

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

Index No:
Date purchased:

-----X
LAUREN SELF,

Plaintiff,

Plaintiff designates:
KINGS County as the
place of trial.

-against-

The basis of the venue is
Plaintiff's Residence

MIXMASTER, LLC, JONATHAN SHAPIRO
and JORDAN EDWARDS,

Defendants.

SUMMONS

Plaintiff resides at:
405 E 16th Street, #2A
Brooklyn, New York 11226

-----X
To the above named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the plaintiff's attorney 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: New York, New York
April 27, 2015

Respectfully submitted,

AKIN LAW GROUP PLLC
Attorneys for Plaintiff

/s/ Robert D. Salaman

By: Robert D. Salaman, Esq.
45 Broadway, Suite 1420
New York, New York 10006
(212) 825-1400

Defendants' Addresses:

MIXMASTER, LLC
(via Secretary of State)
42 Broadway
Lynbrook, New York 11563

JONATHAN SHAPIRO @ Place of Employment
42 Broadway
Lynbrook, New York 11563

JORDAN EDWARDS @ Place of Employment
42 Broadway
Lynbrook, New York 11563

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

Index No.:

-----X
LAUREN SELF,

VERIFIED COMPLAINT

Plaintiff,

-against-

MIXMASTER, LLC, JONATHAN SHAPIRO
and JORDAN EDWARDS,

Defendants.
-----X

Plaintiff LAUREN SELF, by her attorneys, AKIN LAW GROUP PLLC, upon information and belief, complains of the Defendants as follows:

1. Plaintiff LAUREN SELF complains pursuant to the laws of the State of New York and the Administrative Code of the City of New York, seeking damages to redress the injuries Plaintiff has suffered as a result of being sexually harassed, discriminated against, and retaliated against by her former employer on the basis of her **gender/sex**. Upon complaining about the sexual harassment, the hostile work environment and the discrimination, the Plaintiff was subjected to retaliation with further discrimination and hostilities resulting in her constructive termination.
2. That at all times hereinafter mentioned, Plaintiff LAUREN SELF (hereinafter "SELF") was and still is a resident of the County of Kings, State of New York.
3. That at all times hereinafter mentioned, Defendant MIXMASTER, LLC (hereinafter "MIXMASTER") was and is a domestic limited liability company duly organized and existing under and by virtue of the laws of the State of New York.
4. That at all times hereinafter mentioned, Defendant MIXMASTER was and is a domestic limited liability company duly authorized to conduct business in the State of New York.

5. That at all times hereinafter mentioned, Defendant MIXMASTER operates six (6) fashion retail locations and an online fashion store.
6. That at all times hereinafter mentioned, Defendant MIXMASTER headquarters are located at the premises designated and / or more commonly known as 42 Broadway, Lynbrook New York 11563.
7. That at all times hereinafter mentioned, Defendant MIXMASTER (through MIXOLOGY NYC I, LLC) runs/operates a retail fashion store at the premises designated and / or more commonly known as 1467 3rd Avenue, New York New York 10028.
8. That at all times hereinafter mentioned, Defendant MIXMASTER (through MIXOLOGY HEWLETT, LLC) runs/operates a retail fashion store at the premises designated and / or more commonly known as 1199 Broadway, Hewlett New York 11557.
9. That at all times hereinafter mentioned, Defendant MIXMASTER (through MIXOLOGY WOODBURY, LLC) runs/operates a retail fashion store at the premises designated and / or more commonly known as 7923 Jericho Turnpike, Woodbury New York 11797.
10. That at all times hereinafter mentioned, Defendant MIXMASTER (through MIXOLOGY SCARSDALE LLC) runs/operates a retail fashion store at the premises designated and / or more commonly known as 45 Spencer Place, Scarsdale New York 10583.
11. That at all times hereinafter mentioned, Defendant MIXMASTER (through MIXOLOGY RYE, LLC) runs/operates a retail fashion store at the premises designated and / or more commonly known as 120 South Ridge Street, Rye Brook New York 10573.
12. That at all times hereinafter mentioned, Defendant MIXMASTER (through MIXOLOGY WESTHAMPTON, LLC) runs/operates a retail fashion store at the premises designated and / or more commonly known as 148 Westhampton Beach, New York 11978.

13. That at all times hereinafter mentioned, Defendant JONATHAN SHAPIRO (hereinafter "SHAPIRO") was and is a resident of the State of New York.
14. That at all times hereinafter mentioned, Defendant SHAPIRO was employed by Defendant MIXMASTER.
15. That at all times hereinafter mentioned, Defendant SHAPIRO was and is an Owner of Defendant MIXMASTER.
16. That at all times hereinafter mentioned, Defendant SHAPIRO was and is a Founder of Defendant MIXMASTER.
17. That at all times hereinafter mentioned, Defendant SHAPIRO was and is the Chief Marketing Officer of Defendant MIXMASTER.
18. That at all times hereinafter mentioned, Defendant SHAPIRO was and is an agent, servant and/or employee of Defendant MIXMASTER.
19. That at all times hereinafter mentioned, Defendant SHAPIRO worked for the Defendants at the premises designated and / or more commonly known as 1199 Broadway, Hewlett New York 11517.
20. That at all times hereinafter mentioned, Defendant SHAPIRO worked for the Defendants at the premises designated and / or more commonly known as 42 Broadway, Lynbrook NY 11563.
21. That at all times hereinafter mentioned, Defendant JORDAN EDWARDS (hereinafter "EDWARDS") was and is a resident of the State of New York.
22. That at all times hereinafter mentioned, Defendant EDWARDS was and is employed by Defendant MIXMASTER.

23. That at all times hereinafter mentioned, Defendant EDWARDS was and is an Owner of Defendant MIXMASTER.
24. That at all times hereinafter mentioned, Defendant EDWARDS was and is the President of Defendant MIXMASTER.
25. That at all times hereinafter mentioned, Defendant EDWARDS was and is the Chief Operating Officer of Defendant MIXMASTER.
26. That at all times hereinafter mentioned, Defendant EDWARDS was and is an agent, servant and/or employee of Defendant MIXMASTER.
27. That at all times hereinafter mentioned, Defendant EDWARDS worked for the Defendants at the premises designated and / or more commonly known as 45 North Village, Rockville Centre NY 11570.
28. That at all times hereinafter mentioned, Defendant EDWARDS worked for the Defendants at the premises designated and / or more commonly known as 42 Broadway, Lynbrook NY 11563.
29. On or about July 21, 2014, Plaintiff SELF commenced employment with the Defendants.
30. That at all times hereinafter mentioned, Plaintiff SELF was employed by the Defendants as Director of Operations for Defendant MIXMASTER.
31. From the commencement of her employment until approximately April 2015, Plaintiff SELF worked for the Defendants at the premises designated and / or more commonly known as 1199 Broadway, Hewlett New York 11557.
32. From approximately March 2015 until her constructive termination in April 2015, Plaintiff SELF worked for the Defendants at the premises designated and / or more commonly known as 42 Broadway, Lynbrook NY 11563.

33. Plaintiff SELF also worked for the Defendants at the premises designated and / or more commonly known as 30 Greenwich Ave, Unit #6E, New York, New York 10011.
34. Plaintiff SELF also worked for the Defendant at the premises designated and / or more commonly known as Piers 92 94 located at 711 12th Avenue, New York New York 10019.
35. Plaintiff SELF also worked for the Defendant at the premises designated and / or more commonly known as Javitz Center located at 655 W 34th Street, New York New York 10001.
36. Upon commencing employment with the Defendants, Plaintiff SELF earned approximately \$40,000 per year in annual salary plus 15% of net profits from the Defendant MIXMASTER pop-up shop store – store 1 (a total of approximately \$60,000 per year).
37. Plaintiff SELF was a stellar employee during her employment with the Defendants.
38. That at all times herein relevant, Defendant SHAPIRO was a supervisor and/or manager of Plaintiff SELF with regard to her employment with the Defendants.
39. That at all times herein relevant, Plaintiff SELF was in a position subordinate to Defendant SHAPIRO with regard to her employment with the Defendants.
40. That at all times herein relevant, Plaintiff SELF would be given directives and take work orders from Defendant SHAPIRO in the course of her employment with the Defendants.
41. That at all times herein relevant, Defendant EDWARDS was a supervisor and/or manager of the Plaintiff SELF with regard to her employment with the Defendants.
42. That at all times herein relevant, Plaintiff SELF was in a position subordinate to Defendant EDWARDS with regard to her employment with the Defendants.

43. That at all times herein relevant, Plaintiff SELF would be given directives and take work orders from Defendant EDWARDS in the course of her employment with the Defendants.
44. That starting shortly after the commencement of her employment, the Defendants subjected Plaintiff SELF to numerous acts of sexual harassment, unlawful discrimination, unlawful retaliation and unlawful employment practices, including but not limited to the following:

- a. Plaintiff SELF had contact with Defendant SHAPIRO and Defendant EDWARDS on an almost daily basis; at various times throughout the day, Defendant SHAPIRO would approach and sexually harass Plaintiff SELF.
- b. At various times throughout the day, Defendant SHAPIRO would make unwelcome sexual comments and innuendos to Plaintiff SELF.
- c. Defendant SHAPIRO directed unwelcome sexual comments to Plaintiff SELF when she worked for the Defendants in Hewlett, NY, Lynbrook, NY and New York, NY.
- d. For example, in August 2014, Plaintiff SELF was booking travel for a Mixology buying trip in Las Vegas later that month. Without invitation, Defendant SHAPIRO asked Plaintiff SELF if she could hire a girl for him in his room for the trip.
- e. Throughout Plaintiff SELF's employment with the Defendants, Defendant SHAPIRO made comments about the size of Defendant EDWARDS' penis and the size of his own penis.
- f. Plaintiff SELF found these comments highly inappropriate for the workplace.
- g. On or about October 6, 2014, Plaintiff SELF returned to work following an overseas trip. **Upon her return, Defendant SHAPIRO asked Plaintiff SELF if she had been filled up with enough cum to last until the next trip.**
- h. In November and December 2014, Plaintiff SELF worked with a part-time intern for the Defendants. Defendant SHAPIRO made unwelcome sexual comments about the part-time intern to Plaintiff SELF on an ongoing and pervasive basis. **For instance, Defendant SHAPIRO asked Plaintiff SELF if she liked her thick ass and commented about how he isn't really in to an ass that thick.**
- i. Defendant SHAPIRO would often comment to Plaintiff SELF about "flicking the bean."
- j. On or about March 6, 2015, Defendant SHAPIRO informed Plaintiff SELF (by phone) that his recent surgery was successful and nothing would be in the way so he can date Bianca (Plaintiff SELF's friend who was interviewing for a position with the Defendants).
- k. On or about March 17, 2015, posters featuring models wearing Mixology clothing were hung in the Lynbrook, New York office. **Defendant SHAPIRO told Plaintiff SELF (and other Mixology employees) that he was going to**

masturbate to them when everyone leaves at 6:00 and that there will be cum all over the walls.

- l. The very next day – March 18, 2015, Defendant SHAPIRO asked Plaintiff SELF about what a boy's "expectation is" on a date. Plaintiff SELF responded that it is up to every girl independently. Defendant SHAPIRO was unconvinced by the answer, pressing Plaintiff SELF with questions like, "Well what about you?", "Do you have an expectation?" and "When is it okay?"
- m. Plaintiff SELF found these questions highly offensive for the workplace.
- n. Nonetheless, Defendant SHAPIRO pressed on, detailing to Plaintiff SELF how Defendant EDWARDS was dating a "super-hot French girl" until he broke off the relationship when he was informed that she did not want her children to be circumcised.
- o. Shortly thereafter, Defendant SHAPIRO informed Plaintiff SELF that she needed to call the Defendants' accountant Carl Dindial. Defendant SHAPIRO asked Plaintiff SELF to "find out if Carl is circumcised" while she was on the phone.
- p. Plaintiff SELF felt humiliated, powerless, and ashamed when Defendant SHAPIRO would continue to persist on making sexual comments and engaging in a hostile work environment.
- q. Unable to take the sexual harassment any further, Plaintiff SELF told Defendant SHAPIRO to not make comments like that because they are very unprofessional and personally make her feel uncomfortable.
- r. Instead of taking Plaintiff SELF's complaint seriously, Defendant SHAPIRO openly mocked Plaintiff SELF, telling her (and announcing it to the entire Mixology office) that she was the Director of Circumcision and should write operations about it.
- s. The sexual harassment by the Defendants was not only directed at Plaintiff SELF, but also was directed at other female employees.
- t. For instance, in September 2014, Caity Lepore (Mixology employee) underwent breast enhancement surgery. In the weeks immediately following the surgery, Defendant SHAPIRO asked Ms. Lepore, "So, how are the new twins doing?" [referring to Ms. Lepore's breasts]. Furthermore, Defendant SHAPIRO asked other employees in the Mixology office if they had seen a picture of Ms. Lepore's new breasts yet and if he could see them.
- u. **In approximately mid-December 2014, Defendant SHAPIRO asked Alison Bodner (Mixology employee) if she puts her textbook on her boyfriend's chest so she can ride him while she's studying.** Defendant SHAPIRO made this comment in the middle of the workday with much of the staff present.
- v. Additionally, Defendant SHAPIRO referred to Jamie Elia (Mixology employee) as "squirter" and/or "squirrelles".
- w. Defendant SHAPIRO often commented about Emma Davis' (Mixology employee) "big red bush", "fire crotch" and "that carpet matching the drapes."
- x. When considering Brittany Nicole Lucas for a modeling position with the Defendants, Defendant SHAPIRO told Plaintiff SELF how Ms. Lucas can definitely stay at my place and asked open-ended questions like if her rate comes with a blowjob.

- y. In another instance, Defendant SHAPIRO told Blake Frank (Defendant MIXMASTER employee), "I told you that you didn't need to go to traffic court. You could have just given him a blowjob."
- z. On a separate occasion, Defendant SHAPIRO told Bashel Lubarsky (Mixology employee) that her shirt made her look like a stripper.
- aa. Not only did Defendant SHAPIRO engage in sexual harassment, but the hostile work environment also included derogatory comments made about transsexuals and homosexuals.
- bb. By way of example, in August 2014, Plaintiff SELF worked on a Mixology photoshoot with a makeup artist who happened to be transgender. Defendant SHAPIRO mocked the transgender makeup artist for her transgender status during the shoot and thereafter.
- cc. Additionally, Defendant SHAPIRO individually and the Defendants collectively by way of their employee openly said the derogatory term, "faggy" while in the workplace.
- dd. Unable to endure the harassment and discrimination any further, Plaintiff SELF gathered the courage and complained to Defendant EDWARDS on March 19, 2015, regarding Defendant SHAPIRO'S discriminatory conduct and sexual harassment.
- ee. In response to Plaintiff SELF's complaint, Defendant EDWARDS told her that this was not the first time he heard complaints about Defendant SHAPIRO and pleaded for her not to sue, though he would understand if a lawsuit was commenced.
- ff. Despite Defendant EDWARDS "plea", Plaintiff SELF was never given assurances from the Defendants that the situation would be rectified or an investigation would be conducted.
- gg. Rather, following her complaint to Defendant EDWARDS, the Defendants began to blatantly retaliate against Plaintiff SELF, ultimately resulting in her constructive termination.
- hh. Defendant EDWARDS ensured that Defendant SHAPIRO would not be disciplined and began to target/retaliate against Plaintiff SELF for filing a complaint.
- ii. The Defendants reduced Plaintiff SELF's responsibilities in retaliation for filing a complaint of sexual harassment and discrimination. By way of example, the Defendants took away Plaintiff SELF's responsibilities to pay NET 10 vendor invoices (previously one of Plaintiff SELF's most regular and important responsibilities).
- jj. Also, the Defendants took away Plaintiff SELF's responsibility to assist Defendant EDWARDS in filling new positions with the company. This responsibility was handed to Daniella Contreras (Defendant MIXMASTER employee), in retaliation for Plaintiff SELF filing a complaint of sexual harassment.
- kk. Furthermore, the Defendants transferred Plaintiff SELF's responsibility to coordinate and execute the transfer of merchandise out of the Mixology pop-up shop into retail stores to Randi Spellman (Defendant MIXMASTER employee), in retaliation for filing a complaint.

ll. Additionally, the Defendants required Plaintiff SELF to attend a meeting in connection with untrue complaints made against her for supposed "insubordination." Coincidentally, these complaints were only being raised with Plaintiff SELF for the first time within days of her sexual harassment complaint.

mm. On April 19, 2015, unable to endure the sexual harassment, discrimination and retaliation any further, Plaintiff SELF was constructively terminated from her employment with the Defendants.

nn. As a result of the above, Plaintiff SELF was subjected to a continued course of discrimination, harassment, and hostile work environment.

45. Defendants unlawfully harassed, discriminated against and retaliated against Plaintiff SELF.
46. Defendants treated Plaintiff SELF differently because of her sex.
47. Plaintiff SELF's situation at her job was intolerable as a result of the discrimination by Defendants to which she was subjected, and no reasonable person in Plaintiff SELF's position could be expected to continue working under those conditions.
48. Defendants' unwanted hostile actions created a hostile working environment which no reasonable person could be expected to tolerate.
49. Throughout Plaintiff's employment with Defendants, Plaintiff would protest and complain to Defendants about this unlawful conduct.
50. Despite said complaints and protests, Defendants continued to unlawfully discriminate against and harass the Plaintiff.
51. During Plaintiff's employment with the Defendants, Plaintiff was and continued to be regularly exposed to a discriminatory, offensive, and hostile work environment until her discharge.
52. Defendants' actions and conduct were and are intentional and intended to harm the Plaintiff.

53. After Plaintiff protested to Defendants, Plaintiff became the subject of discriminatory retaliation by the Defendants.
54. The Defendants have caused damage and injury to the Plaintiff by first subjecting her to sexual harassment and a hostile work environment and then again by protecting the individual that caused and created the hostile work environment while retaliating against her.
55. Plaintiff has been unlawfully discriminated against, was humiliated, and has been degraded and belittled; and as a result suffers loss of rights, emotional distress, loss of income, earnings and caused to sustain personal injuries.
56. As a result of Defendants actions, Plaintiff felt extremely humiliated, degraded, victimized, embarrassed, and emotionally distressed.
57. As a result of the Defendants discriminatory and intolerable treatment, Plaintiff suffered severe emotional distress.
58. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer the loss of income, the loss of a salary, bonuses, benefits and other compensation which such employment entails, and Plaintiff has also suffered future pecuniary losses, emotional pain, suffering, inconvenience, loss of enjoyment of life, and other non-pecuniary losses. Plaintiff has further experienced severe emotional and physical distress.
59. As a result of the above, Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower Courts.
60. As Defendants conduct has been willful, reckless, outrageous, intentional, and/or malicious, Plaintiff also demands punitive damages in an amount which exceeds the jurisdictional limits of all lower Courts.

**AS A FIRST CAUSE OF ACTION FOR
DISCRIMINATION UNDER NEW YORK STATE LAW**

61. Plaintiff repeats, reiterates and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein at length.
62. Executive Law § 296 provides that it shall be an unlawful discriminatory practice: (a) For an employer or licensing agency, because of the age, race, creed, color, national origin, sexual orientation, military status, sex, disability, genetic predisposition or carrier status, or marital status of any individual, to refuse to hire or employ or to bar or to discharge from employment such individual or to discriminate against such individual in compensation or in terms, conditions or privileges of employment.
63. Defendants engaged in an unlawful discriminatory practice by taking adverse employment action and otherwise discriminating against the Plaintiff because of her sex and engaging in sexual harassment and a hostile work environment.
64. That as a direct result of the foregoing, the Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower Courts.

**AS A SECOND CAUSE OF ACTION FOR
DISCRIMINATION AND RETALIATION
UNDER NEW YORK STATE LAW**

65. Plaintiff repeats, realleges, and restates each and every paragraph above as if said paragraphs were more fully set forth herein at length.
66. New York State Executive Law §296(7) provides that it shall be an unlawful discriminatory practice: "For any person engaged in any activity to which this section applies to retaliate or discriminate against any person because [s]he has opposed any practices forbidden under this article."

67. Defendants engaged in an unlawful discriminatory practice by retaliating, continuing and escalating the discrimination and hostile work environment to which the Plaintiff was subjected, and otherwise discriminating against the Plaintiff because of Plaintiff's opposition to the unlawful employment practices of Defendants.
68. Defendant engaged in an unlawful discriminatory practice by retaliating against the Plaintiff for making a complaint regarding Defendants' violation of New York State Executive Law.
69. That as a direct result of the foregoing, the Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower Courts.

**AS A THIRD CAUSE OF ACTION FOR DISCRIMINATION
UNDER THE NEW YORK CITY ADMINISTRATIVE CODE**

70. Plaintiff repeats, realleges, and restates each and every paragraph above as if said paragraphs were more fully set forth herein at length.
71. The Administrative Code of City of NY § 8-107 [1] provides that "It shall be an unlawful discriminatory practice: "(a) For an employer or an employee or agent thereof, because of the actual or perceived age, race, creed, color, national origin, **gender**, disability, marital status, sexual orientation or alienage or citizenship status of any person, to refuse to hire or employ or to bar or to discharge from employment such person or to discriminate against such person in compensation or in terms, conditions or privileges of employment."
72. Defendants engaged in an unlawful discriminatory practice in violation of New York City Administrative Code Title 8, §8-107(1)(a) by actually taking adverse employment action, creating and maintaining discriminatory working conditions, and otherwise

discriminating against the Plaintiff because of her sex and engaging in sexual harassment and a hostile work environment.

73. That as a direct result of the foregoing, the Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower Courts.

**AS A FOURTH CAUSE OF ACTION FOR
DISCRIMINATION AND RETALIATION
UNDER THE NEW YORK CITY ADMINISTRATIVE CODE**

74. Plaintiff repeats, realleges, and restates each and every paragraph above as if said paragraphs were more fully set forth herein at length.
75. The New York City Administrative Code Title 8, §8-107(1)(e) provides that it shall be unlawful discriminatory practice: "For an employer . . . to discharge . . . or otherwise discriminate against any person because such person has opposed any practices forbidden under this chapter. . . ."
76. Defendants engaged in an unlawful discriminatory practice in violation of New York City Administrative Code Title 8, §8-107(1)(e) by retaliating, continuing and escalating the discrimination and hostile work environment to which the Plaintiff was subjected, and otherwise discriminating against the Plaintiff because of Plaintiff's opposition to the unlawful employment practices of Defendants.
77. Defendants engaged in an unlawful discriminatory practices by retaliating against the Plaintiff for making a complaint regarding Defendants violation of New York City Administrative Code.
78. That as a direct result of the foregoing, the Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower Courts.

AS A FIFTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

- 79. Plaintiff repeats, realleges, and restates each and every paragraph above as if said paragraphs were more fully set forth herein at length.
- 80. Defendants engaged in extreme and outrageous conduct.
- 81. Defendants intended to cause, and/or disregard the substantial actions of their agents and employees, causing severe emotional distress to the Plaintiff.
- 82. That at all times hereinafter mentioned, there exists a causal connection between the Defendants' conduct and the injuries sustained by the Plaintiff.
- 83. That as a result of said conduct, Plaintiff suffered and continues to suffer from severe mental, emotional, and psychological distress.
- 84. That as a direct result of the foregoing, the Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower Courts.

AS A SIXTH CAUSE OF ACTION FOR
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

- 85. Plaintiff repeats, realleges, and restates each and every paragraph above as if said paragraphs were more fully set forth herein at length.
- 86. Defendants breached a duty owed directly to the Plaintiff that either endangered Plaintiff's physical safety or caused Plaintiff to fear for her own safety.
- 87. As a result of said conduct, Plaintiff suffered and suffers from severe emotional distress.
- 88. That as a direct result of the foregoing, the Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower Courts.

INJURY AND DAMAGES

89. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer the loss and/or partial loss of a career and the loss and/or partial loss of a salary, bonuses, benefits and other compensation which such employment entails, out-of-pocket medical expenses and Plaintiff has also suffered future pecuniary losses, emotional pain, suffering, inconvenience, injury to reputation, loss of enjoyment of life, and other non-pecuniary losses. Plaintiff has further experienced severe emotional and physical distress.

WHEREFORE, Plaintiff respectfully requests a judgment against the Defendants:

- A. Declaring that the Defendants engaged in unlawful employment practices prohibited by the New York State Common Law and New York State Executive Law §296 et. Seq.;
- B. Declaring that the Defendants engaged in unlawful employment practices prohibited by The New York City Administrative Code Title 8, §8-107 et. Seq.;
- C. Declaring that the Defendants harassed, discriminated against, retaliated against, and discharged/alterd the terms and conditions of her employment on the basis of her sex;
- D. Awarding damages to the Plaintiff for all lost wages and benefits, retroactive to the date of her constructive termination, resulting from Defendants unlawful employment practices;
- E. Awarding Plaintiff compensatory damages for mental, emotional and physical injury, distress, pain and suffering and injury to her reputation in an amount that exceeds the jurisdictional limit of all lower courts;
- F. Awarding Plaintiff punitive damages;
- G. Awarding Plaintiff attorney's fees, costs and expenses; and
- H. Awarding Plaintiff such other and further relief as the Court may deem equitable, just and proper to remedy the Defendants' unlawful employment practices.

Dated: New York, New York
April 27, 2015

Respectfully submitted,

AKIN LAW GROUP PLLC
Attorneys for Plaintiff

/s/ Robert D. Salaman

By: Robert D. Salaman, Esq.
45 Broadway, Suite 1420
New York, New York 10006
(212) 825-1400

INDIVIDUAL VERIFICATION

STATE OF NEW YORK }
 } ss.
COUNTY OF NEW YORK }

I, LAUREN SELF, being duly sworn, deposes and says;

I am the Plaintiff in the within action and am over the age of eighteen years;

I have read the foregoing SUMMONS AND COMPLAINT, and know the contents thereof;
the same is true to my own knowledge, except as to the matters therein stated to be alleged on
information and belief, and as to those matters I believe them to be true.

The grounds of my belief as to matters not stated upon my own knowledge are as follows: I
am the plaintiff in the within action, investigation and conversation with my attorneys.



LAUREN SELF

Sworn to before me on this
27th day of April 2015



Notary Public/State of New York

ROBERT D SALAMAN
Notary Public, State of New York
No. 026A6293308
Qualified in New York County
Commission Expires December 09, 2017

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

Index No.:

-----X
LAUREN SELF,

Plaintiff,

-against-

MIXMASTER, LLC, JONATHAN SHAPIRO
and JORDAN EDWARDS,

Defendants.

-----X

SUMMONS and VERIFIED COMPLAINT

AKIN LAW GROUP PLLC
Attorneys for Plaintiff
45 Broadway, Suite 1420
New York, NY 10006
Tel: (212) 825-1400
Fax: (212) 825-1440