley”), by her attorneys, Grubin Law Group, P.C., alleges as follows against Defendant Brookfield Asset Management LLC (“Brookfield,” the “Firm” or “Defendant”):

NATURE OF THE ACTION

1. Included in the bill jacket for the bill that would enact New York Labor Law 201-d, prohibiting employers from discriminating against employees for their legal, recreational activities outside of work, is the memorandum of purpose from the bill’s original sponsor, State Senator James J. Lack.

2. That memorandum, summarizing the purpose and justification for the bill, includes the following:

We have long since passed the days of company towns, where the company told you when to work, where to live, and what to buy in their store. ***This bill will ensure that employers do not tell us how to think and play on our own time.***¹

3. Yet that is exactly what Defendant Brookfield Asset Management has tried to do to Plaintiff Jennifer Kipley, Defendant’s former employee.

¹ Sponsor’s Memorandum, 1992, ch. 776, Senate Bill. 6935-C, p. 9.

4. Even more egregious, when Ms. Kipley's protected legal activity drew the attention of an online mob, which proceeded to mercilessly harass her, Brookfield not only refused to reasonably accommodate her need for protection, but discriminated against her in violation of New York City Human Rights Law ("NYCHRL") protecting victims of stalking.

5. This is an action to enforce Plaintiff Jennifer Kipley's legal right to, *inter alia*, engage in lawful, leisure activity outside of working hours and not on her employer's equipment, as protected by New York Labor Law ("NYLL") §§ 201-d, *et seq.*, and to be free from discrimination on the basis of her having been victim of acts that would constitute stalking, as protected by the NYCHRL, N.Y. Admin. Code § 8-107.1.²

6. Defendant Brookfield is a global asset manager with over \$1 trillion in assets under management worldwide.

7. Plaintiff Jennifer Kipley was recognized as a high performer within Brookfield Asset Management, and widely considered to be in line for continued promotion within the Firm since her start there in 2022.

8. As a Senior Vice President within Brookfield's Global Client Group, Ms. Kipley was dedicated to the Firm and its success, and she was relentlessly diligent in her role.

9. Yet within a 48-hour window, Brookfield made the craven choice to throw Ms. Kipley to the wolves, at the behest of a short-lived horde of online trolls and harassers who descended upon Ms. Kipley with threats against her person and demands that Brookfield terminate and denounce her.

² See N.Y. Admin. Code § 8-107.1(a)(2)-(b) ("It shall be an unlawful discriminatory practice for an employer, or an agent thereof, because of any individual's actual or perceived status as a victim [...] stalking: (2) To refuse to hire or employ or to bar or to discharge from employment. ... (b) any person prohibited by paragraph 1 from discriminating on the basis of actual or perceived status as a victim of [...] stalking shall make reasonable accommodation to enable a person who is a victim of [...] stalking to satisfy the essential requisites of a job provided that the status as a victim of [...] stalking is known or should have been known by the covered entity.")

10. The impetus for this harassment was a temporary post on Ms. Kipley's personal Instagram Story questioning Instagram's algorithm that had suddenly begun suggesting she "follow" far-right Instagram accounts.

11. This post, which was online for approximately 12 hours, was made to Ms. Kipley's personal Story feed, which does not identify her except through posts containing her image.

12. When an online mob somehow discovered or was fed a screenshot of the post, anonymous users began to threaten Ms. Kipley personally before turning their sights on Brookfield's social media.

13. Terrified, Ms. Kipley immediately notified Brookfield's Human Resources department that she was being harassed and stalked.

14. Yet HR – rather than comfort, reassure, or protect her – simply sent her home before summarily terminating her employment less than 48 hours after the stalking began.

15. The actions and course of conduct against Ms. Kipley clearly met the statutory definition of stalking in the fourth degree as defined in the New York Penal Law 120.45.³

16. As a stalking victim, Ms. Kipley was protected from discrimination and entitled to reasonable accommodations pursuant to the NYCHRL which protects victims of, *inter alia*, stalking.

³ New York Penal Law defines stalking in the fourth degree as follows: "A person is guilty of stalking in the fourth degree when he or she intentionally, and for no legitimate purpose, engages in a course of conduct directed at a specific person, and knows or reasonably should know that such conduct:

1. is likely to cause reasonable fear of material harm to the physical health, safety or property of such person, a member of such person's immediate family or a third party with whom such person is acquainted; or

[...]

3. is likely to cause such person to reasonably fear that his or her employment, business or career is threatened, where such conduct consists of appearing, telephoning or initiating communication or contact at such person's place of employment or business, and the actor was previously clearly informed to cease that conduct."

The online campaign against Ms. Kipley meets both of these statutory definitions of stalking.

17. Without ever engaging in the required interactive process or cooperative dialogue to provide Ms. Kipley with a reasonable accommodation as a victim of stalking, Brookfield explicitly informed Ms. Kipley that she was being terminated, stating that based on her “seniority” and “what [she] posted,” her employment was ending effective immediately.

18. Ms. Kipley is stunned and dismayed by the Firm’s treatment of her.

19. At the time of the stalking and harassment, and to this day, not a single member of the Firm’s management has reached out to Ms. Kipley to ask about her safety or wellbeing in the aftermath of the stalking campaign.

20. To redress these wrongs, Ms. Kipley brings these claims for violation of the NYLL § 201-d(2)(c)⁴ and N.Y. Admin. Code § 8-107.1(a)(2)-(b).

JURISDICTION AND VENUE

21. This Court has jurisdiction because Plaintiff resides in New York and Defendant does business in New York.

22. Venue is proper pursuant to CPLR § 503(a) because Plaintiff and Defendant reside in New York County and Plaintiff worked for Defendant in New York County.

PARTIES

A. Plaintiff Jennifer Kipley

23. Plaintiff is a resident of New York.

24. Plaintiff was employed by Defendant Brookfield Asset Management, LLC in their office located at 250 Vesey St, New York, NY 10281 from in or around May 2022 through on or around September 19th, 2025.

B. Defendant Brookfield Asset Management

⁴ A copy of this filing has been simultaneously sent to the New York State Office of the Attorney General, pursuant to NYLL 201-d(7)(a).

25. Defendant Brookfield Asset Management LLC is a foreign limited liability company licensed to do business in the State of New York, with headquarters at 250 Vesey Street, New York, New York 10281.

26. Defendant is a global asset manager, with over \$1 trillion in assets under management, and a market cap valuation of over \$85 billion.⁵

FACTUAL ALLEGATIONS

27. Prior to joining Brookfield in May 2022, Ms. Kipley worked in various capacities including investor relations at a multinational investment group for approximately 8 years, ultimately overseeing the investor relations function for the group's infrastructure private funds in the Americas.

28. As a result of recruitment efforts from Brookfield, Ms. Kipley joined the Firm as a Vice President – Global Client Group (“GCG”).⁶

29. In her initial role, Ms. Kipley worked with GCG's Project Management Team, which was responsible for comprehensive project management of fundraising for the Firm's private funds.

30. Ms. Kipley hit the ground running given her extensive prior experience, immediately contributing to the marketing and due diligence efforts of Brookfield's flagship infrastructure equity fund, BIF V.

31. After only five months with the Firm, Ms. Kipley was offered the opportunity to work with a team located in Sydney, Australia, to support a local product while BAM searched for a permanent hire.

⁵ See <https://bam.brookfield.com/sites/brookfield-bam-v2/files/brookfield-bam-v2/report-fillings/annual-quarterly-reports/q3-2025-bam-10-q.pdf>; see also <https://stockanalysis.com/stocks/bam/statistics/>.

⁶ GCG was known as the Private Funds Group when Ms. Kipley joined BAM

32. With approximately a month's notice, Ms. Kipley dutifully packed up her life and moved to Sydney for three months, working within the Real Estate group and providing expertise and support that the existing team lacked.

33. The quality of her work was quickly recognized, and the Australian team offered Ms. Kipley a permanent position almost immediately, but she ultimately declined due to family obligations in the United States.

34. Returning to New York when her work in Sydney was complete, Ms. Kipley continued to strive for excellence within the Firm.

35. When it was announced in mid-2023 that her team would be split into two functions, Ms. Kipley chose to join "Diligence Management," which would oversee every step of the diligence processes for BAM's prospective clients, including working directly with them to shepherd them through the diligence process.

36. Her work in this space prompted an accelerated promotion to Senior Vice President.

37. Brookfield informed her that although she had only been a Vice President for two years, she was clearly a leader within the Firm and her new title and role aligned with her level and quality of job performance.

38. Ms. Kipley excelled in this role, too – taking over the function of two SVPs and managing a team of nine employees across the globe.

39. During that time, Ms. Kipley oversaw the diligence processes for four funds, including one with a \$17B target, in addition to the launch of three new funds, as well as supporting a new product based overseas.

40. The Firm again recognized her contributions with an additional six-figure equity grant for 2024 on top of her standard bonus and equity grant, which she was told was almost

unprecedented.

41. Ms. Kipley was seen as a strong leader, sharing her deep expertise and experience while simultaneously improving team processes, and regularly focusing on the development of the nine individuals within her team.

42. In fact, Ms. Kipley was told that during 2025 roundtable talent discussions, she had been highlighted as an employee with such significant potential within the Firm that efforts to ensure that she remain with the Firm were discussed.

43. By any measure, Ms. Kipley was well regarded by the Firm and on a steady upward trajectory.

Ms. Kipley is the victim of stalking by an online Mob

44. On the morning of September 18, 2025, while in the waiting room for a doctor's appointment, Ms. Kipley noticed that she had begun to receive unsettling, and even threatening, comments through her personal Instagram page.

45. These messages identified her as a Brookfield employee, asking, "Do you work at Brookfield Asset Management" and one threatened that a "Charlie Kirk army" was "coming" for her.

46. Upon information and belief, "Charlie Kirk" refers to a far-right political commentator who had been shot and killed approximately a week earlier.

47. After receiving two comments and a direct message request, Ms. Kipley, confused and frightened, locked her Instagram page so that strangers could no longer post comments or request to send her direct messages.

48. However, noticing an influx of notifications from her LinkedIn account, Ms. Kipley checked her profile there, and found a startling number of hostile, threatening comments on her

page, including posts made by Brookfield and cross-posted to her own LinkedIn page, as well as on Brookfield's page.

49. Many of the comments were identical to one another.

50. Those identical comments stated,

“Meet Jen Kipley. She seems to enjoy celebrating Charlie Kirk's death. Is she the same Jen Kipley working for Brookfield Asset Management (@Brookfield), a company managing more than \$1 TRILLION in assets, as a Senior Vice President? Let's find out!”

51. Those identical message were accompanied by four screenshot images: one from Ms. Kipley's personal and anonymized Instagram page, one showing her Instagram profile landing page, one from her LinkedIn profile landing page, and one from Brookfield's website showing Brookfield's New York address and telephone number.

52. These messages and others like them caused Ms. Kipley reasonable fear of harm to her physical health and safety, as it was clear that these individuals knew what she looked like and where she worked.

53. Horrified, Ms. Kipley checked Brookfield's LinkedIn and X account, and found hundreds of comments on Brookfield's posts and posts by other users, as well as thousands of “reposts,” to these social media sites, all demanding that she be fired or worse.

54. Many of the LinkedIn comments “tagged” Ms. Kipley so that she received notifications when they were posted.

55. Many of these comments were again identical to the original post, while others demanded she be terminated from her role with the Firm.

56. Working backward, Ms. Kipley traced what she believed the “original” post to be back to an X user who has been embroiled in numerous controversial campaigns to harass, intimidate and threaten individuals whose ideology purportedly contradicts the user's own racism,

homo- and transphobia, and misogyny, including spearheading a campaign against a prominent journalist.

57. Upon information and belief, the original post on X about Ms. Kipley was viewed over 50,000 times and reposted nearly 3,000 times.

58. Terrified, Ms. Kipley rushed to inform Brookfield of what she had discovered.

59. In tears and fearful for her own personal safety as well as for her job, she sent a Teams message to Brookfield's Human Resources ("HR").

60. When she did not immediately get a response from senior HR, Ms. Kipley sent a Teams message to a more junior HR executive, stating that she had an urgent matter to discuss about being "harassed" online related to her role at Brookfield.

61. As soon as she reached Brookfield's office, Ms. Kipley entered a conference room and waited for HR to arrive.

62. Shortly thereafter, two HR executives joined Ms. Kipley in the conference room to discuss what happened and what to do next.

63. Ms. Kipley explained that she was being victimized and harassed by an online mob who had apparently made out her identity from a still image of her face screenshotted from an Instagram "Story" (the "Story").

64. She also read some of the posted messages and comments aloud during her meeting with HR, including the comment on her Instagram page referring to a "Charlie Kirk army," and clearly expressed her fear and distress.

65. The Story was posted several days earlier while Ms. Kipley was at home watching television late in the evening, using her personal cellphone, and consisted of one still image and one short video.

66. When viewed sequentially, the Story amounted to a complaint from Ms. Kipley that in the days after the murder of Mr. Kirk, the far-right influencer, her Instagram feed had begun suggesting that she follow Donald Trump and Kirk's organization Turning Point USA.

67. Finding herself served content that was politically anathema to her, she made a "responsive" post on her Story critical of Instagram, Donald Trump and Charlie Kirk.

68. To that end, the screenshot included in the harassing posts and comments shows Ms. Kipley and captions stating "how I feel about Trump and CK in case it's not clear" with the lyrics to the song "F*** You" by Lily Allen appearing behind it.

69. To be very clear, this post did not "celebrate" anyone's death.

70. Instead, she was simply expressing a moment of frustration towards an administration which, Ms. Kipley believes, has attempted to both assert control over the media and push significant amounts of propaganda upon its citizens.

71. Upon information and belief, the Story was on her profile for approximately 12 hours, after which time she deleted it.⁷

72. During her meeting with HR, Ms. Kipley disclosed to Brookfield that she had no idea how the post was found or traced back to her.

73. Her Instagram username only partially identifies her name and with simply the single word "Kipley" in the biography section of her profile.

74. Further, her "followers" consist mostly of friends, family and personal acquaintances she has met over the years.

75. The Story was not promoted in any way via hashtags or location tags, and therefore would not have been visible to the broader public.

⁷ Ms. Kipley's practice was to regularly delete her Instagram Stories, which Instagram removes automatically after 24-hours in any event as a feature of the platform.

76. Upon information and belief, due to Instagram's algorithm, Ms. Kipley's Stories only appeared to those that engaged with her content on a regular basis, which amounted to approximately 90 followers at any given time.

77. Her profile was and is in no way linked to her professional social media.

78. Ms. Kipley did not use her Instagram account to network or conduct any professional business for Brookfield at any time.

79. The relative anonymity of her Instagram account made the comments and messages all the more terrifying, as clearly certain individuals had ascertained not only her identity but also her work location.

80. During her conversation with Brookfield HR, however, it was immediately clear that Brookfield intended to punish her for privately expressing a personal sentiment on her own time and the fact that this post had drawn the attention of a mob of stalkers.

81. Also during that meeting, Brookfield HR informed Ms. Kipley that it was working on removing the harassing comments from its own social media.

82. Brookfield did not offer to accommodate her in any way or express sympathy for her plight or experience, and Brookfield simply told Ms. Kipley to go home.

83. HR did not even extend the courtesy to call Ms. Kipley a car, offer for someone from Brookfield to accompany her home, or provide any other form of help or reassurance.

84. Ms. Kipley simply left the building alone, and spent a terrifying day and night afraid for her safety.

85. In fact, Ms. Kipley was so afraid for the safety of herself and her partner that she fled her home in New York City altogether.

86. At no time did any member of management reach out to her to ask how she was

doing.

87. However, Ms. Kipley did reach out to her immediate supervisor, who was on vacation that day.

88. When she explained to him the situation, he told her in no uncertain terms that she was “probably” going to be terminated and that there was nothing that he could do to help her.

89. Other than that conversation with her supervisor and the meeting with HR, the only contact Mr. Kipley received from Brookfield was an email from HR late that same day, ordering her to work from home the following day.

90. After another full day of no contact, around 5pm the following evening, Ms. Kipley received a phone call from HR informing her that she would be terminated, effective immediately.

91. HR stated in no uncertain terms that “based on her seniority and what she posted” Brookfield was firing her.

92. Despite her years of dedicated service, Ms. Kipley was tossed aside at the behest of a mob of online stalkers.

93. As far as Ms. Kipley knows, the Firm did no investigation into the situation beyond what Ms. Kipley herself told them.

94. The Firm did not at any time offer to accommodate Ms. Kipley’s status as a victim of acts that would constitute stalking, such as providing her with a brief leave of absence to allow the firestorm to peter out.

95. Ms. Kipley is devastated personally and professionally by Brookfield’s treatment of her.

96. What’s more, Brookfield made the choice to punish Ms. Kipley for her lawful, personal activity performed outside of working hours and her victimization because of threats from

anonymous online harassers – not the Firm’s clients, or potential clients but random internet users.⁸

97. Upon information and belief, these harassers were not the Firm’s clients or potential clients but random app users who harassed and stalked Ms. Kipley.

98. Of course, the stalking ultimately ended nearly as quickly as it began.

99. No further activity can be seen online related to Ms. Kipley’s post, and no new comments related to Ms. Kipley appear on Brookfield’s X or LinkedIn posts.

100. Indeed, only Ms. Kipley has been punished for her Instagram Story and the subsequent harassment and stalking that she suffered as a result.

FIRST CAUSE OF ACTION
NYLL § 201-D: DISCRIMINATION

101. Plaintiff repeats and realleges the foregoing allegations as if set forth fully herein.

102. During the full statutory period, Plaintiff was protected by the provisions of NYLL 201-d and all applicable rules and regulations thereunder.

103. During the full statutory period, Defendant was subject to the provisions of NYLL § 201-d and all applicable rules and regulations thereunder.

104. NYLL § 201-d prohibits employers, including Defendant, from discharging or otherwise discrimination against any individual because of any employee’s, including Plaintiff, legal recreational activities outside work hours, off of the employer’s premises and without use of the employer’s equipment or other property.

105. As set forth above, Plaintiff engaged in legal recreational activities by maintaining and posting from time to time on her personal social media accounts, including Instagram, which are unaffiliated with Defendant.

⁸ Upon information and belief, many of these users may have been bots or otherwise fake accounts.

106. As further set forth above, Plaintiff's personal Instagram posts, including Stories, are legal recreational activities protected by NYLL § 201-d.

107. Plaintiff made these posts off Defendant's premises and without using Defendant's equipment or other property.

108. Defendant discriminated against Plaintiff for her protected recreational activities in violation of NYLL § 201-d by, *inter alia*, terminating her employment.

109. As a direct and proximate result of Defendant's unlawful, discriminatory conduct, Plaintiff has suffered and continues to suffer harm for which she is entitled to an award of damages to the greatest extent permitted by law, including, without limitation, economic damages, prejudgment interest, punitive damages, liquidated damages, and recovery of her reasonable attorneys' fees and costs.

SECOND CAUSE OF ACTION
NYCHRL: DISCRIMINATION

110. Plaintiff hereby repeats and realleges the foregoing allegations as if set forth fully herein.

111. During the full statutory period, Plaintiff was protected by the provisions of the NYCHRL and all applicable regulations thereunder.

112. During the full statutory period, Defendant was subject to the provisions of the NYCHRL and all applicable regulations thereunder.

113. By the actions described above, among others, Defendant discriminated against Plaintiff based on her status or perceived status as a victim of stalking, N.Y. Penal § 120.45, in violation of the NYCHRL by, *inter alia*, terminating her employment.

114. Defendant's unlawful discriminatory actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights under the NYCHRL.

115. As a direct and proximate result of Defendant's unlawful discriminatory conduct, Plaintiff has suffered and continues to suffer harm for which she entitled to an award of damages to the greatest extent permitted by law, including, without limitation, economic damages, prejudgment interest, compensatory damages for emotional distress, punitive damages, and recovery of her reasonable attorneys' fees and costs.

THIRD CAUSE OF ACTION
NYCHRL: RETALIATION

116. Plaintiff hereby repeats and realleges the foregoing allegations as if set forth fully herein.

117. During the full statutory period, Plaintiff was protected by the provisions of the NYCHRL and all applicable regulations thereunder.

118. During the full statutory period, Defendant was subject to the provisions of the NYCHRL and all applicable regulations thereunder.

119. By the actions described above, among others, Defendant retaliated against Plaintiff based on her status or perceived status as a victim of stalking, N.Y. Penal § 120.45, in violation of the NYCHRL by, *inter alia*, terminating her employment and refusing her reasonable accommodation.

120. Defendant's unlawful retaliatory actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights under the NYCHRL.

121. As a direct and proximate result of Defendant's unlawful retaliatory conduct, Plaintiff has suffered and continues to suffer harm for which she entitled to an award of damages to the greatest extent permitted by law, including, without limitation, economic damages, prejudgment interest, compensatory damages for emotional distress, punitive damages, and recovery of her reasonable attorneys' fees and costs.

FOURTH CAUSE OF ACTION
NYCHRL: REASONABLE ACCOMODATION

122. Plaintiff hereby repeats and realleges the foregoing allegations as if set forth fully herein.

123. During the full statutory period, Plaintiff was protected by the provisions of the NYCHRL and all applicable regulations thereunder.

124. During the full statutory period, Defendant was subject to the provisions of the NYCHRL and all applicable regulations thereunder.

125. By the actions described above, among others, Defendant discriminated against Plaintiff based on her actual or perceived status as a victim of stalking, N.Y. Penal § 120.45, in violation of the NYCHRL by, *inter alia*, denying her a reasonable accommodation and refusing to engage in the interactive process or cooperative dialogue.

126. Defendant's unlawful discriminatory actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights under the NYCHRL.

127. As a direct and proximate result of Defendant's unlawful discriminatory conduct, Plaintiff has suffered and continues to suffer harm for which she entitled to an award of damages to the greatest extent permitted by law, including, without limitation, economic damages,

prejudgment interest, compensatory damages for emotional distress, punitive damages, and recovery of her reasonable attorneys' fees and costs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Declare that the practices complained of herein are unlawful under applicable State and local law;
- B. Grant an injunction and order permanently restraining Defendant from engaging in such unlawful conduct;
- C. Grant Plaintiff an award of damages in an amount to be determined at trial to compensate her for her economic loss;
- D. Grant Plaintiff an award of damages in an amount to be determined at trial for any and all other monetary and/or non-monetary and/or compensatory damages she has suffered, including, without limitation, compensation for her mental anguish, humiliation, embarrassment, stress and anxiety, emotional pain and suffering, and emotional distress;
- E. Grant Plaintiff an award of prejudgment interest where applicable;
- F. Grant Plaintiff an award of punitive damages in an amount to be determined at trial;
- G. Grant Plaintiff an award of liquidated damages in an amount to be determined at trial;
- H. Grant Plaintiff an award of reasonable attorneys' fees to the greatest extent permitted by law;
- I. Grant Plaintiff an award of reasonable costs that she has incurred in this action, including, without limitation, expert witness fees;


- J. Grant Plaintiff all other available damages to the greatest extent permitted by law;
- and
- K. Grant such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

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

Dated: March 25, 2026
New York, New York

GRUBIN LAW GROUP, P.C.

By: 

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