

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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MELANIE HARDY,

Case No.:

Plaintiff,

COMPLAINT

-against-

JURY TRIAL DEMANDED

THE CITY OF NEW YORK, and THE HUMAN
RESOURCES ADMINISTRATION OF THE CITY OF
NEW YORK

Defendants.

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Plaintiff Melanie Hardy, by her attorneys, Filippatos PLLC, hereby alleges against Defendants The City of New York (“NYC”) and The Human Resources Administration Of The City Of New York (“HRA”) as follows:

NATURE OF THE CASE

1. Since 2017, Plaintiff has been unlawfully discriminated against due to her gender, which is female. Plaintiff's job performance is exemplary and yet Plaintiff is being paid less than her similarly-situated male comparators, some of whom have years less experience than Plaintiff. Furthermore, HRA and NYC have failed to promote Plaintiff, as Plaintiff's job title is that of Administrative Space Analyst (“ASA”) despite her performing the job responsibilities of a Deputy Director.

2. As a result of Defendants' unlawful conduct, Plaintiff hereby brings this action to obtain redress from Defendants for violating her civil rights under the Federal laws, and laws of the State and City of New York, including, but not limited to, 42 U.S.C. §§ 2000e, *et seq.* (hereinafter referred to as “Title VII”), New York Executive Law §§ 290, *et seq.* (hereinafter referred to as “New York State Human Rights Law”) New York City Administrative Code and

Charter, §§ 8-101, *et seq.* (hereinafter referred to as “New York City Human Rights Law”), 29 U.S.C. §§ 206, *et seq.* (enforced through the Fair Labor Standards Act and the penalty provisions therein, and hereinafter referred to as “Equal Pay Act”), N.Y. Labor Law §§ 194, *et seq.* (enforced through the New York Labor Law and the penalty provisions therein, hereinafter referred to as “New York Equal Pay Law”) and other relevant statutes.

PARTIES, JURISDICTION, VENUE, AND ADMINISTRATIVE PREREQUISITES

3. During Plaintiff’s employment by Defendants, she was a resident of the State of New York.

4. At all times relevant hereto, Plaintiff was paid an annual base salary between \$76,750 - \$92,894 by Defendants.

5. At all times relevant hereto, Plaintiff was an employee of HRA; working in the City and State of New York.

8. At all times material, HRA is an agency of the City of New York located at 150 Greenwich Street, New York, New York, 10007.

9. Upon information and belief, HRA employs over 50,000 individuals on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Plaintiff is proceeding herein.

10. Upon information and belief, at all times relevant hereto, City of New York is located at One Centre Street, New York, NY 10007.

11. Upon information and belief, NYC employs over 250,000 individuals on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Plaintiff is proceeding herein.

12. This Court has subject matter jurisdiction over this matter pursuant to 28 USC

§1331.

13. This Court has supplemental jurisdiction over the claims that Plaintiff has brought under state and city law pursuant to 28 USC § 1367.

14. Venue is proper in this district, pursuant to 28 U.S.C. §1391(b)(2), as a substantial part of the acts complained of herein occurred in this district.

15. On or about May 17, 2024, Plaintiff filed a complaint with the Equal Employment Opportunity Commission (“EEOC”) regarding Defendant’s discriminatory harassment and retaliatory actions. (**Exhibit A**, EEOC Charge).

16. On July 18, 2024, Defendants filed a Position Statement with the EEOC. (**Exhibit B**, Defendants’ Position Statement).

17. On September 12, 2024, Plaintiff filed a Rebuttal with the EEOC. (**Exhibit C**, Plaintiff’s Rebuttal).

18. After 180 days had passed since Plaintiff filed her EEOC Charge, Plaintiff requested Notice of Right to Sue (“NORTS”) from the EEOC on November 21, 2024.

19. However, Plaintiff was informed that the EEOC could not process her request because her Charge had been transferred to the New York State Division of Human Rights per their work-sharing agreement and that the parties would be contacted when the transfer is complete.

20. Yet, despite Plaintiff’s counsel’s numerous efforts to contact the New York State Division of Human Rights regarding Plaintiff’s Charge, including emails and telephone calls on October 23, 2024, November 7, 2024, November 21, 2024, December 6, 2024, December 18, 2024, January 23, 2025, February 11, 2025, March 31, 2025, April 1, 2025, and June 17, 2025, the matter has still not been processed.

21. It has now been nearly one year since Plaintiff filed her Charge of Discrimination with the EEOC and pursuant to Title VII, she should have been permitted to proceed to federal court six (6) months ago. The only reason Plaintiff has not yet received a NORTS is due to administrative delays outside of her control.

22. While typically, it is an administrative requirement that a plaintiff receive NORTS prior to filing a complaint, this Court can, and should, waive the requirement. *See Pietras v. Bd. of Fire Comm'rs*, 180 F.3d 468, 473-74 (2d Cir. 1999) (quoting *Zipes v. Trans World Airlines, Inc.*, 455 U.S. 385, 393 (1982)) (“a plaintiff’s failure to obtain a notice-of-right-to-sue-letter is not a jurisdictional bar, but only a precondition to bringing a Title VII action **that can be waived by the parties or the court.**” (emphasis added)).

23. The longer Plaintiff must wait for her day in court, the greater the harm that Plaintiff suffers, and Plaintiff should not be penalized for a waivable prerequisite, which is outside her control.

FACTUAL ALLEGATIONS

24. Plaintiff has been an employee of the City of New York since 1988, when she began working as a Technical Support Aide in HRA.

25. Since beginning her tenure as a City employee, she has worked her way up both the civil service ladder and in-house titles, giving her a breadth of experience throughout her more than thirty five (35) years of service.

26. In 2017, she was promoted from Principal Administrative Associate to Administrative Space Analyst (“ASA”) and became a Regional Director in the unit known as General Support Services/Building Management Services.

27. With this promotion, her base salary increased from \$61,109 to \$76,750 in 2017.

28. Upon information and belief, however, her salary in 2017 was at or near the minimum salary for ASAs, despite her many years of relevant experience.

29. At that time, in 2017, she was the only female ASA in her unit¹, and Plaintiff was paid less than her male peers despite performing substantially similar work on a day-to-day basis.

30. For example, in and around 2017, one of the other ASAs was Kenneth Smith, who was paid nearly \$21,000 more than Plaintiff despite the fact that they held the same title, in the same unit, and performed substantially similar work.

31. Furthermore, soon after Plaintiff began working as an ASA, she assumed the responsibilities of the unit's Deputy Director, Louis Bonets, after he retired.

32. However, even though she assumed his responsibilities, she was still being paid nearly \$12,000 less than Mr. Bonets and was never given the title of Deputy Director.

33. Since that time, Plaintiff has not only been paid less than her male counterparts, but she has been required to perform the work of a Deputy Director without being given this title and without being compensated for the additional tasks assigned to her.

34. For example, from approximately 2017 to 2022, Plaintiff often handled time and leave issues for her unit, which is typically one of the responsibilities of a Deputy Director.

35. Plaintiff was also involved in all hiring, evaluations, and other personnel decisions, similar to a Deputy Director.

36. Plaintiff could not go on vacation at the same time as her unit's Director, Everidith Massey, because the employees would report to Plaintiff in Ms. Massey's absence. This included

¹ While Plaintiff was the only female ASA in her unit at that time, HRA as an agency is predominantly female, with current estimates being that approximately 70.5% of the HRA workforce is female. (See **Exhibit D**, "Pay Disparities in the NYC Municipal Workforce," New York City Council Data Team, April 2024). Not only is HRA predominantly female but it has also been found to have the lowest median salary when compared to all other agencies of the City of New York. See Id. at 25. This occupational segregation and disparate pay has had compounding effects on Plaintiff throughout her career at HRA.

providing oversight and supervision directly and/or indirectly to approximately fourteen (14) building managers, six (6) support staff, two (2) ASAs, and fifty-five to sixty (55-60) HRA leased locations, as well as court locations and Department of Citywide Administrative Services (DCAS) locations.

37. This is also one of the responsibilities of a Deputy Director, but during the time period from 2017-2022, Plaintiff's unit did not have a Deputy Director. Instead, Plaintiff was required to perform these tasks without being properly compensated for these additional duties and responsibilities.

38. Furthermore, to this day, Plaintiff continues to be paid less than her male peers despite not only performing substantially similar work on a day-to-day basis but having substantially more relevant experience.

39. As of 2024, Plaintiff's base annual salary is \$92,894, but the male ASAs in her unit, Rafael Cardona and Hank Memminger, are paid substantially more than Plaintiff at an annual base salary of \$100,553 and \$97,494 respectively.

40. Mr. Cardona was promoted to ASA in 2023 and he has six (6) years less experience than Plaintiff as an ASA, and yet his base annual salary is more than \$7,500 more than Plaintiff's.

41. Mr. Memminger was also promoted to ASA in 2022 which means he also has six (6) years less experience than Plaintiff as an ASA, and yet his base annual salary is more than \$4,500 more than Plaintiff's.

42. Not only do Mr. Cardona, Mr. Memminger, and Plaintiff perform substantially similar work, in the same title, in the same unit, on a day-to-day basis, but Plaintiff supervised Mr. Cardona and Mr. Memminger prior to their promotions to ASA.

43. And yet, both Mr. Cardona and Mr. Memminger are paid substantially more than Plaintiff.

44. This disparity not only impacts Plaintiff's base annual salary, but also the rate she is paid for overtime, which is substantially less than Mr. Cardona and Mr. Memminger, as well as the salary on which her pension will be calculated, which will be substantially less than Mr. Cardona and Mr. Memminger and will therefore continue causing financial harm to Plaintiff for the rest of her life.

45. As further evidence that these disparities are caused by sex/gender, the only other ASA in Plaintiff's unit is Cheryl Labelle, who was promoted to ASA in 2022 and therefore she also has more experience as an ASA than Mr. Cardona and Mr. Memminger.

46. And yet, Ms. Labelle's base annual salary is more than \$7,500 less than Mr. Cardona's and more than \$4,500 less than Mr. Memminger's, despite the fact that she also performs substantially similar work, in the same title, in the same unit, on a day-to-day basis as them.

47. As a direct result of the actions and inactions of Defendants, Plaintiff has suffered injuries and damages and continues to suffer such injuries, the full extent of which is not yet known, including emotional distress, mental anguish and injury to her employment opportunities including but not limited to increased pay, advancement in title, and promotion. She has also suffered deprivation of civil liberties, and loss of professional opportunities.

AS FOR THE FIRST CAUSE OF ACTION
AGAINST DEFENDANTS FOR UNLAWFUL
DISCRIMINATION IN VIOLATION OF TITLE VII

48. Plaintiff repeats and reiterates each and every allegation set forth above with the same force and effect as if more fully set forth at length herein.

49. Plaintiff is a woman, and therefore a member of a protected class, who was qualified for her position with New York City Human Resources Administration, and yet she suffered numerous adverse employment actions, including but not limited to disparate pay by Defendants under circumstances giving rise to an inference of discriminatory intent.

50. Plaintiff was paid a fraction of what her male counterparts earned, male counterparts who performed the same or similar job functions, despite the fact that she is as qualified or more qualified than them.

51. Plaintiff's base annual salary increased from Sixty-One Thousand One Hundred and Nine Dollars (\$61,109) to Seventy-Six Thousand and Seven Hundred and Fifty Dollars (\$76,750) in 2017, which was at or near the minimum required salary for Administrative Space Analysts.

52. Upon information and belief, the base annual salaries of Defendants' male employees who perform similar jobs received compensation of more than Twelve Thousand Dollars (\$12,000) to Twenty-One Thousand Dollars (\$21,000) more than Plaintiff.

53. As of 2024, Plaintiff's annual base salary is Ninety-Two Thousand Eight Hundred and Ninety-Four Dollars (\$92,894), while male counterparts who are performing the same or similar duties as her, but with less experience, are being paid annual base salaries which are at least Seven Thousand Five Hundred Dollars (\$7,500) more than Plaintiff's.

54. Defendants' failure to provide Plaintiff with support, resources, payment or

respect equal to that of males doing equal or comparable work is discriminatory and violates Title VII.

55. By the acts and practices described above, Defendants have discriminated against Plaintiff because of her gender in violation of Title VII.

56. Defendants knew or should have known that their actions constituted unlawful discrimination on the basis of gender and/or showed reckless disregard for Plaintiff's statutorily protected rights.

57. As a direct result of the actions of Defendants', Plaintiff has suffered injuries and damages and continues to suffer such injuries, including embarrassment, humiliation, emotional distress, mental anguish, and loss of wages, salaries, benefits, and promotional opportunities.

AS FOR THE SECOND CAUSE OF ACTION
AGAINST DEFENDANTS FOR UNLAWFUL DISCRIMINATION
IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS LAW

58. Plaintiff repeats and reiterates each and every allegation set forth above with the same force and effect as if more fully set forth at length herein.

59. Plaintiff is a woman, and therefore a member of a protected class, who was qualified for her position with New York City Human Resources Administration, and yet she suffered numerous adverse employment actions, including but not limited to disparate pay by Defendant's under circumstances giving rise to an inference of discriminatory intent.

60. Plaintiff was paid a fraction of what her male counterparts, who performed the same or similar job functions, earned, despite the fact that she is as qualified or more qualified than them.

61. Plaintiff's annual base salary increased from Sixty-One Thousand One Hundred and Nine Dollars (\$61,109) to Seventy-Six Thousand and Seven Hundred and Fifty Dollars

(\$76,750) in 2017, which was at or near the minimum required salary for Administrative Space Analysts.

62. Upon information and belief, the base salaries of Defendant's male employees who perform similar jobs received compensation of more than Twelve Thousand Dollars (\$12,000) to Twenty-One Thousand Dollars (\$21,000) more than Plaintiff.

63. As of 2024, Plaintiff's annual base salary is Ninety-Two Thousand Eight Hundred and Ninety-Four Dollars (\$92,894), while male counterparts who are performing the same or similar duties as her, but with less experience, are being paid annual base salaries which are at least Seven Thousand Five Hundred Dollars (\$7,500) more than Plaintiff's.

64. Defendant's failure to provide Plaintiff with support, resources, payment or respect equal to that of males doing equal or comparable work is discriminatory and violates NYSHR.

65. By the acts and practices described above, Defendant s h a v e discriminated against Plaintiff because of her gender in violation of NYSHR.

66. Defendants knew or should have known that their actions constituted unlawful discrimination on the basis of gender and/or showed reckless disregard for Plaintiff's statutorily protected rights.

67. As a direct result of the actions of Defendants', Plaintiff has suffered injuries and damages and continues to suffer such injuries, including embarrassment, humiliation, emotional distress, mental anguish, and loss of wages, salaries, benefits, and promotional opportunities.

AS FOR THE THIRD CAUSE OF ACTION
AGAINST DEFENDANTS FOR UNLAWFUL DISCRIMINATION
IN VIOLATION OF NEW YORK CITY HUMAN RIGHTS LAW

68. Plaintiff repeats and reiterates each and every allegation set forth above with the same force and effect as if more fully set forth at length herein.

69. Plaintiff is a woman and therefore a member of a protected class, who was qualified for her position with HRA, and yet she suffered numerous adverse employment actions, including but not limited to disparate pay by Defendant's under circumstances giving rise to an inference of discriminatory intent.

70. Plaintiff was paid a fraction of what her male counterparts earned, male counterparts who performed the same or similar job functions, despite the fact that she is as qualified or more qualified than them.

71. Defendant's failure to provide Plaintiff with support, resources, payment or respect equal to that of males doing equal or comparable work is discriminatory and violates the New York City Human Rights Law.

72. By the acts and practices described above, Defendants have discriminated against Plaintiff because of her gender in violation of the New York City Human Rights Law.

73. Defendants knew or should have known that their actions constituted unlawful discrimination on the basis of gender and/or showed reckless disregard for Plaintiff's statutorily protected rights.

74. As a direct result of the actions of Defendants, Plaintiff has suffered injuries and damages and continues to suffer such injuries, including embarrassment, humiliation, emotional distress, mental anguish, and loss of wages, salaries, benefits, and promotional opportunities.

AS FOR THE FOURTH CAUSE OF ACTION
AGAINST DEFENDANTS FOR UNEQUAL PAY
IN VIOLATION OF EQUAL PAY ACT

75. Plaintiff repeats and reiterates each and every allegation set forth above with the same force and effect as if more fully set forth at length herein.

76. Plaintiff alleges that Defendants paid Plaintiff substantially less than Plaintiff's male counterparts who performed the same or similar work on jobs requiring equal skill, effort, and responsibility under similar working conditions.

77. Plaintiff's base salary increased from Sixty-One Thousand One Hundred and Nine Dollars (\$61,109) to Seventy-Six Thousand and Seven Hundred and Fifty Dollars (\$76,750) in 2017, which was at or near the minimum required salary for Administrative Space Analysts.

78. Upon information and belief, the base salaries of Defendant's male employees who perform similar jobs received compensation of more than Twelve Thousand Dollars (\$12,000) to Twenty-One Thousand Dollars (\$21,000) more than Plaintiff.

79. As of 2024, Plaintiff's annual base salary is Ninety-Two Thousand Eight Hundred and Ninety-Four Dollars (\$92,894), while male counterparts who are performing the same or similar duties as her, but with less experience, are being paid annual base salaries which are at least Seven Thousand Five Hundred Dollars (\$7,500) more than Plaintiff's.

80. Upon information and belief, male counterparts who performed the same or similar work, with less experience and skill, but were compensated significantly more by Defendant's include but are not limited to Kenneth Smith, Rafael Cardona and Hank Memminger.

81. Plaintiff alleges that there is no legitimate basis for Defendants failure to compensate her equally to her male counterparts who were performing the same or similar duties as her.

82. As a direct result of the actions of Defendants', Plaintiff has suffered injuries and damages and continues to suffer such injuries, including embarrassment, humiliation, emotional distress, mental anguish, and loss of wages, salaries, benefits, and promotional opportunities.

AS FOR THE FIFTH CAUSE OF ACTION
AGAINST DEFENDANTS FOR UNEQUAL PAY
IN VIOLATION OF NEW YORK STATE EQUAL PAY LAW

83. Plaintiff repeats and reiterates each and every allegation set forth above with the same force and effect as if more fully set forth at length herein.

84. Plaintiff alleges that Defendant's paid Plaintiff substantially less than Plaintiff's male counterparts who performed the same or similar work on jobs requiring equal skill, effort, and responsibility under similar working conditions.

85. Plaintiff's base salary increased from Sixty-One Thousand One Hundred and Nine Dollars (\$61,109) to Seventy-Six Thousand and Seven Hundred and Fifty Dollars (\$76,750) in 2017, which was at or near the minimum required salary for Administrative Space Analysts.

86. Upon information and belief, the base salaries of Defendant's male employees who perform similar jobs received compensation of more than Twelve Thousand Dollars (\$12,000) to Twenty-One Thousand Dollars (\$21,000) more than Plaintiff.

87. As of 2024, Plaintiff's annual base salary is Ninety-Two Thousand Eight Hundred and Ninety-Four Dollars (\$92,894), while male counterparts who are performing the same or similar duties as her, but with less experience, are being paid annual base salaries which are at least Seven Thousand Five Hundred Dollars (\$7,500) more than Plaintiff's.

88. Upon information and belief, male counterparts who performed the same or similar work, with less experience and skill, but were compensated significantly more by Defendant's

include but are not limited to Kenneth Smith, Rafael Cardona, and Hank Memminger.

89. Plaintiff alleges that there is no legitimate basis for Defendant's failure to compensate her equally to her male counterparts who were performing the same or similar duties as her.

90. As a direct result of the actions of Defendant's, Plaintiff has suffered injuries and damages and continues to suffer such injuries, including embarrassment, humiliation, emotional distress, mental anguish, and loss of wages, salaries, benefits, and promotional opportunities.

AS FOR THE SIXTH CAUSE OF ACTION
AGAINST DEFENDANTS FOR FAILURE TO PROMOTE
IN VIOLATION OF TITLE VII

91. Plaintiff repeats and reiterates each and every allegation set forth above with the same force and effect as if more fully set forth at length herein.

92. Plaintiff is a woman, and therefore a member of a protected class, who was qualified for her position with New York City Human Resources Administration, and yet she suffered numerous adverse employment actions, including but not limited to failure to promote by Defendants under circumstances giving rise to an inference of discriminatory intent.

93. Plaintiff was required to perform job responsibilities outside of the scope of her assigned role of ASA.

94. These additional responsibilities included, but are not limited to those of the Deputy Director, such as interviewing and hiring new employees, participating in high level communications, and supporting the department on the actual Deputy Directors behalf when the Deputy Director was out of the office.

95. Plaintiff performed these duties without being compensated for the additional work.

96. Defendant's failure to provide Plaintiff with support, resources, payment or respect equal to that of males doing equal or comparable work is discriminatory and violates Title VII.

97. By the acts and practices described above, Defendant's have discriminated against Plaintiff because of her gender in violation of Title VII.

98. Defendants knew or should have known that their actions constituted unlawful discrimination on the basis of gender and/or showed reckless disregard for Plaintiff's statutorily protected rights.

99. As a direct result of the actions of Defendants, Plaintiff has suffered injuries and damages and continues to suffer such injuries, including embarrassment, humiliation, emotional distress, mental anguish, and loss of wages, salaries, benefits, and promotional opportunities.

AS FOR THE SEVENTH CAUSE OF ACTION
AGAINST DEFENDANTS FOR FAILURE TO PROMOTE
IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS LAW

100. Plaintiff repeats and reiterates each and every allegation set forth above with the same force and effect as if more fully set forth at length herein.

101. Plaintiff is a woman, and therefore a member of a protected class, who was qualified for her position with New York City Human Resources Administration, and yet she suffered numerous adverse employment actions, including but not limited to failure to promote by Defendants under circumstances giving rise to an inference of discriminatory intent.

102. Plaintiff was required to perform job responsibilities outside of the scope of her assigned role of ASA.

103. These additional responsibilities included, but are not limited to those of the Deputy Director, such as interviewing and hiring new employees, participating in high level

communications, and supporting the department on the actual Deputy Directors behalf when the Deputy Director was out of the office.

104. Plaintiff performed these duties without being compensated for the additional work.

105. Defendant's failure to provide Plaintiff with support, resources, payment or respect equal to that of males doing equal or comparable work is discriminatory and violates Title VII.

106. By the acts and practices described above, Defendants have discriminated against Plaintiff because of her gender in violation of New York State Human Rights Law.

107. Defendants knew or should have known that their actions constituted unlawful discrimination on the basis of gender and/or showed reckless disregard for Plaintiff's statutorily protected rights.

108. As a direct result of the actions of Defendants, Plaintiff has suffered injuries and damages and continues to suffer such injuries, including embarrassment, humiliation, emotional distress, mental anguish, and loss of wages, salaries, benefits, and promotional opportunities.

AS FOR THE EIGHTH CAUSE OF ACTION
AGAINST DEFENDANTS FOR FAILURE TO PROMOTE
IN VIOLATION OF NEW YORK CITY HUMAN RIGHTS LAW

109. Plaintiff repeats and reiterates each and every allegation set forth above with the same force and effect as if more fully set forth at length herein.

110. Plaintiff is a woman, and therefore a member of a protected class, who was qualified for her position with New York City Human Resources Administration, and yet she suffered numerous adverse employment actions, including but not limited to failure to promote by Defendants under circumstances giving rise to an inference of discriminatory intent.

111. Plaintiff was required to perform job responsibilities outside of the scope of her assigned role of ASA.

112. These additional responsibilities included, but are not limited to those of the Deputy Director, such as interviewing and hiring new employees, participating in high level communications, and supporting the department on the actual Deputy Directors behalf when the Deputy Director was out of the office.

113. Plaintiff performed these duties without being compensated for the additional work.

114. Defendant's failure to provide Plaintiff with support, resources, payment or respect equal to that of males doing equal or comparable work is discriminatory and violates Title VII.

115. By the acts and practices described above, Defendants have discriminated against Plaintiff because of her gender in violation of New York City Human Rights Law.

116. Defendants knew or should have known that their actions constituted unlawful discrimination on the basis of gender and/or showed reckless disregard for Plaintiff's statutorily protected rights.

117. As a direct result of the actions of Defendants, Plaintiff has suffered injuries and damages and continues to suffer such injuries, including embarrassment, humiliation, emotional distress, mental anguish, and loss of wages, salaries, benefits, and promotional opportunities.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests a judgment against Defendants:

A. Declaring that Defendants engaged in unlawful employment practices prohibited by Title VII; the NYSHRL; the NYCHRL; in that Defendants discriminated and retaliated against

Plaintiff on the basis of her gender (female);

B. Awarding damages to Plaintiff for all lost wages and benefits resulting from Defendants' unlawful discrimination and to otherwise make her whole for any losses suffered as a result of such unlawful employment practices;

C. Awarding Plaintiff compensatory damages for mental, emotional, and physical injury, distress, pain and suffering, and injury to his reputation in an amount to be proven at trial;

D. Awarding Plaintiff punitive damages;

E. Awarding Plaintiff attorneys' fees, costs, disbursements, and expenses incurred in the prosecution of this action; and

F. Awarding Plaintiff such other and further relief as the Court may deem equitable, just, and proper to remedy Defendants' unlawful employment practices.

JURY DEMAND

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

Dated: June 26, 2025
New York, New York

Respectfully submitted,

FILIPPATOS PLLC

By: /s/Erica T. Healey-Kagan
Erica T. Healey-Kagan
425 Madison Ave, Suite 1502
New York, New York 10017
T./F: 914.984.1111, Ext 402
ehealeykagan@filippatoslaw.com
Counsel for Plaintiff