

GIRARD BENGALI, APC
355 S. GRAND AVENUE, SUITE 2450
LOS ANGELES, CA 90071
(323) 302-8300

1 MICHAEL J. WILLEMIN (NY SBN 4985610)

2 mwillemin@wigdorlaw.com

3 MONICA HINCKEN (NY SBN 5351804)

4 mhincken@wigdorlaw.com

(Both to be admitted *pro hac vice*)

5 **WIGDOR LLP**

85 Fifth Avenue, Fifth Floor

New York, NY 10003

6 Tel.: (212) 257-6800

7 Fax.: (212) 257-6845

8 ROBERT J. GIRARD II (BAR NO. 216949)

9 rgirard@girardbengali.com

10 OMAR H. BENGALI (BAR NO. 276055)

11 obengali@girardbengali.com

12 **GIRARD BENGALI, APC**

355 S. Grand Ave., Suite 2450

13 Los Angeles, CA 90071

14 Tel.: (323) 302-8300

15 Fax.: (323) 302-8310

Attorneys for Plaintiff Vanessa LeMaistre

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

17 **COUNTY OF LOS ANGELES – STANLEY MOSK COURTHOUSE**

18 VANESSA LEMAISTRE,

19 Plaintiff,

20 vs.

21 LELAND T. WAYNE p/k/a METRO
22 BOOMIN,

23 Defendant.

Case No. **24STCV28310**

**COMPLAINT SEEKING
DAMAGES**

1. Battery – Civil Sexual Assault
2. Sexual Battery - Cal. Civ. Code § 1708.5
3. Ralph Act - Cal. Civ. Code § 51.7
4. Gender Violence - Cal. Civ. Code § 52.4(c)(2))
5. Bane Act - Cal. Civ. Code § 52.1

JURY TRIAL DEMANDED

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COMPLAINT SEEKING DAMAGES

**TRIGGER WARNING:
THIS DOCUMENT CONTAINS HIGHLY GRAPHIC INFORMATION OF A
SEXUAL NATURE, INCLUDING SEXUAL ASSAULT**

Plaintiff Vanessa LeMaistre (“Plaintiff” or “Ms. LeMaistre”) hereby alleges, by and through her undersigned counsel, Wigdor LLP, as and for her Complaint against Defendant Leland T. “Metro Boomin” Wayne (“Wayne” or “Defendant”) as follows:

PRELIMINARY STATEMENT

1. Wayne is an award-winning music producer and artist who has found fame in his successful partnerships with rappers Future, 21 Savage and Big Sean.¹ He is considered to be one of the most significant producers in the rap and hip-hop community, having been nominated for Album of the Year at the 65th Annual Grammy Awards and Producer of the Year at the 66th Annual Grammy Awards.²

2. Wayne released his first studio album, Not All Heroes Wear Capes, in 2018, which debuted at number one on the Billboard 200 chart.³ His second album, Heroes & Villains, was released in 2022 and was nominated for Best Rap Album at the 66th Annual Grammy Awards.⁴

3. In February 2016, Ms. LeMaistre suffered from the greatest loss possible when her 9-month-old son, Kamden, passed away as a result of a rare and fatal disease.

¹ See <https://www.npr.org/2024/04/18/1245528781/metro-boomin-future-we-still-dont-trust-you>

² See <https://www.grammy.com/artists/metro-boomin/51984>.

³ See <https://www.billboard.com/pro/metro-boomin-not-all-heroes-wear-capes-number-1-billboard-200>.

⁴ See <https://www.grammy.com/artists/metro-boomin/51984>.

1 4. Ms. LeMaistre was deeply distraught and in mourning when she met
2 Wayne in the Spring of 2016 in Las Vegas, Nevada.

3 5. When Wayne invited Ms. LeMaistre to visit him at recording studios in
4 California, where she lived, she was happy for the opportunity to watch him work
5 because she was passionate about music, but more importantly because music
6 provided an escape from the pain she was in after losing her son.

7 6. Devastatingly, however, meeting Wayne resulted in Ms. LeMaistre
8 suffering from the second worst thing that ever happened to her – being raped by
9 someone who pretended to be her friend for months.

10 7. Under the guise of friendship and a shared love of music, Wayne gained
11 Ms. LeMaistre’s trust as she shared her grief over her son’s death. Ms. LeMaistre
12 believed that they had bonded over the ability of music to help people in their darkest
13 moments.

14 8. However, any bond Ms. LeMaistre believed they formed was shattered
15 in or around September 2016 when Wayne invited her to the studio to watch him
16 work.

17 9. Ms. LeMaistre arrived and was immediately given a shot of alcohol.
18 She also ingested half of a Xanax bar which she used to cope with her anxiety after
19 her son’s loss.

20 10. Ms. LeMaistre and Wayne sat on a couch and discussed their mutual
21 depression, with Wayne telling Ms. LeMaistre that he was depressed because he had
22 just broken up with his long-term girlfriend and Ms. LeMaistre sharing again how
23 difficult it was since her son died.

24 11. Wayne then went into the studio to begin working and Ms. LeMaistre
25 settled onto the couch for what she believed would be a normal night watching
26 Wayne work and enjoying the music.

1 12. However, the next thing Ms. LeMaistre can recall is waking up on a bed
2 in a different location with Wayne raping her and being completely unable to move
3 or make a sound. She was in and out of consciousness for an unknown amount of
4 time but awoke again at some point to Wayne performing oral sex on her.

5 13. At no point during this encounter was Ms. LeMaistre able to consent to
6 any sexual activity, and Wayne’s conduct without question constituted rape and
7 sexual assault.

8 14. A few weeks after the sexual assault, Ms. LeMaistre found out that she
9 was pregnant. She had not had sex with anyone else, so Ms. LeMaistre knew that
10 the pregnancy was the result of Wayne raping her.

11 15. Given the recent loss of her son and the traumatic cause of her
12 pregnancy, Ms. LeMaistre knew that she could not continue the pregnancy and
13 maintain any semblance of her declining mental health.

14 16. As a result, Ms. LeMaistre had an abortion in November 2016.

15 17. Approximately one year later, Wayne produced the song, “Rap Saved
16 Me” with the lyrics:

17 She took a Xanny, then she fainted
18 I'm from the gutter, ain't no changing
19 From the gutter, rap saved me
20 She drive me crazy, have my baby

21 18. The lyrics were horrifying for Ms. LeMaistre to hear over and over
22 again, as they recounted the situation that happened to her and caused further trauma.
23

24 19. Many years later, Ms. LeMaistre is still working to put herself back
25 together after experiencing such an extraordinary amount of trauma at the hands of
26

1 Wayne – someone she truly believed to be her friend but turned out to be her worst
2 nightmare.

3 JURISDICTION AND VENUE

4 20. This Court has jurisdiction pursuant to Cal. Civ. Proc. Code § 410.10.
5 This Court has personal jurisdiction over Defendant because he purposefully avails
6 himself of the forum’s benefits, the controversy giving rise to this lawsuit arises out
7 of Defendant’s contacts with the forum and the assertion of personal jurisdiction
8 comports with fair play and substantial justice.

9 21. Venue is proper in this Court pursuant to Cal. Civ. Proc. Code § 395(a)
10 because the incidents, harm and injuries complained of herein occurred within Los
11 Angeles County, California.

12 PARTIES

13 22. Plaintiff Vanessa LeMaistre is a 38-year-old woman domiciled in Los
14 Angeles, California.

15 23. Defendant Leland T. “Metro Boomin” Wayne is, upon information and
16 belief, domiciled in Cartersville, Georgia.

17 FACTUAL ALLEGATIONS

18 I. **Wayne Has Established Himself as an Award-Winning Producer and** 19 **Musical Artist and a Disturbing Misogynist**

20 24. Wayne is a Grammy-nominated producer and artist known for his
21 collaborations with rappers Future, 21 Savage, and Big Sean among many others.

22 25. According to the Grammy Awards, “Metro Boomin has been behind the
23 board of more than 100 Billboard Hot 100 songs, including top 10 hits like the
24 Migos’ ‘Bad and Boujee’ and 21 Savage’s ‘Mr. Right Now’ with Drake.”⁵

25 _____
26 ⁵ See [https://www.grammy.com/news/how-metro-boomin-became-in-demand-rap-
27 producer-2024-grammys](https://www.grammy.com/news/how-metro-boomin-became-in-demand-rap-producer-2024-grammys).

1 26. In 2022, Wayne “created the soundtrack to the animated blockbuster
2 ‘Spider-Man: Across the Spider-Verse.’”⁶

3 27. Wayne also recorded and released his own music including the album
4 Not All Heroes Wear Capes, in 2018, which debuted at number one on the Billboard
5 200 chart⁷ and the album Heroes & Villains, in 2022, which was nominated for Best
6 Rap Album at the 66th Annual Grammy Awards.⁸

7 28. Wayne’s 2022 album included collaborations with several notable
8 artists, including John Legend, Future, Chris Brown, Travis Scott, and A\$AP Rocky.⁹

9 29. In 2017, Wayne launched his own record label called Boominati
10 Worldwide in partnership with Republic Records and Universal Music Group.¹⁰

11 30. Most recently, in May 2024, Wayne received a significant amount of
12 publicity because of his role in a feud that erupted between artists Drake and
13 Kendrick Lamar.

14 31. In response, dozens of misogynistic tweets that Wayne wrote re-
15 surfaced, bringing his flippant attitude toward sexual assault and drugging women
16 to the forefront.

17 32. The tweets were so problematic that the hashtag #metrogroomin began
18 trending on social media.

19 33. Although Wayne (or someone else at his direction) quickly went on a
20 deleting spree, screenshots were taken of the following offensive tweets and re-
21 tweets, among others:

22 _____

23 ⁶ Id.

24 ⁷ See <https://www.billboard.com/pro/metro-boomin-not-all-heroes-wear-capes-number-1-billboard-200>.

25 ⁸ See <https://www.grammy.com/artists/metro-boomin/51984>.

26 ⁹ See <https://hypebeast.com/2022/12/metro-boomin-heroes-and-villains-album-stream>.

27 ¹⁰ See <https://www.universalmusic.com/metro-boomin-announces-boominati-worldwide-label-partnership-republic-records-universal-music-group>.

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She gon suck me whether she like it or not. That's what the molly for

Got your Lil sister on them mollies, she dun ran thru the whole squad

I'll beat the charge RT @NASisBORING: [picture link] this girl is 13

All the loose and easy teenage pussy in Saint Louis Missouri, and you tryna sodomize somebody grandma.. nahhhhhhhhh

YES Maybe even for the crew too lol RT @HoodAffairsTV: If I get a chick that wants me to get her some Molly's, is that guaranteed p*ssy? Lol

She might be young but she ready
The things I would do to Ciara are probably illegal
I'm tryna tell #oomf that "age aint nothin but a number" lol

Walking through the grocery store with both hands in my khakis like a true pedophile tho

The truth. RT @relyOnSMASH: those couple of girls that had big titties and a fat ass in junior high are all washed and folded up now

Imfao!!!!!!! RT @KevMicheal: Chris Brown's album #Graffiti is already outselling Rihanna's album...he just can't stop #beating her...

34. Wayne also tweeted a list of rules to follow numbered 1-10:

- Rule #1: Never Trust a Hoe
- Rule #2: No Means Blow
- Rule #3: Commin 2 my hotel ya gotta blow 1, 2, 3, and maybe 4
- Rule #4: Get yo shit & go
- Rule #5: Bye Bye Hoe
- Rule #6: I'm Not Kissing You
- Rule #7: I'm Tired of talking...(wtf lol)
- Rule #8: You straight?
- Rule #9: You Had a Good Time?

1 • Rule #10: Lez Do It Again! Lmao...

2 35. When Wayne’s offensive tweets resurfaced, he attempted to defend
3 them by posting yet another offensive tweet: lol I can’t be a pedophile @ 15 nigga
4 #nopedo.

5 36. Once it was pointed out that he could not have been 15 years old when
6 the tweets were written, Wayne quickly deleted the tweet, never bothering to
7 disavow his penchant for tweeting about drugging and assaulting women.

8 **II. Ms. LeMaistre Meets Wayne and Believes She Forms a Friendship with**
9 **Him**

10 37. On February 23, 2016, Ms. LeMaistre’s nine-month-old son, Kamden,
11 passed away as a result of a rare and fatal disease.

12 38. A month or two later, while deep in mourning, Ms. LeMaistre took a
13 weekend trip to Las Vegas with the hope that new scenery would be a brief
14 distraction from the overwhelming grief she was feeling and allow her to dull the
15 pain, even if just temporarily.

16 39. A friend introduced her to Wayne in Las Vegas that weekend during a
17 day party. Ms. LeMaistre and several other people hung out at a hotel after the day
18 party and then went to club together that evening.

19 40. In the SUV on the way from the day party to the hotel, Ms. LeMaistre
20 was with Wayne and several other people. During that ride, Ms. LeMaistre told
21 everyone that she had recently turned 30 and, although she tried not to talk about it,
22 she told everyone about losing her son as well. Everyone got very quiet and
23 eventually expressed their sympathy.

24 41. Throughout the day and night, Wayne and Ms. LeMaistre had several
25 discussions about music and life in general. Wayne invited her to visit him while he
26 worked at studios in California, which was where Ms. LeMaistre was living.

1 42. When they returned to California, a mutual friend who was in Las
2 Vegas invited Ms. LeMaistre to go to the studio to see one of Wayne’s studio
3 sessions.

4 43. Over the next few months, Ms. LeMaistre went back to the studio
5 several times.

6 44. Ms. LeMaistre’s interactions were friendly at first, and she found the
7 studio and the music to be a really useful distraction to her grief. It became
8 something of a refuge for her, as she could get away from her thoughts for a short
9 period of time and just focus on the music.

10 45. She and Wayne mostly had light-hearted conversations about music,
11 but occasionally they would discuss heavier topics like her grief.

12 46. Ms. LeMaistre grew to feel safe and comfortable in Wayne’s presence
13 and thought of him as a friend.

14 47. However, there were moments – due to Wayne’s excessive codeine use
15 – that broke that illusion of safety because Wayne was much less predictable when
16 using large amounts of codeine. Yet, he was never threatening to her, so she did not
17 think much of it at the time.

18 48. On some visits, Wayne’s friends warned him about the risk of taking so
19 much codeine, but he refused to allow anyone to measure his intake.

20 49. While Ms. LeMaistre developed a friendly bond with Wayne, she was
21 not in any position to pursue a relationship or intimacy with him.

22 **III. Wayne Horrifically Sexually Assaults Ms. LeMaistre**

23 50. In or around September 2016, Ms. LeMaistre arrived at the studio to
24 see Wayne, as she had done many times over the last few months.

25 51. It was a particularly difficult day from a mental health perspective – as
26 she continued working through her grief and trying to accept that her son was gone.

1 52. When she arrived, she took half a Xanax, which she used to help get
2 through difficult days and numb the pain, and was given a shot of alcohol.

3 53. It was shortly after Wayne’s mid-September birthday, and they
4 discussed feeling mutually depressed. Wayne mentioned that he was upset about a
5 recent break up or trial separation from his long-term girlfriend.

6 54. After their discussion, Wayne then went into the studio and Ms.
7 LeMaistre sat on the couch to watch and listen, as she normally did.

8 55. However, shortly after she began drinking her shot of alcohol, she
9 blacked out.

10 56. The next time Ms. LeMaistre regained consciousness, she woke up on
11 a bed with Wayne on top of her. She had no idea where she was or how she got
12 there.

13 57. Ms. LeMaistre was unable to move or make a sound – she felt
14 incapacitated in a way that she never before experienced.

15 58. She then lost consciousness again and woke up at some point later to
16 Wayne performing oral sex on her.

17 59. Needless to say, Ms. LeMaistre was incapable of giving consent.

18 60. Several hours later, Ms. LeMaistre woke up again. She was alone in a
19 hotel room but had no idea what hotel she was in or how she got there.

20 61. She felt unsteady but tried to quickly gather her clothing and other
21 possessions that were thrown around the room.

22 62. Just a few minutes later, Wayne walked into the room and told her to
23 get her things.

24 63. Ms. LeMaistre asked Wayne where she was, and he said a hotel in
25 Beverly Hills.

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1 64. Ms. LeMaistre, completely confused, overwhelmed and traumatized by
2 the brief flashes of memory she had, was desperate to get out of the room, so she
3 followed Wayne’s lead as he walked out of the hotel to a side street where two black
4 SUVs were waiting.

5 65. Wayne told her to get into one of the SUVs and he got into the other
6 one and drove away. The SUV drove her back to the studio where her car was
7 waiting.

8 **IV. Ms. LeMaistre Discovers She is Pregnant as a Result of Being Raped**

9 66. Ms. LeMaistre continued to have flashbacks of the two memories she
10 had of Wayne vaginally and orally raping her.

11 67. However, as a result of the trauma of losing her son, Ms. LeMaistre was
12 not emotionally prepared to deal with another traumatic incident and tried as hard as
13 she could to forget the feeling of complete helplessness and terror. She desperately
14 wanted to pretend it never happened.

15 68. However, a few weeks later, Ms. LeMaistre found out that she was
16 pregnant. She had not had sex with anyone else, so Ms. LeMaistre knew that the
17 pregnancy was the result of Wayne raping her.

18 69. Given the recent loss of her son and the traumatic cause of her
19 pregnancy, Ms. LeMaistre knew that she could not continue the pregnancy and
20 maintain any semblance of her declining mental health.

21 70. As a result, Ms. LeMaistre had an abortion in November 2016.

22 71. Approximately one year later, Wayne produced the song, “Rap Saved
23 Me” with the lyrics:

24 She took a Xanny, then she fainted
25 I'm from the gutter, ain't no changing
26 From the gutter, rap saved me

1 She drive me crazy, have my baby

2 72. The lyrics were horrifying for Ms. LeMaistre to hear over and over
3 again, as they recounted the situation that happened to her and caused further trauma.

4 73. For a very long time after, Ms. LeMaistre tried to convince herself that
5 the rape did not happen despite knowing that it did. She even occasionally reached
6 out to Wayne to ask how he was and say a kind word. She thought in doing so that
7 she could trick her own mind into thinking he was an actual friend to her.

8 74. Unfortunately, trauma does not simply disappear regardless of how
9 much you try to push it aside. After a lot of therapy and learning healthy coping
10 mechanisms, Ms. LeMaistre now understands that her trauma continues to resurface.

11 75. She has worked relentlessly to improve her mental health and general
12 well-being and realizes now that she cannot simply pretend one of the most traumatic
13 events of her life did not happen.

14 76. As a result, Ms. LeMaistre is determined to seek justice for the pain and
15 devastation she endured, and to make sure others are warned that Wayne’s offensive
16 tweets are more than just lip service – they are in fact a blueprint to his behavior
17 toward women.

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19 **FIRST CAUSE OF ACTION**
20 **(Battery - Civil Sexual Assault)**

21 77. Plaintiff repeats and realleges each and every allegation in all of the
22 preceding paragraphs as if fully set forth herein.

23 78. Defendant committed a battery against Plaintiff when he engaged in
24 unlawful, intentional, and offensive touching or application of force to Plaintiff’s
25 person when touched her for the purpose of sexual arousal, sexual gratification or

1 sexual abuse, where Plaintiff did not act freely and voluntarily, and the actions were
2 against Plaintiff’s will, as defined in Cal. Penal Code § 243.4.

3 79. Additionally, Defendant committed a rape against Plaintiff, as defined
4 in Cal. Penal Code § 261.

5 80. As a result of Defendant’s alleged conduct, Plaintiff has suffered severe
6 emotional distress, humiliation, embarrassment, anxiety, economic harm, and other
7 consequential damages.

8 81. The conduct of Defendant described above was willful, wanton, and
9 malicious. At all relevant times, Defendant acted with conscious disregard of
10 Plaintiff’s rights and feelings, acted with knowledge of or with reckless disregard
11 for the fact that his conduct was certain to cause injury and/or humiliation to
12 Plaintiff, and intended to cause fear, physical injury, and/or pain and suffering to
13 Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive and
14 exemplary damages from Defendant according to proof at trial.

15 82. This cause of action is timely under California’s Sexual Abuse and
16 Cover-Up Accountability Act, AB 2777 because it is “based on conduct that occurred
17 on or after January 1, 2009, and is commenced []after January 1, 2019,” and is
18 thereby revised by Cal. Code Civ. Proc. § 340.16(b)(3).

19 **SECOND CAUSE OF ACTION**
20 **(Sexual Battery - Cal. Civ. Code § 1708.5)**

21 83. Plaintiff repeats and realleges each and every allegation in all of the
22 preceding paragraphs as if fully set forth herein.

23 84. Defendant committed a sexual battery under Cal. Civ. Code § 1708.5
24 when he intended to and did cause harmful and/or offensive contact with intimate
25 parts of Plaintiff.

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1 85. Plaintiff did not act freely and voluntarily, and the actions were against
2 Plaintiff's will.

3 86. As a result of Defendant's alleged conduct, Plaintiff has suffered severe
4 emotional distress, humiliation, embarrassment, anxiety, economic harm, and other
5 consequential damages.

6 87. The conduct of Defendant described above was willful, wanton, and
7 malicious. At all relevant times, Defendant acted with conscious disregard of
8 Plaintiff's rights and feelings, acted with knowledge of or with reckless disregard
9 for the fact that his conduct was certain to cause injury and/or humiliation to
10 Plaintiff, and intended to cause fear, physical injury, and/or pain and suffering to
11 Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive and
12 exemplary damages from Defendant according to proof at trial.

13 88. This cause of action is timely under California's Sexual Abuse and
14 Cover-Up Accountability Act, AB 2777 because it is "based on conduct that occurred
15 on or after January 1, 2009, and is commenced []after January 1, 2019," and is
16 thereby revised by Cal. Code Civ. Proc. § 340.16(b)(3).

17 **THIRD CAUSE OF ACTION**
18 **(RALPH ACT – Cal. Civ. Code § 51.7)**

19 89. Plaintiff repeats and realleges each and every allegation in all of the
20 preceding paragraphs as if fully set forth herein.

21 90. Defendant committed a violent act against Plaintiff, motivated by her
22 sex, by penetrating her vagina without her consent, in that he would not and could
23 not have committed the same violence against a man, and that violent act was a
24 substantial factor in the resulting physical and mental harm suffered by Plaintiff.

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1 91. As a result of Defendant’s alleged conduct, Plaintiff has suffered severe
2 emotional distress, humiliation, embarrassment, anxiety, economic harm, and other
3 consequential damages.

4 92. The conduct of Defendant described above was willful, wanton, and
5 malicious. At all relevant times, Defendant acted with conscious disregard of
6 Plaintiff’s rights and feelings, acted with knowledge of or with reckless disregard
7 for the fact that his conduct was certain to cause injury and/or humiliation to
8 Plaintiff, and intended to cause fear, physical injury, and/or pain and suffering to
9 Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive and
10 exemplary damages from Defendant according to proof at trial.

11 93. This cause of action is timely under California’s Sexual Abuse and
12 Cover-Up Accountability Act, AB 2777 because it is “based on conduct that occurred
13 on or after January 1, 2009, and is commenced []after January 1, 2019,” and is
14 thereby revised by Cal. Code Civ. Proc. § 340.16(b)(3).

15 **FOURTH CAUSE OF ACTION**
16 **(GENDER VIOLENCE - Cal. Civ. Code § 52.4(c)(2))**

17 94. Plaintiff repeats and realleges each and every allegation in all of the
18 preceding paragraphs as if fully set forth herein.

19 95. Defendant committed the act of sexual penetration in contravention of
20 California Penal Code for the purpose of, upon information and belief, arousal,
21 gratification or abuse against Plaintiff’s will and by force and is therefore liable for
22 gender violence.

23 96. As a result of Defendant’s alleged conduct, Plaintiff has suffered severe
24 emotional distress, humiliation, embarrassment, anxiety, economic harm, and other
25 consequential damages.

1 97. The conduct of Defendant described above was willful, wanton, and
2 malicious. At all relevant times, Defendant acted with conscious disregard of
3 Plaintiff's rights and feelings, acted with knowledge of or with reckless disregard
4 for the fact that his conduct was certain to cause injury and/or humiliation to
5 Plaintiff, and intended to cause fear, physical injury, and/or pain and suffering to
6 Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive and
7 exemplary damages from Defendant according to proof at trial.

8 98. This cause of action is timely under California's Sexual Abuse and
9 Cover-Up Accountability Act, AB 2777 because it is "based on conduct that occurred
10 on or after January 1, 2009, and is commenced []after January 1, 2019," and is
11 thereby revised by Cal. Code Civ. Proc. § 340.16(b)(3).

12 **FIFTH CAUSE OF ACTION**
13 **(Bane Act - Cal. Civ. Code § 52.1)**

14 99. Plaintiff incorporates herein by reference, as though set forth in full, all
15 preceding paragraphs of this Complaint.

16 100. At all relevant times herein, Defendant interfered or attempted to
17 interfere by threat, intimidation or coercion and by physical force, with Plaintiff's
18 exercise or enjoyment of her right to be free from sexual assault and sex
19 discrimination as secured by the laws of California.

20 101. As a result, Plaintiff has suffered and will continue to suffer mental and
21 physical pain and suffering.

22 102. This cause of action is timely under California's Sexual Abuse and
23 Cover-Up Accountability Act, AB 2777 because it is "based on conduct that occurred
24 on or after January 1, 2009, and is commenced []after January 1, 2019," and is
25 thereby revised by Cal. Code Civ. Proc. § 340.16(b)(3).

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PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays judgment be entered in her favor against Defendant, and each of them, as follows:

- A. For a money judgment representing compensatory damages including consequential damages, lost wages, earning, and all other sums of money, together with interest on these amounts, according to proof;
- B. For a money judgment for mental pain and anguish and severe emotional distress, according to proof;
- C. For punitive and exemplary damages according to proof;
- D. For attorneys' fees and costs;
- E. For prejudgment and post-judgment interest; and
- F. For such other and further relief as the Court may deem just and proper.

GIRARD BENGALI, APC
355 S. GRAND AVENUE, SUITE 2450
LOS ANGELES, CA 90071
(323) 302-8300

JURY DEMAND

1
2 Plaintiff hereby demands a trial by jury on all issues of fact and damages stated
3 herein.
4

5 Dated: October 29, 2024

6 Respectfully submitted,

7 **WIGDOR LLP**

8
9 By: 

10 Michael J. Willeman
11 Monica Hincken
12 (To be admitted *pro hac vice*)
13 85 Fifth Avenue, Fifth Floor
14 New York, NY 10003
15 Telephone: (212) 257-6800
16 Facsimile: (212) 257-6845
mwillemin@wigdorlaw.com
mhincken@wigdorlaw.com

17 **GIRARD BENGALI, APC**

18
19 By: 

20 Omar H. Bengali
21 Robert J. Girard II

22 355 S. Grand Ave., Suite 2450
23 Los Angeles, California 90071
24 Telephone: (323) 302-8300
25 Facsimile: (323) 302-8310
obengali@girardbengali.com
rgirard@girardbengali.com

26 *Attorneys for Plaintiff Vanessa LeMaistre*