

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

.....X

MA GLINDA CHO,

Plaintiff,

Case No.:

**COMPLAINT**

**JURY TRIAL DEMAND**

- against -

TOURNEAU BUCHERER and ANGELINA  
PETROVA

Defendants.

.....X

Plaintiff Glinda Cho, by and through her attorneys, Filippatos PLLC, hereby allege against Defendants Tourneau Bucherer (“Tourneau” or the “Company”) and Angelina Petrova as follows:

**NATURE OF THE CASE**

1. Plaintiff brings this action alleging that Defendants have violated Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e, *et seq.* (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166) (“Title VII”); Section 1981 of the Civil Rights Act of 1866, 42 U.S.C. § 1981 (“§ 1981”); and the New York State Human Rights Law, New York State Executive Law, §§ 296 *et seq.* (“NYSHRL”).

2. Plaintiff seeks damages, as well as injunctive and declaratory relief, to redress the injuries she has suffered – physical, emotional and pecuniary – as a result of being discriminated and retaliated against by her employer on the basis of her race (Asian) and ethnicity (Filipino), whether actual or perceived.

**JURISDICTION, VENUE, AND ADMINISTRATIVE PREREQUISITES**

3. Jurisdiction of this Court is proper under 29 U.S.C. §§ 2617 and 28 U.S.C. §§ 1331 as Plaintiff allege claim pursuant to the Title VII and 42 U.S.C § 1981.

4. The Court has supplemental jurisdiction over Plaintiff's claims under state and local law pursuant to 28 U.S.C. § 1367(a).

5. Venue is proper in this district, pursuant to 28 U.S.C. § 1391(b), as Tourneau resides within the Southern District of New York, and a substantial part of the acts complained of herein occurred therein.

6. On or about January 22, 2025, Plaintiff filed a Charge of Discrimination with the U.S. Equal Employment Opportunity Commission ("EEOC").

7. On or about May 20, 2025, the EEOC issued Plaintiff Notice of Right to Sue.

**PARTIES**

8. Plaintiff Glinda Cho is a Filipino woman residing in the State of New York, Westchester County.

9. Plaintiff is a former employee of Defendant Tourneau.

10. At all times relevant hereto, Defendant Tourneau was and is a Foreign Limited Liability Company maintaining its principal place of business at 80 State Street, Albany, NY 12207.

11. Upon information and belief Defendant Tourneau employs approximately 500 individuals on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Plaintiff is proceeding herein.

12. At all times relevant hereto, Defendant Angelina Petrova held the title Store Director, and, as such, had the ability to affect the terms and conditions of Plaintiff's employment.

### **MATERIAL FACTS**

#### **I. Ms. Cho is Hired by Tourneau**

13. On or about February 2, 2024, Defendant Tourneau hired Plaintiff as an "Assistant Store Director" at Tourneau's Westchester location (the "Store").

14. In this capacity, she oversaw operations for a \$12 million luxury retail store, demonstrating exceptional leadership and strategic acumen. Her accomplishments included driving double-digit growth, implementing innovative client development initiatives, and fostering a team culture dedicated to delivering outstanding customer experiences.

15. Ms. Cho excelled in her position, earning consistent praise and positive feedback from the then-Store Director, Ernst Bien-Aime, for her exemplary performance and contributions to the store's success.

16. In March 2024, following the termination of two management personnel and one associate, Ms. Cho seized the opportunity to apply for the Store Director position, confident that her proven success and dedication had prepared her for the role.

17. In April 2024, her efforts were recognized when Mathieu Villot, Senior Vice President of Retail, appointed her as Interim Store Director.

18. This appointment gave Ms. Cho hope that the Company valued her contributions and viewed her as a strong candidate for the permanent Store Director role, marking what she believed was a pivotal step toward achieving her career aspirations.

19. On June 5, 2024, five months after applying for the Store Director position and

four months of serving as Interim Store Director, Ms. Cho followed up with Mr. Villot to inquire about the status of her candidacy.

20. Rather than addressing her concerns directly, Mr. Villot dismissed her inquiry, instructing her to focus on filling open Associate positions at the Store before any further discussion about her application.

21. Despite this, he commended Ms. Cho for her accomplishments in the Interim Store Director role and encouraged her to maintain her strong performance to further bolster her candidacy.

22. Ms. Cho took his words as both recognition of her success and a call to continue proving herself, despite the growing delay and lack of clear guidance.

23. In the months that followed, Ms. Cho continued to thrive as Interim Store Director, consistently meeting and exceeding the Store's monthly and quarterly performance goals.

24. Her leadership and strategic efforts ensured the Store's ongoing success, earning recognition during Mr. Villot's visits.

25. Each time, he complimented the Store's performance, a testament to Ms. Cho's unwavering commitment and ability to deliver exceptional results despite the uncertainty surrounding her candidacy for the permanent Store Director role.

## **II. Ms. Cho is Passed Up for a Promotion and the New Store Director Discriminates Against Her**

26. Despite Ms. Cho's unwavering efforts to prove herself as a capable leader, on August 26, 2024, she was informed by Mr. Villot that the Company had decided to hire a permanent Store Director.

27. The position, for which Ms. Cho had worked tirelessly and demonstrated her qualifications over several months, was given to an external candidate, Angelina Petrova.

28. This decision came as a significant disappointment to Ms. Cho, who had dedicated herself to excelling as Interim Store Director, consistently achieving and surpassing goals for the Store.

29. In her very first week as Store Director, Angelina Petrova began targeting Ms. Cho with discriminatory and condescending behavior, setting the tone for a hostile work environment.

30. On September 18, 2024, Ms. Petrova conducted a store inspection and instructed Ms. Cho and Boutique Manager Jeremy Vega to follow her throughout the walkthrough.

31. During this inspection, Ms. Petrova made disparaging remarks about the store's cleanliness, speaking in a noticeably condescending and demeaning tone.

32. Her comments were unwarranted and created an atmosphere of discomfort and tension for Ms. Cho and Mr. Vega.

33. Later that same day, Ms. Petrova called Ms. Cho and Mr. Vega into the back office, where her dismissive attitude escalated.

34. She chastised Mr. Vega for not meeting her for lunch on her first day, despite his explanation that he had a pre-scheduled meeting with a national director from the Omega brand.

35. Ms. Petrova dismissed his explanation and labeled his actions as "unacceptable," her tone continuing to exude hostility.

36. Turning her attention to Ms. Cho, Ms. Petrova questioned her past performance, despite Ms. Cho's proven track record of success. When Ms. Cho tried to defend her efforts, stating, "I worked really hard in the past several months," Ms. Petrova sarcastically retorted, "Did you?" in a belittling tone. The situation grew so tense that Mr. Vega had to intervene to diffuse the conversation.

37. These incidents set the stage for the ongoing hostility Ms. Cho would face at the hands of Ms. Petrova, marking the beginning of a pattern of discriminatory and demeaning behavior.

38. On September 30, 2024, Ms. Petrova's discriminatory actions escalated significantly during a meeting in her office, where she explicitly instructed Ms. Cho not to speak in her native language, Tagalog.

39. When Ms. Cho respectfully inquired if there had been any concerns raised about her use of multiple languages, or if any colleagues had reported an issue, Ms. Petrova dismissively responded, "No issue. In a professional setting we should speak the common language which is English," using an intimidating tone.

40. This directive was not only unnecessary but targeted, as Ms. Cho only spoke Tagalog in the back office or when assisting clients who specifically requested translations.

41. Her professionalism and ability to communicate effectively with both colleagues and customers were weaponized against her in an act that left her feeling demeaned and singled out.

42. Adding to the discriminatory nature of the interaction, Ms. Cho highlighted that other team members regularly spoke in other languages, such as Spanish, without consequence.

43. Ms. Petrova brushed off this fact, stating, "I did not observe it, so it does not matter," making it clear that her actions were selectively aimed at Ms. Cho. Later that same day, Ms. Petrova extended her discriminatory behavior by instructing another employee, Rosario Pinto, a 79-year-old cash office manager with 17 years of service at the Company, not to speak in her native language. This left Ms. Pinto feeling intimidated and deeply offended.

44. These actions were not only unjustified but indicative of a deliberate and pervasive attempt by Ms. Petrova to create an environment of hostility and exclusion.

45. By targeting Ms. Cho and Ms. Pinto based on their use of native languages, Ms. Petrova demonstrated a blatant disregard for inclusivity and respect, fostering a workplace climate marked by intimidation and discrimination.

46. These events further solidified the ongoing hostility Ms. Cho faced under Ms. Petrova's leadership.

### **III. Ms. Cho Makes a Protected Complaint to HR and Subsequently Faces Retaliation**

47. On October 11, 2024, Ms. Cho formally submitted a harassment and discrimination complaint to Human Resources ("HR"), detailing the hostile and discriminatory actions she had endured under Ms. Petrova's leadership.

48. Despite taking this step to address the ongoing mistreatment, the retaliation against Ms. Cho continued. On October 12, 2024, Ms. Cho sent an email to Ms. Petrova, transparently outlining a transaction error that had occurred during store operations, which Ms. Petrova initially acknowledged without issue.

49. However, while Ms. Cho was on vacation, she received a response in the same email thread in which Ms. Petrova wrongfully accused her of actions that did not occur and baselessly claimed that Ms. Cho had been dishonest.

50. This unfounded accusation not only added to the hostility Ms. Cho faced but also served as another attempt by Ms. Petrova to undermine her credibility.

51. On October 28, 2024, Ms. Cho met with Laura Mundell, the Director of HR, to discuss her harassment and discrimination complaint, as well as the false accusations made by Ms. Petrova.

52. Rather than addressing the core issues, Ms. Mundell minimized Ms. Petrova's behavior, suggesting that it was merely a reflection of her "different management style" and "different ways of communicating."

53. Ms. Mundell refused to acknowledge the discriminatory and harassing nature of Ms. Petrova's actions, instead framing the situation as an "opportunity" for improved communication.

54. Frustrated but undeterred, Ms. Cho sought clarification directly from Ms. Petrova on October 31, 2024, regarding the wrongful accusations.

55. Rather than engaging in a meaningful discussion, Ms. Petrova dismissed Ms. Cho's concerns entirely, patronizingly instructing her to "not use big words" when she referred to the accusations as wrongful.

56. These interactions further exemplified the discriminatory, retaliatory, and dismissive treatment Ms. Cho faced, both from her direct supervisor and the HR department that was supposed to protect her.

57. On November 1, 2024, Ms. Cho emailed Mr. Villot and HR to report concerns about declining team morale, which had been communicated to her by multiple store Associates.

58. A few hours later, Mr. Villot contacted Ms. Cho, requesting a meeting at the Company's headquarters in New York City to discuss her email.

59. On November 4, 2024, Ms. Cho attended the meeting with the hope of addressing the workplace issues she had raised, including the pervasive discrimination and harassment she was experiencing.



60. At the outset of the meeting, Mr. Villot invited Ms. Cho to share her concerns. She explained that during her recent absence, team morale had noticeably declined, as reported by three employees.

61. She also recounted a specific incident where she had attempted to collaborate with Ms. Petrova to address the issue of team morale, only to be met with sarcasm.

62. Ms. Cho described suggesting that all team members receive equal attention during status update meetings, to which Ms. Petrova sarcastically replied, “You can close the door too.” Ms. Cho highlighted how such behavior was unprofessional and contrary to the Company’s values.

63. Ms. Cho then reiterated her broader concerns, including the insults, discrimination, intimidation, and wrongful accusations she had endured in just three weeks under Ms. Petrova’s leadership.

64. While Mr. Villot acknowledged that some of her points were “valid,” he attempted to dismiss her experiences by suggesting they were a matter of “perception.”

65. He used an unrelated and hypothetical scenario—working in an environment where everyone spoke French—as an attempt to downplay the discriminatory language directive imposed by Ms. Petrova.

66. When Ms. Cho challenged the relevance of this analogy, Mr. Villot emphasized that Ms. Petrova had the authority to manage as she saw fit and accused Ms. Cho of “taking it personally.”

67. The conversation then took an abrupt and unsettling turn when Mr. Villot shifted focus to question Ms. Cho’s management of timecards—a practice she had handled since joining the company without prior issue.

68. Ms. Cho explained that she had received no indication that her role in managing timecards had changed under Ms. Petrova.

69. Nonetheless, Mr. Villot deemed it “unprofessional” and threatened HR involvement. He did not ask further questions about the harassment or discrimination concerns Ms. Cho raised, instead appearing to use the timecard issue as a pretext to intimidate her.

70. This meeting underscored the dismissive and retaliatory approach Ms. Cho faced from senior leadership when attempting to address legitimate workplace concerns.

71. As a result of the ongoing discrimination, harassment, and retaliation that Ms. Cho has endured under Ms. Petrova's leadership—compounded by the inaction of HR and Mr. Villot—her mental and physical well-being have significantly deteriorated.

72. Ms. Cho now suffers from severe depressive disorder, a condition that has profoundly impacted her quality of life and ability to function.

73. The persistent hostility and lack of support from the Company have left Ms. Cho feeling devalued and powerless, undermining the resilience and determination that have defined her career.

74. For Ms. Cho, the toll is particularly devastating given her journey. She immigrated to the United States from the Philippines in November 2016, seeking to build a better life through hard work and determination.

75. From her early days in retail to her rise to Assistant Store Director of a \$12 million luxury retail operation, Ms. Cho demonstrated an unrelenting commitment to excellence and a belief in the promise of opportunity.

76. Yet, instead of being recognized for her achievements, she was met with hostility, exclusion, and retaliation, eroding the sense of hope and belonging she had worked so hard to cultivate.

77. Despite Plaintiff's determination to remain optimistic about and committed to her career at Tourneau, the ruthless discrimination and retaliation she has suffered at her workplace has rendered her distraught and crestfallen. Indeed, Plaintiff's emotional distress is cognizable given the reality that the Company has allowed Ms. Petrova to openly express her discriminatory remarks towards Plaintiff without repercussion, while ignoring its obligations to seriously investigate Plaintiff's complaints of discrimination, and instead, terminating her employment for no valid reason. Instead of disciplining her harasser, Tourneau retaliated against Plaintiff. Due to her unlawful termination from the Company and the discrimination, harassment, and retaliation she has endured, Plaintiff now suffers from severe depressive disorder, a condition that has profoundly impacted her quality of life and ability to function.

78. Plaintiff's unwavering determination to pursue a career in luxury sales has been shattered by the relentless discrimination and subsequent retaliation she endured at Tourneau.

79. The emotional toll inflicted upon her is evident, leaving her distraught and deeply disheartened.

80. It is undeniably clear that Tourneau not only permitted but actively cultivated a discriminatory and hostile work environment, disregarding its obligations to thoroughly investigate and act in response to Plaintiff's complaints of discrimination.

81. Moreover, Tourneau repeatedly retaliated against Plaintiff, culminating in her unjust firing simply for having the courage to speak out against the discrimination she faced.

82. Tourneau's complete failure to foster a fair and inclusive workplace has had a severe impact on Plaintiff's well-being and outlook on her career.

83. As a result, Plaintiff prays that the EEOC thoroughly investigate her claims and return a finding of probable cause that she has been subjected to race-based (Asian) and ethnicity (Filipino) based discrimination and retaliation in violation of Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166 ("Title VII") and Section 1981 of the Civil Rights Act of 1866, 42 U.S.C. § 1981 ("§ 1981").

**FIRST CAUSE OF ACTION  
DISCRIMINATION UNDER TITLE VII**

84. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint as if fully set forth herein.

85. This claim is authorized and instituted pursuant to the provisions of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e, *et seq.*, for relief based upon the unlawful employment practices of the above-named Defendants. Plaintiff complains that Defendants violated Title VII's prohibition against discrimination in employment based, in whole or in part, upon Plaintiff's race (Asian) and ethnicity (Filipino), whether actual or perceived.

86. Defendants engaged in unlawful employment practices prohibited by 42 U.S.C. §§ 2000e, *et seq.*, by discriminating against Plaintiff because of her race (Asian) and ethnicity (Filipino), whether actual or perceived.

87. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages including but not limited to economic and pecuniary losses (past and future) – such as income, salary, benefits, bonuses, commission and other compensation that her employment entailed; severe emotional, psychological and physical stress, distress, anxiety,

pain and suffering; the inability to enjoy life's pleasures; and other non-pecuniary losses and special damages.

88. Accordingly, as a result of the unlawful conduct of, Plaintiff has been damaged as set forth herein and is entitled to the maximum compensation available to her under this law.

**SECOND CAUSE OF ACTION  
RETALIATION UNDER TITLE VII**

89. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint as if fully set forth herein.

90. This claim is authorized and instituted pursuant to the provisions of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e, *et seq.*, for relief based upon the unlawful employment practices of the above-named Defendants. Plaintiff complains that Defendants violated Title VII's prohibition against retaliation in employment based, in whole or in part, upon Plaintiff's race (Asian) and ethnicity (Filipino), whether actual or perceived.

91. Defendants engaged in unlawful employment practices prohibited by 42 U.S.C. §§ 2000e, *et seq.*, by retaliating against Plaintiff because of her race (Asian) and ethnicity (Filipino), whether actual or perceived.

92. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages including but not limited to economic and pecuniary losses (past and future) – such as income, salary, benefits, bonuses, commission and other compensation that her employment entailed; severe emotional, psychological and physical stress, distress, anxiety, pain and suffering; the inability to enjoy life's pleasures; and other non-pecuniary losses and special damages.

93. Accordingly, as a result of the unlawful conduct of Defendants, Plaintiff has been

damaged as set forth herein and is entitled to the maximum compensation available to her under this law.

**THIRD CAUSE OF ACTION**  
**DISCRIMINATION UNDER 42 U.S.C SECTION 1981**

94. Plaintiff repeats and realleges each and every allegation made in the above paragraph of this complaint as if fully set forth herein.

95. Pursuant to 42 U.S.C. § 1981: “All persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.”

96. Defendants engaged in unlawful employment practices prohibited by 42 U.S.C. § 1981, by discriminating Plaintiff because of her race (Asian) and ethnicity (Filipino).

97. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages including but not limited to economic and pecuniary losses; severe emotional, psychological and physical stress, distress, anxiety, pain and suffering; the inability to enjoy life's pleasures; and other non-pecuniary losses and special damages.

98. Accordingly, as a result of the unlawful conduct of Defendants, Plaintiff has been damaged as set forth herein and is entitled to the maximum compensation available to her under this law.

**FOURTH CAUSE OF ACTION**  
**RETALIATION UNDER 42 U.S.C SECTION 1981**

99. Plaintiff repeats and realleges each and every allegation made in the above paragraph of this complaint as if fully set forth herein.

100. Pursuant to 42 U.S.C. § 1981: “All persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.”

101. Defendants engaged in unlawful employment practices prohibited by 42 U.S.C. § 1981, by retaliating against Plaintiff for engaging in protected conduct.

102. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages including but not limited to economic and pecuniary losses; severe emotional, psychological and physical stress, distress, anxiety, pain and suffering; the inability to enjoy life's pleasures; and other non-pecuniary losses and special damages.

103. Accordingly, as a result of the unlawful conduct of Defendants, Plaintiff has been damaged as set forth herein and is entitled to the maximum compensation available to her under this law.

**FIFTH CAUSE OF ACTION**  
**DISCRIMINATION UNDER NYSHRL**

104. Plaintiff repeats and realleges each and every allegation made in the above paragraphs in this complaint as if fully set forth herein.

105. New York Executive Law § 296 provides that:

It shall be an unlawful discriminatory practice: "(a) For an employer or licensing agency, because of an individual's age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status, or domestic violence victim status, 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."

106. By the actions detailed above, among others, Defendants have discriminated against Plaintiff in violation of the NYSHRL by, *inter alia*, denying her the equal terms and conditions of employment and discriminating against her because of her race (Asian) and ethnicity (Filipino).

107. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages including but not limited to economic and pecuniary losses (past and future) – such as income, salary, benefits, bonuses, commission, and other compensation that her employment entailed; severe emotional, psychological and physical stress, distress, anxiety, pain and suffering; the inability to enjoy life's pleasures; and other non-pecuniary losses and special damages.

108. Accordingly, as a result of the unlawful conduct of Defendants set forth herein, Plaintiff has been damaged and is entitled to the maximum compensation available to her under this law, including, but not limited to, liquidated damages.



**SIXTH CAUSE OF ACTION**  
**RETALIATION UNDER NYSHRL**

109. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint as if fully set forth herein.

110. New York Executive Law § 296 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 he or she has opposed any practices forbidden under this article or because he or she has filed a complaint, testified, or assisted in any proceeding under this article.

111. By the actions detailed above, among others, Defendants have retaliated against Plaintiff based on her protected activities in violation of the NYSHRL, including by terminating Plaintiff's employment.

112. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages including but not limited to economic and pecuniary losses (past and future) – such as income, salary, benefits, bonuses, commission, and other compensation that her employment entailed; severe emotional, psychological and physical stress, distress, anxiety, pain and suffering; the inability to enjoy life's pleasures; and other non-pecuniary losses and special damages.

113. Accordingly, as a result of the unlawful conduct of Defendants set forth herein, Plaintiff has been damaged and is entitled to the maximum compensation available to her under this law, including, but not limited to, liquidated damages.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff respectfully requests a judgement against Defendants:

A. Declaring the Defendants engaged in unlawful employment practices prohibited by Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166 (“Title VII”) and Section 1981 of the Civil Rights Act of 1866, 42 U.S.C. § 1981 (“§ 1981”); and the New York State Human Rights Law, New York State Executive Law, §§ 296 *et seq.* ("NYSHRL").

B. Awarding damages to Plaintiff for all lost wages and benefits resulting from Defendant’s unlawful employment practices, and to otherwise make them 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 their reputation in an amount to be proven;

D. Awarding Plaintiff punitive damages;

E. Awarding Plaintiff liquidated damages;

F. Awarding Plaintiff attorneys’ fees, costs, and expenses incurred in the prosecution of the action; and

G. 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: August 14, 2025  
New York, New York

Respectfully submitted,

**FILIPPATOS PLLC**



By: \_\_\_\_\_  
Erica T. Healey-Kagan  
425 Madison Ave, Suite 1502  
New York, New York  
T/F: 914.984.1111  
[ehealeykagan@filippatoslaw.com](mailto:ehealeykagan@filippatoslaw.com)  
*Attorneys for Plaintiff*