



STATE OF NORTH CAROLINA
COUNTY OF MECKLENBURG

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

[REDACTED]

[REDACTED]

Plaintiff,

v.

[REDACTED] **AND John Doe**

Defendants.

COMPLAINT
(Jury Trial Demanded)

NOW COMES Plaintiff, [REDACTED] by and through undersigned counsel, who hereby alleges the following causes of action against Defendants, [REDACTED] [REDACTED] and John Doe based upon her personal knowledge and based upon information and belief as to all matters, including, *inter alia*, an investigation conducted by and through her attorneys:

JURISDICTION AND VENUE

1. Under N.C.G.S. § 7A-243, this Court has subject matter jurisdiction over this matter because the amount in controversy exceeds twenty-five thousand dollars (\$25,000).
2. Under N.C.G.S. § 1-75.4(3), this Court has personal jurisdiction in this matter as the incident occurred within this State by the defendant.
3. Venue is proper because of the alleged acts or omissions reflected below, which gave rise to this cause of action, having occurred within Mecklenburg County, North Carolina.

PARTIES

4. The Plaintiff, [REDACTED] (“Plaintiff”) is a citizen and resident of Mecklenburg County, North Carolina.

5. Upon information and belief, Defendant, [REDACTED] (“Defendant [REDACTED]”) is a citizen and resident of [REDACTED]

6. Upon information and belief, [REDACTED] (“Defendant [REDACTED]”) is the [REDACTED] of [REDACTED] at the [REDACTED] and is an agent for [REDACTED]

7. Upon information and belief, [REDACTED] (“Defendant [REDACTED]”) is a North Carolina corporation.

8. Upon information and belief, [REDACTED] (“Defendant [REDACTED]”) is an off-duty [REDACTED] Police Officer who worked as security for [REDACTED]. He is an agent for [REDACTED]

FACTUAL ALLEGATIONS

Relationship between Plaintiff and Defendant [REDACTED]

9. Defendant [REDACTED] followed Plaintiff on Twitter and both interacting with each other starting in 2011.

10. Plaintiff and Defendant [REDACTED] met for the first time in 2012 in Charlotte, North Carolina. Subsequently, in the same year, they started exclusively dating.

11. Plaintiff and Defendant [REDACTED] maintained an intimate relationship, but it was distant since they attended different colleges. Plaintiff was in [REDACTED] while Defendant [REDACTED] was in [REDACTED]

12. Plaintiff was a [REDACTED] and Defendant [REDACTED] a [REDACTED]. Despite the distance and her heavy workload, Plaintiff managed to attend Defendant [REDACTED]'s games including the [REDACTED].

13. In 2015, [REDACTED] [REDACTED] selected Defendant [REDACTED] to their team. After this, Defendant [REDACTED] insisted Plaintiff move to [REDACTED] to be closer. He also told Plaintiff not to pursue a [REDACTED] since he will be earning more than her.

14. Plaintiff denied the plan to move to [REDACTED] and this made their relationship worse. Defendant [REDACTED] started behaving violently with Plaintiff.

15. Defendant [REDACTED] also started to belittle Plaintiff on phone in the presence of his other teammates on the [REDACTED].

16. Defendant [REDACTED] emailed Plaintiff and called her dad to beg for forgiveness for the way he was acting to Plaintiff.

17. Later, to make up with Plaintiff for his behavior Defendant [REDACTED] got tickets for Plaintiff to attend his game in [REDACTED].

18. After his [REDACTED] death, Defendant [REDACTED] confided in Plaintiff. He also took Plaintiff's advice and started talking to his mother with whom he never spoke for the past eight years.

19. In [REDACTED], when Defendant [REDACTED] hurt his [REDACTED], Plaintiff left all her other work to take care of him.

20. From [REDACTED] Plaintiff and Defendant [REDACTED] was in an on-again and off-again relationship.

21. In June 2020, Plaintiff told Defendant [REDACTED] that she was married. Soon Defendant [REDACTED] started harassing Plaintiff to get on FaceTime to show proof of marriage.

22. Thereafter, Plaintiff did not have any communication with Defendant [REDACTED] for months.

Incidents of October 17, 2020, between Plaintiff and Defendant [REDACTED]

23. On October 17, 2020, [REDACTED] continuously texted Plaintiff stating that he was in town and wanted to see her.

24. During this communication, Plaintiff let Defendant [REDACTED] know that she was pregnant and was expecting her second child.

25. However, Defendant [REDACTED] was persistent in his effort to meet Plaintiff at the hotel where stayed. He told Plaintiff that he would pay the hotel bill for her visit.

26. Plaintiff informed Defendant [REDACTED] that she was in a webinar for the company she works for and that the webinar would not be over until 9:00 pm. Defendant [REDACTED] still insisted on meeting Plaintiff.

27. After the webinar, Plaintiff dropped her daughter off at her parents' house and went to [REDACTED] to meet Defendant [REDACTED]. She asked Defendant [REDACTED] to meet her in the parking garage of the hotel.

28. Defendant [REDACTED] informed that he could not leave the hotel, due to COVID-19 protocols and Plaintiff to book a room there so that they could meet.

29. Because of Defendant [REDACTED]'s compulsion, Plaintiff booked a room at [REDACTED]

30. The plan was that Plaintiff would book a room to meet Defendant [REDACTED] before the curfew at 11:00 pm and he would pay for Plaintiff's room.

31. Plaintiff arrived at the time of curfew and Defendant [REDACTED] sneaked over to Plaintiff's room breaking the COVID restrictions.

32. After his arrival, Plaintiff and Defendant [REDACTED] had talks regarding reimbursing Plaintiff for the room at [REDACTED]

33. During this conversation, Plaintiff noticed a scratch on Defendant [REDACTED] forehead and enquired about it. Defendant [REDACTED] replied, "[REDACTED] [REDACTED]." He then took out his vape pen and took few breaths and when he exhaled Plaintiff smelled marijuana.

34. Defendant [REDACTED] then pulled his pants down and asked Plaintiff to suck his dick. Plaintiff denied this and answered "no." Plaintiff also informed Defendant [REDACTED] that she will not be intimate with him unless he reimbursed her for the room.

35. Defendant [REDACTED] then made a call and soon Plaintiff received a notification on Cash App regarding receipt of payment from [REDACTED] who is Defendant [REDACTED]'s assistant.

36. Plaintiff then became intimate with Defendant [REDACTED] and engaged in fellatio. Afterward, they sat on the bed watching football on television and engaged in casual talk.

37. Plaintiff knew that Defendant [REDACTED] had a curfew at 11:00 and also that he played the [REDACTED] the next day and needed rest. So, she got ready to leave the room.

38. But Defendant [REDACTED] restrained Plaintiff and told her that he can only get really good rest if he was getting vaginal sex. He then forcefully reached across Plaintiff and tried to put his hands in the back of Plaintiff's pants.

39. Defendant [REDACTED] pulled Plaintiff off the bed and tried to have sex with her. Plaintiff managed to wiggle free and pulled up her pants.

40. Plaintiff reminded Defendant [REDACTED] of a similar incident that happened in 2019 where Defendant [REDACTED] got Plaintiff pregnant and later forced her to do an abortion. Moreover, he also injured Plaintiff during sex and caused her physical injuries.

41. So, Plaintiff informed Defendant [REDACTED] that she is not willing to take the risk now that she is pregnant.

42. Defendant [REDACTED] was angry at Plaintiff for rejecting him and screamed at her saying that he "[REDACTED]" and stated that Plaintiff was a bad mother.

43. Defendant [REDACTED] continued to argue with Plaintiff and Plaintiff started recording the incidents. Immediately as Plaintiff started recording Defendant [REDACTED] launched forward and hit Plaintiff in the face causing her to fall back onto the bed.

44. Defendant [REDACTED] yanked Plaintiff off the bed by her right arm and hit Plaintiff's stomach with his 300 lbs frame causing severe pain to Plaintiff.

45. While this incident occurred, Plaintiff weighed 127 lbs and Defendant [REDACTED] was 280 lbs.

46. Defendant [REDACTED] then grasped Plaintiff's right arm under his right arm and with his left hand, he twisted Plaintiff's long nails backward to her wrist to cause her physical pain.

47. Defendant [REDACTED] continued to intentionally rip Plaintiff's nails to cause incredible pain to her.

48. Defendant [REDACTED] continued to hold on to Plaintiff's right arm and began to forcefully drag her to the door. Meanwhile, Plaintiff tried to free herself from Defendant [REDACTED]. He let go of Plaintiff after reaching the door and walked out.

49. Plaintiff put the door stopper and continued to record Defendant [REDACTED] once again while he was walking down the hallway.

50. Plaintiff yelled at Defendant [REDACTED] for hitting her while she was pregnant. Soon, Defendant [REDACTED] also started to record Plaintiff and got on the elevator. He then stepped off the elevator and hit Plaintiff on the forearm.

51. Plaintiff responded by yelling and calling him derogatory names for hitting her.

52. After this incident, Plaintiff walked back to the hotel room and noticed that her vision was blurry. She realized that she lost her contact lens and found it on the floor of the room.

53. Plaintiff sent the videos to two of her close friends and one of them offered to pick up Plaintiff from [REDACTED].

54. Plaintiff made her way to the lobby to locate a police officer to address the assault committed by Defendant [REDACTED].

Interaction with [REDACTED] Agent and [REDACTED]

55. Plaintiff tried to get assistance from [REDACTED] and saw a valet and explained the incident and informed that she needed police help.

56. Defendant [REDACTED] approached Plaintiff while she was talking with the valet. Defendant [REDACTED] was an off-duty [REDACTED] who was moonlighting as security for [REDACTED]

57. Plaintiff explained the incident to Defendant [REDACTED]. Defendant [REDACTED] had on the [REDACTED] (“CMPD”) uniform, but he informed Plaintiff that he was off-duty and was working as security for the [REDACTED]. He assured Plaintiff he would get assistance after his bathroom break.

58. Defendant [REDACTED] returned after approximately 15 minutes and said that help was on the way. He returned with four [REDACTED]

59. Plaintiff informed Defendant [REDACTED] that she only wanted to talk to CMPD and did not want to talk with anyone else.

60. Defendant [REDACTED] assured Plaintiff that the [REDACTED] were the best people who could help her.

61. However, Plaintiff informed the four men that she did not wish to talk with anyone from the [REDACTED]

62. Defendant [REDACTED] was one among the four men. He told Plaintiff that they were private security contracted by the [REDACTED] and they would help her.

63. Plaintiff agreed to talk with him and explained that it was Defendant [REDACTED] who assaulted her. Defendant [REDACTED] wrote the name on a piece of paper and walked off.

64. Another [REDACTED] representative proceeded to interrogate Plaintiff and asked about Plaintiff’s purpose of visit and the duration of her relationship with Defendant [REDACTED]

65. Plaintiff explained about the on and off relationship with Defendant [REDACTED] for the past 10 years and his act of violence towards her.

66. The [REDACTED] representative asked Plaintiff if there was any chance that [REDACTED] and Plaintiff could have a conversation to reach a conclusion. Plaintiff strongly disagreed with this and informed him that she did not want to talk to Defendant [REDACTED]

67. Later, Plaintiff overheard one of the [REDACTED] representatives say that she was a prostitute and was making a paying call to Defendant [REDACTED]. This enraged Plaintiff and she yelled at the [REDACTED] representative.

68. Plaintiff then made it clear that she would only speak to the police, and not with the [REDACTED] representatives.

69. In the interim, the [REDACTED] representative asked Plaintiff about the video of Defendant [REDACTED] hitting her. After reviewing the video, the [REDACTED] representative stated that it did not look good and asked her if she was okay with Defendant [REDACTED] apologizing to her.

70. Plaintiff responded that she did not want to speak with Defendant [REDACTED] and requested him to keep him away from her. She again said that she wanted to speak with the police regarding the incident.

71. When the [REDACTED] representatives did not take any action, Plaintiff dialed 911 and reported the assault. During her conversation with the operator reporting the assault, Defendant [REDACTED] walked up to her listening to her exchanging the information.

72. Plaintiff also requested the [REDACTED] representative to call the police and to keep [REDACTED] away from her.

73. Meanwhile, Defendant [REDACTED] re-approached Plaintiff and viewed the videos, and stated that it was not clear and did not prove anything.

74. The [REDACTED] representatives continued to persuade Plaintiff to talk with Defendant [REDACTED] to resolve the issue.

75. The [REDACTED] representatives also brought Defendant [REDACTED] to Plaintiff trying to solve the matter without police intervention. Plaintiff repeated that she did not want to talk to Defendant [REDACTED]

76. Plaintiff overheard Defendant [REDACTED] talking to Defendant [REDACTED] that "[REDACTED]." Defendant [REDACTED] replied, "[REDACTED]"

77. Later, Plaintiff's friend showed up and Plaintiff was sitting on the floor holding her abdomen and was in great pain.

78. After an hour and a half, Plaintiff called the police again inquiring about the delay. The operator informed Plaintiff that the officers will soon arrive.

The arrival of Police Officers

79. After almost two hours, two [REDACTED] police officers arrived. They did not have their body cameras turned on as they were required to do.

80. One of the officers, Officer [REDACTED], started observing Plaintiff's left eye and inquired about her pregnancy.

81. The other officer, Officer [REDACTED] then came over and observed Plaintiff's left eye by shining a flashlight on her face. He further stated that at a first glance he did not notice that Plaintiff was pregnant.

82. The officers sat Plaintiff down and she explained the events between her and Defendant [REDACTED] that happened in the room.

83. Officer [REDACTED] then told Plaintiff that he is calling his Sergeant to see how they want to proceed.

84. Officer [REDACTED] then took Plaintiff to a private room, to make her feel more comfortable.

85. Plaintiff explained to the Officer about the incident including the oral sex. Officer [REDACTED] laughed at Plaintiff's narration making it humorous.

86. Plaintiff was almost nineteen weeks pregnant when Defendant [REDACTED] assaulted her. She was visibly in pain, was shaking and sweating to such a degree that one of the officers asked if she needed EMS services. Plaintiff responded that she needed medical attention but did not want to draw attention to herself.

87. After ten minutes, [REDACTED] up and they did preliminary tests on Plaintiff before the ambulance arrived. An ambulance was necessary as Plaintiff suffered pelvic pain due to her pregnancy.

88. After the ambulance arrived, they put Plaintiff on a stretcher and took her to the hospital.

89. Officer Thai gave Plaintiff his business contact card, with a number on the back which is supposed to be her report number.

90. Plaintiff was in the emergency room of the hospital until 7:00 am the following day.

91. On October [REDACTED], Plaintiff tried to find the magistrate's office, but could not locate it.

92. Later, on October [REDACTED], Plaintiff got the police report, and it stated that she was the aggressor, and Defendant [REDACTED] was the victim in the incident. The police had taken assault charges against Plaintiff for the scratch on Defendant [REDACTED]'s forehead.

93. Soon, Plaintiff called the District Sergeant and explained the incident. The Sergeant said he will meet her at the office later that day.

94. Later the evening of the 19th, Officer [REDACTED] arrived to meet Plaintiff at her residence and apologized to her, and took an amended statement.

95. After this, Plaintiff went to the eye doctor and OBGYN and continued her treatment after the hospital visit. Plaintiff had complications and was diagnosed with a concussion.

96. Plaintiff had complications healing after giving birth because of Defendant [REDACTED]'s assault.

Losing Job Opportunities

97. During the incident, Plaintiff worked at [REDACTED] (“[REDACTED]”). Meanwhile, she got an opportunity for employment with [REDACTED] (“[REDACTED]”). Plaintiff applied for the same and when she received her conditional offer, gave notice to [REDACTED].

98. [REDACTED] conducted a background check on Plaintiff and upon finding the pending assault charges, it retracted the offer.

99. Since Plaintiff already gave notice to [REDACTED] losing [REDACTED] opportunity resulted in her unemployment.

100. Later, Plaintiff applied for a position with [REDACTED] (“[REDACTED]”) as [REDACTED]. They offered her the position on [REDACTED]. But on [REDACTED].

██████████, Plaintiff received an email from ██████████ rescinding the offer after completion of the background check.

101. In the interim, Defendant signed a new three-year contract for ██████████, with ██████████ guaranteed and a ██████████ signing bonus with pending assault on a female charge pending. Nonetheless, his economic condition was unaffected

FIRST CAUSE OF ACTION
(Assault Against Defendant ██████████)

102. Plaintiff repeats and incorporates by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

103. Defendant ██████████'s acts of ██████████, constitute assault under the North of Carolina law.

104. Plaintiff was 18 weeks pregnant and Defendant ██████████ knowingly and intentionally attempted to physically harm Plaintiff in an offensive manner causing reasonable apprehension of immediate harm to her.

105. Defendant ██████████ actions include and are not limited to restraining Plaintiff from leaving the room; forcefully trying to have sex with Plaintiff; attempting to hit Plaintiff when she started recording and stepping off the elevator to hit Plaintiff.

106. As a direct and proximate cause of Defendant ██████████'s intentional actions, Plaintiff was, in fact, apprehensive of immediate harm.

107. As a direct and proximate result of Defendant ██████████'s intentional actions, Plaintiff has been damaged and is entitled to recover an amount in excess of

██████████

SECOND CAUSE OF ACTION
(Battery Against Defendant ██████████)

108. Plaintiff repeats and incorporates by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

109. Defendant [REDACTED] s acts of [REDACTED], constitute battery under North Carolina law.

110. Defendant [REDACTED] s acted knowingly and intentionally to cause harmful and offensive contact with Plaintiff without consent or privilege. Defendant

[REDACTED] s acts include and is not limited to:

- a. After arguing with Plaintiff on her refusal to have sex with him, [REDACTED] hit Plaintiff on her face.
- b. Defendant [REDACTED] snatched Plaintiff off the bed by her right arm. As a result of this Plaintiff hit her stomach on [REDACTED] s hip causing an immediate impact on her abdomen.
- c. Defendant [REDACTED] further twisted Plaintiff's arms and nails.
- d. Defendant [REDACTED] dragged Plaintiff to the door and walked out of the room.
- e. Later, at the elevator Defendant, [REDACTED] hit Plaintiff on her forearm.

111. Plaintiff was 18 weeks pregnant during this period and Defendant [REDACTED] s acts including the attempt to do sex, hitting, and other contacts with Plaintiff caused Plaintiff to suffer pain and suffering.

112. Defendant [REDACTED] knew about Plaintiff's pregnancy and his acts were intentional. Defendant [REDACTED] intentionally brought about the apprehension of immediate harm to Plaintiff

113. As a direct and proximate result of Defendant [REDACTED]'s intentional actions, Plaintiff has been damaged and is entitled to damages and to recover an amount in excess of [REDACTED]

THIRD CAUSE OF ACTION
(Intentional Infliction of Emotional Distress Against Defendant [REDACTED])

114. Plaintiff repeats and incorporates by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

115. Defendant [REDACTED]'s offensive and abusive behavior towards Plaintiff was deliberate and intentional.

116. Plaintiff was 18 weeks pregnant when Defendant [REDACTED] assaulted her, and Defendant [REDACTED]'s acts were extreme and outrageous causing severe mental and emotional distress to Plaintiff.

117. Defendant [REDACTED]'s acts causing severe mental and emotional distress to Plaintiff includes but is not necessarily limited to:

- a. Physical abuse of Plaintiff during her pregnancy caused severe emotional distress to her.
- b. Defendant [REDACTED] was Plaintiff's, first love. Calling her a [REDACTED] caused emotional distress to her.
- c. The police report which reported Plaintiff as the aggressor and Defendant [REDACTED] as the victim further caused emotional distress to Plaintiff.
- d. Plaintiff losing the job offered at [REDACTED] and [REDACTED] because of the pending assault charges against her caused emotional distress to Plaintiff.

118. [REDACTED]'s conduct was intentional, extreme, and outrageous, beyond all bounds of decency, and utterly intolerable in a civilized community.

119. As a result of [REDACTED]'s intentional infliction of emotional distress, Plaintiff suffered general and consequential damages, pecuniary loss, emotional pain and suffering, and other damages.

THIRD CAUSE OF ACTION
(False Imprisonment Against Defendant [REDACTED])

120. Plaintiff repeats and incorporates by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

121. On the day of the incident, Defendant [REDACTED] compelled Plaintiff to come to [REDACTED] where he stayed.

122. Defendant [REDACTED] forced Plaintiff to book a room at [REDACTED] irrespective of Plaintiff's suggestion to meet at the parking garage of [REDACTED].

123. Later, when Plaintiff got ready to leave the room at about 11:00 P.M., Defendant [REDACTED] stopped and restrained her illegally.

124. Defendant [REDACTED] used force and pulled Plaintiff off the bed and tried to have sex with her.

125. Defendant [REDACTED] restrain and detention of Plaintiff and the attempt to have sex with her was against her will.

126. As a direct and proximate result of Defendant [REDACTED]'s restraint and detention of Plaintiff, Plaintiff has been damaged and is entitled to recover an amount in excess of [REDACTED]

FOURTH CAUSE OF ACTION
(Abuse of Process Against Defendants [REDACTED], [REDACTED] and John Doe)

127. Plaintiff repeats and incorporates by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

128. Defendant [REDACTED] assaulted and injured Plaintiff at [REDACTED], and Plaintiff reported the incident to the police officers.

129. On [REDACTED], Plaintiff realized that there was a wrong report filed against her. The reported stated Plaintiff to be the aggressor and Defendant [REDACTED] as the victim.

130. Here, Defendant [REDACTED] Defendant [REDACTED] and Defendant John Doe abused the process to showcase Plaintiff to be the aggressor.

131. Upon information and belief, Defendant [REDACTED] Defendant [REDACTED] and Defendant John Doe had an ulterior purpose in abusing the process.

132. From the very beginning, Defendant [REDACTED] and Defendant John Doe tried to save [REDACTED] by trying to solve the issue without police intervention.

133. Upon information and belief, Defendant [REDACTED] and Defendant John Doe are agents of [REDACTED] and have abused the process to accomplish their ulterior purpose of saving Defendant [REDACTED] who is a [REDACTED] player.

134. Defendants' abuse of process resulted in pending assault charges against Plaintiff which caused Plaintiff to lose the job offer from [REDACTED] and [REDACTED] and remain unemployed.

135. As a direct and proximate result of Defendants' abuse of process, Plaintiff has been damaged and is entitled to recover an amount in excess of [REDACTED]

FIFTH CAUSE OF ACTION
(Fraud Against Defendants [REDACTED], [REDACTED] and John Doe)

136. Plaintiff repeats and incorporates by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

137. Defendant [REDACTED] along with the [REDACTED] representatives Defendant [REDACTED] and Defendant John Doe intentionally and deliberately misrepresented to the police officials regarding the incident that occurred on [REDACTED], at the _____.

138. Defendant [REDACTED] along with Defendant [REDACTED] and Defendant John Doe with an intention to save Defendant [REDACTED] misrepresented to the police officials that Plaintiff is the assaulter and Defendant [REDACTED] is the victim.

139. Defendant [REDACTED] Defendant [REDACTED] and Defendant John Doe's misrepresentation and concealments were false, deceptive, misleading, calculated to deceive, and likely to deceive, and had the tendency to deceive Plaintiff.

140. The police officials' reliance on Defendant [REDACTED] Defendant [REDACTED] and Defendant John Doe's misrepresentation resulted in a pending false assault charge against Plaintiff to her detriment.

141. Plaintiff suffered damages in the form of lost job opportunities at [REDACTED] and [REDACTED] because of Defendants' false representation.

142. As a direct and proximate result of Defendants' concealments and misrepresentations, the Plaintiff has suffered damages in excess of [REDACTED]

SIXTH CAUSE OF ACTION
(Slander Against Defendant [REDACTED], [REDACTED] and John Doe)

143. Plaintiff repeats and incorporates by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

144. Defendant [REDACTED] and Defendant [REDACTED] and Defendant John Doe made slanderous statements about Plaintiff to third parties.

145. The slanderous statements include but is not limited to:



- a. Defendant [REDACTED] belittled Plaintiff in the presence of his teammates.
- b. Defendant [REDACTED] told other people that Plaintiff was a [REDACTED]. Plaintiff happened to overhear someone saying at the [REDACTED] lobby that [REDACTED].
- c. Moreover, Defendant [REDACTED] told Defendant [REDACTED] that [REDACTED]. [REDACTED].” [REDACTED] responded stating that [REDACTED]. [REDACTED].”

146. Defendants communicated these statements to persons other than Plaintiff.

147. Plaintiff is a mother and has a professional career but Defendants called Plaintiff a [REDACTED] in the hotel lobby in the presence of other customers.

148. Upon information and belief Defendants intended the defamatory statements to charge Plaintiff with having committed a crime or offense involving moral turpitude.

149. Upon information and belief, the persons other than the Plaintiff to whom the statements were communicated reasonably understood the statements to charge Plaintiff with having committed a crime or offense involving moral turpitude.

150. As a direct and proximate result of Defendants’ slanderous statements Plaintiff has been inherently injured and is entitled to recover an amount in excess of [REDACTED]

SEVENTH CAUSE OF ACTION
(Conspiracy Against Defendants [REDACTED] and John Doe)

151. Plaintiff repeats and incorporates by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

152. Upon information and belief, the security guards Defendant [REDACTED] and John Doe, as agents for [REDACTED] agreed with each other to commit the improper and unlawful acts complained of in this Complaint, specifically to save Defendant [REDACTED]

153. While the incident occurred Defendant [REDACTED] and John Doe were acting in course of their employment with the [REDACTED]

154. After the assault by Defendant [REDACTED] Defendant [REDACTED] and Defendant John Doe tried to persuade Plaintiff several times to have a conversation with Defendant [REDACTED] When Plaintiff informed them she had reported the incident to police, both Defendant [REDACTED] and Defendant John Doe, in their attempt to save Defendant [REDACTED] tried to solve the issue without police intervention.

155. As described above Defendant [REDACTED] and Defendant John Doe's acts ended up in the wrong police report against Plaintiff where the report referred Plaintiff to be the aggressor and Defendant [REDACTED] the victim.

156. Defendant [REDACTED] and Defendant John Doe's acts have inflicted injury on Plaintiff through the common scheme described above. This injury includes, but is not limited to, emotional pain and suffering, unemployment, and monetary loss.

157. The actions of Defendant [REDACTED] and Defendant John Doe have resulted in actual damages to Plaintiff.

158. As a direct and proximate result of Defendant [REDACTED] and Defendant John Doe's conspiracy, Plaintiff suffered and is entitled to recover an amount in excess of [REDACTED]

EIGHTH CAUSE OF ACTION
(Negligence Against [REDACTED])

159. Plaintiff repeats and incorporates by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

160. On [REDACTED], Plaintiff sustained injuries due to Defendant

[REDACTED]'s offensive behavior at her room in [REDACTED].

161. Plaintiff booked the room at Defendant [REDACTED] and being their customer,

[REDACTED] owed a duty towards Plaintiff to maintain a reasonably safe condition while Plaintiff stays at the place.

162. Here, Defendant [REDACTED] behaved offensively towards Plaintiff by restraining her in the room and even harmed her in the elevator. But, Defendant [REDACTED] neither through its agents, servants, or employees took any measures to save Plaintiff or help her.

163. After the incident, Plaintiff had to wait almost one and half hours for the police to arrive and the Defendant [REDACTED] authorities did not offer any help to Plaintiff, thereby breaching its duty towards Plaintiff.

164. Defendant [REDACTED] individually or by and through its agents, servants, or employees acted with less than reasonable care and is guilty of its negligent acts and omissions causing severe physical harm to Plaintiff.

165. As a direct and proximate result of Defendant [REDACTED]'s careless and negligent acts, Plaintiff suffered great pain, emotional pain, and suffering and is entitled to recover an amount in excess of [REDACTED]

NINETH CAUSE OF ACTION
(Negligent Hiring and Supervision)

166. Plaintiff repeats and incorporates by reference each statement and allegation contained in all preceding paragraphs as though fully outlined in this section.

167. Defendant [REDACTED] has a duty to exercise ordinary and reasonable care in the screening, hiring, training, retention, supervision, and discipline of its agents and employees.

168. Defendant [REDACTED] had the duty to ensure that its agents and employees discharged their duties effectively and efficiently.

169. Defendant [REDACTED] was an off-duty [REDACTED] Police Officer who was moonlighting as security for the [REDACTED] but lacked training or experience to perform his duties as a security officer.

170. When Plaintiff was in urgent need of help Defendant [REDACTED] failed to exercise the reasonable care and assistance expected of him in helping a person in need.

171. Defendant [REDACTED] breached its duty and was negligent in the following manner:

- a. Defendant [REDACTED] knew or should have known in the exercise of reasonable care that its agent or employee referred herein did not have the appropriate training, knowledge, skill, and/or other qualities to serve in the role which they did in Defendant [REDACTED]'s employ.
- b. Defendant [REDACTED] was negligent in its continued retention of the agent or employee referred herein.
- c. Defendant [REDACTED] failed to adequately oversee the agent or employee referred herein.
- d. Defendant [REDACTED] further breached its duties in other ways that will be proven at trial.

172. As a direct and proximate result of Defendant [REDACTED]'s negligence, Plaintiff suffered damages and is entitled to recover an amount in excess of [REDACTED]



DEMAND FOR JURY TRIAL

Plaintiff requests a jury trial of all claims and matters set forth herein.

PRAYER FOR RELIEF

For the foregoing reasons, Plaintiff respectfully prays that this Honorable Court grants the following relief:

1. Compensatory, general, consequential, and punitive damages in an amount to be determined by a jury in the trial of this action, but in any event, more than the sum of [REDACTED]
[REDACTED];
2. The costs of this action, including reasonable attorney fees and interest as provided by law;
3. **Punitive damages**, in an amount to be determined by the trier of fact;
4. Trial by jury; and
5. For such other, further, and different relief as the court may deem just and proper.

This ___ the day of [REDACTED].

[REDACTED]

By:

[REDACTED]

Attorneys for Plaintiff