

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

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ANDREA RIGGS,	:
	:
Plaintiff,	:
	:
v.	:
	:
AKAMAI TECHNOLOGIES, JASON	:
HICKEY, JAMES MASSEY, PATRICK	:
SULLIVAN and STEPHEN GOLDSTEIN,	:
	:
Defendants.	:
	:
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Civil Case Number No.:

COMPLAINT

Jury Trial Demanded

Plaintiff Andrea Riggs (“Plaintiff” or “Riggs”), by and through her attorneys, Wigdor LLP, as and for her Complaint against Defendants Akamai Technologies (“Akamai” or “the Company”), Jason Hickey (“Hickey”), James Massey (“Massey”), Patrick Sullivan (“Sullivan”) and Stephen Goldstein (“Goldstein”) (collectively, “Defendants”), alleges as follows:

PRELIMINARY STATEMENT

1. “Why don’t you sleep with your ex-husband’s friends.” “You need to get your chimney cleaned.” “If you don’t use it, Andrea, it will shrivel up.” These are the just some of the sexually harassing comments lobbed at Riggs by her (often drunk) male colleagues during her decade-long tenure at Akamai.

2. But there’s more. Riggs was twice assaulted at work. The first time, Riggs’s very drunk male colleagues directed a male customer to sit on Riggs’s lap in the front of a taxi over her objection. The customer proceeded to grab one of Riggs’s breasts so hard that she was left bruised. Riggs’s male colleagues, all of whom were seated in the rear of the taxi, did nothing to intervene and instead laughed as Riggs screamed, “He’s grabbing me! He’s grabbing me!” Riggs later discovered the men amusing themselves by replaying a recording of the assault that one of the men

had made, further humiliating her.

3. The second time, one of Riggs's male colleagues grabbed Riggs by the forearms, pushed her backward and pinned her against a wall, while screaming at her. Some of Riggs's male colleagues looked on but did not intervene. Akamai later promoted the attacker.

4. Despite the alcohol-soaked, "boys' club" atmosphere, Riggs was a remarkably successful employee for the technology company. She won numerous awards for her work, including twice earning a Titan award that is bestowed on "the best of the best." On numerous occasions, Riggs was also recognized as a member of Akamai's 100% Club for achieving 100% of her sales quota, among other awards.

5. But none of her accomplishments could save Riggs's job. In December 2022, the Company hired another woman into Riggs's group and shortly thereafter told Riggs that she had to leave.

NATURE OF CLAIMS

6. Plaintiff seeks declaratory, injunctive, and equitable relief, as well as monetary damages, to redress Defendants' unlawful employment practices in violation of the New York State Human Rights Law, N.Y. Exec. Law §§ 290 *et seq.* ("State Human Rights Law") and the New York City Human Rights Law, N.Y.C. Admin. Code §§ 8-101 *et seq.* ("City Human Rights Law").

ADMINISTRATIVE PROCEDURES

7. On June 29, 2023, Riggs filed a charge of discrimination with the Equal Employment Opportunity Commission ("EEOC"), alleging violations of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.* ("Title VII"). Upon receiving a Notice of Right

to Sue from the EEOC, Riggs will seek to amend her complaint to add claims under Title VII.¹

8. Pursuant to NYCHRL § 8-502, Riggs will serve a copy of this Complaint upon the New York City Commission on Human Rights and the New York City Law Department, Office of Corporation Counsel, within ten days of its filing, thereby satisfying the notice requirements of this action.

JURISDICTION AND VENUE

9. This Court has jurisdiction pursuant to 28 U.S.C. § 1332 because there is diversity of citizenship among the parties and this action involves an amount in controversy exceeding \$75,000, excluding interests and costs.

10. Pursuant to 28 U.S.C. § 1391(b), venue is proper in the Southern District of New York because a substantial part of the events or omissions giving rise to this action occurred here, including many of the unlawful employment practices alleged herein.

PARTIES

11. Plaintiff Andrea Riggs is a Senior Strategic Account Executive at Akamai domiciled in Florida. At all times, Riggs was an “employee” under all relevant statutes.

12. Defendant Akamai is incorporated in Delaware with its principal office in Cambridge, Massachusetts. It is registered to conduct business in the state of New York, where it also has an office. At all relevant times, Akamai met the definition of an “employer” under all relevant statutes.

13. Defendant Jason Hickey is Regional Director, Financial Services Vertical, at Akamai. He is domiciled in New York.

14. Defendant James Massey is a Strategic Account Executive at Akamai. He is

¹ Riggs also has claims under Florida and Virginia law. She will seek to amend her complaint once those claims have been administratively exhausted.

domiciled in Connecticut.

15. Defendant Patrick Sullivan is Chief Technology Officer, Security Strategy, at Akamai. He is domiciled in Virginia.

16. Defendant Stephen Goldstein is a Strategic Account Executive at Akamai. He is domiciled in Connecticut.

FACTS

I. BACKGROUND

17. Riggs's career with Akamai began in 2013, when she was hired as a Major Account Executive selling performance and security software solutions to clients in the financial services sector. In 2015, she was promoted to Senior Strategic Account Executive.

18. Riggs threw herself into her work and took advantage of every leadership and learning opportunity offered by the Company.

19. For example, Riggs is a graduate of the inaugural class of Akamai's Next Generation Leaders program ("NGL"),³ an early adopter of the Company's GROW program,⁴ and an Akamai Change Catalyst Ambassador.⁵ She was also a role model for other women in sales, both internally as a mentor to women on Akamai's sales teams and externally by representing Akamai at industry events, such as the annual Women in Sales Leadership Conference hosted by the Institute for Excellence in Sales.

³ NGL graduates are "an elite, global group highly valued by the Company to be the voice of the sales field, admired coaches for their peers, and exceptional leaders in moving [Akamai's] business forward." Riggs proved to be such a standout that she was invited to address other participants during an NGL Spotlight presentation.

⁴ GROW "is a program that will help [Akamai] be more open to change and address our need to accelerate our innovation in ways that extend our technology and market leadership."

⁵ Change Catalyst Ambassadors are "critical ambassadors and liaisons for desired changes within [Akamai's] global offices, workgroups, regions, and functions."

20. Riggs also earned numerous accolades from Akamai's management. For example, one colleague gushed that he "[l]ov[ed] working with [Riggs] and watching [her] do great things!" He also praised Riggs for closing a three-year, \$10-plus million renewal as "extraordinary. . . [e]xcellent selling all the way around – incredible effort to support this customer and earn a bigger seat at the table. Much respect here."

21. Riggs was twice honored with the Company's prestigious Titan Award, which recognizes those who are "the best of the best within their function, and who are known for making extraordinary contributions to Akamai."

22. Riggs is also a seven-time member of Akamai's 100% Club in recognition for achieving 100% of her sales quota.

23. Riggs was also the inaugural recipient of the quarterly "Top Gun Award Winner for Outstanding Sales Achievement" from across the three financial services teams, in addition to a three-time Employee of the Month for the Akamai Reston office and a multiple SPIF⁶ winner.

24. Despite these remarkable achievements, Akamai treated Riggs less well because of her sex.

25. In 2015, for example, Riggs was told that she had earned the Account Representative of the Year award for financial services. Moments before the awards ceremony, John Kelly ("Kelly"), then a Regional Sales Manager and Riggs's supervisor, and Bill Ward, then Area VP and Kelly's boss, told Riggs that Akamai would instead bestow the honor on Nate Keliher ("Keliher") - a man with lower sales numbers. According to Kelly, Keliher had "done his team a favor" by taking on a failing account mid-year.

⁶ SPIF is Akamai's acronym for short term incentive programs.

26. Riggs was not the only woman who suffered discrimination. Several other high performing women voiced concerns about similar treatment and, as a result, many of them left the Company, including a Metro team account manager, a Metro team partner representative, an account manager from the Reston office and two West Coast financial services team account managers.

II. THE HOSTILE WORK ENVIRONMENT

A. Riggs Is the Victim of a Physical Assault

27. On February 17, 2016, Riggs traveled by train from her home in Virginia to New York City in advance of a team meeting scheduled for the following morning.⁷

28. Her supervisor at the time, Kelly, invited the team to meet for drinks at a local bar. The group included Kelly and Account Managers Massey, Trey Spruce, Stuart Ford, Patrick Dowd and Adish Kasi, and Sales Engineer Rob Yates, among others.

29. At some point in the evening, Massey made an inappropriate comment to Riggs. She playfully flicked a few droplets from her drink at Massey in response.

30. Massey leaned into Riggs's face and yelled, "Don't you ever do that again," in such an over-the-top way that Riggs thought he was joking, so she flicked her drink at him again.

31. Massey responded by physically assaulting Riggs. Massey grabbed Riggs by her forearms, pushed her backwards into other patrons, and pinned her against a wall while screaming,

⁷ From the beginning of Riggs's employment through approximately August 2022, Riggs worked in Virginia (where she lived) and New York (where her team was stationed). She subsequently moved to Florida and continued to work both from home and in New York.

“I told you not to do it again—do you hear me now?”

32. Neither Kelly nor any of Riggs’s male colleagues – many of whom must have seen Massey assault Riggs – intervened. Rather, a stranger at the bar offered to help.

33. Riggs escaped to the safety of the ladies’ room, where she was comforted by a female colleague, who texted her the next day, “James [Massey] always pushes the edge of the envelope.” The woman further wrote, “[I]ike what was that comment about getting alcohol in this meeting?[] And he [Massey] has made over the top sexual comments to me before.”

34. Upon information and belief, Kelly, Riggs’s manager, did not report the incident to Human Resources, and Massey was never disciplined for assaulting Riggs.

B. Riggs Is the Victim of a Sexual Assault

35. This was not the only time that an alcohol-fueled Akamai event led to an assault on Riggs without any consequences for the male perpetrator or his enablers.

36. In October 2013, shortly after Riggs joined Akamai, she attended a customer conference. Following an Akamai-hosted customer appreciation reception, several male Akamai account executives, managers and VPs, including men from the financial services sales team, decided to take some Akamai’s customers to a nearby bar in Virginia.

37. Riggs’s male co-workers wanted to exclude her from this important networking opportunity, claiming that Riggs “put a damper on things. It’s like having a nun around.” Riggs ignored the sexist comments and joined the group.

38. Once at the bar, the men proceeded to get drunk. Riggs observed several married male employees dancing provocatively with female customers. Riggs protested to Tim McCarthy

(“McCarthy”), then VP Enterprise Sales – North America,⁸ that her previous employer would not have allowed that kind of sexually-charged behavior. McCarthy laughed and said, “[w]elcome to Akamai!”

39. Greg Burns (“Burns”), one of the Company’s top account executives, told Riggs to leave the bar because she is a woman. Burns urged Riggs to take a taxi back to her hotel because she was “ruining the fun.”

40. Having been told in no uncertain terms for a second time that she was unwelcome among her male colleagues, Riggs decided to leave.

41. There were few taxis available, but Riggs was finally able to hail one down. Suddenly, five or six of her drunk male coworkers insisted on piling into the rear seat, forcing Riggs to sit in the front next to the driver.

42. The group included Account Executive Chris Deegan (“Deegan”) and Sullivan, who was then Senior Lead Enterprise Security Architect, but has since been promoted to VP & Chief Technology Officer.

43. As the taxi pulled away from the bar, one of the men insisted that the taxi stop to pick up a male Akamai customer.

44. There was no more room in the back seat, so the customer, who was also drunk, opened the front passenger door and proceeded to sit in Riggs’s lap. She attempted to push him off, but he managed to close the door, and the taxi drove on.

45. Just as Riggs was insisting that the driver pull over to let the drunk customer out, the customer grabbed one of Riggs’s breasts so hard that she was left bruised. Riggs screamed, “He’s grabbing me! He’s grabbing me!” The driver, concerned for Riggs’s safety, stopped the taxi

⁸ Akamai subsequently promoted McCarthy to VP of Sales, although he no longer works at the Company.

and helped Riggs push the customer out.

46. Riggs's male colleagues laughed as they watched Riggs being sexually assaulted. Indeed, they protested the decision to eject the customer from the taxi because, according to them, his was a big account.

47. To make matters worse, the sexual assault was recorded by one of Riggs's male colleagues.

48. Riggs only became aware of the recording when she saw a group of her male colleagues in the Reston, Virginia, office huddled around Deegan's cell phone laughing. When Riggs approached the men to see what was going on, she realized to her horror that the screams on the recording were her own from the sexual assault.

49. Traumatized by both the incident and the humiliating recording, Riggs begged Deegan to delete the recording. He falsely told her that he had but, for some time afterward, he would sporadically play the recording to the amusement of his male colleagues, and the assault became a running joke in the office.

C. Riggs Is the Target of Numerous Sexist Comments

50. Riggs was also subjected to numerous sexist and sexually charged comments from her male coworkers.

51. Immediately after joining Akamai, for example, Ward invited Riggs to travel to the New York office to meet the rest of the Metro team where she was introduced to Kelly, her assigned mentor. Kelly took Riggs to lunch and said he could not believe the Company hired her because she was a "soccer mom with five kids" and "would not cut it at Akamai."

52. Kelly later became Riggs's manager. And, during his tenure, he directed a stream of discriminatory remarks at Riggs. For instance, when Kelly learned that Riggs's then husband

was a partner at a prominent accounting firm, he asked, “Why do you work then? Why don’t you stay home and be a mom? With your five kids! Why work when you don’t have to?”

53. In 2014, another Akamai manager recruited Riggs to interview for a sales manager position, which would have been a promotion for her. Kelly objected, explaining, “Andrea has five kids and is going through a difficult divorce, so the timing is not good for her.”

54. Riggs protested that her divorce was no one’s business and should not be a consideration in promotions. Kelly nonetheless told her that she could not apply for the promotion. Unsurprisingly, the Company hired a man for the role.

55. That same year, Riggs and a guest went on a trip to Miami paid for by Akamai to honor Titan winners. While on the trip, several male colleagues told Riggs that her job was to “babysit” their wives so that the men could “go out and have fun.” Burns made good on this sexist promise, by interrupting a conversation Riggs was having with her guest to deliver his wife to her and direct that the women “hang out.” In short order, other male colleagues did the same.

56. The misogynist environment continued under the leadership of Riggs’s new boss, Hickey.

57. In 2020, Hickey criticized Riggs for being “bossy” and coming across as a “tough woman”—two classic stereotypes that demonize women for assertive behavior otherwise praised in men.

58. In 2022 and 2023, Hickey criticized Riggs on more than one occasion for “mothering” her accounts. According to Hickey, Riggs “nurtured” and “protected” her customers and instead needed to be “more assertive” which, of course, is exactly what he had previously criticized her for.

59. Riggs was caught in a double bind. If she behaved assertively, she was labeled

“bossy.” If she was less aggressive, she was too “mothering.”

60. Hickey admitted that the standards he set for Riggs were impossible to meet and that he was harder on her than anyone else on the team.

61. In 2020, Hickey reassigned one of Riggs’s biggest accounts to a male colleague, claiming that it fit better into the man’s geographic area. According to Hickey, this was part of an effort to rebalance accounts between account executives.

62. Riggs protested the reassignment because the client was located equidistant from both Riggs and her male colleague, and it was one of her biggest accounts, which she had worked hard to obtain.

63. Hickey then changed his story. He now asserted that the client had requested that Riggs be removed from the account and claimed that he falsely told her that the reassignment was about geography and rebalancing to “spare her feelings.”

64. Riggs was also subjected to many sexually charged comments. For example, Kelly announced that the Company had hired a new West Coast account executive, explaining, “[w]e have a new rep, and she is not only smart, but she’s attractive, which will get her far at Akamai.”

65. Kelly then ogled the newly-hired woman before calling her over to talk. Afterward, Kelly told Riggs that the new female colleague was “totally his type.”

66. After Riggs’s male colleagues learned that Riggs had separated from her husband in 2014, they unleashed a torrent of sexually inappropriate remarks that continued through, at least, February 2023.

67. For instance, male employees of the Company, including Goldstein:

- Asked Riggs whether she was “dating” and “getting some”;
- Asked Riggs why she didn’t “sleep with [her] ex-husband’s friends”;

- Asked Riggs how she could “go years without dating and not having sex”;
- Told Riggs that she needed “to get your chimney cleaned”;
- Told Riggs that “[i]f you don’t use it, Andrea, it will shrivel up,” referring to Riggs’s vagina; and
- Commented that “[t]he poor guy that gets you, Andrea! You’ll kill him with all of that [sexual energy] pent up.”

68. Hickey overheard many of the sexually harassing comments yet did nothing to stem the abuse.

69. Many, if not all, of these sexually harassing comments occurred while Riggs was in New York City for work.

70. Most recently, in February 2023, when Riggs was in New York for the Metro team’s territory planning session, her male colleague Goldstein asked whether Riggs was having sex with anyone and if her sex life was better since she moved to Florida.

71. Riggs’s male colleagues also discussed their sex lives while at work. For example, at a Metro team building pizza making event on October 19, 2022, in New York City, Massey suggestively stated, “[t]his is what I do to my wife,” while kneading pizza dough directly across the table from Riggs.

72. Hickey was standing next to Massey but did nothing to address the sexually-charged comment, leaving Riggs, the only woman present, embarrassed and humiliated.

D. Riggs Is Isolated and Denied Resources

73. In addition to being sexually assaulted and harassed, Riggs was also repeatedly isolated from her male colleagues.

74. For example, in 2021, Hickey invited every member of the team except for Riggs

to a New York Yankees game.

75. In 2022, Hickey did not invite Riggs to a work Christmas party when she was in New York City for work.⁹

76. In October 2022, at the pizza making team building event in New York City described above, Riggs's colleagues left a work-related event at a bar while Riggs was in the ladies room. She later learned that the group of men had gone to another bar. The team similarly "ditched" Riggs on other occasions.

77. Burns admitted that Riggs was being isolated because of her sex. While at a work-related conference in Las Vegas, Burns announced – to the delight of Riggs's male colleagues – "I don't know what it is about you, Andrea, but you make me feel like my mother is here. Or maybe a Sunday school teacher. You kill the vibe."

78. Riggs was also deprived of the resources and support provided to her male colleagues.

79. For example, Hickey told Riggs that he was reassigning a small account to her to alleviate the workload of her male colleague, Craig Spengler ("Spengler"). Hickey wanted Spengler to focus on the "big boy" accounts.

80. By contrast, Hickey refused to reassign some of Riggs's smaller accounts so that she could concentrate on a large account which, at the time, was involved in a significant merger. To make matters worse, Hickey assigned Riggs additional accounts, each of which had serious issues, thereby pulling her attention away from her larger accounts.

81. Akamai also gave men credit for Riggs's work. For instance, Riggs acquired

⁹ Hickey falsely claimed that the Christmas party was only for New York City team members. In fact, employees from outside New York attended.

a top tier financial services company as a client in her first year with Akamai. Securing the account was a major coup for Akamai and for Riggs, as it was unusual for a new executive to bring in such a large account. Riggs grew the account revenue significantly and established relationships with the client's top-level executives.

82. Remarkably, Ward required Riggs to split her commission for this account with her male mentor, even though he had failed to secure the account when it was assigned to him.

83. Eventually, the Company assigned the account to Massey, Riggs's attacker.

84. In place of this large account, Hickey assigned Riggs three very small, problematic accounts (including one that had already notified Akamai that it was cancelling its contract).

85. As a result of the discriminatory assignment, Riggs was prevented from achieving her sales goals. Massey, however, was named a Titan.

86. Akamai also refused to permit Riggs to use its private suite at a Las Vegas conference to meet with customers. According to the Company, there was not enough room for Riggs. The men, however, were allowed in.

III. AKAMAI UNLAWFULLY DISMISSES RIGGS

87. In or about December 2022, Akamai hired a new female account executive into the Metro team. Unfortunately, this meant that Riggs - the only other woman on the otherwise all male team - would have to go.

88. In or about January 2023, for the first time in Riggs's decade-long tenure, the Company rated Riggs as only "partially meet[ing]" expectations, even though, according to Hickey, Riggs is "extremely talented."

89. Hickey claimed that the primary reason for removing Riggs was that she had reached only 90% of her sales quota. But, as even Hickey admitted, 2022 “was a challenging year for everyone” and he did not even meet his sales quota.

90. Moreover, upon information and belief, (a) only two members of the Metro team met or exceed their 2022 quotas; (b) none of the men who failed to meet their quotas, including, Hickey, were dismissed; and (c) Riggs narrowly missed her quota only after the Company reassigned the large, top tier financial services account to her male colleague Massey.

91. Riggs protested the unlawful treatment, stating, “I am the most tenured person on my team, managing the most accounts, [and have] the highest revenue responsibility with an acknowledged high quota.”

92. Hickey ignored Riggs’s complaint and dismissed Riggs.

93. In or about March 2023, Hickey told Riggs that she was “headed down the path of a PIP.” Hickey made clear, however, that Riggs would not be able to save her job regardless of how well she performed. According to Hickey, PIPs are “very difficult to come out of” and “difficult to have success on.” Hickey further emphasized that none of the five employees he previously placed on PIPs had retained their jobs. Hickey explained that “it’s basically not a great scenario.”

94. Hickey told Riggs that she was ineligible to even look for another position within Akamai while on a PIP. He claimed that in any event there was no place for Riggs at the Company, saying “[m]aybe it is time for a change . . . I don’t know another job [at Akamai] you’d be an asset for.” As an alternative to the PIP, Hickey stated that Riggs could take 90 days to look for another job outside the Company before she would have to “resign.”

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

95. Plaintiff repeats, reiterates and re-alleges each and every allegation in the preceding paragraphs, as though fully set forth herein.

96. By the actions described above, among others, Defendants discriminated against Plaintiff on the basis of her gender in violation of the NYSHRL.

97. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered, and continues to suffer, monetary and/or other economic harm.

98. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered, and continues to suffer, injury, pain, ailments and conditions, and reputational harm, as well as mental anguish and emotional distress, including, but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and other emotional pain and suffering.

99. Defendants' unlawful actions constitute malicious, willful and wanton violations of the NYSHRL.

SECOND CAUSE OF ACTION
(Retaliation In Violation of the NYSHRL)
Against Akamai and Hickey

100. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation in the preceding paragraphs, as though fully set forth herein.

101. By the actions described above, among others, Defendants retaliated against Plaintiff in violation of the NYSHRL.

102. As a direct and proximate result of Defendants' unlawful against Plaintiff, Plaintiff has suffered, and continues to suffer, monetary and/or other economic harm.

103. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered, and continues to suffer, injury, pain, ailments and conditions, as well as mental anguish and emotional distress, including, but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and other emotional pain and suffering.

105. Defendants' unlawful and retaliatory actions constitute malicious, willful, and wanton violations of the NYSHRL.

THIRD CAUSE OF ACTION
(Discrimination In Violation of the NYCHRL)
Against All Defendants

106. Plaintiff repeats, reiterates and re-alleges each and every allegation in the preceding paragraphs, as though fully set forth herein.

107. By the actions described above, among others, Defendants discriminated against Plaintiff on the basis of her gender in violation of the NYCHRL.

108. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered, and continues to suffer, monetary and/or economic harm.

109. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered, and continues to suffer, injury, pain, ailments and conditions, as well as mental anguish and emotional distress, including, but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and other emotional pain and suffering.

110. Defendants' unlawful and discriminatory actions constitute malicious, willful and wanton violations of the NYCHRL.

FOURTH CAUSE OF ACTION
(Retaliation and Interference with Protected Rights in Violation of the NYCHRL)
Against Akamai and Hickey

111. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation in the preceding paragraphs, as though fully set forth herein.

112. By the actions described above, among others, Defendants retaliated against Plaintiff and interfered with Plaintiff's rights as protected by the NYCHRL and in violation thereof.

113. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered, and continues to suffer, monetary and/or other economic harm.

114. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered, and continues to suffer, injury, pain, ailments and conditions, as well as mental anguish and emotional distress, including, but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and other emotional pain and suffering.

115. Defendants' unlawful and retaliatory actions, and interference with Plaintiff's rights constitute malicious, willful, and wanton violations of the NYCHRL.

PRAYER FOR RELIEF

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

- A. A declaratory judgment that the actions of Defendants complained of herein violate the laws of the State of New York and the City of New York;
- B. An injunction and order permanently restraining Defendants from engaging in such unlawful conduct;
- C. An award of damages in an amount to be determined at trial, plus prejudgment interest, to compensate Plaintiff for all monetary and/or economic damages, including but not limited to past and future lost earnings;

D. An award of damages against Defendants, 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 emotional pain and suffering and emotional distress;

E. An award of punitive damages, in an amount to be determined at trial;

F. Prejudgment interest on all amounts due;

G. An award of attorneys' fees and costs that Plaintiff has incurred in this action to the fullest extent permitted by law; and,

H. 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: July 26, 2023
New York, New York

Respectfully submitted,

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