

**SUPREME COURT OF THE STATE OF NEW YORK
BRONX COUNTY**

-----X
CHARMAINE PAULSON

PLAINTIFF

**Plaintiff designates
Bronx County
as the Place of Trial**

**The basis of the venue is Plaintiff's
residence**

-vs-

SUMMONS

**ASSOCIATION OF WALDORF SCHOOLS OF
NORTH AMERICA, also d/b/a/ AWSNA; and
RUDOLF STEINER SCHOOL OF NEW YORK**

DEFENDANT.
-----X

**Plaintiff resides at
3366 Fenton Avenue
Bronx, New York**

County of Bronx

To the above named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or if the complaint is not served with this summons, to serve a notice of appearance, on the plaintiff's attorney within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after service is completed if this summons is not personally delivered to you within the State of New York); and in the case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Brooklyn, New York
March 6, 2002

WARREN RANDOLPH KRAFT
Attorney for Plaintiff
26 Court Street
Suite 1104
Brooklyn, New York 11242
(718) 222-9797

STATE OF NEW YORK)

COUNTY OF BROOKLYN)

Warren Randolph Kraft, an attorney admitted to practice in the State of New York, affirms: That affirmant is the attorney for the plaintiff in the within action; that affirmant has read the foregoing SUMMONS and VERIFIED COMPLAINT and knows the contents thereof; that the same is true to affirmant's own knowledge, except as to the matters therein stated to be alleged on information and belief, as to those matters, affirmant believes them to be true.

The undersigned further states that the reason this affirmation is made by affirmant and not by the plaintiff is because the said plaintiff does not reside within the County of Kings wherein affirmant's office is located.

The ground of affirmant's belief as to all matters not stated to be upon affirmant's knowledge are information and investigation obtained by affirmant in the course of affirmant's duties as attorney for plaintiff.

The undersigned affirms that the foregoing statements are true, under penalties of perjury.

Dated: Brooklyn, New York
March 6, 2002

Warren Randolph Kraft

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

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CHARMAINE PAULSON

PLAINTIFF,

-VS-

ASSOCIATION OF WALDORF SCHOOLS OF
NORTH AMERICA, also d/b/a/ AWSNA; and
RUDOLF STEINER SCHOOL OF NEW YORK

DEFENDANTS.
-----X

SUMMONS AND COMPLAINT

WARREN RANDOLPH KRAFT

Attorney for Plaintiff

26 Court Street

Suite 1104

Brooklyn, New York 11242

Tel. (718) 222-9797

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
CHARMAINE PAULSON

PLAINTIFF,

INDEX NO.

-vs-

VERIFIED COMPLAINT
AND
JURY TRIAL DEMAND

ASSOCIATION OF WALDORF SCHOOLS OF
NORTH AMERICA, also d/b/a/ AWSNA; and
RUDOLF STEINER SCHOOL OF NEW YORK
DEFENDANT.

-----X

Plaintiff, Charmaine Paulson, by way of complaint against the Defendants, hereby says:

NATURE OF ACTIONS

1. This action is brought for racial and retaliatory discrimination in employment pursuant to the New York State Human Rights Law ("NYSHRL"), New York State Executive Law §§ 296 and New York City Human Rights Law, Title 8: Administrative Code of New York City Human Rights Law ("NYCHRL").
2. A copy of this Complaint is being simultaneously served upon the New York City Human Rights Commission.

PARTIES

3. Plaintiff Charmaine Paulson, an African American female, resides at 3366 Fenton Avenue, Borough of Bronx, City of New York, County of Bronx.
4. Plaintiff was employed as a teacher of the fourth grade by Defendant Rudolf Steiner School of New York ("New York Rudolf Steiner") at 15 East 79th Street, New York, New York 10021, County of New York, between June 2001 and the present. Defendant has fired Plaintiff effective 2002.
5. Plaintiff is presently on a short term disability leave due to emotional injury attributed to the unlawful acts alleged herein.
6. Plaintiff is an employee within the meaning of the New York State Human Rights Law and New York City Human Rights Law.

7. Plaintiff is a person within the meaning of the New York State and New York City Human Rights Law.
8. Defendant Rudolf Steiner School of New York is a non-religious and secular educational institution operating two schools, the Lower School at 15 East 79th Street, New York, New York and the Upper School located at 75 East 78th Street, New York, New York, in the County of New York.
9. New York Rudolf Steiner is an employer within the meaning of the New York City Human Rights Law and New York State Human Rights Law.
10. New York Rudolf Steiner is a person within the meaning if the New York City Human Rights Law and New York State Human Rights Law.
11. Defendant Association of Waldorf Schools of North America ("AWSNA") is an association of non-religious secular educational institutions operating under the philosophy of Rudolf Steiner, its founder. The philosophy of Rudolf Steiner embedded in AWSNA schools is a form of Anthroposophy. AWSNA possesses the proprietary trade marks "Warldorf" and "Rudolf Steiner". All Rudolf Steiner schools operate under the standards, trademark, policies, guidelines, design, accreditation, procedures, evaluation quality control and financial assistance of AWSNA.
12. Upon information and belief AWSNA was formed under the Laws of California and is licensed to and doing business in the State of New York.
13. AWSNA is an association within the meaning of the New York City Human Rights Law and New York State Human Rights Law.
14. Defendant Rudolf Steiner School of New York is a member of AWSNA organized under AWSNA's auspice and operating under AWSNA's upper management, direction standards, trademark policies, guidelines, design, accreditation, procedures, evaluation quality control and financial assistance.
15. Defendant AWSNA's principal place of business is located at 3911 Bannister Road, Fair Oaks, CA 95628.

FACTUAL ALLEGATIONS

16. Between June 2001 and the present, Plaintiff was employed by Defendant New York Rudolf Steiner, working at the Defendant Rudolf Steiner School of New York's located at 15 East 79th Street, New York, New York 10021. Plaintiff has been fired effective June 2002 and is presently on disability leave.

17. The Rudolf Steiner School of New York's management, including employment decisions, is carried out by the College of Teachers, comprised of 16 teachers.
18. At all times relevant herein, the College of Teacher members, included Tim Hoffman (Head Teacher - Lower School), Elizabeth Smith (Plaintiffs designated mentor), Dale Bennet (seventh grade teacher), Bob Dandrew (New York School Foundation) Lucy Schneider (eighth grade teacher), Irene Martell (Director of Admissions), and Giannina Zlatar (second grade teacher).
19. All sixteen (16) college teachers are Caucasian.
20. At all times relevant herein, the aforesaid College of Teachers management at the Defendant NY Rudolf Steiner operated under Defendant AWSNA's upper management, direction standards, trademark, policies, guidelines, design, accreditation, procedures, evaluation, quality control and financial assistance.
21. The NY Rudolph Steiner School employs approximately seventy-five (75) teachers at its New York City locations. All teachers are non African American with the exception of Plaintiff, an African American.
22. In June 2001, Plaintiff became the first ever African American teacher at the Defendant Rudolf Steiner School of New York.
23. Defendant Rudolf Steiner School of New York was the first "Rudolf Steiner" or "Waldorf" School in North America, chartered in 1928.
24. Upon information and belief, Defendant AWSNA is presently comprised of approximately 150 "Rudolf Steiner" or "Waldorf" schools in North America.
25. Upon information and belief, AWSNA members collectively employ in excess of 5,000 teachers in North America.
26. Upon information and belief, AWSNA members, collectively, only employ approximately 4 African American teachers (excluding Plaintiff). The Defendant AWSNA mandates the NY Rudolf Steiner Schools College of Teachers to make the employment decisions. The College of Teachers learn and follow, as part of their teacher training, Steiner's principals, racial ethnography and racial evolution theory.
27. As part of their teacher training, each of the aforesaid College of Teachers at the NY Rudolf Steiner School learned a principal tenant of Steiner's racial evolution theory followed by Defendants is that people of color can't develop on their own and must be educated by whites. This principal is based upon Defendants reasoning that Europeans have always been the origin of all human development.

28. Defendants' racial ethnography theories are based upon racist stereotypes of negroes and people of color.
29. Steiner's racial evolution theory followed by Defendants believes the Aryan race is the great root race of humanity.
30. Steiner's racial evolution theory followed by Defendants espouses that the black race is undeveloped and equates it with the infant/baby stage of human development while equating the white race as the adult race.
31. The aforesaid Steiner principals are racist toward blacks.
32. Defendants decision making body, The College of Teachers, are indoctrinated by Defendants with the aforesaid racist attitudes and principals.
33. Defendant AWSNA mandates the Defendant Rudolf Steiner School of New York to teach as part of their teacher training the aforesaid racist Steiner principals.
34. Defendant AWSNA mandates that Defendant NY Rudolf Steiner's College of Teachers be comprised of its teachers, who all received the aforesaid racist training.
35. Defendant AWSNA mandates that Defendant NY Rudolf Steiner's College of Teachers make all personnel and employment decisions, including decisions effecting he hiring and firing of its teachers.
36. Defendant AWSNA mandates that Defendant Rudolph Steiner School of New York abide by the aforesaid teaching principals and philosophy of Rudolf Steiner.
37. Defendant Rudolf Steiner follows and practices each and every AWSNA mandate described herein above.
38. At all times relevant herein, Defendant AWSNA and Defendant Rudolf Steiner School of New York aided and abetted each other in furtherance of their conduct described herein this complaint.
39. On February 5, 2002 a staff meeting was attended by Plaintiff, members of the College of Teachers and the other faculty members and school staff.
40. At the February 5, 2002 meeting, Plaintiff opposed Defendant's discriminating hiring practices based on race and objected to the lack of racial diversity, including its teachers, complaining that diversity was lacking and a more diverse school community was needed. Elizabeth Smith and Lucy Schneider, both members of the College of Teachers, responded that the school has the right to

receive the kind of teacher into the school that the school deems fit.

41. Two days later on February 7, 2002 the College of Teachers, including Smith and Schneider held a meeting.
42. At the February 7, 2002 meeting the College of Teachers decided to fire Plaintiff effective June 2002.
43. One day later, on February 8, 2002 Timothy Hoffmann, lead teacher of the College of Teachers, informed Plaintiff she was fired effective June 2002.
44. Plaintiff was observed teaching in her classroom by members of the Defendant NY Rudolf Steiner's College of Teachers, who sat in on her class on approximately 30 separate occasions. Sherry Adams, caucasian, a teacher who began her employment at the same time as Plaintiff in June 2001, was not observed teaching by any members of the aforesaid College of Teachers during the same period up through December 24, 2001.
45. Plaintiff asked Mr. Hoffman, lead teacher, of the College of Teachers for permission to include the topic of Kwanza as part of her lesson plan on celebrations. Mr Hoffman disapproved of Plaintiff's desire to include the Kwanza celebration in her lesson plan, stating: "I can't relate to that".

COUNT ONE

RETALIATORY FIRING IN VIOLATION OF THE NEW YORK CITY HUMAN RIGHTS LAW

46. Plaintiff 's repeats each and every paragraph of the previous paragraphs 1 through 45 as if completely set forth herein.
47. Defendant did not possess an Anti-Retaliation Policy to protect its employees from retaliation.
48. Plaintiff's aforesaid opposition to objection to and complaint about the lack of racial diversity at Rudolf Steiner constitutes a protected activity within the meaning of the New York City Human Rights Law and the New York State Human Rights Law.
49. Defendants' aforesaid firing of Plaintiff is a subsequent adverse employment decision by her employer.
50. Defendants' aforesaid adverse employment decisions are related to Plaintiff's aforesaid protected activities.

51. The aforesaid conduct by Defendants constitutes a retaliatory discharge of Plaintiff's employment in violation of the New York City Human Rights Law ("NYCHRL").
52. As a direct and proximate result of the Defendants aforesaid retaliatory discharge, Plaintiff has been damaged economically and otherwise including, but not limited to lost wages, pain and suffering, lost profits, emotional distress, mental anguish, humiliation, embarrassment, loss of fringe benefits, and attorney fees.
53. The aforesaid conduct of Defendants was willful and wanton and deprived Plaintiff of her rights as guaranteed under the NYCHRL, thereby entitling Plaintiff to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment in the sum of \$150,000,000.00 against Defendants for compensatory damages, punitive damages, cost of suit, interest, attorney fees and such other and further relief as the court may deem just and proper.

COUNT TWO

RETALIATORY FIRING IN VIOLATION OF THE NEW YORK STATE HUMAN RIGHTS LAW

54. The Plaintiff repeats each and every of the previous paragraphs 1 through 53 of the complaint as if completely set forth herein.
55. Defendants' retaliatory discharge as set forth herein above is in violation of The New York State Human Rights Law.
56. As a direct and proximate result of the Defendants' aforesaid retaliatory discharge, Plaintiff has been damaged economically and otherwise including, but not limited to lost wages, pain and suffering, lost profits, emotional distress, mental anguish, humiliation, embarrassment, loss of fringe benefits, and attorney fees.
57. The aforesaid conduct of Defendants was willful and wanton and deprived Plaintiff of her rights as guaranteed under the NYCHRL, thereby entitling Plaintiff to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment in the sum of \$150,000,000.00 against Defendants for compensatory damages, punitive damages, cost of suit, interest, attorney fees and such other and further relief as the court may deem just and proper.

COUNT THREE

**DISCRIMINATORY FIRING ON THE BASIS OF RACE, AFRICAN AMERICAN, IN VIOLATION OF
THE NEW YORK CITY HUMAN RIGHTS LAW**

58. The Plaintiff repeats each and every of the previous paragraphs 1 through 57 of the complaint as if completely set forth herein.
59. Defendants discharged Plaintiff on the bases of her race, African American.
60. Defendant's aforesaid discriminatory discharge of Plaintiff's employment on the basis of Plaintiff's race, African American, as set forth herein above is a violation of the New York City Human Rights Law, Title 8: Administrative Code of the City of New York.
61. As a direct and proximate result of the Defendants' aforesaid discriminatory discharge, Plaintiff has been damaged economically and otherwise including, but not limited to, lost wages, pain and suffering, lost profits, emotional distress, mental anguish, humiliation, embarrassment, loss of fringe benefits, and attorney fees.
62. The aforesaid conduct of Defendants was willful and wanton and deprived Plaintiff of his rights as guaranteed under the New York City Human Rights Law, thereby entitling Plaintiff to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment in the sum of \$150,000,000.00 against Defendants for compensatory damages, punitive damages, cost of suit, interest, attorneys fees and such other and further relief as the court may deem just and proper.

COUNT FOUR

**DISCRIMINATORY FIRING ON THE BASIS OF RACE, AFRICAN AMERICAN, IN VIOLATION OF
THE NEW YORK STATE HUMAN RIGHTS LAW**

63. The Plaintiff repeats each and every of the previous paragraphs 1 through 62 of the complaint as if completely set forth herein.
64. Defendants discharged Plaintiff on the bases of her race, African American.
65. Defendants' stated reason for firing Plaintiff was due to her performance.
66. Defendants' aforesaid stated reason is false and merely a pretext to their racially discriminatory motives.

67. Defendants aforesaid discriminatory discharge of Plaintiff's employment on the basis of Plaintiff's race, African American, as set forth herein is a violation of the New York State Human Rights Law.
68. As a direct and proximate result of the Defendants' aforesaid discriminatory discharge, Plaintiff has been damaged economically and otherwise including, but not limited to, lost wages, pain and suffering, lost profits, emotional distress, mental anguish, humiliation, embarrassment, loss of fringe benefits, and attorney fees.
69. The aforesaid conduct of Defendants was willful and wanton and deprived Plaintiff of her rights as guaranteed under the NYSHRL, thereby entitling Plaintiff to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment in the sum of \$150,000,000.00 against Defendants for compensatory damages, punitive damages, cost of suit, interest, attorneys fees and such other and further relief as the court may deem just and proper.

COUNT FIVE

RACIAL HARASSMENT - CREATING HOSTILE WORK ENVIRONMENT IN VIOLATION OF THE NEW YORK CITY HUMAN RIGHTS LAW

70. The Plaintiff repeats each and every of the previous paragraphs 1 through 69 of the complaint as if completely set forth herein.
71. The College of Teachers, acting as Defendants' manager, agent, and/or employee engaged in harassing conduct directed toward Plaintiff because of her race, African American.
72. The aforesaid described conduct by Defendants constitutes racial harassment and was severe and/or regular and pervasive creating a hostile and intimidating work environment for Plaintiff.
73. The aforesaid described conduct by Defendants was unwelcomed by Plaintiff.
74. Defendants are directly and vicariously liable for the aforesaid harassment toward Plaintiff.
75. Defendants did not possess any Anti-Harassment Policy to protect its employees from racial harassment.
76. Defendants did not possess any written Anti-harassment policy to protect its employees from racial harassment.

77. Defendants did not effectively communicate to Plaintiff, The College of Teachers or any other manager or employee of Defendants' any Anti-Harassment Policy that protected its employees from racial harassment.
78. Plaintiff, as a reasonable black human being, was offended by the aforesaid harassing conduct.
79. Defendants' aforesaid harassing conduct created a hostile working environment towards Plaintiff.
80. Defendants' aforesaid conduct is in violation of the New York City Human Rights Law.
81. As direct and proximate result of the Defendants' aforesaid retaliatory discharge, Plaintiff has been damaged economically and otherwise including, but not limited to, lost wages, pain and suffering, lost profits, emotional distress, mental anguish, humiliation, embarrassment, loss of fringe benefits, and attorney fees.
82. The aforesaid conduct of Defendants was willful and wanton and deprived Plaintiff of his rights as guaranteed under the New York City Human Rights Law, thereby entitling Plaintiff to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment in the sum of \$150,000,000.00 against Defendants for compensatory damages, punitive damages, cost of suit, interest, attorneys fees and such other and further relief as the court may deem just and proper.

COUNT SIX

RACIAL HARASSMENT - CREATING HOSTILE WORK ENVIRONMENT IN VIOLATION OF THE NEW YORK STATE HUMAN RIGHTS LAW

83. The Plaintiff repeats each and every of the previous paragraphs 1 through 82 of the complaint as if completely set forth herein.
84. The College of Teachers, acting as Defendants' manager, agent, and/or employee engaged in harassing conduct directed toward Plaintiff because of her race, African American.
85. The aforesaid described conduct by Defendants constitutes racial harassment and was severe and/or regular and pervasive creating a hostile and intimidating work environment for Plaintiff.
86. The aforesaid described conduct by Defendants was unwelcomed by Plaintiff.

87. Defendants are directly and vicariously liable for the aforesaid harassment toward Plaintiff.
88. Defendants did not possess any Anti-Harassment Policy to protect its employees from racial harassment.
89. Defendants did not possess any written Anti-harassment policy to protect its employees from racial harassment.
90. Defendants did not effectively communicate to Plaintiff, The College of Teachers, managers or any other employee of Defendants any Anti-harassment policy that protected its employees from racial harassment.
91. Plaintiff as a reasonable black human being, was offended by the aforesaid harassing conduct.
92. Defendants' aforesaid harassing conduct created a hostile working environment towards Plaintiff.
93. Defendants' aforesaid conduct is in violation of the New York State Human Rights Law.
94. As direct and proximate result of the Defendants aforesaid retaliatory discharge, Plaintiff has been damaged economically and otherwise including, but not limited to, lost wages, pain and suffering, lost profits, emotional distress, mental anguish, humiliation, embarrassment, loss of fringe benefits, and attorney fees.
95. The aforesaid conduct of Defendants was willful and wanton and deprived Plaintiff of his rights as guaranteed under the New York State Human Rights Law, thereby entitling Plaintiff to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment in the sum of \$150,000,000.00 against Defendants for compensatory damages, punitive damages, cost of suit, interest, attorneys fees and such other and further relief as the court may deem just and proper.

COUNT SEVEN

SYSTEM WIDE PATTERN OR PRACTICE OF DISCRIMINATION AGAINST AFRICAN AMERICANS, BECAUSE OF THEIR RACE, IN VIOLATION OF THE NEW YORK CITY HUMAN RIGHTS LAW

96. Plaintiff repeats and realleges each and every of the previous paragraphs 1 through 95 as if completely set forth herein.
97. Defendants possess and engage in a system wide pattern or practice of

discriminating against African Americans, including Plaintiff because of their minority status by providing them unequal terms, conditions and benefits of employment.

98. Plaintiff, an African American, is a member of a protected class based on her race.
99. African Americans who applied or were qualified to continue in available teaching positions were denied employment despite their adequate qualifications because of their minority status as African Americans.
100. Defendants after denying African Americans employment have and continue to seek applicants and employ non African Americans with the same or lesser qualifications.
101. Plaintiff, the sole African American teacher employed by Defendant NY Rudolf Steiner School was evaluated by Defendants with different and higher scrutinizing methods and practices than its non African American teachers.
102. Defendants in furtherance of its system wide pattern or practice of racial discrimination denied Plaintiff continued employment on the basis of her minority status, as an African American.
103. Non African American teachers weren't treated in a similar manner.
104. Defendants' aforesaid harassing conduct created a hostile working environment towards Plaintiff.
105. Defendants' aforesaid conduct is in violation of the New York State Human Rights Law.
106. As direct and proximate result of the Defendants aforesaid retaliatory discharge, Plaintiff has been damaged economically and otherwise including, but not limited to, lost wages, pain and suffering, lost profits, emotional distress, mental anguish, humiliation, embarrassment, loss of fringe benefits, and attorney fees.
107. The aforesaid conduct of Defendants was willful and wanton and deprived Plaintiff of his rights as guaranteed under the New York State Human Rights Law, thereby entitling Plaintiff to an award of punitive damages

WHEREFORE, Plaintiff demands judgment against Defendants in the sum of \$150,000,000.00 for compensatory damages, punitive damages, cost of suit, interest, attorneys fees and such other and further relief as the court may deem just and proper.

COUNT EIGHT

SYSTEM WIDE PATTERN OR PRACTICE OF DISCRIMINATION AGAINST AFRICAN AMERICANS, BECAUSE OF THEIR RACE, IN VIOLATION OF THE NEW YORK STATE HUMAN RIGHTS LAW

108. Plaintiff repeats and realleges each and every of the previous paragraphs 1 through 107 as if completely set forth herein.
109. Defendants possess and engage in a system wide pattern or practice of discriminating against African Americans, including Plaintiff because of their minority status by providing them unequal terms, conditions and benefits of employment.
110. Plaintiff, an African American, is a member of a protected class based on her race.
111. African Americans who applied or were qualified to continue in available teaching positions were denied employment despite their adequate qualifications because of their minority status as African Americans.
112. Defendants after denying African Americans employment have and continue to seek applicants and employ non African Americans with the same or lesser qualifications.
113. Plaintiff, the sole African American teacher employed by Defendant NY Rudolf Steiner School was evaluated by Defendants teacher with different and higher scrutinizing methods and practices than its non African American teachers.
114. Defendants in furtherance of its system wide pattern or practice of racial discrimination denied Plaintiff continued employment on the basis of her minority status, as an African American.
115. Non African American teachers weren't treated in a similar manner.
116. Defendants' aforesaid harassing conduct created a hostile working environment towards Plaintiff.
117. Defendants' aforesaid conduct is in violation of the New York City Human Rights Law.
118. As direct and proximate result of the Defendants aforesaid retaliatory discharge, Plaintiff has been damaged economically and otherwise including, but not limited to, lost wages, pain and suffering, lost profits, emotional distress, mental anguish, humiliation, embarrassment, loss of fringe benefits, and attorney fees.
119. The aforesaid conduct of Defendants was willful and wanton and deprived Plaintiff of his rights as guaranteed under the New York State Human Rights Law, thereby entitling Plaintiff to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment against Defendants in the sum of \$150,000,000.00 for compensatory damages, punitive damages, cost of suit, interest, attorneys fees and such other and further relief as the court may deem just and proper.

DATED

W. RANDOLPH KRAFT,
ATTORNEY FOR PLAINTIFF

Trial by Jury is demanded on all issues.

DATED

W. RANDOLPH KRAFT,
ATTORNEY FOR PLAINTIFF

W. Randolph Kraft is hereby designated as Trial Counsel.

DATED

W. RANDOLPH KRAFT,
ATTORNEY FOR PLAINTIFF

DATED

W. RANDOLPH KRAFT,
ATTORNEY FOR PLAINTIFF
26 Court Street, Suite 1104
Brooklyn, New York 11242
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