

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

PAUL HAGGIS,

Plaintiff,

v.

HALEIGH BREEST,

Defendant.

INDEX NO.

SUMMONS

TO THE ABOVE-NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED and required to answer the complaint in this action and to serve a copy of your answer on the Plaintiff's Attorneys within twenty (20) days after the service of this summons, exclusive of the day of service, or within thirty (30) days after service is complete if this summons is not personally delivered to you within the State of New York. In the case of your failure to answer, judgment will be taken against you by default for the relief demanded in the complaint.

DATED: New York, New York
December 15, 2017

MITCHELL SILBERBERG & KNUPP LLP

By: /s/ Christine Lepera
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Attorneys for Plaintiff Paul Haggis

Plaintiff designates New York County as the place of trial.
The basis of venue is the Plaintiff's residence in New York County.

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COMPLAINT

Plaintiff Paul Haggis (“Plaintiff”), by his attorneys Mitchell Silberberg & Knupp LLP, for his Complaint against Defendant Haleigh Breest (“Defendant”), alleges, on information and belief, as follows:

PRELIMINARY STATEMENT

1. In today’s world, headlines pour down like rain every day with “explosive” new claims and allegations of sexual misconduct and impropriety, particularly targeted at the Hollywood male “elite.” Of course, this environment of support and freedom of expression provides a *positive* forum and voice—for those who actually have been wronged.

2. However, on the darker side, this maelstrom of media attention, coupled with the immediate guilty verdict from the court of public opinion and the utter and complete damnation of anyone accused of any sexual misconduct, has created an opportunity for persons whose motives and intentions are not so pure, and who are looking for a ride on this cultural wave to take advantage of persons at the center of this narrative. That is this case.

3. Unfortunately, Defendant Haleigh Breest has sought to extract many *millions* of dollars from the Plaintiff, an Oscar-winning producer, director and writer. Defendant claims she is entitled to a seven figure pay day as a “settlement,” without which she will file a claim against

Plaintiff falsely accusing him of an alleged act of purported “gender violence” against her one night, almost five years ago. That claim describes that act with mere conclusory allegations, yet included other lurid details that were obviously intended for maximum media impact. There was no such “violence,” then or ever.

4. What’s more, Defendant’s threatened allegations of physical force fly in the face of Plaintiff’s then-current and well-documented serious back problem, which would have precluded his ability to exert such force; Plaintiff had surgery to correct that medical issue shortly before the night Defendant claimed this “violence” occurred, requiring him to wear a post-surgical back brace continuously at the time. He was under a restriction against severe exertion and was unable to lift anything more than a light grocery bag during his recovery period.

5. Plaintiff, who is also known for voicing his negative views about Scientology, of which he was once a member, has many times been on the receiving line of false accusations about him. He is not going to allow the false narrative threatened by the Defendant to frighten him into capitulating to these outrageous and wholly baseless demands, and is instead going to confront his accuser and seek all available remedies for the harm she has inflicted (and intends to continue to inflict) on him.

6. Despite the fact that Defendant and Plaintiff never worked together, Defendant has sought to compare herself to victims of longstanding harassment or abuse in the workplace, victims who have lost opportunities for advancement and been subject to retaliatory acts. The comparison is pure fiction.

7. The clear goal of Defendant's demand for such an absurd amount of money from Plaintiff is to scare him into giving this windfall to her to avoid his public hanging, *i.e.* a loss of all of his good will and reputation, not to mention business opportunities and career. In other words, Defendant thinks she can capitalize on the current headlines, believing she will have to prove nothing, and will only have to threaten to destroy Plaintiff. This is, quite simply, extortion.

8. Since Defendant has threatened to file and publicize lurid factual (and false) assertions against Plaintiff unless he agrees to let her effectively bankrupt him, Plaintiff has experienced severe emotional distress, while simultaneously trying to go on with his life without letting it paralyze him. The crippling anxiety caused by Defendant's outrageous threats is amplified by the potential negative effects those threats could have on Plaintiff's extensive charitable efforts, which support thousands of children in impoverished communities. It is one thing to live in fear of losing one's career, but quite another to bear the anxiety caused by the knowledge that Defendant's threats could destroy Plaintiff's ability to continue to effectively raise money for these children.

9. Indeed, Defendant's threatened statements were designed to inflict the utmost terror upon Plaintiff, and were presented in the most graphically lurid (false) ways. The tactic of using such extreme emotional abuse was clearly designed to best insure the ransom would be paid. In other words, Defendant clearly intended to inflict the utmost emotional distress upon the Plaintiff in order to make her economic plan work. Defendant's conduct is outrageous and indecent. Plaintiff will not allow either the false narrative or the extortion to succeed.

I. THE PARTIES

10. Plaintiff Paul Haggis is an individual residing in New York County, New York.

11. Defendant Haleigh Breest is an individual residing in New York County, New York.

II. JURISDICTION AND VENUE

12. This Court has personal jurisdiction over Defendant pursuant to N.Y. C.P.L.R. §§ 301 and 302.

13. Venue is proper in New York County pursuant to N.Y. C.P.L.R. § 503(a) as at least one of the parties resides in New York County.

III. FACTUAL BACKGROUND

14. Plaintiff is an award-winning screenwriter, producer and director of film and television.

15. Defendant has worked as a publicist for a company that hosts events for clients in the film industry.

16. Plaintiff and Defendant occasionally interacted at film-industry events and developed what Plaintiff believed was a friendly, and at times flirtatious, relationship.

17. On November 16, 2017—nearly five years after the claimed act of “gender violence”—Plaintiff received a letter from an attorney representing Defendant.

18. This letter enclosed a not-yet filed Complaint accusing Plaintiff of a purported “Crime of Violence Motivated by Gender” and violations of various provisions of the New York Penal Code, and directed Plaintiff to contact Defendant’s attorneys if he was “interested in discussing a resolution of this matter without resort to litigation”

19. Plaintiff, through his attorney, soon thereafter contacted Defendant's attorney in order to vigorously dispute the factual and legal basis of Defendant's threatened claims.

20. During a telephone call on December 11, 2017, Defendant's attorney proceeded to demand a payment of \$9 million in order to avoid the threatened lawsuit, attempting to draw comparisons between Defendant's claim and completely unrelated—but highly public—sexual harassment claims against large corporations.

21. Since learning of Defendant's extortionate threat, Plaintiff has suffered from extreme emotional distress, including severe anxiety, crippling back pain, constant fear, depression, and insomnia.

FIRST CAUSE OF ACTION

Intentional Infliction of Emotional Distress

22. Plaintiff repeats and realleges the allegations in paragraphs 1 through 21.

23. Defendant's course of conduct described herein constitutes outrageous conduct exceeding all bounds of decency.

24. Defendant intended to and did cause Plaintiff to suffer severe emotional distress, or recklessly disregarded the substantial probability of causing such severe emotional distress.

25. As a result of Defendant's outrageous conduct, Plaintiff has suffered severe emotional distress, including without limitation severe anxiety, crippling back pain, depression, humiliation, embarrassment, fear, and insomnia.

WHEREFORE, Plaintiff demands judgment against Defendant as follows:

- (a) An award of general and compensatory damages in an amount to be determined at trial, together with interest;
- (b) An award of punitive damages; and
- (c) Such other and further relief as the court deems just and proper.

DATED: New York, New York
December 15, 2017

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