

UNITED STATES DISTRICT COURT

for the

Southern District of New York

myrelb Ikeda

Plaintiff

v.

J. Sisters 57, INC., d/b/a J. Sisters Beauty Salon,

Jonice Padilha, and Antonio Luis Rosa

Defendant

Civil Action No.

14 CW

3570

JUDGE BAER

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

All Defendants:

41 West 57th Street: 2nd floor

New York, NY 10019

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Manuel & Associates, LLP

Attn: Charles B. Manuel, Jr.

1 Penn Plaza-Suite 2527

New York, NY 10119

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

MAY 19 2014

Date: _____

RUBY J. KRAJICK
CLERK OF COURT

Caroline Lapley

Signature of Clerk or Deputy Clerk

Charles B. Manuel, Jr., Esq.
MANUEL & ASSOCIATES, LLP
One Penn Plaza, Suite 2527
New York, New York 10119
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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
MYRELLA IKEDA,

Plaintiff,

v.

J. SISTERS 57, INC.,
d/b/a J. SISTERS BEAUTY SALON,
JONICE PADILHA, and
ANTONIO LUIS ROSA,

Defendants,
-----X

14 CV 3570 () ()

VERIFIED COMPLAINT

Plaintiff MYRELLA IKEDA alleges:

INTRODUCTION

1. This is an action for personal injuries suffered by plaintiff at the J. Sisters Beauty Salon. On October 29, 2011, Myrella Ikeda visited J. Sisters with a prominent Brazilian hairdresser and television and magazine reporter as part of a photo-shoot for a well known Brazilian fashion magazine. Ikeda arrived at the salon with anticipating that in a few hours she would have spectacular hair that would help launch a modeling career. But eight hours later, she left the salon with physical and emotional trauma: her scalp and hair were burned, her modeling plans were in ruins, and she could not show herself publicly. All of this occurred at the incompetent, reckless hands of J. Sisters; its co-owner, Jonice Padilha; and its hair stylist, Antonio Luis Rosa.

PARTIES

2. Plaintiff Myrella Ikeda is a citizen of Brazil who, since October 2010, has been domiciled in Maryland.

3. Defendant J. Sisters 57, Inc., d/b/a J. Sister's Beauty Salon, is a New York corporation with its place of business at 41 West 57th Street, 2nd Floor, New York, New York 10019, is, upon information and belief, partly owned and operated by seven sisters from Brazil: Judséia, Jussara, Juracy, Jocely, Janea, Joyce and Jonice Padilha.

4. Defendant Jonice Padilha is, upon information and belief, a domiciliary of the State of New York and a co-owner of J. Sisters and was the company representative with whom Ikeda dealt on the date in question.

5. Defendant Antonio Luis Rosa is, upon information and belief, a hairdresser and employee or independent contractor at J. Sisters.

JURISDICTION

6. Jurisdiction of this action is based upon diversity of citizenship between Plaintiff and defendants pursuant to 28 U.S.C. Sec. 1332.

7. The amount in question exceeds \$75,000 exclusive of interest and costs.

BACKGROUND

I. Ikeda's Modeling Opportunity

8. In October 2011, Ikeda's Brazilian hairdresser and friend, Júlio Cesar do Carmo Reis, who is also a very well-known television and magazine reporter in Brazil, told Ikeda that he was coming to the U.S. to work for a few days in Florida and New York. He said that he was coming to do some pieces for television and an article for a magazine.

9. One of these works in New York was an article for a special edition of the Brazilian magazine *Malu*, showing a woman in the prestigious New York salon, J. Sisters.

10. This article aimed to show the visual change in the woman's hair and the excellent work of the salon and its professionals. The woman was to be photographed in all stages of the process – before, during and after – showing step-by-step the change in appearance.

11. Reis invited Ikeda to be the woman for the article. He had previously invited Ikeda for similar jobs, but although Ikeda had declined the offers in the past, she decided to accept this time. Another reason for Ikeda to accept this time was that she had decided to pursue a modeling career and this would be an excellent opportunity.

12. Ikeda had other invitations to work in photography and television modeling, and Reis discussed with her some of the particular opportunities that lay ahead, but put all that aside to pursue other avenues, even though this was something that she always wanted to do. And having this and other projects to enter this profession, she was very confident.

13. Therefore, she accepted this invitation with the condition that the visual change would be limited to a hair trim, not more than one centimeter (0.4 inches), and styling and that the salon would not dye her hair.

II. Ikeda's Appointment at J. Sisters

14. Reis then contacted one of the salon's owners – Jonice Padilha, and they organized everything for Ikeda to arrive there on October 29, 2011, which was a Saturday morning. Defendant Jonice Padilha said she would meet Ikeda and Reis personally there.

15. Based on her prior experience with hair treatments, Ikeda expected that her session at J. Sisters would run roughly two hours. Because of the disaster caused by defendants that day, discussed in Section III below, Ikeda spent over eight hours of excruciating trauma at J. Sisters.

16. When Ikeda and Reis arrived at J. Sisters on the morning of October 29, they were greeted by Jonice Padilha. They talked about the special purpose of this trip. Ikeda explained that she was nervous about this day because it was so important for her future. Padilha said that she heard Ikeda and understood all that Ikeda had explained. She explained that she always took very good care of Ikeda's hair and any treatment or cut, highlights or other work would be up to the same standards of Brazilian professionals like Reis. Padilha told Ikeda not to worry because she had scheduled the professional who was the "best of the best" at the salon, defendant Antonio Luis Rosa, for Ikeda. Padilha said Rosa was going to do an excellent job and guaranteed that Ikeda was going to leave beautiful, happy and satisfied with the result.

17. Padilha said that the work of the salon would be perfect and the photo-shoot for the Brazilian magazine article would be a success. She told Ikeda to trust her and be calm because she took care of many famous people in the salon. She said that J. Sisters was the best salon in New York. She asked Ikeda to look at the wall with the customers' pictures and she would be reassured.

18. Ikeda looked at the wall and saw celebrities such as Gwyneth Paltrow, Cindy Crawford, Naomi Campbell, Kate Winslet, Fergie, Cameron Diaz, Uma Thurman, Sarah Jessica Parker and many others. Ikeda had seen these pictures at J. Sisters before, but this time the photos, and Padilha's calming promises, made Ikeda feel calm and reassured. Ikeda totally trusted in what Padilha told her about the salon and the professional who would do the work.

19. Ikeda and Reis waited a while, and after that Padilha came with the professional hairdresser, Antonio Luis Rosa. She introduced him to Ikeda and Reis. Padilha explained to Rosa that Ikeda is very careful with her hair and that this visit was part of a photo-shoot for a top Brazilian magazine. Padilha “guarantee[d]” to Ikeda and Reis was the best hairdresser in the J. Sisters salon.

20. Rosa told Ikeda to relax and not to be worried about anything because he was a great professional who works with and has references from celebrities and knew exactly what he was going to do. He told Ikeda and Reis that they could trust 100% in his work, that he was going to do the best work possible, and that she was going to leave beautiful, much more beautiful than when she got there.

21. Rosa analyzed Ikeda’s hair and said that he was going to trim her bangs, hydrate and highlight her hair with a natural organic product, that this product causes no harm, only hydrates the hair strands. He said that it was a special product and that very soon it was going to be launched in the market as part of a line of products bearing his name. And because he was a renowned professional, it was going to be a big success.

22. Padilha and Rosa were aware that Ikeda was nervous about this important treatment, and they told Ikeda that they wanted to make her more confident and secure that she was going to leave the salon beautiful and wonderful – a Barbie.

III. The Disaster

23. Then the process started which for Ikeda was to trim her hair, do a hydration with a natural organic product, and styling and drying the hair. Rosa stated that he also wanted to put highlights in Ikeda’s hair. Rosa started by separating her hair and putting the product on her scalp. The product was unknown to Ikeda at the time, but the product was subsequently reported by J. Sisters to be Naturlite White Lightening

Powder, a product of International Hair and Beauty, LLC, d/b/a Organic Salon Systems.¹

24. In few seconds after Rosa started, Ikeda felt like he was putting fire or rubbing hot pepper into her head. She felt a great deal of burning and stinging. She very soon became extremely agitated, asking him desperately what he was doing. Rosa told Ikeda it was “normal,” and “don’t worry.”

25. Ikeda was in extreme pain; she kept telling Rosa that her scalp was burning, but he refused to respond to her distress, telling Ikeda that she had to trust him and that she was asking too much. Rosa spoke condescendingly, telling her that she was in a celebrity salon and should not worry. But Ikeda was more than “worried”; her head was burning and hurting a lot. Rosa continued to ignore her and kept on saying that this was a normal reaction to the process.

26. Rosa left the product in Ikeda’s head for close to an hour. All the while, she was in pain. Ikeda’s Brazilian hairdresser/photographer Reis asked Rosa what was going on; Reis’s answer was not to worry that he knew what he was doing. His tone of voice showed a lot of impatience, as if he were put out by responding to Ikeda’s urgent requests.

27. Finally, Rosa put another product on Ikeda’s head, which felt icy and afforded her some relief from what she was feeling.

28. Then Rosa said that he was going to wash Ikeda’s hair since it was “hydrated.” He again told her to trust him and wait to see the results. But when the water hit Ikeda’s scalp she felt burning again. She complained of the pain again, but Rosa continued to wash. According to him, he put shampoo and another product in her

¹ The salon put other products in Ikeda’s hair that day, but those products have not yet been identified.

hair. The other product, he said, was a cream to leave the hair shiny and silky. Then he took Ikeda to a vapor fan for “a few minutes,” but she was left there over one hour.

29. During all of this, Rosa stopped several times, giving Ikeda a very strange look, and then disappeared. Then he would reappear, looking nervous and dazed, and he started not to make any sense. Ikeda was increasingly concerned that Rosa was under the influence of some sort of medication.

30. Ikeda became increasingly distraught. Her eyes also were burning; she was in real agony, compounded by her fear that something was going wrong. Rosa had been absent for many minutes, so Ikeda explained the situation Jonice Padilha, who was doing a manicure for a client. Padilha told Ikeda that it was probably the vapor and that Rosa was coming. But Padilha did nothing herself to help Ikeda, and she did not go to find Rosa, who did not reappear for at least another 30 minutes.

31. Finally, Rosa returned and told Ikeda to get off the machine. He brushed and tied her hair to put in yet another product. He said that it was a cream mixed with a toner, also natural. He separated her hair in several portions and applied the “toner and cream” in several parts. He separated these portions and covered them one-by-one with aluminum strips. He said that this mixture was going to leave the hair shinier. Rosa again assured Ikeda that everything would turn out okay and that this new product was organic and would give her hair a super hydration.

32. As Rosa was applying this latest mixture, Ikeda told him she could not feel her scalp. Rosa said that all he was doing, including this mixture, was normal procedure at J. Sister's. But Ikeda had never experienced anything like this at J. Sisters or any other salon. She told Rosa that she was very anxious to see the result and take the final pictures for the magazine. Rosa told her everything was fine, but her two-hour appointment was already past the five-hour point.

33. Then Rosa took Ikeda again to the vapor machine. She was left there again for about an hour. After that, he took the aluminum paper strips off and washed her hair. Her scalp was dormant and she could not feel anything anymore.

34. When Rosa finished washing Ikeda's hair, he took Ikeda to another room where he was to "trim" her bangs and then would dry and finish the work, which had already taken more than seven hours. Then he took the excess water from her head with a towel and tucked it. He started brushing and when he finished he told Ikeda to close her eyes that he was going to cut it. One more time she told him not to cut a lot, just a little, just a trim.

35. He told Ikeda to trust that he had done excellent work; just wait and see. Ikeda was deeply concerned, and she asked her Brazilian hairdresser Reis to question Rosa. Rosa responded that he was a professional and that Reis should not get involved. Ikeda asked Reis to call Jonice Padilha – the co-owner who had touted the salon and its supposed top hairdresser, Rosa – but she had already left, having done nothing when Ikeda requested her intervention. Ikeda asked that the staff call Padilha, but she was not reachable.

36. When Rosa started to dry Ikeda's hair with the hair drier, Ikeda's scalp started to itch badly. Ikeda told Rosa that her head was itching a lot and was still a little numb. Rosa then rose to a new level of arrogance, telling Ikeda that it was her imagination. Meanwhile, Ikeda was suffering in physical and emotional anguish. she was sad, upset and desperate, because everybody who worked at the salon could see what was happening but no one was doing anything. Finally, after the staff had supposedly tried to contact Jonice Padilha, they informed Ikeda that Padilha had traveled to a Halloween party and could not be reached.

37. Rosa continued to dry Ikeda's hair, and Ikeda saw that her hair was falling out and was very thin. When she touched her hair, she noticed a different texture, very fluffy, like cotton. She asked Rosa what was happening, and why. He again told Ikeda that this was normal, and that she needed to wait until he finished. But in fact he was very nervous and completely bewildered.

38. Then he started to use the straightening iron on the front portion of Ikeda's hair, on her bangs and around her head. Then the worst happened. Immediately, her hair started to fall, burnt and crumbled. Rosa continued using the iron and she watched more hair fall. Ikeda looked at the mirror and went into shock. She could not move. Tears started to fall but she could not move. She told Rosa to stop and everyone there looked at Ikeda in shock, also without moving. The scene of horror caught everyone by surprise. Júlio Reis also was in shock. Ikeda was in tears.

39. It took Ikeda a while to fully realize and react to what had happened. She was in shock, still sitting in front of the mirror, with the "professional" hairdresser Rosa repeating that he was going to fix it, until she said that she was going to call the police.

40. She stood up and went to get her things in the locker and went to the bathroom to change. Inside the bathroom, she looked at the mirror and tried to control herself but could not. She was terrorized, with her hair in her hands. She touched them and they would come off in her hand. She never saw something like that. She only saw this in images of people near death from a debilitating illness. She never imagined living through something like this.

41. Then, as soon as she got out of the bathroom, Jonice Padhila's niece – Ikeda cannot recall her name – took Ikeda to a room, took some pictures with her cell phone, told Ikeda to keep calm, and said that she was going to speak with her aunt Jonice. She asked Ikeda's forgiveness and told Ikeda that Jonice was going to a party,

but that on Monday she would speak with Ikeda. She hugged Ikeda and told Ikeda to keep calm and not to call the police because her aunt was going to fix it.

42. As soon as she left that room and was going to another, behind her friend Reis, she overheard one person whispering that "he was probably on drugs," and "imagine if she was famous, they would close the salon." Ikeda kept on walking without looking at them. At that moment she could not see anyone; she was walking fast, crying uncontrollably. This left Ikeda more desperate, without knowing what to do.

43. Meanwhile, Rosa, like Padilha, disappeared unannounced and did not appear again. To this day, Ikeda has not seen or heard from Rosa.

44. Júlio Reis, who had photographed Ikeda when she arrived at the J. Sisters Salon that morning (see Exhibit 1), took photographs of Ikeda after the salon's mistreatment (see Exhibit 2).

45. After Ikeda mentioned calling the police, the remaining salon staff were anxious; they wanted Ikeda and Reis to leave fast, saying that they needed to close the salon. They gave Ikeda water with sugar to calm her down, but almost the next moment asked her to leave the salon. She felt expelled and abandoned by the salon that had maimed her. After eight hours of hell, Ikeda and Reis were thrown out of J. Sisters.

46. Another friend, Roberto Trevisan, came to pick up Ikeda and Reis. Trevisan was in shock, much the same as everyone else at the salon, and said that Ikeda needed to do something, that this could not be left like that, that no one was supposed to go into a salon and come out that way.

IV. The Aftermath

47. Ikeda went into J. Sisters normal, smiling, happy, with beautiful hair, thinking that she would leave beautiful, with a fantastic appearance to be featured in a magazine. Instead, she was leaving ugly, horrible, a monster, with a terrible appearance and a scary face, crying, desperate, feeling physically and psychologically destroyed, with her hair in her hands, her scalp burned, stinging and itching, and part of it numb.

48. Jonice Padilha only once attempted to call Ikeda, but Ikeda was too upset to speak to Padilla at that time. Instead, the following day, a person by the name of Kiko Altoe, identifying herself as a friend of Padilha, called Júlio Reis. Altoe told Reis that "Jonice regrets what happened at the salon," J.Sisters, and that if Ikeda wanted she could go there "to get free services of wax, facial, manicure and pedicure." This same person sent other messages with the addresses of wig stores, so she could buy a wig and false bangs, because maybe Ikeda's hair would continue to fall.

49. This continuing mistreatment gives a whole new meaning to "adding insult to injury." What were they thinking of Ikeda? That she would think this was a joke? That by doing that she would feel better? That a pedicure and a wig would make her forget what she went through at J. Sisters Salon and thereafter? Ikeda could only think of the photographs on the wall at J. Sisters. Would they offer Cameron Diaz or Tyra Banks free services of wax, manicure or pedicure? Or send a message to these celebrities with addresses of wig stores, so they could buy a wig or false bangs, because their hair was falling out?

50. Approximately one week after the disaster, Jonice Padilha called Reis, stating that she was "sorry" for what had happened and that Rosa had been on drugs on October 29, 2011.

51. Ikeda wanted to wake up from this terrible nightmare that was happening in her life. The only thing she wanted was to go back in time and to never have stepped into the J. Sisters Salon. She became desperate and completely shaken psychologically, having never felt like this in all her life.

52. The hair makes a tremendous difference in someone's visual appearance; that is how the J. Sisters Salon grosses millions of dollars a year in a \$75 billion-a-year salon industry.

53. And that is why this nightmare affected Ikeda's life in all senses. She lost motivation for everything. She had always been a normal person, healthy and happy. Suddenly, she was depressed and unhappy, with no motivation to do anything. She had no will to groom herself. To groom herself for what? She could not eat, she was crying all the time.

54. Ikeda's scalp was very sensitive and her hair was falling a lot. Every day was very difficult. Several times she thought to shave all her head, to become bald. She had to spend some time wearing a wig and false bangs because her appearance was in ruins.

55. Ikeda had been a person with a happy, healthy life. She loved taking care of herself; she love traveling, practicing sports, going to the gym to work out, and spending time with her friends and loved ones, but she had to stop nearly all of this, as she was devoid of self-esteem, depressed and without motivation for anything.

56. Nothing helped; Ikeda was ugly and nothing was going to change that, much less her self-esteem. She felt bad, horrible and terribly sad. She did not want contact with anyone, did not want to leave the house, to go to the gym or any other place. She had no will to do anything.

57. She missed important occasions like her sisters' graduations, weddings of friends, family gatherings, birthdays, parties and special celebrations such as Christmas and New Years with her family.

58. All Ikeda wanted was to isolate herself. She wanted to disappear. Every time she passed by a mirror, she was horrified to see that image, in that manner. She started to wrap towels or caps on her head not to see herself. She started to feel sick, as if she had some disease.

59. This affected her studies. She was in the process to transfer her credits from the Brazilian university Focca - Faculdade de Olinda to the United States, but she could not get herself to enroll and she missed four semesters. She could already have her degree, but now she was unable to proceed.

60. Ikeda's other plans and projects went down the drain. She could no longer think of a career in cinema, television or photography. She had to give up work, study and opportunities, all her life became completely disorganized. Time passed, and Ikeda lost more than two critical years of her life, with no way to bring it back.

61. Ikeda traveled a number of times to Brazil to treat her hair and to try to recover and that cost her a lot, including the treatments, the travel and all the unexpected expenses that she was incurring.

62. It is painful for Ikeda to recall countless sleepless nights, the pain she felt, the wish to disappear, her image destroyed, the losses she had, the unhappy time that she went through and lost, the pain of looking into the mirror and seeing another person, her psychological state completely shaken, the depression, all the psychological suffering, not having the courage to put her head out on the street, the shame, and the traumas that only she can know.

63. While Ikeda's hair has at last grown back, it is thinner, uneven and less lustrous than before. Her scalp is greasy, requiring her to wash her hair at least daily. Part of her skull still feels numb. Júlio Reis, an expert in this field, has estimated that it may be six years before Ikeda fully recovers.

64. The physical scars may have receded, but the psychological trauma of October 29, 2011 – and its long aftermath – will never leave Ikeda. To this day, she has nightmares of that day, and difficulty sleeping. She is in constant fear of losing her hair again, and of suffering a similar incident at a hair salon. Ikeda can never escape the pain, suffering and indignities she suffered at the hands of the J. Sisters Salon, Jonice Padilha and Antonio Luis Rosa.

DAMAGES

65. Plaintiff is entitled, as against Defendants, to compensatory and punitive damages for, among other items, injury, emotional distress, mental anguish, pain, suffering, inconvenience, loss of enjoyment of life, lasting embarrassment and humiliation, and other pecuniary losses.

66. In direct consequence of the above, Plaintiff is entitled to damages as follows:

- a. Out-of-pocket expenditures for hair and scalp treatments and related travel and expenses – \$30,000.
- b. Lost work and business opportunities – \$350,000.
- c. Physical and emotional pain and suffering – \$350,000.
- d. Punitive damages – recklessness – at least \$750,000.

First Cause of Action

NEGLIGENCE

67. Plaintiff repeats the preceding paragraphs.

68. The defendants departed from the standards of care of the hair salon industry in the following respects:

- a. They misused and/or misapplied chemical agents, or used the wrong agents, in the course of plaintiff's hair treatment.
- b. They disregarded clear signs and expressions of distress from plaintiff.
- c. They left plaintiff unattended for hours during her treatment.

69. Defendants' negligence directly caused Plaintiff's injuries set forth in paragraphs 66 (a-c) above, with damages of at least \$730,000.

Second Cause of Action

RECKLESSNESS

70. Plaintiff repeats the preceding paragraphs.

71. Defendants' actions set forth above were wilful, wanton and reckless in the following respects:

- a. Their misuse of chemical agents so deviated from appropriate standards of care as to be wilful, wanton and reckless.
- b. Their inattention to, and outright dismissal of, Plaintiff's repeated expressions of distress were wilful, wanton and reckless.
- c. They repeatedly left Plaintiff unattended notwithstanding Plaintiff's expressions of distress, and then disappeared from the salon when the disaster became more apparently acute.
- d. They misrepresented their experience and qualifications to perform the types of treatments required by Plaintiff.

- e. Upon information and belief, defendant Rosa was impaired by medication on October 29, 2011, and the other defendants knew or should have known of – and recklessly disregarded – Rosa's impairment.

72. Defendants' recklessness directly caused Plaintiff's injuries set forth in paragraphs 66 (a-c) above, with damages of at least \$730,000. Plaintiff is also entitled to punitive damages of at least \$750,000, for a total of at least \$1,480,000.

Third Cause of Action

NEGLIGENT SUPERVISION

73. Plaintiff repeats the preceding paragraphs.

74. Defendants J. Sisters Salon and Padilha had duties to supervise defendant Rosa, who was employed by or was a contracted agent for J. Sisters Salon.

75. Defendants J. Sisters Salon and Padilha recklessly or knowingly misrepresented Rosa's ability, experience and qualification to perform the treatment ordered by Plaintiff.

76. Defendants J. Sisters Salon and Padilha failed to supervise Rosa as he treated Plaintiff on October 29, 2011, even as Plaintiff's distress became acutely apparent throughout the J. Sisters Salon.

77. Defendants J. Sisters Salon and Padilha knew or should have known that Rosa was acting in an erratic, ill-tempered and physically and/or mentally impaired state on October 29, 2011.

78. Defendants J. Sisters Salon and Padilha allowed (or caused) Rosa to disappear from the salon when the disaster that befell Plaintiff became fully apparent.

75. Defendants' negligent supervision directly caused Plaintiff's injuries set forth in paragraphs 66 (a-c) above, with damages of at least \$730,000.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests judgment as follows:

- I. As to Plaintiff's First Cause of Action, damages of at least \$730,000;
- II. As to Plaintiff's Second Cause of Action, damages of at least \$1,480,000;
- III. As to Plaintiff's Third Cause of Action, damages of at least \$730,000; and
- IV. Granting Plaintiff her attorneys' fees, costs and such other and further relief
as may be just and proper.

JURY TRIAL DEMAND

Plaintiff demands a trial by jury of all issues so triable.

Dated: New York, New York
April 3, 2014

MANUEL & ASSOCIATES LLP

By: 

Charles B. Manuel, Jr. [CM3020]

One Penn Plaza, Suite 2527

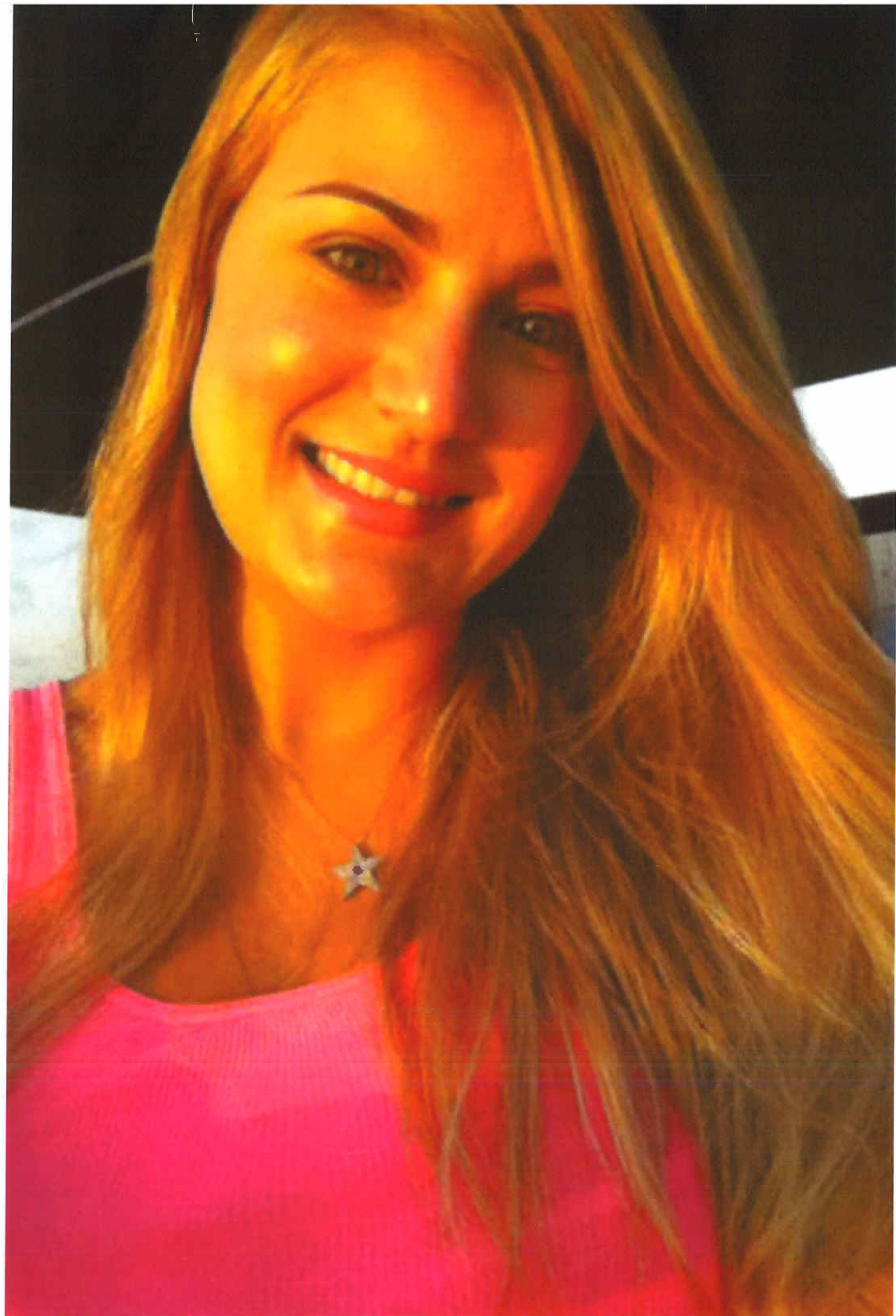
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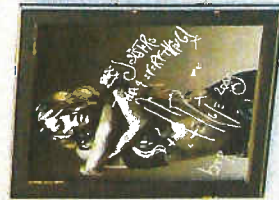
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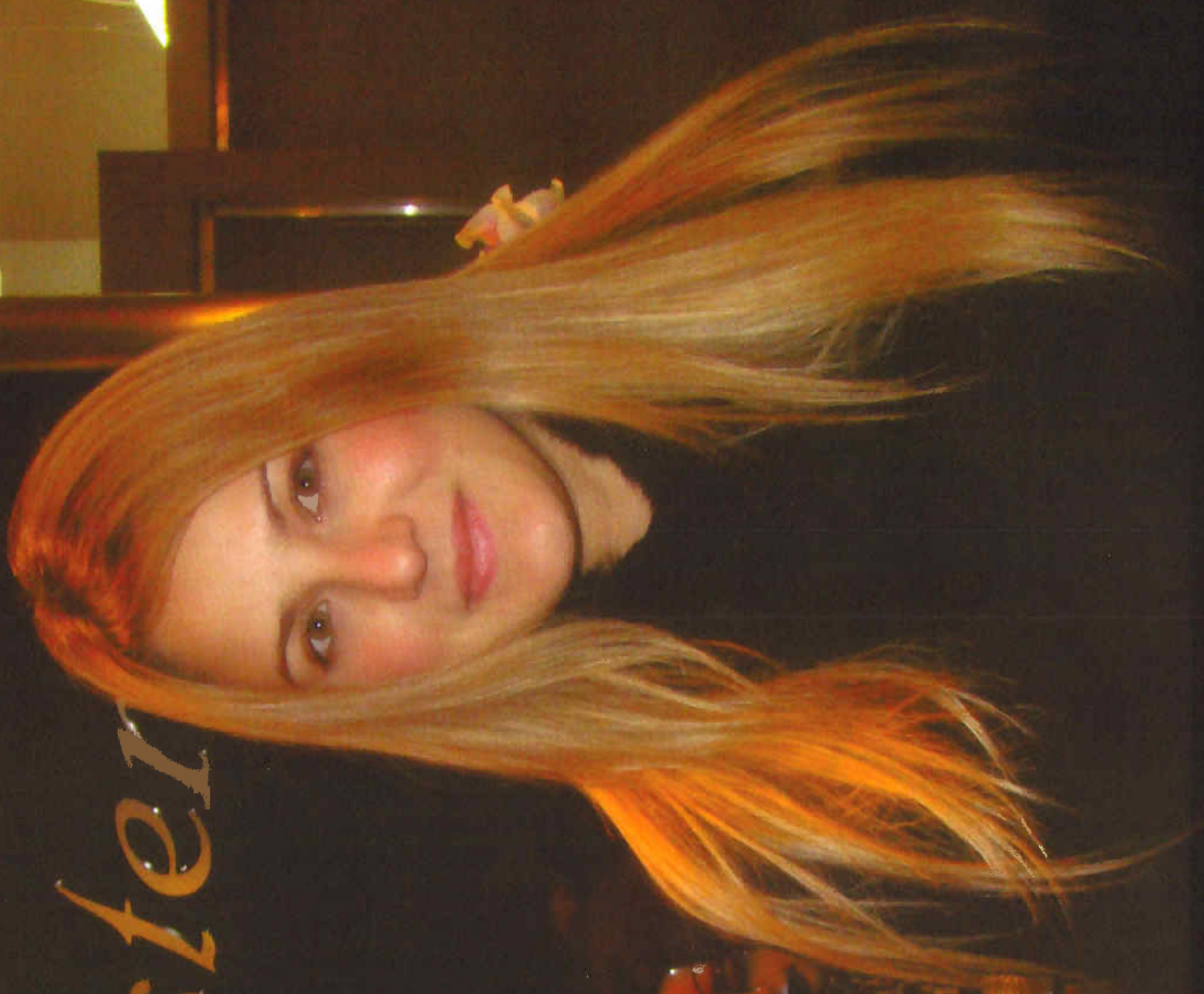
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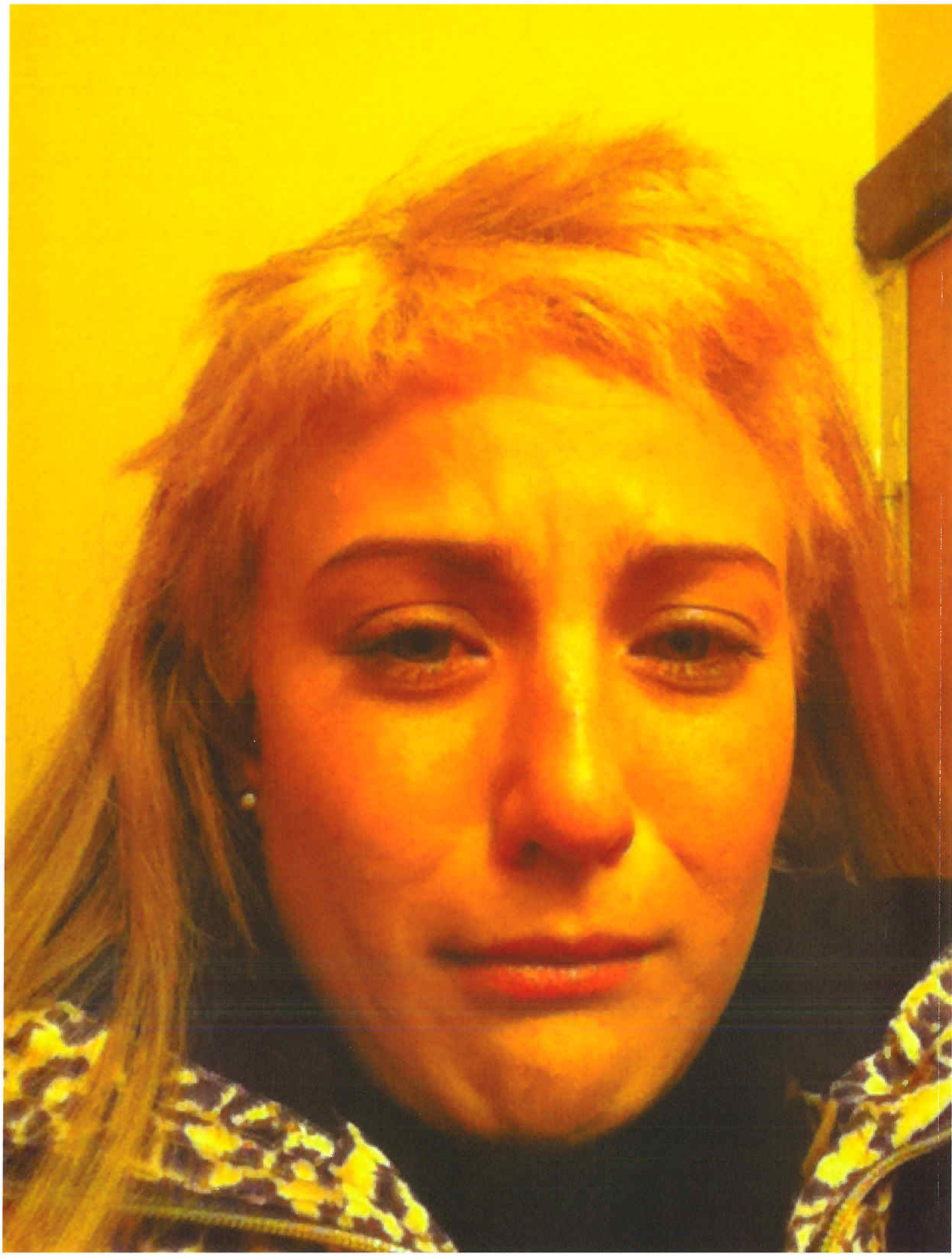
Attorneys for Plaintiff

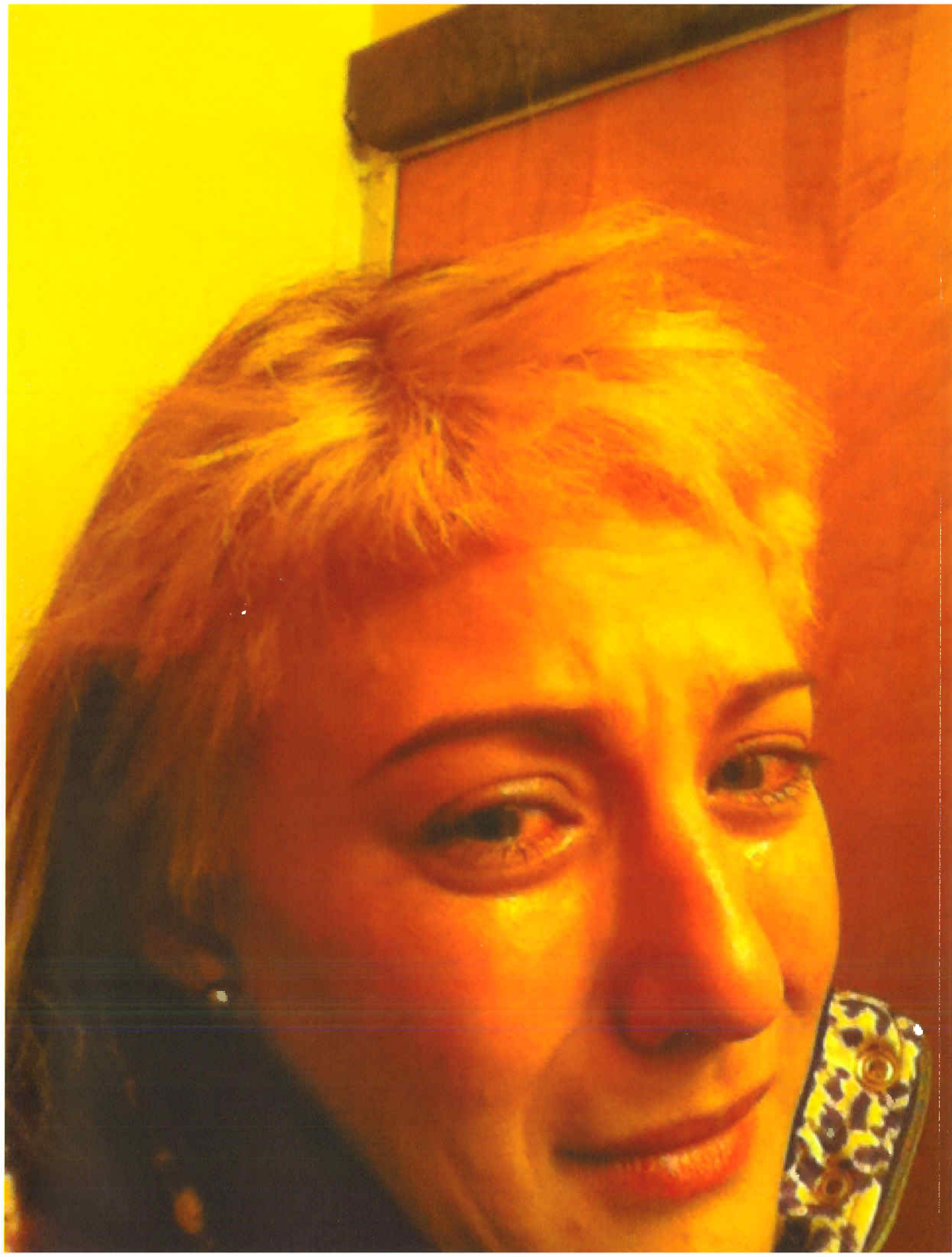


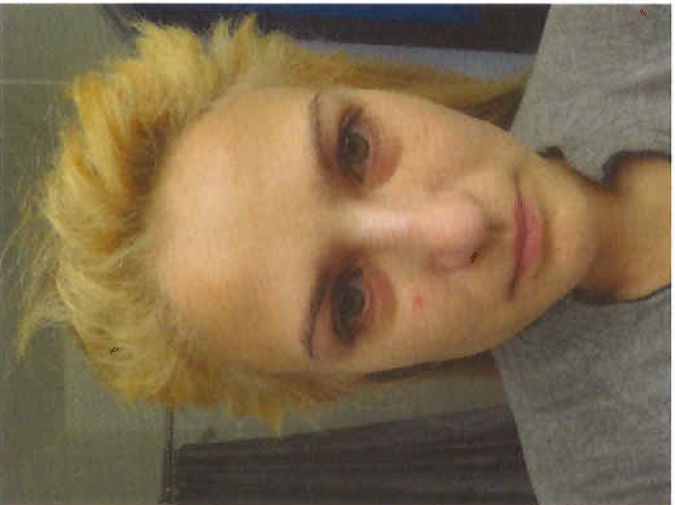
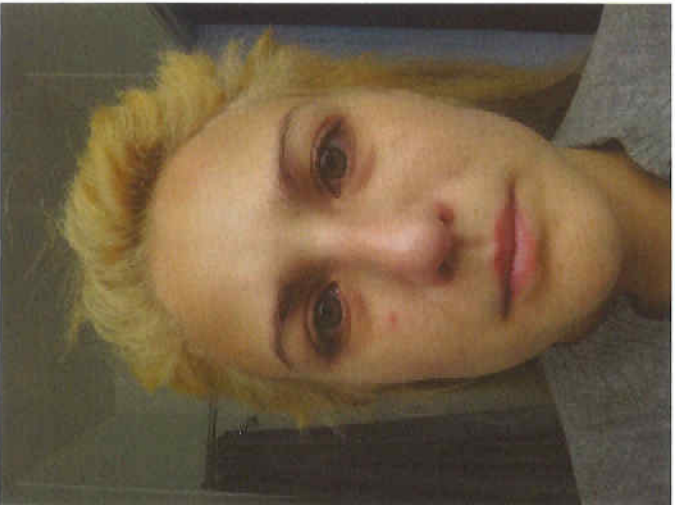
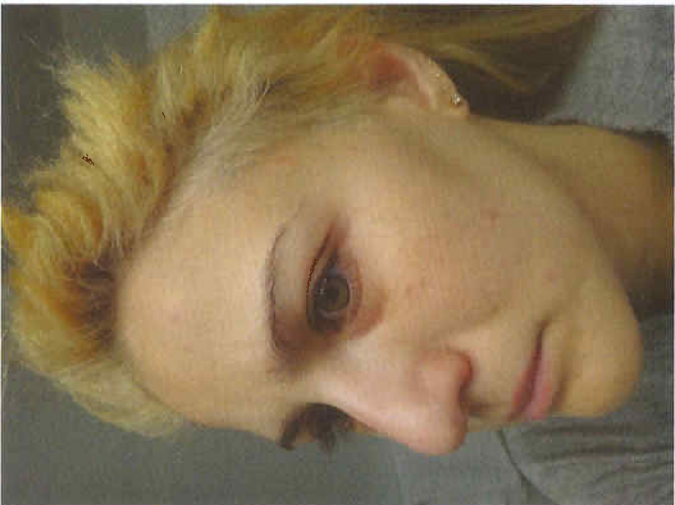
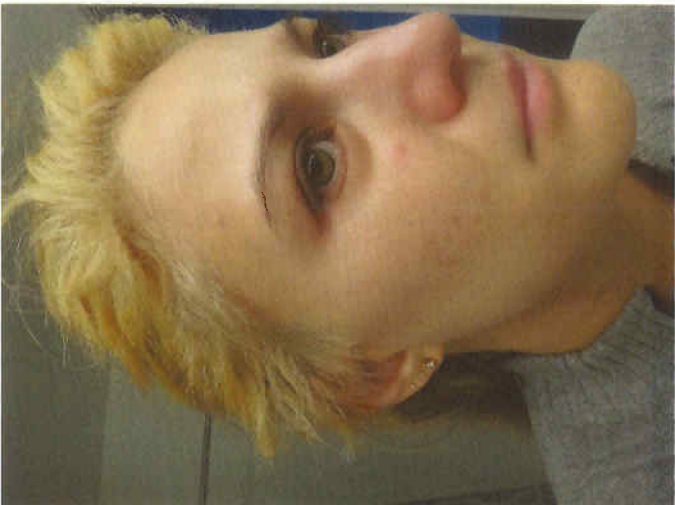
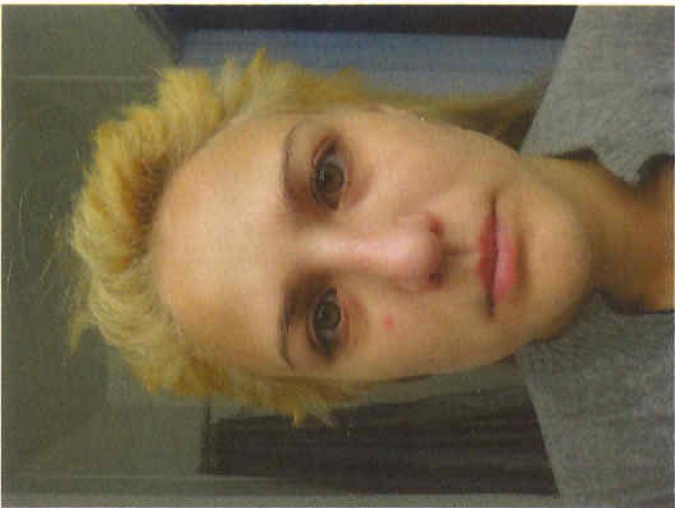


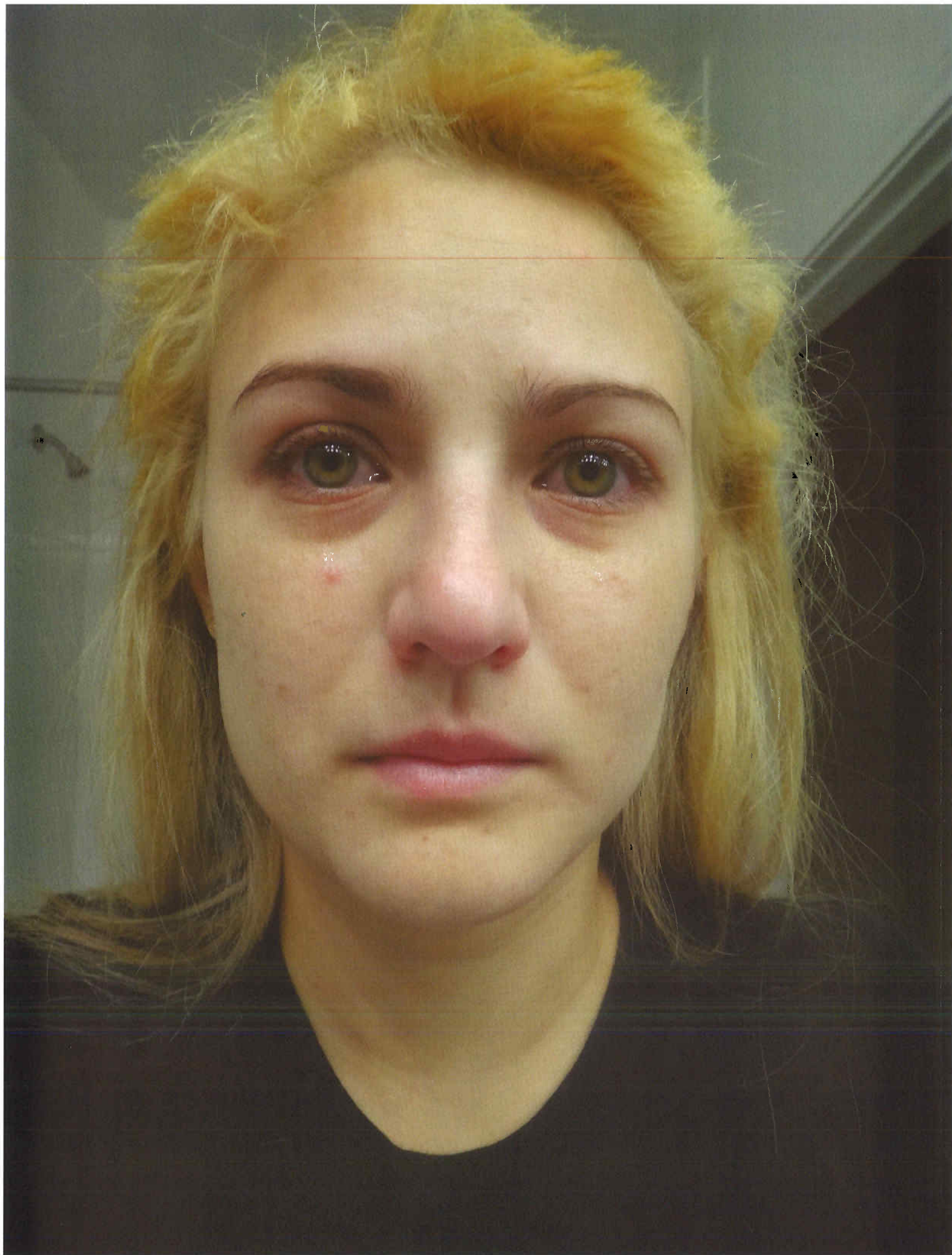
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
MYRELLA IKEDA,

Plaintiff,

v.

J. SISTERS 57, INC.,
d/b/a J. SISTERS BEAUTY SALON,
JONICE PADILHA, and
ANTONIO LUIS ROSA,

Defendants,
-----X

Index No.

VERIFICATION


STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

I, Myrella Ikeda, plaintiff in this action, do swear and affirm, under penalty of perjury, that I have read the foregoing Verified Complaint in this case and that the statements in the Verified Complaint are true and correct to the best of my knowledge, except as to matters pleaded upon information and belief, which I believe to be true based upon the information available to me.



Myrella Ikeda

Sworn to and subscribed
before me April 3, 2014



Notary Public



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
MYRELLA IKEDA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	<u>14</u> CV <u>3570</u> () ()
	:	
J. SISTERS 57, INC.,	:	
d/b/a J. SISTERS BEAUTY SALON,	:	
JONICE PADILHA, and	:	
ANTONIO LUIS ROSA,	:	
	:	
Defendants,	:	
-----X		

VERIFIED COMPLAINT

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