

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

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VICTORIA SMITH, a/k/a VIC SMITH,	:	
	:	
Plaintiff,	:	Case No.: 1:25-cv-8580
	:	
v.	:	
	:	<u>COMPLAINT</u>
LA LIGNE LLC, MOLLY HOWARD, <i>individually and</i>	:	
<i>in her professional capacity</i> , MEREDITH MELLING,	:	
<i>individually and in her professional capacity</i> , VALERIE	:	<u>Jury Trial Demanded</u>
MACAULAY, <i>individually and in her professional</i>	:	
<i>capacity</i> ,	:	
Defendants.	:	
-----X	:	

Plaintiff, VICTORIA SMITH a/k/a VIC SMITH (“Plaintiff” or “Mx. Smith”), by their attorneys, FILIPPATOS PLLC, hereby complains of Defendants, upon personal knowledge as well as information and belief, by alleging and averring as follows:

NATURE OF THE CASE

1. This is a case against La Ligne, LLC (“La Ligne”), Molly Howard, Meredith Melling, and Valerie Macaulay (“Individual Defendants”) (hereinafter collectively “Defendants”). This action is brought by Filippatos PLLC on behalf of Plaintiff, Victoria Smith a/k/a Vic Smith (“Plaintiff” or “Mx. Smith”), who seeks to hold Defendants accountable under federal and state law outlawing workplace discrimination or retaliation on the basis of sex and gender.

2. Specifically, Plaintiff brings this action alleging that Defendants have violated, inter alia, 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”); the New York State Human Rights Law, New York State Executive Law, §§ 296 et seq. (“NYSHRL”); and the New York City Human Rights Law, Administrative Code §§8-107, et seq. (“NYCHRL”) by discriminating against Mx. Smith in the terms and conditions of their

employment on the basis of their sex/gender and retaliating against them after they raised protected complaints of discrimination in the workplace by summarily terminating their employment.

3. Plaintiff seeks damages, as well as injunctive and declaratory relief, to redress the injuries they have suffered – physical, emotional and pecuniary – as a result of being discriminated and retaliated against by their employer on the basis of their sex and gender.

JURISDICTION AND VENUE

4. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 because Plaintiff is asserting claims arising under federal law, specifically Title VII of the Civil Rights Act of 1991, Pub. L. No. 102-166 (“Title VII”).

5. This Court has supplemental jurisdiction over Plaintiff’s NYSHRL and NYCHRL claims pursuant to 28 USC § 1367.

6. Venue in the Southern District of New York is proper pursuant to 28 U.S.C. § 1391 because Defendants are headquartered in New York, New York. Moreover, a substantial part of the events and omissions giving rise to the claims occurred in this district.

ADMINISTRATIVE REQUIREMENTS

7. Plaintiff has satisfied all administrative prerequisites for the filing of this action.

8. Prior to the filing of this action, Plaintiff timely filed a Charge of Discrimination with the U.S. Equal Employment Opportunity Commission (“EEOC”) alleging unlawful discrimination and retaliation.

9. The EEOC thereafter issued Plaintiff a Notice of Right to Sue, upon request, dated July 18, 2025.

10. Plaintiff initiated this litigation by filing a Complaint on October 16, 2025 [ECF No. 1].

11. This action is filed within ninety (90) days of Plaintiff's receipt of that Notice. Accordingly, Plaintiff has exhausted all required administrative remedies prior to bringing this suit.

PARTIES

12. At all times relevant hereto, Plaintiff, Victoria "Vic" Smith, has been a resident of the State of New York, in the County of Brooklyn.

13. At all times relevant hereto, Plaintiff worked for Defendants and met the definition of "employee" as the term is defined by the applicable statutes.

14. At all times relevant hereto, Defendant, La Ligne, was and is a foreign limited liability company duly existing pursuant to, and by virtue of the laws of the State of Delaware and maintains its principal place of business at 154 Grand St., #2 (177 Lafayette), New York, New York 10013.

15. Upon information and belief, La Ligne employs approximately 25 individuals on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Plaintiff is proceeding herein.

16. At all times relevant hereto, La Ligne met the definition of and was Plaintiff's "employer" as that term is defined by the applicable statutes.

17. Upon information and belief, Defendant, Molly Howard, was and is an individual residing in the State of New York.

18. At all relevant times hereto, Defendant, Molly Howard, has been the Chief Executive Officer at La Ligne. Ms. Howard supervised Mx. Smith's work and had the power to hire and fire Mx. Smith, supervised and controlled Mx. Smith's work schedule and conditions of employment, determined their rate of pay and method of payment, and maintained their employment records. Defendant Howard also directly participated in the unlawful actions taken against Mx. Smith

described herein, including discriminating against Mx. Smith on the basis of their sex and gender identity and allowing the hostile work environment to unfold. At all relevant times Defendant Howard met the definition of a “person,” “employer” and/or a “covered employer” under all relevant statutes.

19. Upon information and belief, Defendant, Meredith Melling, was and is an individual residing in the State of New York.

20. At all relevant times hereto, Defendant, Meredith Melling, has been the Chief Marketing Officer at La Ligne. Ms. Melling supervised Mx. Smith’s work and had the power to hire and fire Mx. Smith, supervised and controlled Mx. Smith’s work schedule and conditions of employment, determined their rate of pay and method of payment, and maintained their employment records. Defendant Melling also directly participated in the unlawful actions taken against Mx. Smith described herein, including discriminating against Mx. Smith on the basis of their sex and gender identity and allowing the hostile work environment to unfold. At all relevant times Defendant Melling met the definition of a “person,” “employer” and/or a “covered employer” under all relevant statutes.

21. Upon information and belief, Defendant, Valerie Macaulay, was and is an individual residing in the State of New York.

22. At all relevant times hereto, Defendant, Valerie Macaulay, has been the Chief Creative Officer at La Ligne. Ms. Macaulay supervised Mx. Smith’s work and had the power to hire and fire Mx. Smith, supervised and controlled Mx. Smith’s work schedule and conditions of employment, determined their rate of pay and method of payment, and maintained their employment records. Defendant Macaulay also directly participated in the unlawful actions taken against Mx. Smith described herein, including discriminating against Mx. Smith on the basis of

their sex and gender identity and allowing the hostile work environment to unfold. At all relevant times Defendant Macaulay met the definition of a “person,” “employer” and/or a “covered employer” under all relevant statutes.

MATERIAL FACTS

A. Mx. Smith’s Illustrious Career in Operations

23. After studying English Literature at CUNY Macaulay Honors College, in 2013 Mx. Smith became an Event Coordinator & Account Manager at Bonbite, where their responsibilities included planning events with high-end corporate clients and event planners. In the same year, they began working as a Wedding Planner at 14 Stories, where they planned and delivered LGBTQ+ weddings in NYC, the Hamptons, Fire Island, and beyond. In 2015, Mx. Smith joined The Falcon as Manager and Events Coordinator, where they opened the venue’s beer garden and rock ‘n’ roll museum.

B. Mx. Smith is Hired by La Ligne

24. Mx. Smith joined La Ligne on or about March 23, 2017, after being contacted for an interview by former Vice President of Operations, Andrew Tuch.

25. After three rounds of interviews, which Mx. Smith apparently passed with flying colors, they were informed of an opening at La Ligne with “unlimited growth potential” and eagerly accepted an offer to begin as La Ligne’s new Customer Experience Manager.

26. In this role, Mx. Smith’s responsibilities included all levels of customer experience management, but especially day-to-day communication and inquiry follow-up, operational and interpersonal problem solving, and oversight and implementation of efficient systems of operation and protocol.

27. Throughout their time working at La Ligne, Mx. Smith reported directly to CEO Molly Howard and CMO Meredith Melling (both co-founders of La Ligne).

28. When Defendants hired Mx. Smith, they knew that the latter identified as non-binary/transgender with strong ties to the LGBTQ+ community, as Mx. Smith informed Defendants about this during their interview.

C. Mx. Smith's Exemplary Performance with Defendants is Rewarded as They Assume Substantial Responsibilities and Implement Significant Improvements for La Ligne

29. For their initial role as Customer Experience Manager, Mx. Smith was offered a starting rate of \$30/hour. Mx. Smith accepted this rate on the condition that they be offered a flexible work schedule that would include a partial remote work arrangement.

30. Based on their excellent early performance within the Company, Mx. Smith's role rapidly expanded in scope to include operational responsibilities beyond customer experience, such as wholesale, special projects, retail, and office management.

31. Mx. Smith often acted as a one-person department in these capacities, accepting the full weight of any responsibilities that arose and consistently going above and beyond what was expected. As such, Mx. Smith effectively wrote the guidelines and operational protocols for Defendants at that critical growth stage of its operation.

32. Indeed, Ms. Howard and Ms. Melling regularly noted throughout Mx. Smith's tenure that they could "do it all," that they "just get it," and that Mx. Smith was "even better than us with speaking to customers."

33. Consequently, Mx. Smith's rate of compensation was increased to \$50/hour in or around late 2017.

34. Around this time, Mx. Smith had separate conversations with Mr. Tuch and Ms. Howard regarding the opportunity for equity-based earnings; Mr. Tuch and Ms. Howard assured

Mx. Smith that while equity was not yet available, there was an ongoing discussion between the co-founders regarding offering equity to reward well-performing early-stage employees such as Mx. Smith.

35. Mx. Smith was such an exemplary employee that the Defendants flew them to Paris, France in October 2018 to oversee the safe return of goods from a photoshoot, and another time, in February 2022, flew Mx. Smith to Denver, Colorado to ensure the timely delivery of goods for an important trunk show in Aspen.

36. Indeed, from 2018 up until early 2022, Mx. Smith was trusted to make executive decisions and often acted as a fill-in for the co-founders as Mx. Smith was able to speak very eloquently about the brand.

37. In March 2019, because of their consistently exemplary work, ability to multitask, and “can-do” attitude, Mx. Smith was vetted to be the Project Manager for the opening of La Ligne’s flagship retail location on Madison Avenue in New York. Upon completion of the wildly successful flagship store opening, Mx. Smith continued to exhibit exemplary work ethic and commitment to the Defendants and continued working in the retail sector as needed while the flagship store took root.

38. In or about May 2019, Mx. Smith was invited to speak with Ms. Howard and Ms. Melling about their future at La Ligne, during which conversation Ms. Howard and Ms. Melling made Mx. Smith an informal offer for a salaried role. Mx. Smith was also informed that they would not be eligible for the equity that Defendants had “set aside” for the employee pool unless they became a full-time, salaried employee.

39. Accordingly, in June 2019, Mx. Smith accepted the salaried offer, for a role in which they continued to report directly to Ms. Howard.

40. Mx. Smith maintained all their existing responsibilities in their new, salaried role, as well as being expected to spearhead the new retail sector.

41. Mx. Smith's new responsibilities in this role included overseeing retail operations, hiring, and onboarding retail staff, and managing new store openings; in reality, however, their contributions continued above and beyond their role, touching almost all day-to-day operations of the Company.

D. Despite Performing as a Stellar Employee in all Aspects, Mx. Smith Experiences Gender-based Discrimination at La Ligne, Including Microaggressions

42. By May 2019, it was well understood in the workplace that Mx. Smith identified as nonbinary and/or transgender.

43. Regrettably, after Defendants learned of Mx. Smith's gender identity, over time Mx. Smith encountered a distressing series of challenges, including microaggressions, discrimination, and even retaliation.

44. These experiences eventually created an environment filled with hostility and exclusion, severely impacting Mx. Smith's professional well-being and posing a significant obstacle to their ability to flourish in their multi-faceted role for the Company.

45. Despite their accomplishments and unwavering commitment, Defendants failed to provide much needed support to Mx. Smith, creating an environment that was ultimately deeply harmful.

46. For example, upon the opening of the Madison Avenue store, Ms. Howard commented that the "ladies up here (Upper East Side) are going to eat [Mx. Smith] up." Ms. Howard's comment suggested to Mx. Smith that they would be a target of harassment and/or ridicule, in turn causing Mx. Smith to feel belittled, hurt, and marginalized.

47. Unfortunately, things took a further turn for the worse in May 2019, when Slava Tverskoy was hired as the Store Manager of Defendants' Madison Avenue store.

48. Mr. Tverskoy exclusively misgendered Mx. Smith in the workplace, even after being corrected by Mx. Smith and multiple other employees of Defendants, numerous times.

49. Furthermore, Mr. Tverskoy regularly encouraged a retail environment that was hyper-focused on female figure – even going so far as to suggest that retail employees, including Mx. Smith, wear more form-fitting garments in a way to show off their perceived femininity – in Mx. Smith's case, completely disregarding their gender identity.

50. On multiple occasions, Mr. Tverskoy pressured Mx. Smith to partake in a “fashion show” where they would try on garments and Mr. Tverskoy would solicit comments from staff.

51. While this was initially playful, it became hurtful and harmful once Mx. Smith publicly came out as transgender to their colleagues which only aggravated the instances of the Plaintiff being misgendered.

52. This behavior continued in Defendants' store for two years, and Mr. Tverskoy's blatant and constant misgendering of Mx. Smith was witnessed by Molly Howard, Meredith Melling, and Valerie Macaulay, on multiple occasions, with no corrective action ever taken.

53. Indeed, Mx. Smith had to endure this constant harassment, by way of misgendering, alone and with no help or HR support.

54. Worse, in innumerable emails throughout their tenure, both internally and externally with third parties, Mx. Smith would be misgendered, with no meaningful corrective action being implemented by the Defendants.

55. Additionally, Mr. Tverskoy felt empowered to comment on Mx. Smith's body since his hiring and misgender them in the process and continued to do so another two years uncorrected until Mx. Smith's discriminatory and retaliatory termination.

56. At the same time, by late 2019, Mx. Smith's role had expanded such that they had become the Lead individual overseeing five critical departments: Retail Operations; Wholesale Operations; HR/Office Management; Customer Experience; and Special Projects.

57. During this time, Mx. Smith voiced to Ms. Howard and Ms. Melling that they needed additional support to not "burn out" and continue operating in their position effectively; yet, no immediate action was taken in response to Mx. Smith's concerns.

58. In Q1 of 2020, the COVID-19 pandemic struck, and the company implemented a freeze on hiring and compensation increases. At that time, Mx. Smith was made aware that a round of funding for the company was subsequently delayed, and equity-based compensation would be on hold until further notice.

59. For six months through Q3 of 2020, Defendants had a blanket work from home order in place, which continued in part through the end of 2020 and into 2021 as the pandemic surged and resurged in NYC. During this time, Mx. Smith went above and beyond to ensure that the staff, co-founders, and customers of Defendants were well taken care of. For example, Mx. Smith led remote team building activities such as wine tasting, monthly trivia games, as well as initiatives identified by the co-founders.

60. In March 2020, Mx. Smith exhibited immense flexibility and ingenuity, helping launch an immediate flash sale that gave Defendants a much-needed cash flow injection, and shifting trunk shows into a remote format allowing customers to shop virtually.

61. Further, when the Company was ready to open its second store in Dallas, Texas in late 2020, Mx. Smith agreed to fly to Dallas at the height of the pandemic and lived there alone for six weeks through the Thanksgiving holiday while heading up operations on the ground for Defendants, including acquiring talent, and overseeing the construction build out and store opening details.

62. In addition, Mx. Smith was entrusted with Ms. Howard's day-to-day role and responsibilities as CEO while Ms. Howard was on maternity leave.

63. From the time of Mx. Smith's preliminary interview with the Defendants and into November 2020, Defendants were aware of the fact that Mx. Smith identified as non-binary/transgender. Particularly, in November 2020, Defendants featured Mx. Smith on an Instagram post for Transgender Awareness Week for which Ms. Melling wrote the caption.

64. Despite this, Mx. Smith was consistently and repeatedly misgendered and subject to denigration and harassment which was met with repeated inaction despite Defendants' awareness of the ongoing harassment Mx. Smith faced.

65. As stated above, Mx. Smith's exceptional performance, dedication, and ability to go above and beyond in their work set them apart in all areas. They consistently tackled and overcame any challenge that came their way, exceeding expectations and surpassing the bounds of their job description. Mx. Smith had at all times disclosed to the Defendants that they were non-binary/transgender. As Defendants recognized their exceptional abilities, Mx. Smith was entrusted with jobs, assignments, and tasks that extended beyond their initial responsibilities.

E. The Onslaught of Discriminatory and Retaliatory Conduct Continued as Mx. Smith Suffered Multiple Adverse Actions, Ending with Their Discriminatory Termination

66. While Mx. Smith had initially been very optimistic about becoming La Ligne's Director of Retail, they began to experience a further shift in their working conditions shortly after

beginning hormone replacement therapy (HRT) in July 2021 and consequently developing secondary sex characteristics including facial hair and vocal range drop.

67. Specifically, Mx. Smith was increasingly excluded from customer and VIP facing events and opportunities that they had previously not only been involved in, but led, including special retail events and trunk shows.

68. Beginning in or around July 2021 and continuing through the following seasons, Mx. Smith was replaced in these capacities by junior employees, such as Mx. Smith's direct report, and in some cases by interns.

69. During the summer of 2021, Mx. Smith began advocating anew for equity and an appropriate salary adjustment. This was brought to the attention of Ms. Howard, Ms. Melling, and Ms. Macaulay at a meeting where Mx. Smith's role was discussed. At that time, Mx. Smith was told that equity was still not available, and that no raise would be discussed before end of year.

70. In December 2021, Mx. Smith raised the salary issue yet again when they sent Ms. Howard an email requesting a promotion to Chief of Staff and accompanying salary raise to a salary of \$100,000, annually, due in part to a need for increased communication within Mx. Smith's team. Mx. Smith wrote: "I want to continue to work hard for you, but I am currently feeling a lack in direct guidance and communication from top down...as we scale I am increasingly feeling the effects of a lack of transparent and consistent communication. In pursuing the chief of staff role, I sought to aid in filling this gap and I am now addressing this again so that we can discuss a solution that aligns with your growth plans."

71. In the spirit of open and honest communication, Mx. Smith ended the email stating: "I wanted to raise these points so that we can all provide the best communication possible."

72. Instead, at the end of Q4 2021, Mx. Smith was given a raise of precisely 5%, bringing them painfully shy of the requested \$100,000 salary, at \$99,750 – Mx. Smith felt that since Defendants’ offered salary increase was only \$250 shy of \$100,000, it was rather another attempt to keep Mx. Smith “in their place” and below the requested six-figure salary.

73. In another shocking display of discrimination and retaliation, at Defendants’ 2021 holiday party, Mr. Tverskoy reduced Mx. Smith to tears by misgendering them and denigrating them, confronting Mx. Smith for their “lack of retail experience,” despite the immense success of Defendants’ retail stores under Mx. Smith’s strong leadership.

74. Mx. Smith reported this incident in person to Ms. Howard and Ms. Melling shortly thereafter; shockingly, Mx. Smith never heard anything further about this incident.

75. Indeed, Mx. Smith was regularly misgendered within the corporate office by almost all staff members.

76. To make matters worse, at times throughout 2021-2022 when the team returned to the office post-pandemic, Mx. Smith was asked by members of the design team, as well as Ms. Macaulay, to try on women's t-shirts and sweaters to check the fit across breast or otherwise.

77. Worse, Mx. Smith was casually misgendered in the retail environment on a regular day-to-day basis which was witnessed by both Ms. Howard and Ms. Melling.

78. Indeed, as the micro-aggressions increased while Defendants took no corrective action, Mx. Smith was forced to send an email “reminder” to employees in January 2022 regarding their appropriate pronouns.

79. Only one staff member replied to this email, and the issue was not addressed by the co-founders in any way or otherwise acknowledged.

80. In or about Q1 of 2022, Defendants hired a new Head of People (i.e., HR), Jelcia Suriel.

81. During Mx. Smith's first one-on-one meeting with Ms. Suriel in February 2022, Mx. Smith notified Ms. Suriel that they had endured ongoing misgendering in the workplace and that Mx. Smith was currently dealing with a working environment that was unsustainable for their mental health.

82. By way of solution, Mx. Smith suggested that the team undergo training to ensure that future microaggressions did not occur in the workplace.

83. Disappointingly, Ms. Suriel met Mx. Smith's serious concerns with a dismissive attitude, stating that she would revisit them in Q3 as she had "much to accomplish in [her] new role."

84. Following this conversation, and as Ms. Suriel was incorporated further into the Company, Mx. Smith became further limited toward a desk-tethered role, where their responsibilities were drastically reduced and, in many cases, taken away altogether.

85. Worse, there were multiple occasions where Mx. Smith would train incoming staff, only to be unceremoniously removed and secluded from their departments.

86. This discriminatory treatment of Mx. Smith was only further amplified with Defendants' hiring of COO Becky Moyes in or about Q2 of 2022, who immediately treated Mx. Smith with toxic "girl boss" behavior, attempting to box them out at every turn.

87. Indeed, Ms. Suriel and Ms. Moyes quickly teamed up, soon removing most if not all of Mx. Smith's autonomy and authority.

88. In Q2 of 2022, Mx. Smith opened the fourth retail store for La Ligne, located in Greenwich, Connecticut; against Mx. Smith's suggestions, Ms. Suriel insisted on rushing the hiring process and bypassing an in-person interview with a managerial candidate for the store. This

ultimately led to Defendants hiring “Dee” (Last Name Unknown) to be the Greenwich Store Manager.

89. Unfortunately, Store Manager Dee immediately took cues from Mr. Tverskoy and began misgendering Mx. Smith in the workplace; due to Mr. Tverskoy’s examples, Dee quickly adopted the status quo of using “she/her” pronouns for Mx. Smith while in Defendants’ store.

90. By June and July of 2022, Mx. Smith had become wholly excluded from discussions about a foundational event, Lizzie Tisch’s annual “Lizziepalooza,” --a VIP shopping event that Mx. Smith had helped organize and attended years prior.

91. Mx. Smith was also excluded from attending an annual series of trunk shows in the Hamptons, New York, during this time, which they had previously organized and attended with Ms. Melling.

92. It was around this time that the Plaintiff began developing secondary sex characteristics such as facial hair, and a lower voice, which resulted in the Defendants removing them from customer-facing roles, thus denying Mx. Smith the opportunity to fulfill the expectations of their role.

93. The Defendants also placed the blame on Mx. Smith for tasks that they were no longer responsible for at this time.

94. Specifically, in June 2022, Mx. Smith was accused of an error that cost Defendants a sum in excess of \$500,000.

95. However, this cannot be attributed to Plaintiff as a newly hired Head of Wholesale discovered that an Operations Associate, who had been promoted around this time, was responsible for the error while the role and responsibilities were in transition between them.

96. Additionally, Mx. Smith was accused of authorizing changes to shelving installations at Defendants' Greenwich store without the approval of the CEO, however, they were trying to correct an error on behalf of the store's Project Manager, in the normal course of business, by adding a missing shelf.

97. The budget for the shelving installation made clear that the bottom-most cabinets had been removed as a cost-cutting measure, the top of the cabinet acted as a shelf, and Mx. Smith had included it in the normal course of business so that the shelves would aesthetically align with the stores in other locations – the same had been done at La Ligne's Palm Beach location.

98. Ms. Howard ended up removing the top shelf, believing it was not worth the price.

99. Then, the vendor refused to install the shelves in a dispute over the price negotiations, not because of any lack of clarity in the shelving plans.

100. Defendants also alleged that a delayed seasonal display in or around the Fall of 2022 was Mx. Smith's fault.

101. However, delays regarding seasonal displays were commonplace as the working budget did not reflect market costs and created difficulties locating appropriate vendors local to each store which led to the delays.

102. In reality, this was an issue that was repeatedly arising, and one that Mx. Smith consistently worked with Defendants to address.

103. On August 31, 2022, Mx. Smith wrote an email to Ms. Howard yet again raising their concerns surrounding promotion and gender discrimination/misgendering.

104. Regarding gender discrimination, Mx. Smith wrote: "I cannot end this message without [once] again raising the issue that the majority of employees (corporate and otherwise) misgender me regularly; while I have brought this to the attention of Head of People with the

request of a sensitivity training, there have been no steps or corrective actions taken (i.e.; correcting a specific employee when they repeatedly misgender me in passing) by the company to demonstrate their understanding or prioritization of this. I can't help but feel at this point the company is turning a blind eye to this which, regardless of my feelings or relationships with you, is discriminatory, a fact which greatly dismays me after all the time, effort, and hard work I have put in for the past five years.”

105. In keeping with what had become Defendants’ unsurprising pattern of ignoring Mx. Smith’s concerns of discrimination, this email was not met with an adequate or supportive response.

106. On September 9, 2022, Mx. Smith engaged in text conversation with Ms. Suriel regarding Defendants’ silence surrounding Mx. Smith’s repeated complaints regarding inadequate compensation and discrimination.

107. Frustratingly, Ms. Suriel acted aloof during this exchange, asking why Mx. Smith was “upset”; however, at Mx. Smith’s insistence, Ms. Suriel finally rescheduled an existing “check-in” meeting with Ms. Howard and Ms. Melling to a sooner date of September 12, 2022, assuring Mx. Smith that their concerns could be addressed as soon as possible.

108. Shockingly, instead of addressing Mx. Smith’s concerns during this meeting, Defendants instead retaliated against Mx. Smith, terminating them in retaliation to their sex and gender identity discrimination complaints on September 12, 2022.

F. Mx. Smith has incurred significant damages as a result of Defendants’ unlawful conduct

109. As a result of La Ligne’s unlawful conduct, Mx. Smith has incurred significant damages.

110. Furthermore, Mx. Smith has suffered considerable emotional distress. They are depressed and suffer from apathy, lethargy, constant exhaustion, lowered self-esteem, insomnia, and headaches from the stress of their unlawful termination.

111. Plaintiff's depression has affected their relationships with their family members, and their self-confidence.

112. Mx. Smith is embarrassed when they have to explain to people what happened to them at La Ligne. In contrast, Mx. Smith had a successful career and was highly regarded in their industry until their unlawful termination by Defendants.

113. As a result of the foregoing, Mx. Smith has been unlawfully discriminated against and retaliated against, humiliated, and degraded, and as a result, suffered loss of rights, emotional distress, loss of income and earnings.

114. As a result of Defendants' actions, Mx. Smith feels extremely degraded, victimized, embarrassed, and emotionally distressed.

115. Mx. Smith 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, as well as future pecuniary losses, emotional pain, loss of enjoyment of life, and other nonpecuniary losses. Mx. Smith further experienced severe emotional and physical distress.

116. Because Defendants' conduct has been malicious, willful, outrageous, and done with full knowledge of law to the contrary, Mx. Smith demands punitive damages against Defendants.

FIRST CAUSE OF ACTION
(Discrimination in Violation of Title VII)
Against Defendant La Ligne LLC

117. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

118. Title VII prohibits employers from discriminating against employees because of their sex and gender.

119. Plaintiff, who is a non-binary/transgender individual, was subjected to disparate treatment because of their sex and gender consistently and repeatedly, despite Defendants' knowledge and multiple protected complaints lodged by Mx. Smith.

120. Defendants denied Plaintiff equal terms and conditions of employment, including failing to address their complaints of sex and gender-based harassment, and systematically excluding them from performing tasks that were within the Plaintiff's purview and blaming Ms. Smith for errors that could not be attributed to them.

121. Defendants' actions constitute unlawful sex and gender discrimination in violation of Title VII.

122. As a direct and proximate result of Defendants' unlawful conduct, Mx. Smith 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, as well as future pecuniary losses, emotional pain, loss of enjoyment of life, and other nonpecuniary losses. Mx. Smith further experienced severe emotional and physical distress.

SECOND CAUSE OF ACTION
(Hostile Work Environment in Violation of Title VII)
Against Defendant La Ligne LLC

123. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

124. Title VII prohibits a workplace permeated with discriminatory intimidation, ridicule and insult that is sufficiently severe or pervasive to alter the conditions of the victim's employment and create an abusive working environment.

125.From May 2019 to September 2022, Plaintiff was subjected to ongoing, consistent misgendering and discriminatory treatment on the basis of their sex and gender.

126.Mx. Smith made multiple complaints to Defendants regarding the ongoing discriminatory treatment, and no meaningful action was ever taken.

127.Rather than operating to protect Mx. Smith, and address their valid concerns regarding discrimination, Defendants instead escalated and permitted the harassment and discrimination to endure resulting in Mx. Smith's unlawful termination, thereby altering their working conditions after years of harassment and discrimination.

128.As a direct and proximate result of Defendants' unlawful conduct in violation of Title VII, Plaintiff has suffered, and will continue to suffer, monetary and/or other economic harm for which they are entitled to an award of monetary damages.

129.As a direct and proximate result of Defendants' unlawful conduct in violation of Title VII, Plaintiff has suffered, and continues to suffer, mental anguish, and emotional distress, for which they are entitled to an award of damages, to the greatest extent permitted under the law.

130.Respondents' unlawful discriminatory actions constitute discriminatory actions and malicious, willful, and wanton violations of Title VII for which Plaintiff is entitled to an award of punitive damages.

THIRD CAUSE OF ACTION
(Retaliation in Violation of Title VII)
Against Defendant La Ligne LLC

131.Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

132.Plaintiff engaged in protected activity under Title VII when they complained internally about discrimination on the basis of sex and gender.

133. Defendants retaliated against Plaintiff by systematically undermining the full scope of their role, subjected them to repeated instances of sex and gender discrimination at Defendants' hands or at the hands of other employees and sought to blame Mx. Smith for matters not within their purview.

134. Defendants' hostile treatment culminated in Mx. Smith's employment being terminated shortly after Mx. Smith's last protected complaint.

135. Defendants' actions constitute unlawful retaliation under Title VII.

136. As a direct and proximate result of Defendants' unlawful conduct in violation of Title VII, Plaintiff has suffered, and will continue to suffer, monetary and/or other economic harm for which they are entitled to an award of monetary damages.

137. As a direct and proximate result of Defendants' unlawful conduct in violation of Title VII, Plaintiff has suffered, and continues to suffer, mental anguish, and emotional distress, for which they are entitled to an award of damages, to the greatest extent permitted under the law.

FOURTH CAUSE OF ACTION
(Discrimination in Violation of the NYSHRL)
Against All Defendants

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

139. 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.”

140. By the actions detailed above, among others, Defendants have discriminated against Plaintiff in violation of the NYSHRL by, *inter alia*, denying them the equal terms and conditions

of employment because of their sex and gender and allowing Plaintiff to be subjected to discrimination and a hostile work environment.

141.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, and other compensation that their 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.

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

FIFTH CAUSE OF ACTION
(Hostile Work Environment in Violation of the NYSHRL)
Against All Defendants

143.Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

144.New York State Human Rights Law prohibits a workplace permeated with discriminatory intimidation, ridicule and insult that is sufficiently severe or pervasive to alter the conditions of the victim’s employment and create an abusive working environment.

145.From May 2019 to September 2022, Plaintiff was subjected to ongoing, consistent misgendering and discriminatory treatment on the basis of their sex and gender.

146.Mx. Smith made multiple complaints to Defendants regarding the ongoing discriminatory treatment, and no meaningful action was ever taken.

147.Rather than operating to protect Mx. Smith, and address their valid concerns regarding discrimination, Defendants instead escalated and permitted the harassment and discrimination to

endure resulting in Mx. Smith's unlawful termination, thereby altering their working conditions after years of harassment and discrimination.

148.As a direct and proximate result of Defendants' unlawful conduct in violation of the NYSHRL, Plaintiff has suffered, and will continue to suffer, monetary and/or other economic harm for which they are entitled to an award of monetary damages.

149.As a direct and proximate result of Defendants' unlawful conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, mental anguish, and emotional distress, for which they are entitled to an award of damages, to the greatest extent permitted under the law.

150.Respondents' unlawful discriminatory actions constitute discriminatory actions and malicious, willful, and wanton violations of the NYSHRL for which Plaintiff is entitled to an award of punitive damages.

SIXTH CAUSE OF ACTION
(Retaliation in Violation of the NYSHRL)
Against All Defendants

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

152.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.

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

154.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, and other compensation that their 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.

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

SEVENTH CAUSE OF ACTION
(Aiding and Abetting Under NYSHRL)
Against Individual Defendants Only

156.Plaintiff hereby repeats, reiterates, and re-alleges each and every allegation made in the above paragraphs in this Complaint as if fully set forth herein.

157.New York State Executive law § 296(6) provides that it shall be an unlawful discriminatory practice: “For any person to aid, abet, incite, compel or coerce the doing of any of the acts forbidden under this article, or attempt to do so.”

158.Individual Defendants engaged in an unlawful employment practice in violation of New York State Executive Law § 296(6) by aiding, abetting, inciting, compelling, and coercing the discriminatory conduct against Plaintiff.

159.As a direct and proximate result of Defendants’ unlawful conduct in violation of the NYSHRL, Plaintiff has suffered, and will continue to suffer, monetary and/or other economic harm for which they are entitled to an award of monetary damages.

160.As a direct and proximate result of Defendants’ unlawful conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, mental anguish, and emotional distress,

for which they are entitled to an award of damages, to the greatest extent permitted under the law.

161.Respondents’ unlawful discriminatory actions constitute discriminatory actions and malicious, willful, and wanton violations of the NYSHRL for which Plaintiff is entitled to an award of punitive damages

EIGHTH CAUSE OF ACTION
(Discrimination in Violation of the NYCHRL)
Against All Defendants

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

163.New York City Administrative Code §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.”

164.By the actions detailed above, among others, the Defendants has discriminated against Plaintiff in violation of the NYCHRL by, *inter alia*, denying them the equal terms and conditions of employment because of their sex and gender, and allowing Plaintiff to be subjected to discrimination and a hostile work environment.

165.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, and other compensation that their 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.

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

NINTH CAUSE OF ACTION
(Hostile Work Environment in Violation of NYCHRL)
Against All Defendants

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

168. New York City Human Rights Law prohibits a workplace permeated with discriminatory intimidation, ridicule and insult that is sufficiently severe or pervasive to alter the conditions of the victim's employment and create an abusive working environment.

169. From May 2019 to September 2022, Plaintiff was subjected to ongoing, consistent misgendering and discriminatory treatment on the basis of their sex and gender.

170. Mx. Smith made multiple complaints to Defendants regarding the ongoing discriminatory treatment, and no meaningful action was ever taken.

171. Rather than operating to protect Mx. Smith, and address their valid concerns regarding discrimination, Defendants instead escalated and permitted the harassment and discrimination to endure resulting in Mx. Smith's unlawful termination, thereby altering their working conditions after years of harassment and discrimination.

172. As a direct and proximate result of Defendants' unlawful conduct in violation of the NYCHRL, Plaintiff has suffered, and will continue to suffer, monetary and/or other economic harm for which they are entitled to an award of monetary damages.

173. As a direct and proximate result of Defendants' unlawful conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, mental anguish, and emotional distress, for which they are entitled to an award of damages, to the greatest extent permitted under the law.

174. Respondents' unlawful discriminatory actions constitute discriminatory actions and malicious, willful, and wanton violations of the NYCHRL for which Plaintiff is entitled to an award of punitive damages.

TENTH CAUSE OF ACTION
(Retaliation under the NYCHRL)
Against All Defendants

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

176. New York City Administrative Code §8-107(7) provides that:

“it shall be unlawful discriminatory practice for any person engaged in any activity to which this chapter applies to retaliate or discriminate in any manner against any person because such person has (i) opposed any practice forbidden under this chapter, (ii) filed a complaint, testified or assisted in any proceeding under this chapter, (iii) commenced a civil action alleging the commission of an act which would be an unlawful discriminatory practice under this chapter, (iv) assisted the commission or the corporation counsel in an investigation commenced pursuant to this title, (v) requested a reasonable accommodation under this chapter, or (vi) provided any information to the commission pursuant to the terms of a conciliation agreement made pursuant to section 8-115 of this chapter.”

177. 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, and other compensation that their 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.

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

ELEVENTH CAUSE OF ACTION
Aiding and Abetting in Violation of NYCHRL
Against Individual Defendants Only

179. Plaintiff hereby repeats, reiterates, and re-alleges each and every allegation made in the above paragraphs in this Complaint as if fully set forth herein.

180. New York City Administrative Code § 8-107(6) provides that it shall be an unlawful discriminatory practice “for any person to aid, abet, incite, compel or coerce the doing of any of the acts forbidden under this chapter, or attempt to do so.”

181. Individual Defendants engaged in an unlawful employment practice in violation of New York City Administrative Code § 8-107(6) by aiding, abetting, inciting, compelling, and coercing the discriminatory conduct against Plaintiff.

182. As a direct and proximate result of Defendants’ unlawful conduct in violation of the NYCHRL, Plaintiff has suffered, and will continue to suffer, monetary and/or other economic harm for which they are entitled to an award of monetary damages.

183. As a direct and proximate result of Defendants’ unlawful conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, mental anguish, and emotional distress, for which they are entitled to an award of damages, to the greatest extent permitted under the law.

184. Respondents’ unlawful discriminatory actions constitute discriminatory actions and malicious, willful, and wanton violations of the NYCHRL for which Plaintiff is entitled to an award of punitive damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that the Court enter judgment in their favor and against Defendants, containing the following relief:

A. A declaratory judgment that the actions, conduct and practices of Defendants

complained of herein violate the laws of the United States, State of New York, and City of New York;

B. An injunction and order permanently restraining Defendants and its officers, officials, agents, successors, employees and/or representatives, and any and all persons acting in concert with them, from engaging in any such further unlawful conduct, including the policies and practices complained of herein;

C. An award of damages against Defendants, or any jointly or severally liable entity or person, in an amount to be determined at trial, plus prejudgment interest, to compensate Plaintiff for all monetary and/or economic damages;

D. An award of damages against Defendants, or any jointly or severally liable entity or person, in an amount to be determined at trial, plus prejudgment interest, to compensate Plaintiff for all non-monetary and/or compensatory damages, including, but not limited to, compensation for their emotional distress;

E. An award of damages for any and all other monetary and/or non-monetary losses suffered by Plaintiff, including, but not limited to, loss of income, reputational harm and harm to professional reputation, in an amount to be determined at trial, plus prejudgment interest;

F. An award of punitive damages, and any applicable penalties and/or liquidated damages in an amount to be determined at trial;

G. Prejudgment interest on all amounts due;

H. An award of costs that Plaintiff has incurred in this action, including, but not limited to, expert witness fees, as well as Plaintiff's reasonable attorneys' fees and costs to the fullest extent permitted by law; and,

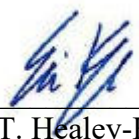
I. Such other and further relief as the Court may deem just and proper.

JURY DEMAND

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

Dated: October 16, 2025
New York, New York

Respectfully submitted,
FILIPPATOS PLLC

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