

Dated: September 13, 2023

BOIES SCHILLER FLEXNER LLP

/s/ Lindsey Ruff

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To:

Stan Polovets

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Group, and he established, funded, and manages the Vnimanie Foundation. Behind closed doors, however, Polovets exhibited predatory behavior that directly undermines the benevolent façade.

3. On a December night, Polovets drugged Jane Doe 1, took her to his apartment against her will, and sexually abused her while she was incapacitated and physically powerless to stop him. Polovets' violence caused Jane Doe 1 to suffer extreme fear, shame, and lasting mental torment.

4. The Skylark—a luxury cocktail lounge in Manhattan—directly helped Polovets' commit and conceal his crimes. The Skylark knowingly destroyed relevant evidence (despite being expressly and repeatedly asked to preserve that evidence) and helped Polovets achieve his aim of covertly drugging Jane Doe 1 without her knowledge or consent.

5. Rather than accept responsibility or admit remorse, Polovets has doubled down on his crimes, blaming Jane Doe 1 for the trauma he inflicted upon her and attempting to bully her into silence. Polovets' intimidation tactics will not work. Jane Doe 1 brings the instant action to hold Polovets accountable, and to protect future girls and women from Polovets' campaign of terror and abuse.

PARTIES

6. Plaintiff Jane Doe 1 is an individual who is domiciled in New York, NY.
7. Defendant Stan Polovets is an individual who is domiciled in New York, NY.
8. Defendant 530 Hospitality LLC d/b/a The Skylark is a limited liability company with its principal place of business in New York, NY.

JURISDICTION AND VENUE

9. This Court has subject matter jurisdiction over this action pursuant to N.Y. Jud. Law § 140-b.

10. This Court has personal jurisdiction over Defendant Polovets pursuant to C.P.L.R. § 301.

11. Venue is proper pursuant to C.P.L.R. § 503.

FACTUAL BACKGROUND

I. On December 16, 2021, Polovets Drugged Jane Doe 1, Trapped Her in His Apartment, and Sexually Abused Her While She Was Physically Powerless to Stop Him.

12. In 2019, Jane Doe 1 separated from her husband of thirteen years. Since that separation, Jane Doe 1 has raised her young daughter on her own, assuming primary responsibility for her daughter's education and well-being.

13. Jane Doe 1's acquaintance is a professional matchmaker. Following Jane Doe 1's separation, Jane Doe 1 asked her acquaintance to help Jane Doe 1 find a new potential life partner.

14. Jane Doe 1 went on multiple dates with men she met through this matchmaking service. Some of these dates were with high-profile, high-net-worth individuals. Each of these dates occurred without incident.

15. During the summer of 2021, Jane Doe 1 and Polovets met through the matchmaking service and had dinner together. No sexual contact occurred on this date.

16. Following this initial date, Jane Doe 1 and Polovets had sporadic contact through social media and What's App. In December 2021, Jane Doe 1 and Polovets reconnected to plan a second date.

17. Jane Doe 1 and Polovets discussed a plan to watch a movie and eat pizza. Jane Doe 1 reasonably assumed the movie would be screened at a public movie theatre, and that Jane Doe 1 and Polovets would share a meal in a public restaurant. To her surprise, however, Polovets instructed Jane Doe 1 to come to his residence at the Mandarin Oriental Hotel.

18. Jane Doe 1 made **abundantly clear** in multiple written messages to Polovets that she did not feel comfortable going to his private residence, and she declined his invitation.



19. Because Jane Doe 1 refused to go to Polovets' apartment, Polovets agreed to switch the date to be in a public place. Polovets suggested that they attend a play hosted by the Council of Foreign Affairs, and Jane Doe 1 agreed.

20. On December 16, 2021, around 7:00 PM, Jane Doe 1 met Polovets at Chez Josephine for a drink before the play. Jane Doe 1 and Polovets each had one cocktail and then proceeded to attend the play.

21. Jane Doe 1 and Polovets left the play around 9:15 PM. Polovets then informed Jane Doe 1 that he made a reservation at The Skylark, and he suggested Jane Doe 1 join him there for a drink.

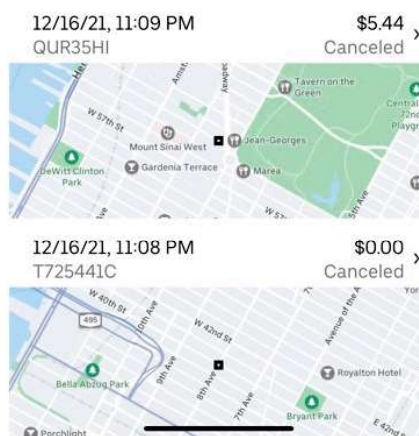
22. Around 9:20 PM, Jane Doe 1 and Polovets each ordered one cocktail. Polovets engaged Jane Doe 1 in conversation as she sipped her drink. Around 10:30 PM, Polovets ordered a second round of cocktails.

23. After a few sips of her second cocktail, Jane Doe 1 felt suddenly disoriented and began to lose control of her motor functions. Jane Doe 1 had never experienced the feeling before, and she felt overwhelmed by distress, confusion, and fear.

24. Polovets did not act alarmed or surprised by the sudden change in Jane Doe 1's behavior.

25. Polovets then stood up and authoritatively said, "let's go." Polovets placed his hands around Jane Doe 1's waist and pressed her toward the exit. Jane Doe 1's vision became blurry, and she repeatedly stumbled as she attempted to exit the bar and escape Polovets' grip.

26. Once outside, Jane Doe 1 repeatedly stated that she wanted to go home and needed to be with her daughter. Jane Doe 1 attempted to call Ubers to her apartment at 11:08 PM and 11:09 PM, but Polovets took Jane Doe 1's phone from her hands and canceled both Ubers against Jane Doe 1's will.



27. Jane Doe 1 begged Polovets to let her go home, but he insisted that she instead travel with him to his residence, despite the fact that her home was only a short drive outside of the City. Rather than simply take her home, Polovets placed her into an Uber that he ordered.

28. By the time the Uber arrived at Polovets' apartment, Jane Doe 1 was disoriented and physically unable to walk. Polovets guided Jane Doe 1 into his bedroom.

29. Thereafter, Jane Doe 1 drifted in and out of awareness. As she gained perspective, Jane Doe 1 realized that Polovets had taken her into his bed and taken off her dress. While Jane Doe was still suffering from the effects of being drugged, Jane Doe 1 lay in Polovets bed in only her undergarments and Polovets was groping her intimate areas and kissing her. Jane Doe 1 told him to stop but he continued as she drifted in and out of lucidity. Jane Doe 1 was terrified for her own safety and deeply concerned about her daughter, who was at Jane Doe's home awaiting her return.

30. At one point, Polovets took Jane Doe 1's phone and texted Jane Doe 1's daughter, "good night."

31. When Jane Doe 1 woke up around 1:00 AM, her dress was still off and she was still in Polovets' bed wearing only her undergarments. Jane Doe 1 felt terrified.

II. Two Tests Confirmed Polovets Drugged Jane Doe 1.

32. When Jane Doe 1 awoke in Polovets bed, Polovets appeared to be sleeping next to her. Jane Doe 1 found her clothes, snuck past Polovets to escape his apartment, and called an Uber home at 1:03 AM.

33. Jane Doe 1 still felt disoriented, and she passed out in her Uber. When she arrived at her apartment building, her doorman had to assist her out of the car and help her upstairs to her apartment.

34. Once in her apartment, Jane Doe 1 collapsed back into asleep. She woke up to several What's App messages from Polovets, which she ignored.

35. Around 8:00 AM, Jane Doe 1 emailed her friend from the matchmaking service saying, "I feel like I was drugged" and "I would not recommend fixing [Polovets] up with anyone else." In this email, Jane Doe 1 described the evening as a "scary and bizarre situation."

36. Jane Doe 1 also emailed her doorman saying, "I think someone spiked my drink and I felt pretty incapacitated and barely made it home. When are you working again? If you don't mind I'd like to ask you about some things I don't remember."

37. Jane Doe 1's doorman responded that when she arrived home he "did feel something was off," including because Jane Doe 1 "walked from the car with [her] shoes off."

38. At home, Jane Doe 1 reached out to a drug testing service called Empire City Laboratories, which has an at-home drug testing service. A practitioner from Empire came to Jane Doe 1's apartment to draw her blood and test it for drugs. The blood test subsequently came back positive for Benzodiazepines.

39. Benzodiazepines is a class of drugs that includes Rohypnol, which is commonly referred to as the "date rape drug." The side effects of benzodiazepines include confusion, unsteadiness, and memory problems. Date rapists administer Benzodiazepines to their victims to render them physically powerless and unable to protect themselves against abuse.

40. On December 18, Polovets sent Jane Doe 1 a message via What's App that expressly acknowledged that Jane Doe 1 was incapacitated on their date—and thus unable to consent to any sexual activity—and that Polovets took Jane Doe 1 to his apartment against her will. Specifically, the message said,

I don't know what you're so upset about. You had too much to drink on an empty stomach and I did not want to put you in an Uber because I was concerned that you could get assaulted by the driver, fall down on your way from the car to your home, or embarrass yourself in front of your daughter. I helped you text your daughter and let her know that you'll be coming late and wish her goodnight. And you left as soon as you were able to, but not before **you fell down on the way to the bathroom because you could not walk.** If you don't want to see me again, that's fine. But maybe you can be more mature about it rather than to block [me] or leave without saying goodbye.

41. The defensive and intimidating tone of the message intensified Jane Doe 1's fear of Polovets, and Jane Doe 1 blocked his number.

42. Jane Doe 1 suffered and continues to suffer physical pain, mental anguish, and severe emotional distress as a direct and proximate result of Polovets' conduct.

43. Jane Doe 1 has expended significant costs, including on medical and psychological treatment, as a direct and proximate result of Polovets' conduct.

III. The Skylark Helped Polovets Commit and Conceal His Crimes.

44. On February 2, 2022, Jane Doe 1's counsel personally visited The Skylark to retrieve security footage of Jane Doe 1's date with Polovets. Upon information and belief, such security footage would show: (1) that Jane Doe 1 became visibly incapacitated shortly after consuming alcohol that Polovets gave to her; and (2) that Polovets placed benzodiazepines in Jane

Doe 1's drink (or in the alternative, someone placed benzodiazepines in Jane Doe 1's drink at Polovets direction).

45. Jane Doe 1's counsel personally spoke to Anthony Simone, the manager at The Skylark, who confirmed that as of February 2, 2022, The Skylark had retained security footage from December 16, 2023 (the date Jane Doe 1 and Polovets visited the Skylark.) But Mr. Simone advised Jane Doe 1's counsel to reach out by email to obtain a copy.

46. Accordingly, on February 11, 2022, Jane Doe 1's counsel emailed Mr. Simone stating in pertinent part, "I write to confirm that—as we discussed—you will preserve all relevant materials in your possession, custody, and control, including but not limited to (1) security footage from the evening of December 16, 2021 capturing the elevator and the lounge at The Skylark; (2) reservation records; and (3) receipts of purchases made on December 16, 2021."

47. The Skylark ignored Jane Doe 1's counsel's email. On February 24, 2022, Jane Doe 1's counsel again emailed Mr. Simone (1) asking to communicate with The Skylark's counsel to obtain a copy of the security footage; and (2) again notifying The Skylark to preserve materials in its' possession, custody, and control related to the investigation and prosecution of Polovets.

48. Subsequently, when law enforcement officers attempted to obtain relevant security footage from The Skylark, they were informed that The Skylark had **destroyed the relevant security footage**.

49. The Skylark brazenly destroyed obviously relevant evidence despite being repeatedly notified (1) to preserve such evidence, and that (2) such evidence was directly relevant to an ongoing criminal investigation and legal dispute. The Skylark failed to provide any explanation whatsoever for its wrongful destruction of evidence.

50. On March 15, 2022, Polovets' counsel wrote a letter to Jane Doe 1's counsel that additionally indicates Polovets enlisted an employee of The Skylark to help him drug Jane Doe 1. Indeed, in that letter, Polovets' counsel writes, "It defies common sense to believe that someone as intelligent and prominent as Mr. Polovets would slip a foreign substance into [Jane Doe 1's] drink in plain view of surveillance cameras and several witnesses."

51. That letter additionally attempts to bully Jane Doe 1 into silence. For instance, Polovets' counsel writes that if Jane Doe 1 comes forward about Polovets crimes, Polovets will "use every legal remedy available" to retaliate against Jane Doe 1 and states that any litigation would "attract media attention and embarrass both parties."

52. To the contrary, Jane Doe 1—a victim—has nothing to be embarrassed about, and the only person who should be embarrassed here is Polovets and his accomplices at The Skylark.

53. Jane Doe 1 suffered and continues to suffer damages as a direct and proximate result of The Skylark helping Polovets commit and conceal his crimes, including physical pain, mental anguish, severe emotional distress, and significant costs, including on medical and psychological treatment.

FIRST CAUSE OF ACTION

SEXUAL BATTERY (Jane Doe 1 against Stan Polovets)

54. Plaintiff Jane Doe 1 incorporates each and every allegation contained above as though fully set forth herein.

55. Polovets intended to commit and committed acts of unwanted sexual contact with Jane Doe 1.

56. Polovets committed unwanted contact with Jane Doe 1 in a harmful and offensive manner.

57. Among other batteries, Polovets drugged Jane Doe 1, forced Jane Doe 1 into his apartment, removed Jane Doe 1's clothing without her consent, and groped Jane Doe 1 when she was incapacitated and unable to consent.

58. Polovets used drugs and physical force to intimidate, overwhelm, and subdue Jane Doe 1.

59. Polovets' batteries on Jane Doe 1 caused physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

60. Polovets' unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 1's rights.

61. Jane Doe 1 seeks all available relief including claiming compensatory and punitive damages herein.

SECOND CAUSE OF ACTION

SEXUAL ASSAULT
(Jane Doe 1 against Stan Polovets)

62. Plaintiff Jane Doe 1 incorporates each and every allegation contained above as though fully set forth herein.

63. Polovets intentionally attempted and committed harmful and offensive contacts against Jane Doe 1, including but not limited to drugging Jane Doe 1, forcing Jane Doe 1 into his apartment, removing Jane Doe 1's clothing without her consent, and groping Jane Doe 1 when she was incapacitated and unable to consent.

64. Polovets' conduct placed Jane Doe 1 in reasonable apprehension of imminent harmful contact.

65. Polovets intended to place Jane Doe 1 in apprehension of imminent harmful contact.

66. Polovets' assaults on Jane Doe 1 caused physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

67. Polovets' unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 1's rights.

68. Jane Doe 1 seeks all available relief including claiming compensatory and punitive damages herein.

THIRD CAUSE OF ACTION

FALSE IMPRISONMENT (Jane Doe 1 against Stan Polovets)

69. Plaintiff Jane Doe 1 incorporates each and every allegation contained above as though fully set forth herein.

70. Polovets intentionally confined Jane Doe 1, including but not limited to by trapping her in his apartment against her will.

71. Polovets used drugs, physical force, and an unequal power dynamic to intimidate, overwhelm, and subdue Jane Doe 1.

72. Jane Doe 1 was conscious of the confinement.

73. Jane Doe 1 did not consent to the confinement.

74. Polovets' conduct caused physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

75. Polovets' unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 1's rights.

76. Jane Doe 1 seeks all available relief including claiming compensatory and punitive damages herein.

FOURTH CAUSE OF ACTION

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(Jane Doe 1 against Stan Polovets)

77. Plaintiff Jane Doe 1 incorporates each and every allegation contained above as though fully set forth herein.

78. Polovets' conduct was extreme and outrageous and intentionally caused severe emotional distress to Jane Doe 1.

79. Polovets' sexual assault of Jane Doe 1 exceeded all possible bounds of decency.

80. Polovets acted with the intent and knowledge that Jane Doe 1 suffered emotional distress due to his coercive conduct.

81. Polovets' conduct caused physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

82. Polovets' unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 1's rights.

83. Jane Doe 1 seeks all available relief including claiming compensatory and punitive damages herein.

FIFTH CAUSE OF ACTION**FRAUD*****(Jane Doe 1 against Stan Polovets)***

84. Plaintiff Jane Doe 1 incorporates each and every allegation contained above as though fully set forth herein.

85. Polovets made false representations and omissions of material facts, including related to the contents of the beverages that Polovets gave to Jane Doe 1.

86. Polovets made these representations and omissions with knowledge of their falsity.

87. Polovets made these representations and omissions for the purpose of inducing Jane Doe 1 to act, including for the purpose of causing Jane Doe 1 to consume drugs and become incapacitated and therefore physically unable to stop his sexual assaults.

88. Jane Doe 1 reasonably relied upon Polovets' misrepresentations and omissions.

89. Jane Doe 1 acted upon Polovets' misrepresentations and omissions, including by unknowingly consuming drugs.

90. Polovets' conduct caused physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

91. Polovets' unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 1's rights.

92. Jane Doe 1 seeks all available relief including claiming compensatory and punitive damages herein.

SIXTH CAUSE OF ACTION**GENDER MOTIVATED VIOLENCE*****(Jane Doe 1 against Stan Polovets)***

93. Plaintiff Jane Doe 1 incorporates each and every allegation contained above as though fully set forth herein.

94. Polovets' conduct, including but not limited to Polovets' forceful drugging, forced removal of Jane Doe 1's clothing, and groping while Jane Doe 1 was physically incapacitated and powerless to stop him, constitute crimes of violence.

95. Jane Doe 1 is a woman.

96. Polovets' conduct was motivated by Jane Doe 1's gender and was due, at least in part, to an animus based on Jane Doe 1's gender.

97. Polovets' gender-motivated animus toward women is demonstrated by, among other things, his coercive, deceptive, violent treatment of women.

98. Polovets' conduct caused physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

99. Polovets' unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 1's rights.

100. Jane Doe 1 seeks all available relief including claiming compensatory and punitive damages herein.

SEVENTH CAUSE OF ACTION

NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

(Jane Doe 1 against Stan Polovets)

(Pled in the alternative)

101. Plaintiff Jane Doe 1 incorporates each and every allegation contained above as though fully set forth herein.

102. Polovets owed a duty of care to Jane Doe 1.

103. Polovets breached his duty to Jane Doe 1, including by taking Jane Doe 1 to his apartment, removing her clothing, and groping Jane Doe 1 when she was incapacitated.

104. Polovets' breach unreasonably endangered Jane Doe 1's physical safety and caused Jane Doe 1 to fear for her own safety.

105. Polovets' conduct caused physical injury caused by psychological trauma, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

EIGHTH CAUSE OF ACTION

NEGLIGENCE

(Jane Doe 1 against The Skylark)

106. Plaintiff Jane Doe 1 incorporates each and every allegation contained above as though fully set forth herein.

107. The Skylark owns, maintains, manages, and controls the premises located at 200 W 39th St, New York, NY 10018.

108. On December 16, 2022, Jane Doe 1 was an invitee lawfully occupying the premises known as The Skylark located at 200 W 39th St, New York, NY 10018.

109. While at The Skylark, Jane Doe 1 conducted herself in the manner of a reasonably prudent person.

110. The Skylark owed a duty of care to Jane Doe 1, including but not limited to a duty to protect Jane Doe 1 from harm from foreseeable criminal conduct on its premises.

111. The Skylark breached its duty of care to Jane Doe 1. Polovets forcefully dragged a visibly incapacitated Jane Doe 1 through The Skylark, into an elevator, and into an Uber, and no Skylark employees took any steps to protect Jane Doe 1.

112. The Skylark also breached its duty of care to Jane Doe 1 for the separate and independent reason that it destroyed relevant evidence, despite being put on repeated, clear notice that The Skylark's security footage was relevant to an ongoing criminal investigation and legal dispute.

113. The Skylark also breached its duty of care to Jane Doe 1 for the separate and independent reason that, upon information and belief, a Skylark employee conspired with Polovets to put benzodiazapenes in Jane Doe 1's drink without her knowledge or consent.

114. Polovets' criminal conduct was foreseeable to The Skylark given, among other things, the nature of The Skylark's business, Jane Doe 1's visible incapacitation, and Polovets' public, violent treatment of Jane Doe 1.

115. The Skylark's employees' negligent and criminal conduct was foreseeable to The Skylark given, among other things, the nature of The Skylark's business, The Skylark's failure to properly hire, train, and supervise its employees, and The Skylark's refusal to properly retain security footage of crimes that occurred on its premises.

116. The Skylark's conduct caused Jane Doe 1 to suffer physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

NINTH CAUSE OF ACTION

AIDING AND ABETTING
(Jane Doe 1 against The Skylark)

117. Plaintiff Jane Doe 1 incorporates each and every allegation contained above as though fully set forth herein.

118. The Skylark affirmatively assisted Polovets harm Jane Doe 1 by placing benzodiazepines in Jane Doe 1's drink without her knowledge or consent.

119. The Skylark affirmatively assisted Polovets harm Jane Doe 1 by failing to take steps to protect Jane Doe 1 when Polovets forcefully dragged a visibly incapacitated Jane Doe 1 through The Skylark and into an Uber against her will.

120. The Skylark affirmatively assisted Polovets harm Jane Doe 1 by destroying relevant evidence, despite being repeatedly and expressly asked to preserve such evidence.

121. The Skylark was aware of Polovets fraud, battery, assault, and/or false imprisonment of Jane Doe 1.

122. The Skylark provided substantial assistance to Polovets in committing fraud, battery, assault, and/or false imprisonment of Jane Doe 1.

123. The Skylark's conduct caused Jane Doe 1 to suffer physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

124. The Skylark's unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 1's rights.

125. Jane Doe 1 seeks all available relief including claiming compensatory and punitive damages herein.

126. The amount of damages sought herein exceeds the jurisdictional limits of all other courts which would otherwise have jurisdiction.

TENTH CAUSE OF ACTION

FRAUD

(Jane Doe 1 against The Skylark)

127. Plaintiff Jane Doe 1 incorporates each and every allegation contained above as though fully set forth herein.

128. The Skylark made false representations and omissions of material facts, including related to the contents of the beverages that Polovets gave to Jane Doe 1.

129. The Skylark made these representations and omissions with knowledge of their falsity.

130. The Skylark made these representations and omissions for the purpose of inducing Jane Doe 1 to act, including for the purpose of causing Jane Doe 1 to consume drugs and become incapacitated.

131. Jane Doe 1 reasonably relied upon The Skylark's misrepresentations and omissions.

132. Jane Doe 1 acted upon The Skylark's misrepresentations and omissions, including by unknowingly consuming drugs.

133. The Skylark's conduct caused Jane Doe 1 to suffer physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

134. The Skylark's unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 1's rights.

135. Jane Doe 1 seeks all available relief including claiming compensatory and punitive damages herein.

ELEVENTH CAUSE OF ACTION

GENDER MOTIVATED VIOLENCE

(Jane Doe 1 against The Skylark)

136. Plaintiff Jane Doe 1 incorporates each and every allegation contained above as though fully set forth herein.

137. Because The Skylark conspired with Polovets to harm Jane Doe 1 by (1) placing benzodiazepines in Jane Doe 1's drink without her knowledge or consent; (2) failing to take steps to protect Jane Doe 1 when Polovets dragged a visibly incapacitated Jane Doe 1 through The Skylark and into an Uber; and (3) destroying relevant evidence of Polovets' crimes, The Skylark is responsible for Polovets' gender motivated crimes of violence against Jane Doe 1.

138. Jane Doe 1 is a woman.

139. The Skylark and Polovets' conduct was motivated by Jane Doe 1's gender and was due, at least in part, to an animus based on Jane Doe 1's gender.

140. The Skylark's gender-motivated animus toward women is demonstrated by, among other things, its intentional concealment of crimes of violence against women.

141. The Skylark's conduct caused physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

142. The Skylark's unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 1's rights.

143. Jane Doe 1 seeks all available relief including claiming compensatory and punitive damages herein.

144. The amount of damages sought herein exceeds the jurisdictional limits of all other courts which would otherwise have jurisdiction.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff respectfully requests judgment against Defendants, awarding compensatory, consequential, exemplary, and punitive damages in an amount to be determined at trial; costs of suit; attorneys' fees; and such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff hereby requests a trial by jury on all causes of action asserted within this pleading.

Dated: September 13, 2023

Respectfully Submitted,

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