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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----------X
VANESSA HARRIS and KIMBERLY MEALER,

Plaintiffs,

v.

McDONALD'S CORPORATION, McDONALD'S RESTAURANTS OF NEW YORK, INC., and MICHAEL BOCK,

Defendants.
----------X

COMPLAINT
Docket No. 14-CV-4256

JURY TRIAL DEMANDED

Plaintiffs, Vanessa Harris and Kimberly Mealer, ("Plaintiffs") by and through their attorneys at Valli Kane & Vagnini, LLP, bring this action for damages and other legal and equitable relief from the Defendants McDonald's Corporation ("McDonald's Corp."), McDonald's Restaurants of New York, Inc. ("McDonald's New York")(jointly "McDonald's") and Michael Bock ("Mr. Bock")(all collectively "Defendants") for violation of the laws prohibiting sexual harassment, discrimination based on race, hostile work environment, retaliatory and discriminatory termination, and constructive discharge and stating the following as Plaintiffs' claims against Defendants.

JURISDICTION AND VENUE

1. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331, which confers original jurisdiction upon this Court for actions arising under the laws of the United

States, and pursuant to 28 U.S.C. §§ 1343(3) and 1343(4), which confer original jurisdiction upon this Court in a civil action to recover damages or to secure equitable relief (i) under any Act of Congress providing for the protection of civil rights; and (ii) under the Declaratory Judgment Statute, 28 U.S.C. § 2201. The Court's supplemental jurisdiction is invoked pursuant to 28 U.S.C. § 1367(a), which confers supplemental jurisdiction over all non-federal claims arising from a common nucleus of operative facts such that they form part of the same case or controversy under Article III of the United States Constitution.

2. Venue is proper in this Court in as much as this judicial district lies in a State in which the unlawful employment practices occurred. Venue is also proper in this Court pursuant to 28 U.S.C. § 1391(b)(1) and (c), in that Defendants maintain offices, conduct business and reside in this district.

PARTIES

3. Plaintiff Vanessa Harris, an African American female, ("Plaintiff" or "Ms. Harris") is a former employee of Defendants McDonald's at the restaurant located at 114-01 Sutphin Boulevard, Jamaica, New York 11434, (hereinafter referred to as the "Sutphin Boulevard Location"), and resides in Hempstead, New York.

4. Plaintiff Kimberly Mealer, an African American female, ("Plaintiff" or "Ms. Mealer") is a former employee of Defendants McDonald's at the Sutphin Boulevard Location, and resides in Hempstead, New York.

5. Defendant McDonald's Corporation ("McDonald's Corp.") is a Delaware Corporation whose principal place of business is 1 McDonald's Plaza, Oak Brook, Illinois

60523, and which owns, controls, manages, and/or operates the McDonald's restaurant at 114-01 Sutphin Boulevard, Jamaica, New York 11434.

6. Defendant McDonald's Restaurants of New York, Inc. ("McDonald's New York") is a New York Corporation which also owns, controls, manages, and/or operates the McDonald's restaurant at 114-01 Sutphin Boulevard, Jamaica, New York 11434.

7. Thus, Defendants McDonald's Corp. and McDonald's New York (jointly "McDonald's") jointly own, control, manage and/or operate the McDonald's restaurant located at 114-01 Sutphin Boulevard, Jamaica, New York 11434 (the "Sutphin Boulevard Location").

8. Defendant Michael Bock, a white male, ("Mr. Bock") was the McDonald's Area Supervisor/Operations Consultant for the McDonald's New York Metro Region and was responsible for supervising McDonald's Sutphin Boulevard Location during the time of the incidents alleged in the Complaint herein. Mr. Bock is currently McDonald's Operations Manager for the Philadelphia Region.

ADMINISTRATIVE EXHAUSTION

9. Plaintiffs filed a verified complaint of discrimination with the Equal Employment Opportunity Commission ("EEOC") on or about March 9, 2012.

10. The EEOC issued Notices of Right to Sue Letters to Plaintiffs Vanessa Harris and Kimberly Mealer dated April 14, 2014, and which were received by Plaintiffs on April 16, 2014. Accordingly, Plaintiffs' 90 day Right-to-Sue period, which is counted from the date of receipt, ends on July 15, 2014.

11. Plaintiffs will serve this Complaint within ten (10) days of filing upon the New York City Division of Human Rights and Corporation Counsel as required by the New York City Human Rights Law.

STATEMENT OF FACTS

12. On August 19, 2010, Michael Lauria ("Mr. Lauria"), a white male, was hired at the Sutphin Boulevard Location as a Department Manager III by Defendant Mr. Bock, McDonald's Area Supervisor/Operations Consultant for the New York Metro Region.

13. On November 1, 2010, Mr. Lauria was then promoted to Restaurant Manager at the Sutphin Boulevard Location.

14. Starting in August 2010 when Mr. Lauria started working at McDonald's Sutphin Boulevard Location and during the remainder of her employment for Defendants which was at that location, Ms. Harris was subjected by Defendants to a sexually and racially hostile work environment, and discriminatory conduct which was severe or pervasive.

15. After Ms. Mealer was transferred to the Sutphin Boulevard Location in March 2011, she too was subjected by Defendants to a sexually and racially hostile work environment, and discriminatory conduct which was severe or pervasive.

16. Mr. Lauria was the source of the sexually and racially harassing comments and conduct and when Plaintiffs complained to Defendants about the sexually and racially hostile work environment, Defendants took no remedial action during Plaintiffs' employment to investigate and/or remedy the problem.

17. Mr. Lauria subjected Plaintiffs to a racially hostile work environment including making frequent racially harassing comments such as regularly calling his employees, including Plaintiffs, "niggers", "niggas", "house niggers" and/or "my niggers." Mr. Lauria also frequently made comments such as, "What's up niggers", and "You niggers need to get it together."

18. On several occasions, Mr. Lauria commented "It's hotter than Africa in here," referring to the restaurant.

19. On one occasion, Mr. Lauria forwarded a video text message to Plaintiffs and other employees, showing black children dancing with a caption stating "It's Friday Niggas."

20. On another occasion, Mr. Lauria sent another racist video text message to Plaintiffs and other employees of a cartoon of a white man spraying a water hose at black children.

21. Mr. Lauria also subjected Plaintiffs to frequent and regular sexually harassing touchings such as on their buttocks, backs and waists about which Plaintiffs objected and complained.

22. Mr. Lauria also made frequent sexually harassing comments to Plaintiffs. Plaintiffs were subject to Mr. Lauria's making statements at least once a week about his penis such as "Do you know why they call me 'Big Mike'?" about which Mr. Lauria was referring to his penis because he would simultaneously thrust his pelvis into the air each time he made this comment.

23. Another such joke Mr. Lauria subject Plaintiffs to was "Have I told you the one about my penis? Oh, never mind, it's too long."

24. Mr. Lauria also regularly made sexually harassing comments to his employees such as saying how his staff "blew labor like a two dollar whore" and also showed Plaintiffs sexually harassing images on his cell phone, such as one which was a cartoon image of a man exposing his penis.

25. During Plaintiffs' employment at the McDonald's Sutphin Boulevard Location, the management office was a very small space with a computer for managers, an additional touch screen monitor where employees would clock in, a desk, files and a safe.

26. The safe was situated behind the desk where Mr. Lauria would stand up during the day as he used the computer for management.

27. At that location, employees were required to access the safe at various times during the day.

28. Rather than step out momentarily while his female managers accessed the safe, Mr. Lauria refused to move away from the desk even though the female managers asked him to.

29. Thus, Mr. Lauria would remain standing in front of the safe as the female managers bent down and reached between his legs to access the safe.

30. Because Mr. Lauria refused to move even after Plaintiffs asked him to, Plaintiffs were forced into positions where Mr. Lauria would engage in sexually harassing touchings of them.

Vanessa Harris

31. Vanessa Harris began working as a server for Defendants McDonald's on January 12, 2004.

32. In January 2012, Harris was forced to take medical leave for severe emotional and physical distress and anxiety, which she suffered as a result of sexual and racially hostile work environment at the Sutphin Boulevard Location.

33. Ms. Harris's employment with Defendants McDonald's ended in June 2012 when she was forced to resign due to the sexually and racially hostile work environment created at McDonald's Sutphin Boulevard Location.

34. In her eight years at McDonald's, Ms. Harris was a model employee.

35. She was promoted to a Department Manager III (First Assistant Manager) on November 16, 2010.

36. In November 2011, she was nominated for an Outstanding Assistant Manager Award at the Atlantic City McDonald's Convention.

37. In December 2011, she participated in the McDonald's Rising Star Program, and she has won awards at McDonald's Academy classes.

38. Ms. Harris was transferred to the Sutphin Boulevard Location on July 1, 2010.

39. Ms. Harris was subject to the racially hostile and harassing comments by Mr. Lauria as described above such as regularly calling his employees, including Plaintiffs,

"niggers", "niggas", "house niggers" and/or "my niggers", and frequently saying "what's up niggers", and "you niggers need to get it together."

40. Ms. Harris was subject to Mr. Lauria's forwarding a video text message to her, Ms. Mealer and other employees, showing black children dancing with a caption stating "It's Friday Niggas."

41. On another occasion, Ms. Harris was also subject to Mr. Lauria's sending another racist video text message to her, Ms. Mealer and other employees of a cartoon of a white man spraying a water hose at black children.

42. On another occasion when Mr. Lauria was driving Ms. Harris to another McDonald's location, he asked Ms. Harris which exit to take. When Ms. Harris answered that the exit was "N19", Mr. Lauria responded by saying that the "N" was for "Niggerville".

43. Ms. Harris was subject to Mr. Lauria's comments that "it was hotter than Africa." On one occasion, in response to Mr. Lauria making this comment, Ms. Harris objected and asked where Mr. Lauria was from. When Mr. Lauria informed her that he was Italian, Ms. Harris questioned him why he didn't say "It's hotter than Italy."

44. Despite Ms. Harris's complaints, Mr. Lauria continued his racially harassing comments as described earlier.

45. Ms. Harris was an excellent and hardworking employee with a bright future at McDonald's.

46. However, once Mr. Lauria became the store manager of the Sutphin Boulevard Location, his unrelenting sexual and racial harassment, which Defendants failed to investigate and/or remedy during her employment, had a devastating effect on Ms. Harris.

47. Ms. Harris requested that Defendants transfer her out of the Sutphin Boulevard Location but Defendants denied her requests.

48. Consequently, Ms. Harris suffered severe emotional and physical distress and anxiety due to being forced to work in the sexually and racially hostile working environment.

49. Defendants McDonald's has a policy against discrimination and harassment.

50. In a document provided to all employees entitled, "McDonald's Policy Against Discrimination and Harassment", managers are instructed to report occurrences of discrimination and/or harassment to the Operations Supervisor/Consultant or to the Human Resources Representative.

51. On January 3, 2011, Ms. Harris was so distraught by Mr. Lauria's racially harassing conduct that she walked out during her shift after Mr. Lauria refused to take any action when an employee called another co-worker a "bitch ass nigger" and threatened physical harm to Ms. Harris.

52. Ms. Harris reprimanded the employee for using such racially hostile language and when the crew member defied Ms. Harris, she directed him to speak with Mr. Lauria with the expectation that Mr. Lauria would support her and enforce McDonald's policy against harassment and discrimination policy.

53. Instead, Mr. Lauria took no action against the crew member.

54. After leaving the restaurant, Ms. Harris received a phone call from Mr. Bock.

55. During that phone call, Ms. Harris complained to Mr. Bock about Mr. Lauria's failure to take any action when the employee used the term "bitch as nigger" and threatened her.

56. Ms. Harris also complained to Mr. Bock about Mr. Lauria's frequent use of racial slurs and racist jokes at the Sutphin Boulevard Location.

57. On the same day, Ms. Harris attempted to contact and complain to McDonald's Human Resources Representative, Ebony Evans ("Ms. Evans"), but was told that Ms. Evans was away on vacation.

58. Next, also on the same day, Ms. Harris sent a text message to Mr. Bock, asking him who she should contact to complain when the HR Representative was away.

59. However, Mr. Bock failed to provide any guidance such as directing her to the HR Hotline and failed to take down the particulars of Ms. Harris's complaint. Instead, Mr. Bock blamed Ms. Harris for walking out and directed her to follow the work schedule.

60. On January 9, 2011, Ms. Harris finally spoke with Ms. Evans when she visited the Sutphin Boulevard Location. At that time, Ms. Harris relayed the details of racially hostile work environment perpetrated by Mr. Lauria in the workplace.

61. On or about the end of January 2011, Ms. Harris met with Ms. Evans, Mr. Bock and Mr. Lauria, and she reiterated her complaints against Mr. Lauria and asked to be transferred to another McDonald's restaurant but her request was denied.

62. At this same meeting, Mr. Bock stated that he stood behind any and all actions taken by Mr. Lauria at the Sutphin Boulevard Location.

63. Subsequently, Defendants failed to investigate and/or remedy Ms. Harris's complaints about a racially hostile work environment during her employment.

64. As a result, Mr. Lauria's racial harassment continued and occurred more frequently.

65. Furthermore, after Ms. Harris's complaints and her meeting with Ms. Evans, Mr. Bock and Mr. Lauria, Mr. Lauria began to also sexually harass Ms. Harris at the Sutphin Boulevard Location.

66. Thus, Ms. Harris was subject to sexually harassing conduct by Mr. Lauria which was both discriminatory and retaliatory.

67. Mr. Lauria subjected Ms. Harris to sexually harassing jokes as described above, sent her sexually harassing text messages, and engaged in sexually harassing touching and other behavior on a regular basis.

68. In weekly text messages, while communicating about work related matters, Mr. Lauria sent Ms. Harris messages saying, "I miss you" and "I love you."

69. On one occasion, he referred to Ms. Harris as "Brown Sugar" in a text message.

70. Mr. Lauria sexually harassed Ms. Harris when he touched Ms. Harris's buttocks, her back and her waist which occurred about three to four times each week as walked passed her in tight spaces around the restaurant.

71. Mr. Lauria took advantage of every opportunity to brush past Ms. Harris and to touch her body in a sexually harassing manner, including occasions when Ms. Harris had to access the restaurant's safe.

72. As described earlier, the safe was located in a tightly enclosed office from which Mr. Lauria refused to move out of to allow Ms. Harris access to the safe.

73. As a result, when Ms. Harris attempted to bend down and access the safe in the tight enclosure, she was forced into positions in which Mr. Lauria engaged in sexually harassing touchings.

74. Mr. Lauria often found excuses to be alone with Ms. Harris so he could continue to sexually harass Ms. Harris.

75. For example, Ms. Harris regularly commuted to and from work via LIRR. However, in an effort to be alone with Ms. Harris, Mr. Lauria often asked her to accompany him after work to another McDonald's location near Ms. Harris's home, for the purpose of obtaining restaurant supplies.

76. As Mr. Lauria's direct report, Ms. Harris felt obligated to accompany Mr. Lauria when asked to do so and during such rides, Mr. Lauria would continue to subject Ms. Harris to sexually harassing comments.

77. Defendants took no action to investigate and/or remedy the sexually and racially hostile work environment at their Sutphin Boulevard Location during Ms. Harris's employment.

78. As a result, the sexually and racially hostile work environment at the Defendants' Sutphin Boulevard Location continued, and to which Ms. Harris was subject.

79. Because of Defendants' failure to remedy the sexually and racially hostile work environment, Ms. Harris was caused to suffer severe anxiety and physical and emotional distress.

80. As a result, on January 17, 2012, Ms. Harris was forced to take medical leave from McDonald's, and in June 2012, Ms. Harris was forced to resign due to Defendants' racially and sexually hostile work environment at the Sutphin Boulevard Location.

Kimberly Mealer

81. Kimberly Mealer began working as a server for Defendants McDonald's in November 1997. On November 14, 2011, Ms. Mealer was unlawfully terminated by McDonald's after she complained about the sexually and racially hostile work environment at McDonald's Sutphin Boulevard Location.

82. After approximately fourteen years of dedicated service to McDonald's, Ms. Mealer worked her way up to Department Manager and on March 2011, she was transferred to the Sutphin Boulevard Location.

83. At the time of Ms. Mealer's transfer in March 2011, which was after Ms. Harris's January 2011 complaints, Defendants were already aware of Mr. Lauria's racially hostile behavior and the racially hostile work environment at the McDonald's Sutphin Boulevard Location.

84. After Ms. Mealer's March 2011 transfer, Ms. Mealer was indeed subjected to the racially hostile and also sexually hostile work environment, including the racially and sexually harassing conduct and disparate treatment by Mr. Lauria.

85. Ms. Mealer was exposed to repeated sexually harassing comments, actions, and/or touchings by Mr. Lauria on a daily basis.

86. On one occasion, Mr. Lauria showed Ms. Mealer an image on his cell phone of what appeared to be a penis to which Ms. Mealer objected.

87. About two or three times a week, Mr. Lauria also told Ms. Mealer jokes about the size of his penis including the one where he referred to himself as "Big Mike" to which Ms. Mealer also objected.

88. Ms. Mealer was also regularly subject to sexually harassing touchings by Mr. Lauria on her back, waist and buttocks.

89. As with Ms. Harris, Mr. Lauria also refused to step out of the small office space to allow Ms. Mealer to access the safe. Thus, like Ms. Harris, Ms. Mealer was subject to sexually harassing conduct by Mr. Lauria when she was forced to bend down and reach between Mr. Lauria's legs to access the safe which she had to do regularly.

90. Thus, despite Ms. Mealer's objections and complaints, Mr. Lauria persisted in creating a sexually hostile work environment.

91. At McDonald's Sutphin Boulevard Location, Ms. Mealer was also subject to the same frequent and regular racially harassing comments and the racially hostile work environment

described earlier, including but not limited to being sent racially hostile text messages such as a video text message of the black children dancing with the caption, "It's Friday Niggas," and a video text message with the cartoon of the black children being hosed down by a white man.

92. Ms. Mealer was also subject to racially disparaging comments at the beginning of each month that the restaurant would be busy because the African American customers had just received their "welfare checks."

93. Ms. Mealer told Mr. Lauria that she objected to his sexually and racially harassing and hostile comments and actions.

94. Nevertheless, Mr. Lauria continued his illegal behavior and Defendants failed to investigate or remedy the problem during Ms. Mealer's employment.

95. Instead, Defendants retaliated against Ms. Mealer for objecting to Mr. Lauria's unlawful conduct and the sexually and racially hostile work environment.

96. Indeed, on November 14, 2011, Defendants retaliated by terminating Ms. Mealer.

97. Defendants' stated reason for termination was Mr. Lauria's claim that he was not pleased with her pre-shift paperwork and floor-plan documents.

98. Yet, Ms. Mealer completed those assignments and did so in the same manner in which two white male managers, Tim Kregel and Ilya Volchyk, had completed them.

99. Still, neither Mr. Kregel nor Mr. Volchyk were reprimanded nor terminated by Defendants for completing their assignments in the same manner as Ms. Mealer.

100. Thus, Defendants' stated reason for terminating Ms. Mealer was not the actual grounds for termination at the Sutphin Boulevard Location; instead, Defendants stated reason for firing Ms. Mealer was a mere pretext for her unlawful retaliatory and discriminatory termination.

AS AND FOR PLAINTIFFS' FIRST CAUSE OF ACTION FOR VIOLATION OF 42 U.S.C. 2000, et seq., ("TITLE VII") AGAINST DEFENDANTS MCDONALD'S CORPORATION AND MCDONALD'S NEW YORK

101. Plaintiff Vanessa Harris was subjected to sexual harassment, discrimination based on race, a hostile work environment, retaliation and constructive discharge by Defendants McDonald's Corporation and McDonald's New York.

102. Plaintiff Kimberly Mealer was subjected to sexual harassment, discrimination based on race, a hostile work environment, retaliation, and retaliatory and discriminatory termination by Defendants McDonald's Corporation and McDonald's New York.

103. These actions are in direct violation of Title VII of the Civil Rights Act of 1964, as amended.

104. As a result of these illegal actions, Plaintiffs Vanessa Harris and Kimberly Mealer have been physically and emotionally damaged in an amount that is not presently calculable due to the ongoing and future effects. Plaintiffs have also been damaged by having lost wages and benefits due to their discriminatory constructive discharge and termination.

AS AND FOR PLAINTIFFS' SECOND CAUSE OF ACTION FOR VIOLATION OF THE NEW YORK STATE HUMAN RIGHTS LAW AGAINST DEFENDANTS MCDONALD'S CORPORATION AND MCDONALD'S NEW YORK

105. Plaintiff Vanessa Harris was subjected to sexual harassment, discrimination based on race, a hostile work environment, retaliation and constructive discharge by Defendants McDonald's Corporation and McDonald's New York.

106. Plaintiff Kimberly Mealer was subjected to sexual harassment, discrimination based on race, a hostile work environment, retaliation, and retaliatory and discriminatory termination by Defendants McDonald's Corporation and McDonald's New York.

107. These actions are in direct violation of the New York State Human Rights Law, Executive Law § 290 et. seq.

108. As a result of these illegal actions, Plaintiffs Vanessa Harris and Kimberly Mealer have been physically and emotionally damaged in an amount that is not presently calculable due to the ongoing and future effects. Plaintiffs have also been damaged by having lost wages and benefits due to their discriminatory constructive discharge and termination.

AS AND FOR PLAINTIFFS' THIRD CAUSE OF ACTION FOR VIOLATION OF THE NEW YORK STATE HUMAN RIGHTS LAW AGAINST DEFENDANT MICHAEL BOCK

109. Defendant Michael Bock aided and abetted Defendants McDonald's Corporation and McDonald's New York in discriminatory actions subjecting Plaintiff Vanessa Harris to sexual harassment, discrimination based on race, a hostile work environment, retaliation and constructive discharge.

110. Defendant Michael Bock aided and abetted Defendants McDonald's Corporation and McDonald's New York in discriminatory actions subjecting Plaintiff Kimberly Mealer to sexual harassment, discrimination based on race, a hostile work environment, retaliation, and retaliatory and discriminatory termination.

111. These actions are in direct violation of the New York State Human Rights Law, Executive Law § 290 et. seq.

112. As a result of these illegal actions, Plaintiffs Vanessa Harris and Kimberly Mealer have been physically and emotionally damaged in an amount that is not presently calculable due to the ongoing and future effects. Plaintiffs have also been damaged by having lost wages and benefits due to their discriminatory and retaliatory constructive discharge and termination.

AS AND FOR PLAINTIFFS' FOURTH CAUSE OF ACTION FOR VIOLATION OF THE NEW YORK CITY HUMAN RIGHTS LAW AGAINST DEFENDANTS MCDONALD'S CORPORATION AND MCDONALD'S NEW YORK

113. Plaintiff Vanessa Harris was subjected to sexual harassment, discrimination based on race, a hostile work environment, retaliation and constructive discharge by Defendants McDonald's Corporation and McDonald's New York.

114. Plaintiff Kimberly Mealer was subjected to sexual harassment, discrimination based on race, a hostile work environment, retaliation, and retaliatory and discriminatory termination by Defendants McDonald's Corporation and McDonald's New York.

115. These actions are in direct violation of the New York City Human Rights Law, New York City Administrative Code § 8-107.

116. As a result of these illegal actions, Plaintiffs Vanessa Harris and Kimberly Mealer have been physically and emotionally damaged in an amount that is not presently calculable due to the ongoing and future effects. Plaintiffs have also been damaged by having lost wages and benefits due to their discriminatory and retaliatory constructive discharge and termination.

AS AND FOR PLAINTIFFS' FIFTH CAUSE OF ACTION FOR VIOLATION OF THE NEW YORK CITY HUMAN RIGHTS LAW AGAINST DEFENDANT MICHAEL BOCK

117. Defendant Michael Bock aided and abetted Defendants McDonald's Corporation and McDonald's New York in discriminatory actions subjecting Plaintiff Vanessa Harris to

sexual harassment, discrimination based on race, a hostile work environment, retaliation and constructive discharge.

118. Defendant Michael Bock aided and abetted Defendants McDonald's Corporation and McDonald's New York in discriminatory actions subjecting Plaintiff Kimberly Mealer to sexual harassment, discrimination based on race, a hostile work environment, retaliation, and retaliatory and discriminatory termination.

119. These actions are in direct violation of the New York City Human Rights Law, New York City Administrative Code § 8-107.

120. As a result of these illegal actions, Plaintiffs Vanessa Harris and Kimberly Mealer have been physically and emotionally damaged in an amount that is not presently calculable due to the ongoing and future effects. Plaintiffs have also been damaged by having lost wages and benefits due to their discriminatory and retaliatory constructive discharge and termination.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand judgment and trial by jury on their first, second, third fourth, and fifth causes of action directing Defendants to compensate Plaintiffs for their economic loss, humiliation, embarrassment, physical and emotional distress, and mental anguish caused by Defendants' violations of the law alleged in this Complaint. Plaintiffs also seek an award of punitive damages where warranted that are commensurate with Defendants' ability to pay and so as to deter Defendants' future wanton, willful and malicious acts as outlined in the Complaint. Plaintiffs also seek costs and disbursements of this action, including reasonable attorney's fees, and any such other and further relief the Court may deem just and proper.

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Garden City, New York

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