

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

Index No.: 152438/2017

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JANE DOE #3, JANE DOE #4, JANE DOE #5,
and JANE DOE #6,

Plaintiffs,

Plaintiffs designate
NEW YORK County
as the place of trial
Venue is based upon
defendant's principle
place of business.

- against -

THE NEW YORK AND PRESBYTERIAN HOSPITAL;
COLUMBIA PRESBYTERIAN MEDICAL CENTER;
COLUMBIA UNIVERSITY MEDICAL CENTER;
COLUMBIA-PRESBYTERIAN MEDICAL
CENTER, EAST SIDE ASSOCIATES; EAST SIDE
ASSOCIATES; ROBERT HADDEN; THE TRUSTEES OF
COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK;
COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS
AND SURGEONS; PRESBYTERIAN HOSPITAL
PHYSICIAN SERVICES ORGANIZATION, INC.;
COLUMBIA-CORNELL CARE, LLC; COLUMBIA
CORNELL NETWORK PHYSICIANS, INC.;
SLOANE HOSPITAL FOR WOMEN,

SUMMONS

Defendants.

COUNTY OF NEW YORK

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To the above named defendant(s):

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 Plaintiffs' Attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York; and in case of your failure to appear or answer, judgment will be taken for the relief demanded herein.

Dated: New York, New York
March 15, 2017

Law Office of Anthony T. DiPietro, P.C.



By:

Anthony T. DiPietro
Attorney for Plaintiffs
The Woolworth Building
233 Broadway - Suite 2700
New York, New York 10279
(212) 233-3600

Defendants' Addresses:

THE NEW YORK AND PRESBYTERIAN HOSP - 525 E. 68th Street, New York, NY 10021
COLUMBIA PRESBYTERIAN MED CTR - 525 E. 68th Street, New York, NY 10021
COLUMBIA UNIVERSITY MEDICAL CTR - 630 West 168th St., New York, NY 10032
COLUMBIA-PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES - 622 W
168th Street, New York, NY or 16 E. 60th Street, Suite 408, New York, NY 10022
EAST SIDE ASSOCIATES - 16 E. 60th Street, Suite 408, New York, NY 10022
ROBERT HADDEN - 16 E. 60th Street, Suite 408, New York, NY 10022
THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK - 211 Low
Library, 535 West 116th Street, Mail Code 4324, New York, NY 10027
COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS - 630 West 168th
St., New York, NY 10032
PRESBYTERIAN HOSPITAL PHYSICIAN SERVICES ORG., INC. - c/o McDermott Will &
Emery, 1211 Avenue of the Americas, New York, NY 10036
COLUMBIA-CORNELL CARE, LLC - 16 E. 60th Street, Suite 480, New York, NY 10022
COLUMBIA CORNELL NETWORK PHYSICIANS, INC. - 900 Third Avenue, Suite 500
New York, NY 10022
SLOANE HOSPITAL FOR WOMEN - 161 Fort Washington Avenue, New York, NY 10032

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JANE DOE #3, JANE DOE #4, JANE DOE #5,
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Plaintiffs,

- against -

THE NEW YORK AND PRESBYTERIAN HOSPITAL;
COLUMBIA PRESBYTERIAN MEDICAL CENTER;
COLUMBIA UNIVERSITY MEDICAL CENTER;
COLUMBIA-PRESBYTERIAN MEDICAL CENTER,
EAST SIDE ASSOCIATES; EAST
SIDE ASSOCIATES; ROBERT HADDEN; THE TRUSTEES
OF COLUMBIA UNIVERSITY IN THE CITY OF NEW
YORK; COLUMBIA UNIVERSITY COLLEGE OF
PHYSICIANS AND SURGEONS; PRESBYTERIAN
HOSPITAL PHYSICIAN SERVICES ORGANIZATION, INC.;
COLUMBIA-CORNELL CARE, LLC; COLUMBIA
CORNELL NETWORK PHYSICIANS, INC.;
SLOANE HOSPITAL FOR WOMEN,

VERIFIED COMPLAINT

Defendants.
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Plaintiffs above named, complaining of the defendants by her attorneys, Law Office of Anthony T. DiPietro, P.C., respectfully allege:

PARTIES, JURISDICTION & VENUE

1. Upon information and belief, Defendant THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK (hereinafter "TRUSTEES"), has no parent corporation and has no publicly held corporations that own 10% or more of its stock.
2. Upon information and belief, Defendant "TRUSTEES" is a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York with its principal offices located at 622 W. 169th Street, New York, NY 10032.
3. Upon information and belief, Defendant "TRUSTEES" is a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York with its principal offices located at 680 W. 168th Street, New York, NY 10032.
4. Upon information and belief, Defendant "TRUSTEES" is a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York with

its principal offices located at 16 E. 60th Street, Suite 480, New York, NY 10022.

5. Upon information and belief, Defendant "TRUSTEES" serves as the obstetrics and gynecological service within THE NEW YORK AND PRESBYTERIAN HOSPITAL, and the Department of Obstetrics and Gynecology of the COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS. Upon information and belief, Defendant NYPH and Defendant CUCPS do business as SLOANE HOSPITAL FOR WOMEN is located at 161 Fort Washington Avenue, New York, NY 10032.

6. Upon information and belief, Defendant "TRUSTEES" serves as the obstetrics and gynecological service within THE NEW YORK AND PRESBYTERIAN HOSPITAL, and the Department of Obstetrics and Gynecology of the NEW YORK PRESBYTERIAN HOSPITAL. Upon information and belief, Defendant NYPH and Defendant TRUSTEES do business as COLUMBIA PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES located at 16 E. 60th Street, Suite 408, New York, NY 10022.

7. Upon information and belief, Defendant "TRUSTEES" serves as the obstetrics and gynecological service within COLUMBIA UNIVERSITY MEDICAL CENTER, and the Department of Obstetrics and Gynecology of the COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS. Upon information and belief, Defendant NYPH and Defendant CUCPS do business as EAST SIDE ASSOCIATES located at 16 E. 60th Street, Suite 408, New York, NY 10022.

8. Upon information and belief, Defendant COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS (hereinafter "CUCPS") is a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York with its principal offices located at 680 W. 168th Street, New York, NY 10032.

9. Upon information and belief, Defendant THE NEW YORK AND PRESBYTERIAN HOSPITAL (hereinafter "NYPH") is a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York with its principal offices located at 525 East 68th Street, Box 88, New York, NY 10065.

10. Upon information and belief, SLOANE HOSPITAL FOR WOMEN serves as the obstetrics and gynecological service within THE NEW YORK AND PRESBYTERIAN HOSPITAL, and the Department of Obstetrics and Gynecology of the COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS. Upon information and belief, Defendant NYPH and Defendant CUCPS do business as SLOANE HOSPITAL FOR WOMEN is located at 161 Fort Washington Avenue, New York, NY 10032.

11. Upon information and belief, Defendant COLUMBIA PRESBYTERIAN MEDICAL CENTER (hereinafter "CPMC") is a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York with its principal offices located at 525 East 68th Street, Box 88, New York, NY 10065.

12. Upon information and belief, Defendant COLUMBIA UNIVERSITY MEDICAL CENTER (hereinafter "CUMC") is a domestic not-for-profit corporation organized and existing

under and by virtue of the laws of the State of New York with its principal offices located at 630 West 168th St., New York, NY 10032.

13. Upon information and belief, Defendant PRESBYTERIAN HOSPITAL PHYSICIAN SERVICES ORGANIZATION, INC. (hereinafter "PHPSO") is a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York with its principal offices located at 1211 Avenue of the Americas, New York, NY 10036.

14. Upon information and belief, Defendant COLUMBIA-CORNELL CARE, LLC (hereinafter "CCC") is a domestic not-for-profit entity with its principal office located at 16 E. 60th Street, Suite 480, New York, NY 10022.

15. Upon information and belief, Defendant COLUMBIA CORNELL NETWORK PHYSICIANS, INC. (hereinafter "CCNP") is a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York with its principal offices located at 900 Third Avenue, Suite 500, New York, NY 10022.

16. Upon information and belief, COLUMBIA PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES ("CPMC-ESA") serves as an obstetrics and gynecological service to THE NEW YORK AND PRESBYTERIAN HOSPITAL, and the Department of Obstetrics and Gynecology of the COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS. Upon information and belief, Defendant NYPH and Defendant CUCPS do business as COLUMBIA PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES located at 16 E. 60th Street, Suite 408, New York, NY 10022.

17. Upon information and belief, EAST SIDE ASSOCIATES ("ESA") serves as the obstetrics and gynecological service within THE NEW YORK AND PRESBYTERIAN HOSPITAL, and the Department of Obstetrics and Gynecology of the COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS. Upon information and belief, Defendant NYPH and Defendant CUCPS do business as EAST SIDE ASSOCIATES located at 16 E. 60th Street, Suite 408, New York, NY 10022.

18. Upon information and belief, COLUMBIA PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES serves as an obstetrics and gynecological service to THE NEW YORK AND PRESBYTERIAN HOSPITAL, and the Department of Obstetrics and Gynecology of the COLUMBIA UNIVERSITY MEDICAL CENTER. Upon information and belief, Defendant NYPH and Defendant CUMC do business as COLUMBIA PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES located at 16 E. 60th Street, Suite 408, New York, NY 10022.

19. Upon information and belief, EAST SIDE ASSOCIATES serves as the obstetrics and gynecological service within THE NEW YORK AND PRESBYTERIAN HOSPITAL, and the Department of Obstetrics and Gynecology of the COLUMBIA UNIVERSITY MEDICAL CENTER. Upon information and belief, Defendant NYPH and Defendant CUMC do business as EAST SIDE ASSOCIATES located at 16 E. 60th Street, Suite 408, New York, NY 10022.

20. Upon information and belief, Defendant ROBERT HADDEN, is and was a resident of the

State of New York, New York.

21. Upon information and belief, Defendant ROBERT HADDEN, is and was a resident of the State of New Jersey, residing in Tenafly, New Jersey.

22. At all times herein mentioned, defendant ROBERT HADDEN, was an agent, servant or employee of defendant TRUSTEES.

23. At all times herein mentioned, defendant ROBERT HADDEN, was an agent, servant or employee of defendant CUCPS.

24. At all times herein mentioned, defendant ROBERT HADDEN, was an agent, servant or employee of defendant NYPH.

25. At all times herein mentioned, defendant ROBERT HADDEN, was an agent, servant or employee of defendant CPMC.

26. At all times herein mentioned, defendant ROBERT HADDEN, was an agent, servant or employee of defendant CUMC.

27. At all times herein mentioned, defendant ROBERT HADDEN, was an agent, servant or employee of defendant PPHSO.

28. At all times herein mentioned, defendant ROBERT HADDEN, was an agent, servant or employee of defendant CCC.

29. At all times herein mentioned, defendant ROBERT HADDEN, was an agent, servant or employee of defendant CCNP.

30. At all times herein mentioned, defendant ROBERT HADDEN, was an agent, servant or employee of defendant CPMC-ESA.

31. At all times herein mentioned, defendant ROBERT HADDEN, was an agent, servant or employee of defendant EAST SIDE ASSOCIATES.

32. At all times herein mentioned, defendant ROBERT HADDEN, was an agent, servant or employee of defendant SLOANE.

33. At all times herein mentioned, defendant NYPH, was a domestic corporation, duly organized and existing under and by virtue of the laws of the State of New York.

34. At all times herein mentioned, defendant NYPH was the owner of a hospital known as NEW YORK PRESBYTERIAN HOSPITAL, located at 525 E. 68th Street, New York, NY 10021.

35. At all times herein mentioned, defendant NYPH operated, managed and controlled the aforesaid hospital.

36. At all times herein mentioned, defendant Columbia-Presbyterian Medical Center, East Side Associates, was a domestic corporation, duly organized and existing under and by virtue of the laws of the State of New York.

37. At all times herein mentioned, defendant NYPH was the owner of a medical facility known as Columbia-Presbyterian Medical Center, East Side Associates, located at 16 E. 60th Street, Suite 408, New York, NY 10022.

38. At all times herein mentioned, defendant NYPH was the owner of a medical facility known as East Side Associates, located at 16 E. 60th Street, Suite 408, New York, NY 10022.

39. At all times herein mentioned, defendant NYPH operated, managed and controlled CPMC-ESA.

40. At all times herein mentioned, defendant NYPH operated, managed and controlled ESA.

41. At all times herein mentioned, defendant CUMC operated, managed and controlled CPMC-ESA.

42. At all times herein mentioned, defendant CUMC operated, managed and controlled ESA.

43. At all times herein mentioned, defendant SLOANE operated, managed and controlled CPMC-ESA.

44. At all times herein mentioned, defendant SLOANE operated, managed and controlled ESA.

45. At all times herein mentioned, defendant PHPSO operated, managed and controlled CPMC-ESA.

46. At all times herein mentioned, defendant PHPSO operated, managed and controlled ESA.

47. At all times herein mentioned, defendant CUCPS operated, managed and controlled CPMC-ESA.

48. At all times herein mentioned, defendant CUCPS operated, managed and controlled ESA.

49. At all times herein mentioned, defendant CCNP operated, managed and controlled CPMC-ESA.

50. At all times herein mentioned, defendant CCNP operated, managed and controlled ESA.

51. At all times herein mentioned, defendant CUMC was the owner of a medical facility known as Columbia-Presbyterian Medical Center, East Side Associates, located at 16 E. 60th Street, Suite 408, New York, NY 10022.

52. At all times herein mentioned, defendant CUMC was the owner of a medical facility known as East Side Associates, located at 16 E. 60th Street, Suite 408, New York, NY 10022.

53. At all times herein mentioned, defendant CPMC was the owner of a medical facility known as Columbia-Presbyterian Medical Center, East Side Associates, located at 16 E. 60th Street, Suite 408, New York, NY 10022.

54. At all times herein mentioned, defendant CPMC was the owner of a medical facility known as East Side Associates, located at 16 E. 60th Street, Suite 408, New York, NY 10022.

55. At all times herein mentioned, defendant PHPSO was the owner of a medical facility known as Columbia-Presbyterian Medical Center, East Side Associates, located at 16 E. 60th Street, Suite 408, New York, NY 10022.

56. At all times herein mentioned, defendant PHPSO was the owner of a medical facility known as East Side Associates, located at 16 E. 60th Street, Suite 408, New York, NY 10022.

57. At all times herein mentioned, defendant CCNP was the owner of a medical facility known as Columbia-Presbyterian Medical Center, East Side Associates, located at 16 E. 60th Street, Suite 408, New York, NY 10022.

58. At all times herein mentioned, defendant CCNP was the owner of a medical facility known as East Side Associates, located at 16 E. 60th Street, Suite 408, New York, NY 10022.

59. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant NYPH, were agents, servants and/or employees of defendant NYPH.

60. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant Columbia-Presbyterian Medical Center, East Side Associates, were agents, servants and/or employees of defendant NYPH.

61. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant East Side Associates, were agents, servants and/or employees of defendant NYPH.

62. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant Columbia-Presbyterian Medical Center, East Side Associates, were agents, servants and/or employees of defendant Columbia-Presbyterian Medical Center, East Side Associates.

63. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant East Side Associates, were agents, servants and/or employees of defendant East Side Associates.

64. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant Columbia-Presbyterian Medical Center, East Side Associates, were agents, servants and/or employees of defendant CUCPS.

65. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant East Side Associates, were agents, servants and/or employees of defendant CUCPS.

66. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant Columbia-Presbyterian Medical Center, East Side Associates, were agents, servants and/or employees of defendant CPMC.

67. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant East Side Associates, were agents, servants and/or employees of defendant CPMC.

68. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant Columbia-Presbyterian Medical Center, East Side Associates, were agents, servants and/or employees of defendant CUMC.

69. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant East Side Associates, were agents, servants and/or employees of defendant CUMC.

70. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant Columbia-Presbyterian Medical Center, East Side Associates, were agents, servants and/or employees of defendant PHPSO.

71. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant East Side Associates, were agents, servants and/or employees of defendant PHPSO.

72. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant Columbia-Presbyterian Medical Center, East Side Associates, were agents, servants and/or employees of defendant CCNP.

73. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant East Side Associates, were agents, servants and/or employees of defendant CCNP.

74. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant Columbia-Presbyterian Medical Center, East Side Associates, were agents, servants and/or employees of defendant CCC.

75. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant East Side Associates, were agents, servants and/or employees of defendant CCC.

76. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant Columbia-Presbyterian Medical Center, East Side Associates, were agents, servants and/or employees of defendant SLOANE.

77. At all times herein mentioned all of the physicians, nurses and other personnel involved in the diagnosis, care and treatment of the plaintiffs in defendant East Side Associates, were agents, servants and/or employees of defendant SLOANE.

78. At all times herein mentioned, defendant ROBERT HADDEN, was a physician duly licensed to practice medicine in the State of New York.

79. At all times herein mentioned Defendant ROBERT HADDEN, was and agent servant or employee of Defendant TRUSTEES, Defendant CUCPS, Defendant NYPH, Defendant CPMC-ESA, Defendant ESA, Defendant CPMC, Defendant CUMC, Defendant PPHSO, Defendant CCNP, Defendant CCC, and/or Defendant SLOANE (hereinafter collectively "MEDICAL ENTITIES").

80. Prior to April 2008, defendant "MEDICAL ENTITIES", their agents, servants and/or employees, hired, employed, credentialed and/or enlisted Defendant ROBERT HADDEN, to render gynecologic and/or obstetric care to their patients.

81. At all times herein mentioned, defendant ROBERT HADDEN was a sexual predator.

82. ROBERT HADDEN sexually assaulted patients on the premises of defendant "MEDICAL ENTITIES".

83. ROBERT HADDEN sexually assaulted patients on the premises of defendant "MEDICAL ENTITIES" under the guise of rendering medical care.

84. Defendant "MEDICAL ENTITIES" enabled defendant ROBERT HADDEN to sexually assault patients on their premises.

85. Defendant "MEDICAL ENTITIES" failed to timely and properly supervise and/or monitor defendant ROBERT HADDEN.

86. Defendant "MEDICAL ENTITIES" knew or should have known that defendant ROBERT HADDEN was sexually assaulting patients under the guise of rendering medical care.

87. Defendant "MEDICAL ENTITIES" knew or should have known that defendant ROBERT HADDEN was sexually assaulting patients on their premises.

88. Defendant “MEDICAL ENTITIES” did not have policies or procedures in place to protect patients from being sexually assaulted by defendant ROBERT HADDEN.

89. Medical personnel, including nurses and administrators, of defendant “MEDICAL ENTITIES” knew that defendant ROBERT HADDEN was sexually assaulting patients on their premises.

90. Defendant “MEDICAL ENTITIES” created an environment which caused medical personnel, including nurses and administrators, to not report the sexual assaults being committed by defendant ROBERT HADDEN for fear of reprisals.

91. Medical personnel, including nurses and administrators at defendant “MEDICAL ENTITIES” have known for 10-15 years that defendant ROBERT HADDEN is a sexual predator who has sexually assaulted patients on their premises.

92. Medical personnel, including nurses and administrators at defendant “MEDICAL ENTITIES” facilitated defendant ROBERT HADDEN in the sexual assaults he was committing on the premises of “MEDICAL ENTITIES”.

93. Defendant “MEDICAL ENTITIES” have failed to take action or levy penalties against defendant ROBERT HADDEN for the sexual assaults he has committed on their premises.

94. Defendant “MEDICAL ENTITIES” have failed to undertake a meaningful investigation to ascertain the facts and circumstances that allowed the sexual assaults to be committed by defendant ROBERT HADDEN upon their premises.

95. Defendant “MEDICAL ENTITIES” have approved disability payments to defendant ROBERT HADDEN for a purported “disability” which he claims caused him to be unable to work.

96. Defendant ROBERT HADDEN was convicted of criminal sexual assault of patients on the premises of defendant “MEDICAL ENTITIES”.

97. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees, failed to monitor and supervise the actions of Defendant ROBERT HADDEN which enabled the sexual assaults to take place.

98. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees, failed to act upon information and facts that Defendant ROBERT HADDEN had sexually assaulted patients on their premises.

99. Defendant “MEDICAL ENTITIES” have permitted defendant ROBERT HADDEN to collect disability income despite the fact that he is a sexual predator - and is now registered as a convicted sex offender - as a result of him having sexually assaulted patients on the premises of defendant “MEDICAL ENTITIES”.

100. Defendant "MEDICAL ENTITIES" have enabled defendant ROBERT HADDEN to collect disability income for a purported mental "disability" which he claims is causing him to be unable to work.

101. Defendant "MEDICAL ENTITIES" have entered into an arrangement with defendant ROBERT HADDEN in exchange for his cooperation with them in the civil lawsuits involving his sexual assault of multiple patients.

102. There has been no disciplinary action by defendant "MEDICAL ENTITIES" against defendant ROBERT HADDEN.

103. There has been no disciplinary action by defendant "MEDICAL ENTITIES" against any of the nurses and administrators who enabled defendant ROBERT HADDEN to sexually assault patients on their premises.

104. Defendant "MEDICAL ENTITIES" have taken no disciplinary action against defendant ROBERT HADDEN, from the first time that ROBERT HADDEN first obtained privileges with the named "MEDICAL ENTITIES" through the present.

105. Defendant "MEDICAL ENTITIES" have taken no disciplinary action against defendant ROBERT HADDEN between September 27, 2011 and the present.

106. Prior to January 2014, Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees, were aware of complaints that defendant ROBERT HADDEN had sexually assaulted patients upon the premises of Defendant "MEDICAL ENTITIES".

107. Prior to January 2013, Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees, were aware of complaints that defendant ROBERT HADDEN had sexually assaulted patients upon the premises of Defendant "MEDICAL ENTITIES".

108. Prior to August 2012, Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees, were aware of complaints that defendant ROBERT HADDEN had sexually assaulted patients upon the premises of Defendant "MEDICAL ENTITIES".

109. Prior to January 2012, Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees, were aware of complaints that defendant ROBERT HADDEN had sexually assaulted patients upon the premises of Defendant "MEDICAL ENTITIES".

110. Prior to January 2011, Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees, were aware of complaints that defendant ROBERT HADDEN had sexually assaulted patients upon the premises of Defendant "MEDICAL ENTITIES".

111. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees knew or should have known that defendant ROBERT HADDEN had sexually assaulted patients upon their premises as far back as the 1990s.

112. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees, observed defendant ROBERT HADDEN sexually assaulting patients as far back as the 1990s.

113. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees witnessed defendant ROBERT HADDEN sexually assaulting patients as far back as the 1990s.

114. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees, were informed and/or aware of sexual assaults being committed by defendant ROBERT HADDEN and failed to protect patients from further sexual assaults and sexual abuse.

115. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees, knew or should have known of sexual assaults being committed by defendant ROBERT HADDEN and failed to protect patients from further sexual assaults and/or sexual abuse.

116. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees reported to other defendant “MEDICAL ENTITIES” personnel that defendant ROBERT HADDEN was sexually assaulting patients as far back as the 1990s.

117. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees had received complaints by patients who had been sexually assaulted and sexually abused by ROBERT HADDEN prior to ROBERT HADDEN entering a plea of being criminally guilty on February 22, 2016.

118. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees took no action on the information and knowledge they had concerning patients being sexually abused and sexually assaulted by ROBERT HADDEN prior to ROBERT HADDEN entering a plea of criminal guilt on February 22, 2016.

119. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees have taken no action on the information and knowledge they have about patients being sexually assaulted and sexually abused by ROBERT HADDEN since DEFENDANT HADDEN entered his plea of criminal guilt on February 22, 2016.

120. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees have taken no action on the information and knowledge they have about patients being sexually assaulted and sexually abused by ROBERT HADDEN since DEFENDANT HADDEN was sentenced in the Criminal Case on March 29, 2016.

121. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees have a legal, professional and/or ethical duty to report all suspicions of sexual assaults by doctors or other medical personnel to Criminal Authorities.

122. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees have a legal, professional and/or ethical duty to report all suspicions of sexual assaults by doctors or other medical personnel to Defendant Medical Entity supervisors.

123. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees have a legal, professional and/or ethical duty to report all suspicions of sexual assaults by doctors or other medical personnel to both Criminal Authorities and Defendant Medical Entity supervisors.

124. Defendant "MEDICAL ENTITIES" should encourage all medical personnel, as well as all of their agents, servants, and/or employees, to immediately report all suspected sexual assaults to the Administration as well as to Criminal Authorities.

125. Defendant "MEDICAL ENTITIES" created an environment which discouraged reporting medical doctors to Administrators and Criminal Authorities - even where medical doctor were sexually assaulting patients.

126. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees never reported ROBERT HADDEN to any Administrators for having sexually assaulted patients.

127. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees did report ROBERT HADDEN to Administrators for having sexually assaulted patients.

128. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees never took any disciplinary action against ROBERT HADDEN for having sexually assaulted patients.

129. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees continue to grant ROBERT HADDEN privileges despite the fact that they know or should have known that he was sexually assaulting patients.

130. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees have a duty to timely and properly monitor and/or supervise their medical personnel, including ROBERT HADDEN, to ensure that patients are not being sexually assaulted.

131. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees failed to timely and properly monitor and/or supervise their medical personnel, including ROBERT HADDEN, to ensure that patients are not being sexually assaulted.

132. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees never reported ROBERT HADDEN to any Criminal Authorities.

133. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees allowed ROBERT HADDEN to continue to work as a medical doctor upon their premises after he sexually assaulted patients.

134. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees allowed ROBERT HADDEN to continue to work as a medical doctor upon their premises after they knew or should have known that he sexually assaulted patients.

135. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees failed to protect their patients from further sexual assaults and sexual abuse by ROBERT HADDEN.

136. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees failed to conduct timely and proper investigations into the allegations that ROBERT HADDEN had sexually assaulted patients.

137. Defendant “MEDICAL ENTITIES” continued judicial and extrajudicial denials that ROBERT HADDEN sexually assaulted patients despite the fact that they had conclusive proof that ROBERT HADDEN is guilty of criminal sexual assaults.

138. Defendant ROBERT HADDEN maintained his judicial and extrajudicial denials that he sexually assaulted patients despite the fact that ROBERT HADDEN is, in fact, guilty of criminal sexual assaults.

139. Defendant ROBERT HADDEN has betrayed a position of respect and trust by committing criminal sexual assaults on patients.

140. Defendant “MEDICAL ENTITIES” have betrayed a position of respect and trust by permitting defendant ROBERT HADDEN to criminal sexual assaults on patients upon their premises.

141. Defendant “MEDICAL ENTITIES” have long known that ROBERT HADDEN was a sexual predator, but instead of terminating ROBERT HADDEN’s medical privileges and reporting him to Criminal Authorities, the defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees instead chose to simply move defendant ROBERT HADDEN to other medical facilities at other locations within Defendant “MEDICAL ENTITIES”S control where he continued to sexually assault other patients.

142. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees have violated a sacrosanct relationship of Trust by failing to protect patients from being sexually assaulted by defendant ROBERT HADDEN.

143. By tolerating the sexual misconduct of ROBERT HADDEN, Defendant MEDICAL “MEDICAL ENTITIES”, their agents, servants, and/or employees have completely violated the sacrosanct relationship of Trust by placing their patients in the way of harm and being sexually assaulted by defendant ROBERT HADDEN.

144. Defendant ROBERT HADDEN has violated a sacrosanct relationship of Trust by sexually assaulting patients.

145. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees were informed and/or aware of the sexual assaults being committed by ROBERT HADDEN and failed to protect their patients from further sexual assaults and sexual abuse.

146. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees were informed and/or aware of the sexual assaults being committed by ROBERT HADDEN and failed to protect their patients from further sexual assaults and sexual abuse.

147. Defendant ROBERT HADDEN is guilty of committing a Criminal Sexual Act in the Third Degree upon a patient in violation of P.L. § 130.40(1).

148. On February 7, 2012 Defendant ROBERT HADDEN engaged in Oral Sexual Contact with an Individual who was incapable of consent by reasons of some factor other than being less than seventeen years old in violation of P.L. § 130.40(1).

149. On February 7, 2012 Defendant ROBERT HADDEN engaged in Oral Sexual Contact with a patient in violation of P.L. § 130.40(1).

150. Defendant ROBERT HADDEN is guilty of the Crime of Forcibly Touching "JANE DOE #6" (hereinafter "JANE DOE #6") in violation of P.L. § 130.52.

151. On May 7, 2012, ROBERT HADDEN intentionally and for no legitimate purpose forcibly touched the sexual and other intimate parts of "JANE DOE #6" for the purpose of degrading and abusing her and for the purpose of gratifying his sexual desire.

152. On May 7, 2012 Defendant ROBERT HADDEN Forcibly Touched "JANE DOE #6" in violation of P.L. § 130.52.

153. "JANE DOE #6" was hiv-positive when she was under the care and treatment of defendants, their agents, servants, and/or employees.

154. Defendant ROBERT HADDEN was fully aware that patient "JANE DOE #6" was hiv-positive while she was under his care and treatment in May of 2012.

155. Defendant "MEDICAL ENTITIES" were fully aware that patient "JANE DOE #6" was hiv-positive while she was under their care and treatment in May of 2012.

156. Defendant ROBERT HADDEN forcibly touched the sexual and other intimate parts of "JANE DOE #6" for the purpose of degrading and abusing her and for the purpose of gratifying his sexual desire on May 7, 2012, despite his full knowledge and awareness that she was hiv-positive.

157. Despite Defendant ROBERT HADDEN's full knowledge and awareness that plaintiff "JANE DOE #6" was hiv-positive, ROBERT HADDEN criminally sexually assaulted her on May 7, 2012, and exposed her and other patients and personnel to an increased risk of harm, all in a wanton and reckless disregard of Patient Safety.

158. Defendant ROBERT HADDEN sexually assaulted patient "JANE DOE #6" on May 7, 2012.

159. Defendant ROBERT HADDEN sexually assaulted "JANE DOE #6" on dates prior to May 7, 2012.

160. ROBERT HADDEN is a convicted sexual felon.

161. ROBERT HADDEN is a registered sex offender.

162. Had plaintiffs not commenced their Civil lawsuits against defendant ROBERT HADDEN and Defendant "MEDICAL ENTITIES", defendant "MEDICAL ENTITIES" would have continued to allow ROBERT HADDEN to retain his medical privileges and sexually abuse and sexually assault obstetric & gynecologic patients upon the premises of defendant "MEDICAL ENTITIES".

163. ROBERT HADDEN has sexually abused and sexually assaulted innumerable patients over the course of his career as a medical doctor upon the premises of defendant "MEDICAL ENTITIES".

164. ROBERT HADDEN has sexually abused and sexually assaulted patients going back as far as the 1990's all while under the employment and supervision of defendant "MEDICAL ENTITIES".

165. Defendant "MEDICAL ENTITIES" were aware of defendant ROBERT HADDEN's criminal and outrageous behavior prior to August 2012.

166. Defendant "MEDICAL ENTITIES" have chosen to turn their backs on the patients who have been sexually abused and sexually assaulted by defendant ROBERT HADDEN.

167. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees have failed to report instances of sexual misconduct and sexual abuse committed by defendant ROBERT HADDEN.

168. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees have failed to act on instances of sexual misconduct and sexual abuse committed by defendant ROBERT HADDEN.

169. Defendant "MEDICAL ENTITIES" deny they have any responsibility for the sexual abuse that their patients have endured at the hands of defendant ROBERT HADDEN.

170. The answering defendant feels it is not responsible for the sexual abuse that its patients have endured at the hands of defendant ROBERT HADDEN.

171. Defendant "MEDICAL ENTITIES" have taken no disciplinary action against defendant ROBERT HADDEN as a result of the sexual assaults and sexual abuse he has committed on their premises.

172. Defendant "MEDICAL ENTITIES" have made no effort to right the wrongs that have been committed upon their premises with regard to the within individually named survivors.

173. Defendant "MEDICAL ENTITIES" refuse to take responsibility for the sexual abuse their patients have endured as a result of the complicity of their agents, servants and/or employees who failed to report, terminate and/or take any disciplinary or legal action against ROBERT HADDEN.

174. Defendant ROBERT HADDEN denies violating the standard of care with regard to the care and treatment rendered to "JANE DOE #6" on May 7, 2012.

175. Defendant TRUSTEES denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #6" on May 7, 2012.

176. Defendant CUCPS denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #6" on May 7, 2012.

177. Defendant NYPH denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #6" on May 7, 2012.

178. Defendant CPMC denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #6" on May 7, 2012.

179. Defendant CUMC denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #6" on May 7, 2012.

180. Defendant PHPSO denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #6" on May 7, 2012.

181. Defendant CCC denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #6" on May 7, 2012.

182. Defendant CCNP denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #6" on May 7, 2012.

183. Defendant COLUMBIA PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #6" on May 7, 2012.

184. Defendant EAST SIDE ASSOCIATES denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #6" on May 7, 2012.

185. Defendant SLOANE denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #6" on May 7, 2012.

186. Defendant ROBERT HADDEN denies violating the standard of care with regard to the care and treatment rendered to the patient he sexually assaulted (hereinafter "JANE DOE #1") on February 7, 2012.

187. Defendant TRUSTEES denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #1" on February 7, 2012.

188. Defendant CUCPS denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #1" on February 7, 2012.

189. Defendant NYPH denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #1" on February 7, 2012.

190. Defendant CPMC denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #1" on February 7, 2012.

191. Defendant CUMC denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #1" on February 7, 2012.

192. Defendant PHPSO denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #1" on February 7, 2012.

193. Defendant CCC denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #1" on February 7, 2012.

194. Defendant CCNP denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #1" on February 7, 2012.

195. Defendant COLUMBIA PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES. denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #1" on February 7, 2012.

196. Defendant EAST SIDE ASSOCIATES denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #1" on February 7, 2012.

197. Defendant SLOANE denies that ROBERT HADDEN violated the standard of care with regard to the care and treatment rendered to "JANE DOE #1" on February 7, 2012.

AS AND FOR THE FIRST CAUSE OF ACTION FOR "JANE DOE #3"

198. Plaintiff "JANE DOE #3" is identified and referenced heretofore as "JANE DOE #3" - which is the pseudonym for this plaintiff. Plaintiff requests permission to use a pseudonym because of the extremely private nature of this matter. Plaintiff was a resident of the State of New York at the relevant times herein.

199. Plaintiff "JANE DOE #3" is an adult with no legal disability.

200. At all times herein mentioned, "JANE DOE #3" was a patient of defendant ROBERT HADDEN.
201. At all times herein mentioned, "JANE DOE #3" was a patient of defendant TRUSTEES.
202. At all times herein mentioned, "JANE DOE #3" was a patient of defendant CUCPS.
203. At all times herein mentioned, "JANE DOE #3" was a patient of defendant NYPH.
204. At all times herein mentioned, "JANE DOE #3" was a patient of defendant CPMC-ESA.
205. At all times herein mentioned, "JANE DOE #3" was a patient of defendant ESA.
206. At all times herein mentioned, "JANE DOE #3" was a patient of defendant CPMC.
207. At all times herein mentioned, "JANE DOE #3" was a patient of defendant CUMC.
208. At all times herein mentioned, "JANE DOE #3" was a patient of defendant PHPSO.
209. At all times herein mentioned, "JANE DOE #3" was a patient of defendant CCNP.
210. At all times herein mentioned, "JANE DOE #3" was a patient of defendant CCC.
211. At all times herein mentioned, "JANE DOE #3" was a patient of defendant SLOANE.
212. Beginning on or about March 6, 2012 through June 12, 2012, Plaintiff "JANE DOE #3" was under the medical care and treatment of Defendant ROBERT HADDEN for gynecologic care, monitoring and treatment, at the medical facilities maintained by the Defendant "MEDICAL ENTITIES" located at 16 E. 60th Street, New York, NY 10022.
213. Beginning on or about March 6, 2012 through June 12, 2012, and beyond, Plaintiff "JANE DOE #3" was under the medical care and treatment of Defendant "MEDICAL ENTITIES" as well as their agents, servants, and/or employees for gynecologic care, monitoring and treatment, at the medical facilities maintained by Defendant "MEDICAL ENTITIES" located at 16 E. 60th Street, New York, NY 10022.
214. Beginning on or about March 6, 2012 through June 12, 2012, and beyond, Plaintiff "JANE DOE #3" was under the medical care and treatment of Defendant "MEDICAL ENTITIES" and ROBERT HADDEN, and their agents, servants, and/or employees, for gynecologic care, monitoring and treatment, at the medical facilities maintained by the Defendant "MEDICAL ENTITIES" located at or about 16 E. 60th Street, New York, NY 10022.

215. During a time beginning on or about March 6, 2012 through June 12, 2012, Plaintiff "JANE DOE #3" was under the medical care and treatment of Defendant ROBERT HADDEN for gynecologic care, monitoring and treatment, at the medical facilities maintained by the Defendant "MEDICAL ENTITIES" located at 680 W. 168th Street, New York, NY 10032.

216. During a time beginning on or about March 6, 2012 through June 12, 2012, and beyond, Plaintiff "JANE DOE #3" was under the medical care and treatment of Defendant "MEDICAL ENTITIES" as well as their agents, servants, and/or employees for gynecologic care, monitoring and treatment, at the medical facilities maintained by Defendant "MEDICAL ENTITIES" located at 680 W. 168th Street, New York, NY 10032.

217. During a time beginning on or about March 6, 2012 through June 12, 2012, and beyond, Plaintiff "JANE DOE #3" was under the medical care and treatment of Defendant "MEDICAL ENTITIES" and ROBERT HADDEN, and their agents, servants, and/or employees, for gynecologic care, monitoring and treatment, at the medical facilities maintained by the Defendant "MEDICAL ENTITIES" located at or about 680 W. 168th Street, New York, NY 10032.

218. During a time beginning on or about March 6, 2012 through June 12, 2012, Plaintiff "JANE DOE #3" was under the medical care and treatment of Defendant ROBERT HADDEN for gynecologic care, monitoring and treatment, at the medical facilities maintained by the Defendant "MEDICAL ENTITIES" located at 622 W. 168th Street, New York, NY 10022.

219. During a time beginning on or about March 6, 2012 through June 12, 2012, and beyond, Plaintiff "JANE DOE #3" was under the medical care and treatment of Defendant "MEDICAL ENTITIES" as well as their agents, servants, and/or employees for gynecologic care, monitoring and treatment, at the medical facilities maintained by Defendant "MEDICAL ENTITIES" located at 622 W. 168th Street, New York, NY 10022.

220. During a time beginning on or about March 6, 2012 through June 12, 2012, and beyond, Plaintiff "JANE DOE #3" was under the medical care and treatment of Defendant "MEDICAL ENTITIES" and ROBERT HADDEN, and their agents, servants, and/or employees, for gynecologic care, monitoring and treatment, at the medical facilities maintained by the Defendant "MEDICAL ENTITIES" located at or about 622 W. 168th Street, New York, NY 10022.

221. While under the gynecologic care, monitoring and treatment of Defendant ROBERT HADDEN, and Defendant "MEDICAL ENTITIES" - and in the course of rendering continuous treatment to Plaintiff "JANE DOE #3" - defendant ROBERT HADDEN did sexually assault Plaintiff "JANE DOE #3".

222. While under the gynecologic and obstetric care, monitoring and treatment of Defendant ROBERT HADDEN, the agents, servants, and/or employees of Defendant "MEDICAL

ENTITIES” enabled and/or were complicit in ROBERT HADDEN sexually assaulting Plaintiff "JANE DOE #3".

223. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees failed to timely and properly monitor, supervise, and train the medical personnel accompanying ROBERT HADDEN while caring for patients upon their premises.

224. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees failed to timely and properly monitor and supervise ROBERT HADDEN.

225. Prior to the time when plaintiff "JANE DOE #3" came under the care and treatment of defendant ROBERT HADDEN, defendant “MEDICAL ENTITIES” knew or should have know that ROBERT HADDEN had a history of sexually assaulting patients.

226. Prior to the time when plaintiff "JANE DOE #3" came under the care and treatment of defendant ROBERT HADDEN, defendant “MEDICAL ENTITIES” chose to take no disciplinary actions against ROBERT HADDEN - which enable ROBERT HADDEN to continue to sexually assault patients upon their premises, including patient "JANE DOE #3".

227. The improper and tortious conduct of Defendant ROBERT HADDEN, was not performed for a valid medical purpose.

228. Defendant ROBERT HADDEN, performed the aforementioned actions for his own sexual gratification and without regard for the plaintiff’s well-being.

229. Defendant ROBERT HADDEN, performed the aforementioned actions for his own sexual gratification and without plaintiff "JANE DOE #3"'s consent.

230. The aforementioned actions were performed by Defendant ROBERT HADDEN - under circumstances caused and permitted by the Defendant “MEDICAL ENTITIES” - which cloaked Defendant ROBERT HADDEN with the actual and apparent authority to perform gynecologic and obstetric treatment and enabled the sexual assaults to occur.

231. Defendant “MEDICAL ENTITIES” had knowledge of Defendant ROBERT HADDEN’s sexual assaults of other patients and/or medical personnel prior to the time that "JANE DOE #3" came under the care and treatment of defendant ROBERT HADDEN.

232. Defendant “MEDICAL ENTITIES” had knowledge of Defendant ROBERT HADDEN’s, sexual assaults of other patients and/or medical personnel before March 6, 2012.

233. Defendant “MEDICAL ENTITIES” had knowledge of Defendant ROBERT HADDEN’s, sexual assaults of other patients and/or medical personnel before June 12, 2012.

234. The agents, servants and/or employees of Defendant “MEDICAL ENTITIES” had prior

knowledge of Defendant ROBERT HADDEN's sexual assaults of other patients and/or medical personnel before the time that "JANE DOE #3" came under the care and treatment of defendant ROBERT HADDEN.

235. The agents, servants and/or employees of Defendant "MEDICAL ENTITIES" had prior knowledge of Defendant ROBERT HADDEN's sexual assaults of other patients and/or medical personnel before March 6, 2012.

236. The agents, servants and/or employees of Defendant "MEDICAL ENTITIES" had prior knowledge of Defendant ROBERT HADDEN's sexual assaults of other patients and/or medical personnel before June 12, 2012.

237. The Defendant "MEDICAL ENTITIES" owed a duty to Plaintiff "JANE DOE #3" to ensure that qualified and competent personnel would render medical treatment to them and to have proper safeguards and procedures in place to prevent the occurrences of sexual assaults on patients as set forth herein.

238. The agents, servants and/or employees of Defendant "MEDICAL ENTITIES" had a duty to offer plaintiff "JANE DOE #3" appropriate medical care, appropriate psychological counseling for victims of sexual assaults, and appropriate emotional support, upon learning that she was sexually assaulted by one of their own physicians - instead of ignoring her complaints and denying any knowledge that ROBERT HADDEN was a sexual predator - which caused "JANE DOE #3" to experience further self-doubt and trauma, and further emotional and psychological harm.

239. The Defendant "MEDICAL ENTITIES" are liable for the actions committed by Defendant ROBERT HADDEN under the doctrine of respondeat superior.

240. The Defendant "MEDICAL ENTITIES" are vicariously liable for the actions committed by Defendant ROBERT HADDEN.

241. The Defendant "MEDICAL ENTITIES" are directly liable for their own acts and/or omissions which were a proximate cause of plaintiff "JANE DOE #3" being sexually assaulted by defendant ROBERT HADDEN.

242. The Defendant "MEDICAL ENTITIES" were complicit in the criminal acts committed by Defendant ROBERT HADDEN.

243. Defendant ROBERT HADDEN had a duty to timely and properly care for and treat "JANE DOE #3".

244. Defendant "MEDICAL ENTITIES" had a duty to timely and properly care for "JANE DOE #3".

245. Defendant "MEDICAL ENTITIES" had a duty to timely and properly supervise Defendant ROBERT HADDEN.

246. Defendant "MEDICAL ENTITIES" had a duty to enact certain Policies governing the use of chaperones during gynecologic and obstetric examinations.

247. Defendant COLUMBIA UNIVERSITY MEDICAL CENTER had a duty to enact certain Policies governing the use of chaperones during gynecologic and obstetric examinations.

248. Defendant SLOANE had a duty to enact certain Policies governing the use of chaperones during gynecologic and obstetric examinations.

249. Defendant TRUSTEES had a duty to enact certain Policies governing the use of chaperones during gynecologic and obstetric examinations.

250. Defendant ROBERT HADDEN, had a duty to properly care for "JANE DOE #3".

251. Defendant ROBERT HADDEN, had a legal duty to not sexually assault "JANE DOE #3".

252. Defendant ROBERT HADDEN, had a medical duty to not sexually assault "JANE DOE #3".

253. Defendant ROBERT HADDEN, had a moral duty to not sexually assault "JANE DOE #3".

254. Defendant ROBERT HADDEN, had an ethical duty to not sexually assault "JANE DOE #3".

255. A doctor may never sexually assault a patient.

256. Sexually assaulting a patient is a violation of the medical standard of care.

257. All medical personnel are required to report any incident or occurrence wherein a sexual assault by a doctor is suspected.

258. Defendant "MEDICAL ENTITIES" had a duty to ensure Defendant Robert Hadden did not sexually assault "JANE DOE #3".

259. Defendant "MEDICAL ENTITIES" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

260. Defendant "NYPH" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

261. Defendant "CPMC" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

262. Defendant "CUMC" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

263. Defendant "CPMC-ESA" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

264. Defendant "ESA" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

265. Defendant "TRUSTEES" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

266. Defendant "CUCPS" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

267. Defendant "PHPSO" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

268. Defendant "CCC" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

269. Defendant "CCNP" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

270. Defendant "SLOANE" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

271. Defendant ROBERT HADDEN failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

272. Defendant ROBERT HADDEN failed to follow policies and/or procedures of the defendant "MEDICAL ENTITIES" concerning the use of chaperones during examinations at the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

273. Defendant "MEDICAL ENTITIES" failed to enforce the Policy concerning the use of chaperones during examinations during the time when "JANE DOE #3" was under the care and treatment of defendant ROBERT HADDEN.

274. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to March 6, 2012.

275. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to June 12, 2012.

276. The answering defendant, its agents, servants, and/or employees knew or should have known that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to March 6, 2012.

277. The answering defendant, its agents, servants, and/or employees knew or should have known that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to June 12, 2012.

278. Defendant "MEDICAL ENTITIES" permitted defendant ROBERT HADDEN to examine patients at the premises of defendant "MEDICAL ENTITIES" without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault of another patient prior to June 12, 2012.

279. Defendant "NYPH" permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault of another patient prior to June of 2012.

280. Defendant "CPMC" permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault of another patient prior to June of 2012.

281. Defendant "CUMC" permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault of another patient prior to June of 2012.

282. Defendant "CPMC-ESA" permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault of another patient prior to June of 2012.

283. Defendant "ESA" permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault of another patient prior to June of 2012.

284. Defendant "TRUSTEES" permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault of a patient prior to June of 2012.

285. Defendant "CUCPS" permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault of another patient prior to June of 2012.

286. Defendant "PHPSO" permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault of another patient prior to June of 2012.

287. Defendant "CCC" permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault of another patient prior to June of 2012.

288. Defendant "CCNP" permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault of another patient prior to June of 2012.

289. Defendant "SLOANE" permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault of another patient prior to June of 2012.

290. The answering defendant permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to June of 2012.

291. The answering defendant had a duty to enact a policy concerning the presence of chaperones during examinations performed by ROBERT HADDEN upon their premises.

292. The answering defendant failed to enact a policy concerning the presence of chaperones during examinations performed ROBERT HADDEN upon their premises.

293. The answering defendant failed to enforce a policy concerning the presence of chaperones during examinations performed by ROBERT HADDEN upon their premises.

294. The answering defendant failed to timely and properly supervise defendant ROBERT HADDEN in regard to the examinations he performed of female patients upon the premises of defendant "MEDICAL ENTITIES" from in or about 1993 through September 2012, specifically including, but not limited to, the time period between April 4, 2008 and July 31, 2012.

295. Beginning on or about March 6, 2012 plaintiff "JANE DOE #3" came under the gynecologic and medical diagnosis, care and treatment of the defendants, their agents, servants, and/or employees, and in a continuous course of treatment through on or about June 12, 2012, and beyond, defendant ROBERT HADDEN sexually assaulted plaintiff "JANE DOE #3" upon the within named defendants' premises, and as a result of the foregoing, including the failure of the within named defendants, their agents, servants and/or employees to properly protect, treat, examine, diagnose, and care for plaintiff "JANE DOE #3", the failure to timely and properly monitor the actions of its agents, servants and/or employees, the failure to timely and properly supervise the actions of its agents, servants and/or employees, the failure to timely and properly provide chaperones during gynecologic and obstetric examinations, the failure to timely and properly require chaperones during gynecologic and obstetric examinations performed by ROBERT HADDEN, the failure to timely and properly investigate defendant ROBERT HADDEN, the failure to timely and properly suspend defendant ROBERT HADDEN, the failure to timely and properly limit the practice privileges defendant ROBERT HADDEN, the failure to timely and properly revoke the practice privileges defendant ROBERT HADDEN, the failure to timely and properly require the use of a preceptor for ROBERT HADDEN, the improper re-issuance of privileges and/or re-certification of defendant ROBERT HADDEN, the failure to stop the performance of serial vaginal and breast exams for no legitimate medical purpose, the failure to stop the inappropriate questioning of patient's sexual history, the performance of serial and medically inappropriate vaginal cultures and PAP smears, the failure to prevent defendant ROBERT HADDEN from engaging in criminal oral sexual contact with patients, including "JANE DOE #3", the fraudulent billing and revenues generated through illegal and unnecessary examinations, the failure to act upon complaints of sexual assaults committed by defendant ROBERT HADDEN, the failure to provide a chaperone to prevent ROBERT HADDEN from engaging in physical sexual contact with patients, the failure to provide a chaperone to prevent ROBERT HADDEN from engaging in oral sexual contact with patients, the failure to timely and properly terminate defendant ROBERT HADDEN, the failure to provide appropriate psychological counseling and appropriate emotional support to "JANE DOE #3" upon learning and/or suspecting that she was sexually assaulted by one of their own physicians, the failure to timely and properly report the actions of defendant ROBERT HADDEN for disciplinary review, the failure to timely and properly report the actions of defendant ROBERT HADDEN for criminal prosecution, and the failure to timely and properly cooperate with the criminal investigation of defendant ROBERT HADDEN, the plaintiff "**JANE DOE #3**" was **duped, betrayed, sexually abused, manipulated, exploited, objectified, and sexually assaulted by defendant ROBERT HADDEN**, and sustained severe injuries and complications as a result.

296. Said occurrence was due to the carelessness and negligence of the defendants, their agents, servants and/or employees in failing to treat the plaintiff in a good, accepted and proper medical manner, in failing to timely and properly supervise the actions of defendant ROBERT HADDEN, and without any fault or lack of care on the part of the plaintiff.

297. By reason of the foregoing, plaintiff sustained severe and serious personal injuries, a severe shock to her nervous system and certain internal injuries, and was caused to suffer severe physical pain, mental anguish, and psychological injuries as a result thereof.

298. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

299. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A SECOND CAUSE OF ACTION FOR "JANE DOE #3" FOR CIVIL
BATTERY

300. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 299. inclusive, with the same force and effect as if hereinafter set forth at length.

301. Defendant ROBERT HADDEN engaged in intentional, offensive, harmful, sexual misconduct and wrongful bodily contact of Plaintiff "JANE DOE #3", without Plaintiff "JANE DOE #3"'s consent on the aforementioned occasions.

302. As a direct and proximate result of the negligence, careless, and wanton recklessness by Defendant "MEDICAL ENTITIES" and that of their agents, servants and/or employees in allowing ROBERT HADDEN to commit serial sexual assaults upon multiple women over a prolonged period of time, ROBERT HADDEN was enabled, and did, sexually assault female patients - including "JANE DOE #3" - seemingly on an at will basis and without any consequences or oversight.

303. As a direct and proximate result of the aforementioned sexual batteries and utter lack of oversight, Plaintiff "JANE DOE #3" sustained in the past, and will sustain in the future, physical injury, pain and suffering, serious psychological and emotional distress, mental anguish, embarrassment and humiliation.

304. As a direct and proximate result of Defendant ROBERT HADDEN's, offensive and wrongful physical contact of plaintiff "JANE DOE #3", without her consent, "JANE DOE #3" has suffered severe emotional and physical injuries and has been damaged in an amount to be determined at trial, and in an amount of damages which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A THIRD CAUSE OF ACTION FOR "JANE DOE #3" FOR CRIMINAL
BATTERY

305. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 304. inclusive, with the same force and effect as if hereinafter set forth at length.

306. Defendant ROBERT HADDEN, intentionally engaged in criminal, offensive, harmful, sexual misconduct, sexual assault, and wrongful bodily contact of Plaintiff "JANE DOE #3", without Plaintiff "JANE DOE #3"'s consent on the aforementioned occasions.

307. Defendant ROBERT HADDEN was permitted and enabled to commit these criminal acts as a direct and proximate result of the negligence, careless, and wanton recklessness of

Defendant "MEDICAL ENTITIES" and that of their agents, servants and/or employees through the failure to timely and properly train, supervise, monitor, discipline, terminate, and report ROBERT HADDEN to the Criminal Authorities.

308. As a direct and proximate result of the aforementioned sexual batteries, Plaintiff "JANE DOE #3" sustained in the past, and will sustain in the future, physical injury, pain and suffering, serious psychological and emotional distress, mental anguish, embarrassment and humiliation.

309. As a direct and proximate result of Defendant ROBERT HADDEN's criminal, offensive and wrongful physical contact of Plaintiff "JANE DOE #3", without her consent, "JANE DOE #3" has suffered severe emotional and physical injuries and has been damaged in an amount to be determined at trial, and in an amount of damages which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A FOURTH CAUSE OF ACTION FOR "JANE DOE #3"
FOR NEGLIGENCE & PROFESSIONAL NEGLIGENCE

310. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 309. inclusive, with the same force and effect as if hereinafter set forth at length.

311. The defendant MEDICAL ENTITIES, their agents, servants, and/or employees, and Defendant ROBERT HADDEN, failed to treat and care for plaintiff "JANE DOE #3" in accordance with the standards of care and treatment generally accepted in the medical community and treated plaintiffs in a manner which violated the customary and accepted standards in the community.

312. The defendant MEDICAL ENTITIES, their agents, servants, and/or employees, and Defendant ROBERT HADDEN, committed acts of negligence, professional negligence, and medical malpractice by negligently and carelessly failing to treat and care for plaintiff "JANE DOE #3" in a careful, skillful and medically acceptable manner.

313. Further, defendant "MEDICAL ENTITIES" by and through their personnel, administrators, agents, servants, and/or employees, failed to conduct themselves and operate their medical institutions, offices, hospitals, and clinics in accordance with the required standards to ensure that patients are safe and free from being sexually assaulted in the course of receiving medical care and treatment.

314. As a result of the foregoing, Plaintiff "JANE DOE #3" sustained physical, emotional, and psychological injuries, along with pain and suffering in an amount of damages which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A FIFTH CAUSE OF ACTION FOR
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

315. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 314. inclusive, with the same

force and effect as if hereinafter set forth at length.

316. Defendant ROBERT HADDEN and defendant "MEDICAL ENTITIES" owed a duty to Plaintiff "JANE DOE #3" to not cause her emotional distress, the initiation of post-traumatic stress disorder, or other harm during the course of gynecological and/or obstetric examinations and other related treatment, which are very personal to the patient.

317. Defendant ROBERT HADDEN, was negligent as to the effect of his conduct in performing unwanted sexual acts without the consent of Plaintiff "JANE DOE #3" during the course and scope of his purported medical treatment of the Plaintiff.

318. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees were negligent as to the effect of their conduct in allowing and enabling defendant ROBERT HADDEN to perform unwanted sexual acts on patient "JANE DOE #3", as well as other patients, during the course and scope of his purported medical treatment of the patient.

319. Defendant "MEDICAL ENTITIES," as well as their agents, servants, and/or employees were further negligent and careless in failing to attend to "JANE DOE #3" in a timely and proper manner after she was sexually assaulted by ROBERT HADDEN, and after these facts were brought to the attention of the medical personnel upon the premises of defendant "MEDICAL ENTITIES".

320. Defendants ROBERT HADDEN and "MEDICAL ENTITIES", as well as their agents, servants, employees and/or legal teams were further negligent and careless in failing to timely and properly investigate the reports, claims and legal filings about the sexual assaults upon patients being committed by ROBERT HADDEN, and made false, disparaging and degrading oral and written statements about the lack of veracity of plaintiff "JANE DOE #3".

321. As a direct and proximate consequence of Defendants's negligence, Plaintiff "JANE DOE #3" has suffered physical, emotional, and psychological injuries, along with pain and suffering.

**AS AND FOR A SIXTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

322. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 321. inclusive, with the same force and effect as if hereinafter set forth at length.

323. Defendant ROBERT HADDEN, acted in a manner that was criminal, intentional, willful, shameful, grossly reckless, and for the purpose of causing serious and substantial emotional distress to Plaintiff "JANE DOE #3" and/or in reckless and wanton disregard for same.

324. Defendant "MEDICAL ENTITIES" acted in a manner that was likewise criminal, intentional, willful, shameful, grossly reckless, and in abject, wanton, and total disregard to the serious harm being inflicted upon Plaintiff "JANE DOE #3" - and other patients - through their complicity in allowing, enabling and permitting Defendant ROBERT HADDEN to perform unwanted and criminal sexual acts without the consent of Plaintiff "JANE DOE #3" during the

course and scope of his so-called treatment of Plaintiff.

325. Defendant “MEDICAL ENTITIES” further acted in a manner that is criminal, intentional, willful, grossly reckless, intentionally deceitful, and in reckless disregard of the safety and well-being of Plaintiff "JANE DOE #3" when the agents, servants, and/or employees of defendant “MEDICAL ENTITIES” failed to timely and properly attend to plaintiff “JANE DOE #3” when she informed them of the sexual assault that had been committed by defendant ROBERT HADDEN.

326. Defendants ROBERT HADDEN and “MEDICAL ENTITIES” further acted in a manner that is criminal, premeditated, willful, grossly reckless, intentionally deceitful, and in reckless disregard of the safety and well-being of Plaintiff "JANE DOE #3" when their agents, servants, employees and/or legal teams made knowingly false, malicious and derogatory oral and written statements about the victims of ROBERT HADDEN’s serial sexual assaults, including the sexual assaults of JANE DOE #3.

327. As a result of the foregoing, Plaintiff "JANE DOE #3" sustained physical, emotional, and psychological injuries, along with pain and suffering.

AS AND FOR A SEVENTH CAUSE OF ACTION FOR
NEGLIGENT HIRING & NEGLIGENT SUPERVISION

328. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 327. inclusive, with the same force and effect as if hereinafter set forth at length.

329. Defendant “MEDICAL ENTITIES” prior to the granting or renewing of privileges or employment of defendants, residents, nurses and others medical personnel involved in plaintiff "JANE DOE #3"’s care, failed to investigate the qualifications, competence, capacity, abilities and capabilities of said defendants, residents, nurses and other employees, including but not limited to obtaining the following information: patient grievances, criminal investigations, governmental inquiries, negative health care outcomes, incidents injurious to patients, medical malpractice action commenced against said persons, including the outcome thereof, any history of association, privilege and/or practice at other institutions, and discontinuation of said association, employment, privilege and/or practice at said institution, and any pending professional misconduct proceedings in this State or another State, the substance of the allegations in such proceedings and any additional information concerning such proceedings and the findings of the proceedings and defendant “MEDICAL ENTITIES” failed to make sufficient inquiry of the physicians, nurses, employees other personnel and institutions which should and did have information relevant to the capacity, capability, ability and competence of said persons rendering treatment, including defendant ROBERT HADDEN - as well as the medical staff with which he was associated - upon defendants’s premises.

330. Further, defendant “MEDICAL ENTITIES” failed to timely and properly educate, train, supervise and/or monitor its agents, servants, and/or employees with regard to the policies and

procedures that must be followed when sexual abuse by a physician is suspected or observed, and instead created an environment where sexual misconduct by physicians was tolerated.

331. Defendant "MEDICAL ENTITIES" created an environment where its agents, servants and/or employees who suspected - or even witnessed - sexual misconduct by a physician, were more fearful about their prospects for future employment if they said something, than they were about the safety and well-being of the patients who were being sexually abused.

332. Had defendant "MEDICAL ENTITIES" made the above stated inquiry, or in the alternative, had it reviewed and analyzed the information obtained and available to it in a timely and proper manner, privileges and/or employment would not have been granted and/or renewed.

333. Defendant "MEDICAL ENTITIES" were additionally negligent, grossly reckless, wanton and willful, in failing to supervise, monitor, chaperone and/or investigate defendant ROBERT HADDEN, and/or failed to create, institute and/or enforce rules, policies, procedures and/or regulations for defendant ROBERT HADDEN's treatment of plaintiff "JANE DOE #3".

334. By reason of defendant "MEDICAL ENTITIES" failures to meet the aforementioned obligations, plaintiff "JANE DOE #3" was treated by physicians, nurses, medical personnel and other employees who were lacking the requisite skills, abilities, competence, capacity and supervision, as a result of which the plaintiff sustained significant injuries and complications.

335. The aforesaid injuries resulting therefrom were caused wholly and solely as a result of the defendant "MEDICAL ENTITIES"'s negligent and reckless supervision of its agents, servants, and/or employees, and created a foreseeable risk of harm to its patients.

336. Defendant "MEDICAL ENTITIES"'s negligence and recklessness further lies in having placed Defendant ROBERT HADDEN in a position to cause foreseeable harm, of which plaintiff "JANE DOE #3" would have been spared, had the defendant "MEDICAL ENTITIES" taken reasonable care in the supervision and investigation of its employees - including, but not limited to, defendant ROBERT HADDEN, himself.

337. In a claim for negligent hiring and/or retention, an employer is held liable and responsible for its negligence or recklessness in hiring, retaining and/or supervising an employee, whereas under respondeat superior the employer is vicariously liable for the torts of the agent, servant or employee. Thus, while Defendant "MEDICAL ENTITIES" may or may not be vicariously liable under respondeat superior for an act of an employee that was committed outside the scope of the employee's employment, Defendant "MEDICAL ENTITIES" are nevertheless liable for their failure to exercise reasonable care in hiring, retaining and/or supervising their agents, servants and/or employees - including, but not limited to, defendant ROBERT HADDEN, himself.

338. In a claim for negligent supervision, the employer is held liable and responsible for its negligence or recklessness in failing to timely and properly supervise an agent, servant, and/or employee, whereas under respondeat superior the employer is vicariously liable for the torts of the employee. Thus, while Defendant "MEDICAL ENTITIES" may or may not be vicariously liable under respondeat superior for an act of an agent, servant, or employee that was committed

outside the scope of the employee's employment, Defendant "MEDICAL ENTITIES" are nevertheless liable for their own failure to exercise reasonable care in hiring, retaining, monitoring, investigating, and/or supervising their agents, servants and/or employees - including, but not limited to, defendant ROBERT HADDEN, himself.

339. As a result of the foregoing, Plaintiff "JANE DOE #3" sustained physical, emotional, and psychological injuries, along with pain and suffering.

AS AND FOR A EIGHTH CAUSE OF ACTION FOR "JANE DOE #3" FOR
FAILING TO INVESTIGATE CRIMINALLY SUSPICIOUS ACTIVITY - ALL DEFENDANTS

340. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 339. inclusive, with the same force and effect as if hereinafter set forth at length.

341. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees, failed to timely and properly investigate complaints made by the sexual assault victims of ROBERT HADDEN, as well as suspicious circumstances wherein ROBERT HADDEN and other medical staff, agents, servants, and/or employees placed patients in compromised and unprotected situations which either led, or should have led, to an investigation of defendant ROBERT HADDEN and other medical staff, agents, servants, and/or employees's negligence, carelessness, recklessness, and/or criminal and wanton misconduct.

342. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees, failed to timely and properly act upon complaints made by the sexual assault victims of Robert Hadden, as well as suspicious circumstances wherein ROBERT HADDEN, and/or other medical staff, agents, servants, and/or employees, placed patients in compromised and unprotected situations, all of which caused and/or enabled further and additional negligent, careless, reckless, criminal and/or wanton acts and harm to be inflicted upon patients, including "JANE DOE #3".

343. By reason of defendant "MEDICAL ENTITIES" and/or their agents, servants, and/or employees's failures to meet the aforementioned obligations and duties, plaintiff-patient "JANE DOE #3", as well as other patients, were subjected to physical and mental injury, mental manipulation, harm, duress, sexual objectification, sexual assault, and sexual abuse.

AS AND FOR A NINTH CAUSE OF ACTION FOR "JANE DOE #3" FOR
DEFAMATION - ALL DEFENDANTS

344. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 343. inclusive, with the same force and effect as if hereinafter set forth at length.

345. Since the time of the initial Civil filing in the Supreme Court through the present, the defendants, through their agents, servants, employees, lawyers and legal team, have made knowingly false and harmful judicial and extra-judicial statements - libelous written averments and slanderous verbal statements - wherein it has been asserted that the 5-sexual abuse survivors

herein, as well as the 19-victims/criminal court witnesses in the criminal case, including plaintiff "JANE DOE #3", are variously: lying, promiscuous, infected with sexually transmissible diseases, unattractive, unworthy of being believed, unworthy of being sexually abused, out to ruin a distinguished doctor's career for the money, were/and are somehow at fault for being sexually abused by ROBERT HADDEN, and not the actual victims of this criminal sexual predator.

346. Further, the defendants through their agents, servants, employees, lawyers and legal team, have judicially and publicly accused the named civil plaintiffs, the 19-criminal court witnesses, and the sexual assault crime victims, including "JANE DOE #3", their legal representatives (including each of plaintiff's counsel), the New York State Office of Medical Conduct, and the New York District Attorney's Office, of lying, being untruthful, after a "money grab" and on a "witch-hunt".

347. Defendants, their agents, servants, employees, lawyers and legal team, have further judicially and extrajudicially accused the named civil plaintiffs, the 19-criminal court witnesses, the sexual assault crime victims, including "JANE DOE #3", and their legal representatives of controlling, manipulating, commandeering, and illegally coercing and influencing both the New York State Office of Medical Conduct, and the New York District Attorney's Office, to criminally prosecute a "completely innocent" and "respected doctor" - who, in reality, is a criminal and deviant sexual predator.

348. Defendants, their agents, servants, employees, lawyers and legal teams knew or should have known the their invective and personal attacks upon the sexual assault survivors and their counsel were untrue and were made with malicious intent.

349. As a result of their false and damaging statements, the named civil plaintiffs, the 19-criminal court witnesses, the sexual assault crime victims including "JANE DOE #3" have been further emotionally and psychologically injured and their reputations have been damaged and impaired.

350. Multiple versions of defendants' defamatory and scurrilous statements about the within named plaintiffs and plaintiffs's counsel have been circulated, many of which are, and will be, known to the plaintiffs's family members, neighbors, colleagues, friends, peers, and eventually their own children.

351. Plaintiffs can neither wind back the clock, nor can they unring the bell, on defendants's undignified, false, and malicious statements about their lack of veracity and ethical composition.

352. Defendants's injurious, untrue and malicious averments, attacks and knowingly false statements constitute defamation per se.

353. The within named defendants are all jointly and severally liable for defamation of the names and reputations of the plaintiffs named herein in an amount to be determined at trial.

AS AND FOR A TENTH CAUSE OF ACTION FOR "JANE DOE #3" FOR
PUNITIVE DAMAGES - ALL DEFENDANTS

354. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 353. inclusive, with the same force and effect as if hereinafter set forth at length.

355. Defendant ROBERT HADDEN's sexual assault of plaintiff "JANE DOE #3" - and multiple other named and unnamed patients - as well as Defendant "MEDICAL ENTITIES"'s gross negligence, willfulness, and wantonness concerning the improper hiring, retention, lack of supervision, and other reckless acts and omissions set forth herein, constitute intentional, extreme, and outrageous conduct of the highest order.

356. Such grossly reckless conduct is motivated by greed, self-seeking, self-interest, deliberate indifference, deviant sexual desire, and is the product of malicious and evil minds such that the imposition of punitive damages are warranted.

357. Punitive damages are justified in cases like this to both punish the wrongdoers - and also to hold them out as examples to the rest of the community - such that these defendants, and others that may be similarly situated, are clearly and explicitly discouraged from engaging in these kinds of grossly deviant and abhorrent behaviors in the future.

358. For purposes of particularization of the acts which constitute and mandate the imposition of punitive damages committed by the within named defendants, it is stated that defendant ROBERT HADDEN - while pretending to render medical care to obstetric and gynecology patients - serially, and criminally, sexually assaulted numerous female patients at defendant MEDICAL ENTITIES's obstetric and gynecologic clinics - both on the East and West sides of Manhattan. Further, evidence exists that defendant "MEDICAL ENTITIES" enabled ROBERT HADDEN to continue to sexually assault their patients, and instead of terminating him and reporting him to the Criminal Authorities, they simply moved him from one clinic to another clinic in an effort to conceal his criminal activity. Moreover, evidence has surfaced from the Criminal Action which demonstrates that defendant ROBERT HADDEN has been sexually assaulting and sexually abusing patients on the premises of defendant "MEDICAL ENTITIES" for approximately 15-20 years, - all the way back into the 1990's.

359. Defendant ROBERT HADDEN was already the subject of an active Criminal Investigation at the time that he sexually assaulted plaintiff "JANE DOE #3". However, defendant "MEDICAL ENTITIES" failed to act on the information and enabled defendant ROBERT HADDEN to continue to sexually assault other women on its premises - even while he was the subject of an Active and On-going Criminal Investigation.

360. Said criminal investigation of ROBERT HADDEN occurred as a result of defendant ROBERT HADDEN's criminal sexual assault of another female patient at a clinic that was also affiliated with - and/or owned and operated by - defendant "MEDICAL ENTITIES".

361. Despite defendant ROBERT HADDEN being the subject of a criminal investigation for the sexual assaults of a female patients, defendant "MEDICAL ENTITIES" failed to commence

a timely and proper inquiry into the actions of defendant ROBERT HADDEN relative to the events surrounding the District Attorney's active criminal investigation.

362. Despite defendant ROBERT HADDEN being the subject of a criminal investigation for the sexual assaults of female patients, defendant "MEDICAL ENTITIES" continued to allow defendant ROBERT HADDEN to maintain his privileges at their hospitals, medical facilities, offices, and/or clinics, without any restrictions, limitations, preceptors, chaperones or additional supervision, where defendant ROBERT HADDEN was allowed to continue preying on unsuspecting women.

363. Defendant ROBERT HADDEN should have already been the subject of an internal and Criminal Investigation by the time that he sexually assaulted plaintiff "JANE DOE #3". However, defendant MEDICAL ENTITIES failed to act on the information they had and enabled defendant ROBERT HADDEN to continue to sexually assault other women on its premises - despite a long history of sexually assaulting patients.

364. While being allowed to continue preying on women at defendant "MEDICAL ENTITIES"'s hospitals, medical facilities, offices, and/or clinics without any restrictions, limitations, preceptors, chaperones or additional supervision, defendant ROBERT HADDEN continued to sexually assault female patients.

365. While sexually assaulting female patients - seemingly at will - due to the utter indifference of defendant "MEDICAL ENTITIES" as well as the indifference of "MEDICAL ENTITIES"'s agents, servants, and employees, defendant ROBERT HADDEN sexually assaulted plaintiff "JANE DOE #3".

366. Plaintiff "JANE DOE #3" was a 25-year-old female gynecology and obstetric patient of defendant COLUMBIA UNIVERSITY MEDICAL CENTER, TRUSTEES, SLOANE, ROBERT HADDEN, and/or defendant "MEDICAL ENTITIES" at the time when defendant ROBERT HADDEN sexually assaulted her by conducting repeated and unnecessary vaginal cultures and PAP smears and by licking her vagina in the course of a purported "vaginal exam" on June 12, 2012.

367. No chaperone was present in the room when defendant ROBERT HADDEN, sexually assaulted "JANE DOE #3" on the premises of defendant MEDICAL ENTITIES.

368. The sexual assaults of "JANE DOE #3" occurred months after ROBERT HADDEN admitted to sexually assaulting two other patient on the premises of defendant "MEDICAL ENTITIES", and in the course of an ongoing 20-year year period where ROBERT HADDEN serially sexually assaulted untold numbers of women also on the premises of defendant "MEDICAL ENTITIES".

369. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees had knowledge and/or awareness of the prior sexual assault(s), and chose to do nothing to protect their female patients from being sexually assaulted by defendant ROBERT HADDEN.

370. As a result of defendant "MEDICAL ENTITIES"'s gross indifference and wanton lack of

regard for the safety and well-being of its female patients, plaintiff "JANE DOE #3" has become yet another one of the countless sexual assault victims - and now survivors - of defendant ROBERT HADDEN and defendant "MEDICAL ENTITIES".

371. Defendant "MEDICAL ENTITIES"'s indolence and complicity - as well the prurient, deviant, and criminal sexual exploits of defendant ROBERT HADDEN on the premises of defendant "MEDICAL ENTITIES" - are abhorrent.

372. Punitive damages are indicated and necessary under these facts.

AS AND FOR THE FIRST CAUSE OF ACTION FOR "JANE DOE #4"

373. Plaintiff "JANE DOE #4", is identified and referenced heretofore as "JANE DOE #4" - which is the pseudonym for this plaintiff. Plaintiff requests permission to use a pseudonym because of the extremely private nature of this matter. Plaintiff was a resident of the State of New York at the relevant times herein.

374. Plaintiff "JANE DOE #4" is an adult with no legal disability.

375. At all times herein mentioned, "JANE DOE #4" was a patient of defendant ROBERT HADDEN.

376. At all times herein mentioned, "JANE DOE #4" was a patient of defendant TRUSTEES.

377. At all times herein mentioned, "JANE DOE #4" was a patient of defendant CUCPS.

378. At all times herein mentioned, "JANE DOE #4" was a patient of defendant NYPH.

379. At all times herein mentioned, "JANE DOE #4" was a patient of defendant CPMC-ESA.

380. At all times herein mentioned, "JANE DOE #4" was a patient of defendant ESA.

381. At all times herein mentioned, "JANE DOE #4" was a patient of defendant CPMC.

382. At all times herein mentioned, "JANE DOE #4" was a patient of defendant CUMC.

383. At all times herein mentioned, "JANE DOE #4" was a patient of defendant PHPSO.

384. At all times herein mentioned, "JANE DOE #4" was a patient of defendant CCNP.

385. At all times herein mentioned, "JANE DOE #4" was a patient of defendant CCC.

386. At all times herein mentioned, "JANE DOE #4" was a patient of defendant SLOANE.

387. Beginning on or about April 4, 2008 through September 27, 2011, Plaintiff "JANE DOE #4" was under the medical care and treatment of Defendant ROBERT HADDEN for gynecologic

and obstetric care, monitoring and treatment, at the medical facilities maintained by the Defendant "MEDICAL ENTITIES" located at 16 E. 60th Street, New York, NY 10022.

388. Beginning on or about April 4, 2008 through September 27, 2011, and beyond, Plaintiff "JANE DOE #4" was under the medical care and treatment of Defendant "MEDICAL ENTITIES" as well as their agents, servants, and/or employees for gynecologic and obstetric care, monitoring and treatment, at the medical facilities maintained by Defendant "MEDICAL ENTITIES" located 16 E. 60th Street, New York, NY 10022.

389. Beginning on or about April 4, 2008 through September 27, 2011, Plaintiff "JANE DOE #4" was under the care and treatment of Defendant "MEDICAL ENTITIES" and ROBERT HADDEN, and their agents, servants, and/or employees, for gynecologic and obstetric care, monitoring and treatment, at the medical facilities maintained by the Defendant "MEDICAL ENTITIES" located at or about 16 E. 60th Street, New York, NY 10022.

390. While under the obstetric and gynecologic care, monitoring and treatment of Defendant ROBERT HADDEN, and Defendant "MEDICAL ENTITIES" - and in the course of rendering continuous treatment to Plaintiff "JANE DOE #4" - defendant ROBERT HADDEN, did sexually assault Plaintiff "JANE DOE #4".

391. While under the obstetric and gynecologic care, monitoring and treatment of Defendant ROBERT HADDEN, the agents, servants, and/or employees of Defendant "MEDICAL ENTITIES" enabled and were complicit in ROBERT HADDEN, sexually assaulting Plaintiff "JANE DOE #4".

392. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees failed to timely and properly monitor, supervise, and train the medical personnel accompanying ROBERT HADDEN while caring for patients upon their premises.

393. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees failed to timely and properly monitor and supervise ROBERT HADDEN.

394. Prior to the time when plaintiff "JANE DOE #4" came under the care and treatment of defendant ROBERT HADDEN, defendant "MEDICAL ENTITIES" knew or should have know that ROBERT HADDEN had a history of sexually assaulting patients.

395. Prior to the time when plaintiff "JANE DOE #4" came under the care and treatment of defendant ROBERT HADDEN, defendant "MEDICAL ENTITIES" chose to take no disciplinary actions against ROBERT HADDEN - which enable ROBERT HADDEN to continue to sexually assault patients upon their premises, including patient "JANE DOE #4".

396. The improper and tortious conduct of Defendant ROBERT HADDEN, was not performed for a valid medical purpose.

397. Defendant ROBERT HADDEN, performed the aforementioned actions for his own sexual gratification and without regard for the plaintiff's well-being.

398. Defendant ROBERT HADDEN, performed the aforementioned actions for his own sexual gratification and without plaintiff "JANE DOE #4"'s consent.

399. The aforementioned actions were performed by Defendant ROBERT HADDEN - under circumstances caused and permitted by the Defendant "MEDICAL ENTITIES" - which cloaked Defendant ROBERT HADDEN, with the actual and apparent authority to perform gynecologic and obstetric treatment and enabled the sexual assaults to occur.

400. Defendant MEDICAL ENTITIES had knowledge of Defendant ROBERT HADDEN's sexual assaults of other patients and/or medical personnel prior to the time that "JANE DOE #4" came under the care and treatment of defendant ROBERT HADDEN.

401. Defendant "MEDICAL ENTITIES" had knowledge of Defendant ROBERT HADDEN's, sexual assaults of other patients and/or medical personnel before April 4, 2008.

402. Defendant "MEDICAL ENTITIES" had knowledge of Defendant ROBERT HADDEN's, sexual assaults of other patients and/or medical personnel before September 27, 2011.

403. The agents, servants and/or employees of Defendant "MEDICAL ENTITIES" had prior knowledge of Defendant ROBERT HADDEN's sexual assaults of other patients and/or medical personnel before the time that "JANE DOE #4" came under the care and treatment of defendant ROBERT HADDEN.

404. The agents, servants and/or employees of Defendant "MEDICAL ENTITIES" had prior knowledge of Defendant ROBERT HADDEN's sexual assaults of other patients and/or medical personnel before April 4, 2008.

405. The agents, servants and/or employees of Defendant "MEDICAL ENTITIES" had prior knowledge of Defendant ROBERT HADDEN's sexual assaults of other patients and/or medical personnel before September 27, 2011.

406. The Defendant "MEDICAL ENTITIES" owed a duty to Plaintiff "JANE DOE #4" to ensure that qualified and competent personnel would render medical treatment to them and to have proper safeguards and procedures in place to prevent the occurrences of sexual assaults on patients as set forth herein.

407. The agents, servants and/or employees of Defendant "MEDICAL ENTITIES" had a duty to offer plaintiff "JANE DOE #4" appropriate medical care, appropriate psychological counseling for victims of sexual assaults, and appropriate emotional support, upon learning that she was sexually assaulted by one of their own physicians - instead of ignoring her complaints and denying any knowledge that ROBERT HADDEN was a sexual predator - which caused

“JANE DOE #4” to experience further self-doubt and trauma, and further emotional and psychological harm.

408. The Defendant “MEDICAL ENTITIES” are liable for the actions committed by Defendant ROBERT HADDEN, under the doctrine of respondeat superior.

409. The Defendant “MEDICAL ENTITIES” are vicariously liable for the actions committed by Defendant ROBERT HADDEN.

410. The Defendant “MEDICAL ENTITIES” are directly liable for their own acts and/or omissions which were a proximate cause of plaintiff "JANE DOE #4" being sexually assaulted by defendant ROBERT HADDEN.

411. The Defendant “MEDICAL ENTITIES” were complicit in the criminal acts committed by Defendant ROBERT HADDEN.

412. Defendant ROBERT HADDEN had a duty to timely and properly care for and treat "JANE DOE #4".

413. Defendant “MEDICAL ENTITIES” had a duty to timely and properly care for "JANE DOE #4".

414. Defendant “MEDICAL ENTITIES” had a duty to timely and properly supervise Defendant ROBERT HADDEN.

415. Defendant “MEDICAL ENTITIES” had a duty to enact certain Policies governing the use of chaperones during gynecologic and obstetric examinations.

416. Defendant “CUMC” had a duty to enact certain Policies governing the use of chaperones during gynecologic and obstetric examinations.

417. Defendant “SLOANE” had a duty to enact certain Policies governing the use of chaperones during gynecologic and obstetric examinations.

418. Defendant “TRUSTEES” had a duty to enact certain Policies governing the use of chaperones during gynecologic and obstetric examinations.

419. Defendant “NYPH” had a duty to enact certain Policies governing the use of chaperones during gynecologic and obstetric examinations.

420. Defendant “CPMC-ESA” had a duty to enact certain Policies governing the use of chaperones during gynecologic and obstetric examinations.

421. Defendant ROBERT HADDEN, had a duty to properly care for "JANE DOE #4".

422. Defendant ROBERT HADDEN, had a legal duty to not sexually assault "JANE DOE #4".
423. Defendant ROBERT HADDEN, had a medical duty to not sexually assault "JANE DOE #4".
424. Defendant ROBERT HADDEN, had a moral duty to not sexually assault "JANE DOE #4".
425. Defendant ROBERT HADDEN, had an ethical duty to not sexually assault "JANE DOE #4".
426. A doctor may never sexually assault a patient.
427. Sexually assaulting a patient is a violation of the medical standard of care.
428. All medical personnel are required to report any incident or occurrence wherein a sexual assault by a doctor is suspected.
429. Defendant "MEDICAL ENTITIES" had a duty to ensure Defendant Robert Hadden did not sexually assault "JANE DOE #4".
430. Defendant "MEDICAL ENTITIES" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #4" was under the care and treatment of defendant ROBERT HADDEN.
431. Defendant "CUMC" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #4" was under the care and treatment of defendant ROBERT HADDEN.
432. Defendant "CPMC" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #4" was under the care and treatment of defendant ROBERT HADDEN.
433. Defendant "CPMC-ESA" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #4" was under the care and treatment of defendant ROBERT HADDEN.
434. Defendant "SLOANE" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #4" was under the care and treatment of defendant ROBERT HADDEN.
435. Defendant "TRUSTEES" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #4" was under the care and treatment of defendant ROBERT HADDEN.

436. Defendant "NYPH" failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #4" was under the care and treatment of defendant ROBERT HADDEN.

437. Defendant ROBERT HADDEN failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #4" was under the care and treatment of defendant ROBERT HADDEN.

438. Defendant ROBERT HADDEN failed to follow the Policy concerning the use of chaperones during examinations during the time when "JANE DOE #4" was under the care and treatment of defendant ROBERT HADDEN.

439. Defendant "MEDICAL ENTITIES" failed to enforce the Policy concerning the use of chaperones during examinations during the time when "JANE DOE #4" was under the care and treatment of defendant ROBERT HADDEN.

440. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to September 27, 2011.

441. Defendant "NYPH" were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to September 27, 2011.

442. Defendant "CPMC" were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to September 27, 2011.

443. Defendant "CUMC" were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to September 27, 2011.

444. Defendant "CPMC-ESA" were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to September 27, 2011.

445. Defendant "ESA" were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to September 27, 2011.

446. Defendant "TRUSTEES" were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to September 27, 2011.

447. Defendant "CUCPS" were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to September 27, 2011.

448. Defendant "PHPSO" were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to September 27, 2011.

449. Defendant "CCNP" were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to September 27, 2011.

450. Defendant "CCC" were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to September 27, 2011.

451. Defendant "SLOANE" were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to September 27, 2011.

452. The answering defendant knew or should have known that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to September 27, 2011.

453. Defendant "MEDICAL ENTITIES" permitted defendant ROBERT HADDEN to examine patients at the premises of defendant "MEDICAL ENTITIES" without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault of another patient prior to September 27, 2011.

454. Defendant TRUSTEES permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient prior to September of 2011.

455. Defendant CUCPS permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to September of 2011.

456. Defendant NYPH permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to September of 2011.

457. Defendant CPMC-ESA permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to September of 2011.

458. Defendant ESA permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to September of 2011.

459. Defendant CPMC permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to September of 2011.

460. Defendant CUMC permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to September of 2011.

461. Defendant PHPSO permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to September of 2011.

462. Defendant CCNP permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to September of 2011.

463. Defendant CCC permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to September of 2011.

464. Defendant SLOANE permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to September of 2011.

465. The answering defendant permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to September of 2011.

466. The answering defendant had a duty to enact a policy concerning the presence of chaperones during examinations performed by ROBERT HADDEN upon their premises.

467. The answering defendant failed to enact a policy concerning the presence of chaperones during examinations performed ROBERT HADDEN upon their premises.

468. The answering defendant failed to enforce a policy concerning the presence of chaperones during examinations performed by ROBERT HADDEN upon their premises.

469. The answering defendant failed to supervise defendant ROBERT HADDEN in regard to the examinations he performed of female patients at defendant "MEDICAL ENTITIES" between April 2008 and July 31, 2012.

470. Beginning in or about April 2008 plaintiff "JANE DOE #4" came under the obstetric and gynecologic diagnosis, care and treatment of the defendants, their agents, servants, and/or employees, and in a continuous course of treatment through in or about September 27, 2011, defendant ROBERT HADDEN, serially sexually assaulted plaintiff "JANE DOE #4" upon the within named defendants' premises, and as a result of the foregoing, including the failure of the defendants, their agents, servants and/or employees to properly protect, treat, examine, diagnose, and care for plaintiff "JANE DOE #4", the failure to timely and properly monitor the actions of its agents, servants and/or employees, the failure to timely and properly supervise the actions of its agents, servants and/or employees, the failure to timely and properly provide chaperones during gynecologic and obstetric examinations, the failure to timely and properly require chaperones during gynecologic and obstetric examinations performed by ROBERT HADDEN the failure to timely and properly investigate defendant ROBERT HADDEN the failure to timely and properly suspend defendant ROBERT HADDEN, the failure to timely and properly limit the practice privileges defendant ROBERT HADDEN, the failure to timely and properly revoke the practice privileges defendant ROBERT HADDEN, the failure to timely and properly require the use of a preceptor for ROBERT HADDEN, the improper re-issuance of privileges and/or re-

certification of defendant ROBERT HADDEN, the failure to stop the performance of serial vaginal and breast exams for no legitimate medical purpose, the failure to stop the inappropriate questioning of patient's sexual history, the failure to inquire about the presence of detailed, graphic and gratuitous sketches of the patient's genitalia placed inside the patient's chart, the performance of serial and medically inappropriate vaginal cultures and PAP smears, the failure to prevent defendant ROBERT HADDEN from engaging in criminal oral sexual contact with patients, including "JANE DOE #4", the fraudulent billing and revenues generated through illegal and unnecessary examinations, the failure to act upon complaints of sexual assaults committed by defendant ROBERT HADDEN, the failure to provide a chaperone to prevent ROBERT HADDEN from engaging in physical sexual contact with patients, the failure to provide a chaperone to prevent ROBERT HADDEN from engaging in oral sexual contact with patients, the failure to timely and properly terminate defendant ROBERT HADDEN, the failure to timely and properly report the actions of defendant ROBERT HADDEN for disciplinary review, the failure to timely and properly report the actions of defendant ROBERT HADDEN for criminal prosecution, and the failure to timely and properly cooperate with the criminal investigation of defendant ROBERT HADDEN, the plaintiff "**JANE DOE #4**" **was duped, betrayed, sexually abused, manipulated, exploited, objectified, and sexually assaulted by defendant ROBERT HADDEN**, and sustained severe injuries and complications as a result.

471. Said occurrence was due to the carelessness and negligence of the defendants, their agents, servants and/or employees in failing to treat the plaintiff in a good, accepted and proper medical manner, in failing to timely and properly supervise the actions of defendant ROBERT HADDEN, and without any fault or lack of care on the part of the plaintiff.

472. By reason of the foregoing, plaintiff sustained severe and serious personal injuries, a severe shock to her nervous system and certain internal injuries, and was caused to suffer severe physical pain, mental anguish, and psychological injuries as a result thereof.

473. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

474. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A SECOND CAUSE OF ACTION FOR "JANE DOE #4" FOR CIVIL
BATTERY

475. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 474. inclusive, with the same force and effect as if hereinafter set forth at length.

476. Defendant ROBERT HADDEN engaged in intentional, offensive, harmful, sexual misconduct and wrongful bodily contact of Plaintiff "JANE DOE #4", without Plaintiff "JANE DOE #4"'s consent on the aforementioned occasions.

477. As a direct and proximate result of the negligence, careless, and wanton recklessness by Defendant "MEDICAL ENTITIES" and that of their agents, servants and/or employees in

allowing ROBERT HADDEN to commit serial sexual assaults upon multiple women over a prolonged period of time, ROBERT HADDEN was enabled, and did, sexually assault female patients - including "JANE DOE #4" - seemingly on an at will basis and without any consequences or oversight.

478. As a direct and proximate result of the aforementioned sexual batteries and utter lack of oversight, Plaintiff "JANE DOE #4" sustained in the past, and will sustain in the future, physical injury, pain and suffering, serious psychological and emotional distress, mental anguish, embarrassment and humiliation.

479. As a direct and proximate result of Defendant ROBERT HADDEN's, offensive and wrongful physical contact of plaintiff "JANE DOE #4", without her consent, "JANE DOE #4" has suffered severe emotional and physical injuries and has been damaged in an amount to be determined at trial, and in an amount of damages which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A THIRD CAUSE OF ACTION FOR "JANE DOE #4" FOR CRIMINAL
BATTERY

480. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 479. inclusive, with the same force and effect as if hereinafter set forth at length.

481. Defendant ROBERT HADDEN, intentionally engaged in criminal, offensive, harmful, sexual misconduct, sexual assault, and wrongful bodily contact of Plaintiff "JANE DOE #4", without Plaintiff "JANE DOE #4"'s consent on the aforementioned occasions.

482. Defendant ROBERT HADDEN was permitted and enabled to commit these criminal acts as a direct and proximate result of the negligence, careless, and wanton recklessness of Defendant "MEDICAL ENTITIES" and that of their agents, servants and/or employees through the failure to timely and properly train, supervise, monitor, discipline, terminate, and report ROBERT HADDEN to the Criminal Authorities.

483. As a direct and proximate result of the aforementioned sexual batteries, Plaintiff "JANE DOE #4" sustained in the past, and will sustain in the future, physical injury, pain and suffering, serious psychological and emotional distress, mental anguish, embarrassment and humiliation.

484. As a direct and proximate result of Defendant ROBERT HADDEN's criminal, offensive and wrongful physical contact of Plaintiff "JANE DOE #4", without her consent, "JANE DOE #4" has suffered severe emotional and physical injuries and has been damaged in an amount to be determined at trial, and in an amount of damages which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A FOURTH CAUSE OF ACTION FOR "JANE DOE #4" FOR NEGLIGENCE &
PROFESSIONAL NEGLIGENCE

485. Plaintiff repeats, reiterates and realleges each and every allegation contained in those

paragraphs of the complaint marked and designated 1. through 484. inclusive, with the same force and effect as if hereinafter set forth at length.

486. The defendant MEDICAL ENTITIES, their agents, servants, and/or employees, and Defendant ROBERT HADDEN, failed to treat and care for plaintiff "JANE DOE #4" in accordance with the standards of care and treatment generally accepted in the medical community and treated plaintiffs in a manner which violated the customary and accepted standards in the community.

487. The defendant MEDICAL ENTITIES, their agents, servants, and/or employees, and Defendant ROBERT HADDEN, committed acts of negligence, professional negligence, and medical malpractice by negligently and carelessly failing to treat and care for plaintiff "JANE DOE #4" in a careful, skillful and medically acceptable manner.

488. Further, defendant "MEDICAL ENTITIES" by and through their personnel, administrators, agents, servants, and/or employees, failed to conduct themselves and operate their medical institutions, offices, hospitals, and clinics in accordance with the required standards to ensure that patients are safe and free from being sexually assaulted in the course of receiving medical care and treatment.

489. As a result of the foregoing, Plaintiff "JANE DOE #4" sustained physical, emotional, and psychological injuries, along with pain and suffering in an amount of damages which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A FIFTH CAUSE OF ACTION FOR
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

490. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 489. inclusive, with the same force and effect as if hereinafter set forth at length.

491. Defendant ROBERT HADDEN and defendant "MEDICAL ENTITIES" owed a duty to Plaintiff "JANE DOE #4" to not cause her emotional distress, the initiation of post-traumatic stress disorder, or other harm during the course of gynecological and/or obstetric examinations and other related treatment, which are very personal to the patient.

492. Defendant ROBERT HADDEN, was negligent as to the effect of his conduct in performing unwanted sexual acts without the consent of Plaintiff "JANE DOE #4" during the course and scope of his purported medical treatment of the Plaintiff.

493. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees were negligent as to the effect of their conduct in allowing and enabling defendant ROBERT HADDEN to perform unwanted sexual acts on patient "JANE DOE #4", as well as other patients, during the course and scope of his purported medical treatment of the patient.

494. Defendants ROBERT HADDEN and "MEDICAL ENTITIES", as well as their agents, servants, employees and/or legal teams were further negligent and careless in failing to timely

and properly investigate the reports, claims and legal filings about the sexual assaults upon patients being committed by ROBERT HADDEN, and made false, disparaging and degrading oral and written statements about the lack of veracity of plaintiff "JANE DOE #4".

495. As a direct and proximate consequence of Defendants's negligence, Plaintiff "JANE DOE #4" has suffered physical, emotional, and psychological injuries, along with pain and suffering.

AS AND FOR A SIXTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

496. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 495. inclusive, with the same force and effect as if hereinafter set forth at length.

497. Defendant ROBERT HADDEN, acted in a manner that was criminal, intentional, willful, shameful, grossly reckless, and for the purpose of causing serious and substantial emotional distress to Plaintiff "JANE DOE #4" and/or in reckless and wanton disregard for same.

498. Defendant "MEDICAL ENTITIES" acted in a manner that was likewise criminal, intentional, willful, shameful, grossly reckless, and in abject, wanton, and total disregard to the serious harm being inflicted upon Plaintiff "JANE DOE #4" - and other patients - through their complicity in allowing, enabling and permitting Defendant ROBERT HADDEN to perform unwanted and criminal sexual acts without the consent of Plaintiff "JANE DOE #4" during the course and scope of his so-called treatment of Plaintiff.

499. Defendants ROBERT HADDEN and "MEDICAL ENTITIES" further acted in a manner that is criminal, premeditated, willful, grossly reckless, intentionally deceitful, and in reckless disregard of the safety and well-being of Plaintiff "JANE DOE #4" when their agents, servants, employees and/or legal teams made knowingly false, malicious and derogatory oral and written statements about the victims of ROBERT HADDEN's serial sexual assaults, including the sexual assaults of "JANE DOE #4".

500. As a result of the foregoing, Plaintiff "JANE DOE #4" sustained physical, emotional, and psychological injuries, along with pain and suffering.

AS AND FOR A SEVENTH CAUSE OF ACTION FOR
NEGLIGENT HIRING & NEGLIGENT SUPERVISION

501. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 500. inclusive, with the same force and effect as if hereinafter set forth at length.

502. Defendant "MEDICAL ENTITIES" prior to the granting or renewing of privileges or employment of defendants, residents, nurses and others medical personnel involved in plaintiff "JANE DOE #4"'s care, failed to investigate the qualifications, competence, capacity, abilities and capabilities of said defendants, residents, nurses and other employees, including but not limited to obtaining the following information: patient grievances, criminal investigations,

governmental inquiries, negative health care outcomes, incidents injurious to patients, medical malpractice action commenced against said persons, including the outcome thereof, any history of association, privilege and/or practice at other institutions, and discontinuation of said association, employment, privilege and/or practice at said institution, and any pending professional misconduct proceedings in this State or another State, the substance of the allegations in such proceedings and any additional information concerning such proceedings and the findings of the proceedings and defendant "MEDICAL ENTITIES" failed to make sufficient inquiry of the physicians, nurses, employees other personnel and institutions which should and did have information relevant to the capacity, capability, ability and competence of said persons rendering treatment, including defendant ROBERT HADDEN - as well as the medical staff with which he was associated - upon defendants's premises.

503. Further, defendant "MEDICAL ENTITIES" failed to timely and properly educate, train, supervise and/or monitor its agents, servants, and/or employees with regard to the policies and procedures that must be followed when sexual abuse by a physician is suspected or observed, and instead created an environment where sexual misconduct by physicians was tolerated.

504. Defendant "MEDICAL ENTITIES" further created an environment where its agents, servants and employees who suspected - or even witnessed - sexual misconduct by a physician were more fearful about their prospects of future employment if they said something, than they were about the safety and well-being of the patients who were being sexually abused.

505. Had defendant "MEDICAL ENTITIES" made the above stated inquiries, or in the alternative, had it reviewed and analyzed the information obtained and available to it in a timely and proper manner, privileges and/or employment would not have been granted and/or renewed.

506. Defendant "MEDICAL ENTITIES" were additionally negligent, grossly reckless, wanton and willful, in failing to supervise, monitor, chaperone and/or investigate defendant ROBERT HADDEN, and/or failed to create, institute and/or enforce rules, policies, procedures and/or regulations for defendant ROBERT HADDEN's treatment of plaintiff "JANE DOE #4".

507. By reason of defendant "MEDICAL ENTITIES" failures to meet the aforementioned obligations, plaintiff "JANE DOE #4" was treated by physicians, nurses, medical personnel and other employees who were lacking the requisite skills, abilities, competence, capacity and supervision, as a result of which the plaintiff sustained significant injuries and complications.

508. The aforesaid injuries resulting therefrom were caused wholly and solely as a result of the defendant "MEDICAL ENTITIES"'s negligent and reckless supervision of its agents, servants, and/or employees, and created a foreseeable risk of harm to its patients.

509. Defendant "MEDICAL ENTITIES"'s negligence and recklessness further lies in having placed Defendant ROBERT HADDEN in a position to cause foreseeable harm, of which plaintiff "JANE DOE #4" would have been spared, had the defendant "MEDICAL ENTITIES" taken reasonable care in the supervision and investigation of its employees - including, but not limited to, defendant ROBERT HADDEN, himself.

510. In a claim for negligent hiring and/or retention, an employer is held liable and responsible for its negligence or recklessness in hiring, retaining and/or supervising an employee, whereas under respondeat superior the employer is vicariously liable for the torts of the agent, servant or employee. Thus, while Defendant "MEDICAL ENTITIES" may or may not be vicariously liable under respondeat superior for an act of an employee that was committed outside the scope of the employee's employment, Defendant "MEDICAL ENTITIES" are nevertheless liable for their failure to exercise reasonable care in hiring, retaining and/or supervising their agents, servants and/or employees - including, but not limited to, defendant ROBERT HADDEN, himself.

511. In a claim for negligent supervision, the employer is held liable and responsible for its negligence or recklessness in failing to timely and properly supervise an agent, servant, and/or employee, whereas under respondeat superior the employer is vicariously liable for the torts of the employee. Thus, while Defendant "MEDICAL ENTITIES" may or may not be vicariously liable under respondeat superior for an act of an agent, servant, or employee that was committed outside the scope of the employee's employment, Defendant "MEDICAL ENTITIES" are nevertheless liable for their own failure to exercise reasonable care in hiring, retaining, monitoring, investigating, and/or supervising their agents, servants and/or employees - including, but not limited to, defendant ROBERT HADDEN, himself.

512. As a result of the foregoing, Plaintiff "JANE DOE #4" sustained physical, emotional, and psychological injuries, along with pain and suffering.

**AS AND FOR A EIGHTH CAUSE OF ACTION FOR "JANE DOE #4" FOR
FAILING TO INVESTIGATE CRIMINALLY SUSPICIOUS ACTIVITY - ALL DEFENDANTS**

513. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 512. inclusive, with the same force and effect as if hereinafter set forth at length.

514. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees, failed to timely and properly investigate complaints made by the sexual assault victims of ROBERT HADDEN, as well as suspicious circumstances wherein ROBERT HADDEN and other medical staff, agents, servants, and/or employees placed patients in compromised and unprotected situations which either led, or should have led, to an investigation of defendant ROBERT HADDEN and other medical staff, agents, servants, and/or employees's negligence, carelessness, recklessness, and/or criminal and wanton misconduct.

515. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees, failed to timely and properly act upon complaints made by the sexual assault victims of Robert Hadden, as well as suspicious circumstances wherein ROBERT HADDEN, and/or other medical staff, agents, servants, and/or employees, placed patients in compromised and unprotected situations, all of which caused and/or enabled further and additional negligent, careless, reckless, criminal and/or wanton acts and harm to be inflicted upon patients, including "JANE DOE #4".

516. By reason of defendant "MEDICAL ENTITIES" and/or their agents, servants, and/or employees's failures to meet the aforementioned obligations and duties, plaintiff-patient "JANE

DOE #4", as well as other patients, were subjected to physical and mental injury, mental manipulation, harm, duress, sexual objectification, sexual assault, and sexual abuse.

AS AND FOR A NINTH CAUSE OF ACTION FOR "JANE DOE #4" FOR
DEFAMATION - ALL DEFENDANTS

517. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 516. inclusive, with the same force and effect as if hereinafter set forth at length.

518. Since the time of the initial Civil filing in the Supreme Court through the present, the defendants, through their agents, servants, employees, lawyers and legal team, have made knowingly false and harmful judicial and extra-judicial statements - libelous written averments and slanderous verbal statements - wherein it has been asserted that the 5-sexual abuse survivors herein, as well as the 19-victims/criminal court witnesses in the criminal case, including plaintiff "JANE DOE #4", are variously: lying, promiscuous, infected with sexually transmissible diseases, unattractive, unworthy of being believed, unworthy of being sexually abused, out to ruin a distinguished doctor's career for the money, were/and are somehow at fault for being sexually abused by ROBERT HADDEN, and not the actual victims of this criminal sexual predator.

519. Further, the defendants through their agents, servants, employees, lawyers and legal team, have judicially and publicly accused the named civil plaintiffs, the 19-criminal court witnesses, and the sexual assault crime victims, including "JANE DOE #4", their legal representatives (including each of plaintiff's counsel), the New York State Office of Medical Conduct, and the New York District Attorney's Office, of lying, being untruthful, after a "money grab" and on a "witch-hunt".

520. Defendants, their agents, servants, employees, lawyers and legal team, have further judicially and extrajudicially accused the named civil plaintiffs, the 19-criminal court witnesses, the sexual assault crime victims, including "JANE DOE #4", and their legal representatives of controlling, manipulating, commandeering, and illegally coercing and influencing both the New York State Office of Medical Conduct, and the New York District Attorney's Office, to criminally prosecute a "completely innocent" and "respected doctor" - who, in reality, is a criminal and sexual predator.

521. Defendants, their agents, servants, employees, lawyers and legal teams knew or should have known the their invective and personal attacks upon the sexual assault survivors and their counsel were untrue and were made with malicious intent.

522. As a result of their false and damaging statements, the named civil plaintiffs, the 19-criminal court witnesses, the sexual assault crime victims including "JANE DOE #4" have been further emotionally and psychologically injured and their reputations have been damaged and impaired.

523. Multiple versions of defendants' defamatory and scurrilous statements about the within named plaintiffs and plaintiffs's counsel have been circulated, many of which are, and will be, known to the plaintiffs's family members, neighbors, colleagues, friends, peers, and eventually their own children.

524. Plaintiffs can neither wind back the clock, nor can they unring the bell, on defendants's undignified, false, and malicious statements about their lack of veracity and ethical composition.

525. Defendants's injurious, untrue and malicious averments, attacks and knowingly false statements constitute defamation per se.

526. The within named defendants are all jointly and severally liable for defamation of the names and reputations of the plaintiffs named herein in an amount to be determined at trial.

AS AND FOR A TENTH CAUSE OF ACTION FOR "JANE DOE #4" FOR
PUNITIVE DAMAGES - ALL DEFENDANTS

527. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 526. inclusive, with the same force and effect as if hereinafter set forth at length.

528. Defendant ROBERT HADDEN's sexual assault of plaintiff "JANE DOE #4" - and multiple other named and unnamed patients - as well as Defendant "MEDICAL ENTITIES"'s gross negligence, willfulness, and wantonness concerning the improper hiring, retention, lack of supervision, and other reckless acts and omissions set forth herein, constitute intentional, extreme, and outrageous conduct of the highest order.

529. Such grossly reckless conduct is motivated by greed, self-seeking, self-interest, deliberate indifference, deviant sexual desire, and is the product of malicious and evil minds such that the imposition of punitive damages are warranted.

530. Punitive damages are justified in cases like this to both punish the wrongdoers - and also to hold them out as examples to the rest of the community - such that these defendants, and others that may be similarly situated, are clearly and explicitly discouraged from engaging in these kinds of grossly deviant and abhorrent behaviors in the future.

531. For purposes of particularization of the acts which constitute and mandate the imposition of punitive damages committed by the within named defendants, it is stated that defendant ROBERT HADDEN - while pretending to render medical care to obstetric and gynecology patients - serially, and criminally, sexually assaulted numerous female patients at defendant MEDICAL ENTITIES's obstetric and gynecologic clinics - both on the East and West sides of Manhattan. Further, evidence exists that defendant "MEDICAL ENTITIES" enabled ROBERT HADDEN to continue to sexually assault their patients, and instead of terminating him and reporting him to the Criminal Authorities, they simply moved him from one clinic to another in an effort to conceal his criminal activity. Moreover, evidence has surfaced from the Criminal Action which demonstrates that defendant ROBERT HADDEN has been sexually assaulting and sexually abusing patients on the premises of defendant "MEDICAL ENTITIES" for

approximately 15-20 years, - all the way back into the 1990's.

532. Defendant ROBERT HADDEN should have already been the subject of an internal and Criminal Investigation by the time that he sexually assaulted plaintiff "JANE DOE #4". However, defendant MEDICAL ENTITIES failed to act on the information and enabled defendant ROBERT HADDEN to continue to sexually assault other women on its premises - despite a long history of sexually assaulting patients.

533. Said criminal investigation of ROBERT HADDEN occurred as a result of defendant ROBERT HADDEN's criminal sexual assault of another female patient at a clinic that was also affiliated with - and/or owned and operated by - defendant MEDICAL ENTITIES.

534. Despite defendant ROBERT HADDEN being the subject of a criminal investigation for the sexual assaults of a female patients, defendant MEDICAL ENTITIES failed to commence a timely and proper inquiry into the actions of defendant ROBERT HADDEN relative to the events surrounding the District Attorney's active criminal investigation.

535. Despite defendant ROBERT HADDEN being the subject of a criminal investigation for the sexual assaults of female patients, defendant MEDICAL ENTITIES continued to allow defendant ROBERT HADDEN to maintain his privileges at their hospitals, medical facilities, offices, and/or clinics, without any restrictions, limitations, preceptors, chaperones or additional supervision, where defendant ROBERT HADDEN was allowed to continue preying on unsuspecting women.

536. While being allowed to continue preying on women at defendant MEDICAL ENTITIES's hospitals, medical facilities, offices, and/or clinics without any restrictions, limitations, preceptors, chaperones or additional supervision, defendant ROBERT HADDEN continued to sexually assault female patients.

537. While sexually assaulting female patients - seemingly at will - due to the utter indifference of defendant MEDICAL ENTITIES as well as the indifference of MEDICAL ENTITIES's agents, servants, and employees, defendant ROBERT HADDEN sexually assaulted plaintiff "JANE DOE #4".

538. Plaintiff "JANE DOE #4" was a female obstetric and gynecology patient of defendant ROBERT HADDEN and defendant "MEDICAL ENTITIES", their agents, servants, and/or employees at the time when defendant ROBERT HADDEN sexually assaulted her by licking her vagina in the course of a purported "vaginal exam" on September 27, 2011.

539. No chaperone was present in the room when defendant ROBERT HADDEN, sexually assaulted "JANE DOE #4" on the premises of defendant MEDICAL ENTITIES.

540. Defendant ROBERT HADDEN further performed repeated and unneeded inter-vaginal examinations and testing including serial internal PAP smears, vaginal cultures, and breast and vaginal exams that were not consistent with the standard of care, and performed solely for his own sick sexual pleasure and defendant MEDICAL ENTITIES's financial gain. Despite the repeated specimens being sent to the laboratory for testing, the excessive testing be being noted

in defendant MEDICAL ENTITIES's chart, and the services being billed to the patient's insurance company by medical billing, nothing was done by DEFENDANT MEDICAL ENTITIES, their agents, servants, and/or employees to stop ROBERT HADDEN from sexually assaulting these patients to the patients's detriment; to ROBERT HADDEN's sexual pleasure; and to the defendant MEDICAL ENTITIES's financial benefit.

541. Defendant MEDICAL ENTITIES, their agents, servants, and/or employees had knowledge and/or awareness of the prior and ongoing sexual assault(s) and sexual abuse being committed but chose to do nothing to protect their female patients from further sexual assaults by defendant ROBERT HADDEN.

542. As a result of defendant MEDICAL ENTITIES's gross indifference and wanton lack of regard for the safety and well-being of its female patients, plaintiff "JANE DOE #4" has become yet another one of the countless sexual assault victims - and now survivors - of defendant ROBERT HADDEN and defendant "MEDICAL ENTITIES".

543. Defendant MEDICAL ENTITIES's indolence and complicity - as well the prurient, deviant, and criminal sexual exploits of defendant ROBERT HADDEN on the premises of defendant "MEDICAL ENTITIES" - is abhorrent.

544. Punitive damages are necessary under these facts.

AS AND FOR THE FIRST CAUSE OF ACTION FOR "JANE DOE #5"

545. Plaintiff "JANE DOE #5", is identified and referenced heretofore as "JANE DOE #5" - which is the pseudonym for this plaintiff. Plaintiff requests permission to use a pseudonym because of the extremely private nature of this matter. Plaintiff was a resident of the State of New York at the relevant times herein.

546. Plaintiff "JANE DOE #5" is an adult with no legal disability.

547. At all times herein mentioned, "JANE DOE #5" was a patient of defendant ROBERT HADDEN.

548. At all times herein mentioned, "JANE DOE #5" was a patient of defendant TRUSTEES.

549. At all times herein mentioned, "JANE DOE #5" was a patient of defendant CUCPS.

550. At all times herein mentioned, "JANE DOE #5" was a patient of defendant NYPH.

551. At all times herein mentioned, "JANE DOE #5" was a patient of defendant CPMC-ESA.

552. At all times herein mentioned, "JANE DOE #5" was a patient of defendant ESA.

553. At all times herein mentioned, "JANE DOE #5" was a patient of defendant CPMC.

554. At all times herein mentioned, "JANE DOE #5" was a patient of defendant CUMC.
555. At all times herein mentioned, "JANE DOE #5" was a patient of defendant PHPSO.
556. At all times herein mentioned, "JANE DOE #5" was a patient of defendant CCNP.
557. At all times herein mentioned, "JANE DOE #5" was a patient of defendant CCC.
558. At all times herein mentioned, "JANE DOE #5" was a patient of defendant SLOANE.
559. Beginning on or about February 21, 2012 through July 31, 2012, Plaintiff "JANE DOE #5" was under the medical care and treatment of Defendant ROBERT HADDEN for gynecologic and obstetric care, monitoring and treatment, at the medical facilities maintained by the Defendant "MEDICAL ENTITIES" located at 16 E. 60th Street, New York, NY 10022.
560. Beginning on or about February 21, 2012 through July 31, 2012, and beyond, Plaintiff "JANE DOE #5" was under the medical care and treatment of Defendant "MEDICAL ENTITIES" as well as their agents, servants, and/or employees for gynecologic and obstetric care, monitoring and treatment, at the medical facilities maintained by Defendant "MEDICAL ENTITIES" located at 16 E. 60th Street, New York, NY 10022.
561. Beginning on or about February 21, 2012 through July 31, 2012, and beyond, Plaintiff "JANE DOE #5" was under the medical care and treatment of Defendant "MEDICAL ENTITIES" and ROBERT HADDEN, and their agents, servants, and/or employees, for obstetric and gynecologic care, monitoring and treatment, at the medical facilities maintained by the Defendant "MEDICAL ENTITIES" located at or about 16 E. 60th Street, New York, NY 10022.
562. While under the care and treatment of the defendants, their agents, servants and/or employees, plaintiff "JANE DOE #5" was trying to conceive - and became pregnant - with her first child.
563. While under the obstetric and gynecologic care, monitoring and treatment of Defendant ROBERT HADDEN, and Defendant "MEDICAL ENTITIES" - and in the course of rendering continuous treatment to Plaintiff "JANE DOE #5" - defendant ROBERT HADDEN, did sexually assault and sexually abuse Plaintiff "JANE DOE #5".
564. While under the obstetric and gynecologic care, monitoring and treatment of Defendant ROBERT HADDEN, the agents, servants, and/or employees of Defendant "MEDICAL ENTITIES" enabled and were complicit in ROBERT HADDEN, sexually assaulting and sexually abusing Plaintiff "JANE DOE #5".
565. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees failed to timely and properly monitor, supervise, and train the medical personnel accompanying ROBERT HADDEN while caring for patients upon their premises.

566. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees failed to timely and properly monitor and supervise ROBERT HADDEN.

567. Prior to the time when plaintiff "JANE DOE #5" came under the care and treatment of defendant ROBERT HADDEN, defendant "MEDICAL ENTITIES" knew or should have know that ROBERT HADDEN had a history of sexually assaulting patients.

568. Prior to the time when plaintiff "JANE DOE #5" came under the care and treatment of defendant ROBERT HADDEN, defendant "MEDICAL ENTITIES" chose to take no disciplinary actions against ROBERT HADDEN - which enable ROBERT HADDEN to continue to sexually assault and sexually abuse patients upon their premises, including patient "JANE DOE #5".

569. The improper and tortious conduct of Defendant ROBERT HADDEN, was not performed for a valid medical purpose.

570. Defendant ROBERT HADDEN, performed the aforementioned actions for his own sexual gratification and without regard for the plaintiff's well-being.

571. Defendant ROBERT HADDEN, performed the aforementioned actions for his own sexual gratification and without plaintiff "JANE DOE #5"'s consent.

572. The aforementioned actions were performed by Defendant ROBERT HADDEN - under circumstances caused and permitted by the Defendant "MEDICAL ENTITIES" - which cloaked Defendant ROBERT HADDEN with the actual and apparent authority to perform gynecologic and obstetric treatment and enabled the sexual assaults to occur.

573. Defendant "MEDICAL ENTITIES" had knowledge of Defendant ROBERT HADDEN's sexual assaults of other patients and/or medical personnel prior to the time that "JANE DOE #5" came under the care and treatment of defendant ROBERT HADDEN.

574. Defendant "MEDICAL ENTITIES" had knowledge of Defendant ROBERT HADDEN's sexual assault of other patients and/or medical personnel before February 7, 2012.

575. Defendant "MEDICAL ENTITIES" had knowledge of Defendant ROBERT HADDEN's sexual assault of other patients and/or medical personnel before February 21, 2012.

576. Defendant "MEDICAL ENTITIES" had knowledge of Defendant ROBERT HADDEN's sexual assault of other patients and/or medical personnel before May 7, 2012.

577. Defendant "MEDICAL ENTITIES" had knowledge of Defendant ROBERT HADDEN's sexual assault of other patients and/or medical personnel before June 29, 2012.

578. Defendant "MEDICAL ENTITIES" had knowledge of Defendant ROBERT HADDEN's

sexual assault of other patients and/or medical personnel before July 31, 2012.

579. The agents, servants and/or employees of Defendant “MEDICAL ENTITIES” had prior knowledge of Defendant ROBERT HADDEN’s sexual assault of other patients and/or medical personnel before the time that "JANE DOE #5" came under the care and treatment of defendant ROBERT HADDEN.

580. The agents, servants and/or employees of Defendant “MEDICAL ENTITIES” had prior knowledge of Defendant ROBERT HADDEN’s sexual assault of other patients and/or medical personnel before February 7, 2012.

581. The agents, servants and/or employees of Defendant “MEDICAL ENTITIES” had prior knowledge of Defendant ROBERT HADDEN’s sexual assault of other patients and/or medical personnel before February 12, 2012.

582. The agents, servants and/or employees of Defendant “MEDICAL ENTITIES” had prior knowledge of Defendant ROBERT HADDEN’s sexual assault of other patients and/or medical personnel before May 7, 2012.

583. The agents, servants and/or employees of Defendant “MEDICAL ENTITIES” had prior knowledge of Defendant ROBERT HADDEN’s sexual assault of other patients and/or medical personnel before June 29, 2012.

584. The agents, servants and/or employees of Defendant “MEDICAL ENTITIES” had prior knowledge of Defendant ROBERT HADDEN’s sexual assault of other patients and/or medical personnel before July 31, 2012.

585. The Defendant “MEDICAL ENTITIES” owed a duty to Plaintiff "JANE DOE #5" to ensure that qualified and competent personnel would render medical treatment to her and to have proper safeguards and procedures in place to prevent the occurrences of sexual assaults on patients as set forth herein.

586. The agents, servants and/or employees of Defendant “MEDICAL ENTITIES” had a duty to offer plaintiff “JANE DOE #5” appropriate medical care, appropriate psychological counseling for victims of sexual assaults, and appropriate emotional support, upon learning that she was sexually assaulted by one of their own physicians - instead of ignoring her complaints and denying any knowledge that ROBERT HADDEN was a sexual predator - which caused “JANE DOE #5” to experience further self-doubt and trauma, and further emotional and psychological harm.

587. The Defendant “MEDICAL ENTITIES” are directly liable for their own acts and/or omissions which were a proximate cause of plaintiff "JANE DOE #5" suffering additional harm when she indicated that she was sexually assaulted by defendant ROBERT HADDEN to the agents, servants and/or employees of “MEDICAL ENTITIES”.

588. The Defendant “MEDICAL ENTITIES” are liable for the actions committed by Defendant ROBERT HADDEN, under the doctrine of respondeat superior.

589. The Defendant “MEDICAL ENTITIES” are vicariously liable for the actions committed by Defendant ROBERT HADDEN.

590. The Defendant “MEDICAL ENTITIES” are directly liable for their own acts and/or omissions which were a proximate cause of plaintiff "JANE DOE #5" being sexually assaulted by defendant ROBERT HADDEN.

591. The Defendant “MEDICAL ENTITIES” were complicit in the criminal acts committed by Defendant ROBERT HADDEN.

592. Defendant ROBERT HADDEN, had a duty to timely and properly care for and treat "JANE DOE #5".

593. Defendant “MEDICAL ENTITIES” had a duty to timely and properly care for "JANE DOE #5".

594. Defendant “MEDICAL ENTITIES” had a duty to timely and properly supervise Defendant ROBERT HADDEN.

595. Defendant “MEDICAL ENTITIES” had a duty to enact certain Policies governing the use of chaperones during examinations.

596. Defendant NYPH had a duty to enact certain Policies governing the use of chaperones during examinations.

597. Defendant CPMC-ESA had a duty to enact certain Policies governing the use of chaperones during examinations.

598. Defendant ESA had a duty to enact certain Policies governing the use of chaperones during examinations.

599. Defendant CUMC had a duty to enact certain Policies governing the use of chaperones during examinations.

600. Defendant SLOANE had a duty to enact certain Policies governing the use of chaperones during examinations.

601. Defendant TRUSTEES had a duty to enact certain Policies governing the use of chaperones during examinations.

602. Defendant ROBERT HADDEN had a duty to properly care for "JANE DOE #5".

603. Defendant ROBERT HADDEN had a legal duty to not sexually assault "JANE DOE #5".
604. Defendant ROBERT HADDEN had a medical duty to not sexually assault "JANE DOE #5".
605. Defendant ROBERT HADDEN had a moral duty to not sexually assault "JANE DOE #5".
606. Defendant ROBERT HADDEN had an ethical duty to not sexually assault "JANE DOE #5".
607. A doctor may never sexually assault a patient.
608. Sexually assaulting a patient is a violation of the medical standard of care.
609. All medical personnel are required to report any incident or occurrence wherein a sexual assault by a doctor is suspected.
610. Defendant "MEDICAL ENTITIES" had enacted a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #5" was under the care and treatment of defendant ROBERT HADDEN.
610. Defendant "MEDICAL ENTITIES" were aware that defendant ROBERT HADDEN had been accused of sexual assault by a patient in June of 2012.
612. Defendant TRUSTEES were aware that defendant ROBERT HADDEN had been accused of sexual assault by a patient in June of 2012.
613. Defendant CUCPS were aware that defendant ROBERT HADDEN had been accused of sexual assault by a patient in June of 2012.
614. Defendant NYPH were aware that defendant ROBERT HADDEN had been accused of sexual assault by a patient in June of 2012.
615. Defendant SLOANE were aware that defendant ROBERT HADDEN had been accused of sexual assault by a patient in June of 2012.
616. Defendant CPMC-ESA were aware that defendant ROBERT HADDEN had been accused of sexual assault by a patient in June of 2012.
617. Defendant ESA were aware that defendant ROBERT HADDEN had been accused of sexual assault by a patient in June of 2012.
618. Defendant CPMC were aware that defendant ROBERT HADDEN had been accused of sexual assault by a patient in June of 2012.

619. Defendant CUMC were aware that defendant ROBERT HADDEN had been accused of sexual assault by a patient in June of 2012.
620. Defendant PHPSO were aware that defendant ROBERT HADDEN had been accused of sexual assault by a patient in June of 2012.
621. Defendant CCNP were aware that defendant ROBERT HADDEN had been accused of sexual assault by a patient in June of 2012.
622. Defendant CCC were aware that defendant ROBERT HADDEN had been accused of sexual assault by a patient in June of 2012.
623. Defendant SLOANE were aware that defendant ROBERT HADDEN had been accused of sexual assault by a patient in June of 2012.
624. The answering defendant was aware that defendant ROBERT HADDEN had been accused of sexual assault by a patient in June of 2012.
625. Defendant "MEDICAL ENTITIES" permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient in June of 2012.
626. Defendant Trustees permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient in June of 2012.
627. Defendant CUCPS permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient in June of 2012.
628. Defendant NYPH permitted defendant ROBERT HADDEN to examine patients at without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient in June of 2012.
629. Defendant COLUMBIA PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient in June of 2012.
630. Defendant EAST SIDE ASSOCIATES permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient in June of 2012.
631. Defendant CPMC permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient in June of 2012.

632. Defendant CUMC permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient in June of 2012.

633. Defendant PHPSO permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient in June of 2012.

634. Defendant CCNP permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient in June of 2012.

635. Defendant CCC permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient in June of 2012.

636. Defendant SLOANE permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient in June of 2012.

637. The answering defendant permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient in June of 2012.

639. The answering defendant had a duty to enact a Policy concerning the presence of chaperones during gynecologic and obstetric examinations performed by ROBERT HADDEN upon their premises.

640. The answering defendant failed to enact a Policy concerning the presence of chaperones during gynecologic and obstetric examinations performed by ROBERT HADDEN upon their premises.

641. The answering defendant failed to enforce a Policy concerning the presence of chaperones during examinations performed by ROBERT HADDEN upon their premises.

642. Defendant ROBERT HADDEN failed to follow defendant's Policy concerning the presence of chaperones during gynecologic and obstetric examinations of patients upon their premises.

643. The answering defendant failed to supervise defendant ROBERT HADDEN in regard to the gynecologic and obstetric examinations he performed of female patients upon their premises between February 21, 2012 and July 31, 2012.

644. Beginning in or about February 2012 plaintiff "JANE DOE #5" came under the obstetrical diagnosis, care and treatment of the defendants, their agents, servants, and/or

employees, and in a continuous course of treatment through in or about July 31, 2012, and beyond, defendant ROBERT HADDEN sexually assaulted plaintiff "JANE DOE #5" upon the within named defendants' premises, and as a result of the foregoing, including the failure of the defendants, their agents, servants and/or employees to properly protect, treat, examine, diagnose, and care for plaintiff "JANE DOE #5", the failure to timely and properly monitor the actions of its agents, servants and/or employees, the failure to timely and properly supervise the actions of its agents, servants and/or employees, the failure to timely and properly provide chaperones during gynecologic and obstetric examinations, the failure to timely and properly require chaperones during gynecologic and obstetric examinations performed by ROBERT HADDEN, the failure to timely and properly investigate defendant ROBERT HADDEN, the failure to timely and properly suspend defendant ROBERT HADDEN, the failure to timely and properly limit the practice privileges defendant ROBERT HADDEN, the failure to timely and properly revoke the practice privileges defendant ROBERT HADDEN, the failure to timely and properly require the use of a preceptor for ROBERT HADDEN, the improper re-issuance of privileges and/or re-certification of defendant ROBERT HADDEN, the performance of serial vaginal cultures that were not medically indicated, the failure to stop the performance of serial vaginal and breast exams for no legitimate medical purpose, the failure to stop the inappropriate questioning of patient's sexual history, the performance of medically and ethically inappropriate examinations of the patient, the failure to prevent defendant ROBERT HADDEN from engaging in criminal sexual contact with patients, including "JANE DOE #5", the fraudulent billing and revenues generated through illegal and unnecessary examinations, the failure to act upon complaints of sexual assaults committed by defendant ROBERT HADDEN, the failure to provide a chaperone to prevent ROBERT HADDEN from engaging in physical sexual contact with patients, the failure to provide a chaperone to prevent ROBERT HADDEN from engaging in oral sexual contact with other patients, the failure to timely and properly terminate defendant ROBERT HADDEN, the failure to timely and properly report the actions of defendant ROBERT HADDEN for disciplinary review, the failure to timely and properly report the actions of defendant ROBERT HADDEN for criminal prosecution, and the failure to timely and properly cooperate with the criminal investigation of defendant ROBERT HADDEN, the plaintiff **"JANE DOE #5" was duped, betrayed, sexually abused, manipulated, exploited, objectified, and sexually assaulted by defendant ROBERT HADDEN, and was also abandoned and betrayed by defendant "MEDICAL ENTITIES"**, and sustained severe injuries and complications as a result.

645. Said occurrence was due to the carelessness and negligence of the defendants, their agents, servants and/or employees in failing to treat the plaintiff in a good, accepted and proper medical manner, in failing to timely and properly supervise the actions of defendant ROBERT HADDEN, and without any fault or lack of care on the part of the plaintiff.

646. By reason of the foregoing, plaintiff sustained severe and serious personal injuries, a severe shock to her nervous system and certain internal injuries, and was caused to suffer severe physical pain, mental anguish, and psychological injuries as a result thereof.

647. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

648. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A SECOND CAUSE OF ACTION FOR "JANE DOE #5" FOR CIVIL
BATTERY

649. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 648. inclusive, with the same force and effect as if hereinafter set forth at length.

650. Defendant ROBERT HADDEN engaged in intentional, offensive, harmful, sexual misconduct and wrongful bodily contact of Plaintiff "JANE DOE #5", without Plaintiff "JANE DOE #5"'s consent on the aforementioned occasions.

651. As a direct and proximate result of the negligence, careless, and wanton recklessness by Defendant "MEDICAL ENTITIES" and that of their agents, servants and/or employees in allowing ROBERT HADDEN to commit serial sexual assaults upon multiple women over a prolonged period of time, ROBERT HADDEN was enabled, and did, sexually assault female patients - including "JANE DOE #5" - seemingly on an at will basis and without any consequences or oversight.

652. As a direct and proximate result of the aforementioned sexual batteries, Plaintiff "JANE DOE #5" sustained in the past, and will sustain in the future, physical injury, pain and suffering, serious psychological and emotional distress, mental anguish, embarrassment and humiliation.

653. As a direct and proximate result of Defendant ROBERT HADDEN's, offensive and wrongful physical contact of Plaintiff "JANE DOE #5", without her consent, "JANE DOE #5" has suffered severe emotional and physical injuries and has been damaged in an amount to be determined at trial, and in an amount of damages which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A THIRD CAUSE OF ACTION FOR "JANE DOE #5" FOR CRIMINAL
BATTERY

654. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 653. inclusive, with the same force and effect as if hereinafter set forth at length.

655. Defendant ROBERT HADDEN, intentionally engaged in criminal, offensive, harmful, sexual misconduct, sexual assault, and wrongful bodily contact of Plaintiff "JANE DOE #5", without Plaintiff "JANE DOE #5"'s consent on the aforementioned occasions.

656. Defendant ROBERT HADDEN was permitted and enabled to commit these criminal acts as a direct and proximate result of the negligence, careless, and wanton recklessness of Defendant "MEDICAL ENTITIES" and that of their agents, servants and/or employees through the failure to timely and properly train, supervise, monitor, discipline, terminate, and report ROBERT HADDEN to the Criminal Authorities.

657. As a direct and proximate result of the aforementioned sexual batteries, Plaintiff "JANE DOE #5" sustained in the past, and will sustain in the future, physical injury, pain and suffering, serious psychological and emotional distress, mental anguish, embarrassment and humiliation.

658. As a direct and proximate result of Defendant ROBERT HADDEN's criminal, offensive and wrongful physical contact of Plaintiff "JANE DOE #5", without her consent, "JANE DOE #5" has suffered severe emotional and physical injuries and has been damaged in an amount to be determined at trial, and in an amount of damages which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A FOURTH CAUSE OF ACTION FOR "JANE DOE #5" FOR
NEGLIGENCE AND PROFESSIONAL NEGLIGENCE

659. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 658. inclusive, with the same force and effect as if hereinafter set forth at length.

660. The defendant MEDICAL ENTITIES, their agents, servants, and/or employees, and Defendant ROBERT HADDEN, failed to treat and care for plaintiff "JANE DOE #5" in accordance with the standards of care and treatment generally accepted in the medical community and treated plaintiffs in a manner which departed from the customary and accepted standards in the community.

661. The defendant MEDICAL ENTITIES, their agents, servants, and/or employees, and Defendant ROBERT HADDEN, committed acts of negligence, professional negligence and medical malpractice in that they negligently and carelessly failed to treat and care for plaintiff "JANE DOE #5" in a careful, skillful and acceptable manner.

662. Further, defendant "MEDICAL ENTITIES" by and through their personnel, administrators, agents, servants, and/or employees, failed to conduct themselves and operate their medical institutions, offices, hospitals, and clinics in accordance with the required standards to ensure that patients are safe and free from being sexually assaulted in the course of receiving medical care and treatment.

663. As a result of the foregoing, Plaintiff "JANE DOE #5" sustained physical, emotional, and psychological injuries, along with pain and suffering in an amount of damages which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A FIFTH CAUSE OF ACTION FOR
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

664. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 663. inclusive, with the same force and effect as if hereinafter set forth at length.

665. Defendant ROBERT HADDEN and the defendant MEDICAL ENTITIES owed a duty to Plaintiff "JANE DOE #5" to not cause her emotional distress, the initiation of post-traumatic

stress disorder, or other harm during the course of gynecological pelvic exams and other related treatment, which are very personal to the patient.

666. Defendant ROBERT HADDEN, was negligent as to the effect of his conduct in performing unwanted sexual acts without the consent of Plaintiff "JANE DOE #5" during the course and scope of his treatment of Plaintiff.

667. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees were negligent as to the effect of their conduct in allowing and enabling defendant ROBERT HADDEN to perform unwanted sexual acts on patient "JANE DOE #5", as well as other patients, during the course and scope of his purported medical treatment of the patient.

668. Defendant "MEDICAL ENTITIES," as well as their agents, servants, and/or employees were further negligent and careless in failing to attend to "JANE DOE #5" in a timely and proper manner after she was sexually assaulted by ROBERT HADDEN, and after these facts were brought to the attention of the medical personnel upon the premises of defendant "MEDICAL ENTITIES".

669. Defendants ROBERT HADDEN and "MEDICAL ENTITIES", as well as their agents, servants, employees and/or legal teams were further negligent and careless in failing to timely and properly investigate the reports, claims and legal filings about the sexual assaults upon patients being committed by ROBERT HADDEN, and made false, disparaging and degrading oral and written statements about the lack of veracity of plaintiff "JANE DOE #5".

670. As a direct and proximate consequence of Defendants's negligence, Plaintiff "JANE DOE #5" has suffered physical, emotional, and psychological injuries, along with pain and suffering.

AS AND FOR A SIXTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

671. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 670. inclusive, with the same force and effect as if hereinafter set forth at length.

672. Defendant ROBERT HADDEN, acted in a manner that is criminal, intentional, willful, grossly reckless, and for the purpose of causing serious and substantial emotional distress to Plaintiff "JANE DOE #5" and/or in reckless and wanton disregard for same.

673. Defendant "MEDICAL ENTITIES" acted in a manner that was likewise criminal, intentional, willful, shameful, grossly reckless, and in abject, wanton, and total disregard to the serious harm being inflicted upon Plaintiff "JANE DOE #5" - and other patients - through their complicity in allowing, enabling and permitting Defendant ROBERT HADDEN to perform unwanted and criminal sexual acts without the consent of Plaintiff "JANE DOE #5" during the course and scope of his so-called treatment of Plaintiff.

674. Defendant “MEDICAL ENTITIES” further acted in a manner that is criminal, intentional, willful, grossly reckless, intentionally deceitful, and in reckless disregard of the safety and well-being of Plaintiff "JANE DOE #5" when the agents, servants, and/or employees of defendant “MEDICAL ENTITIES” failed to timely and properly attend to plaintiff “JANE DOE #5” when she informed them of the sexual assault that had been committed by defendant ROBERT HADDEN.

675. Defendants ROBERT HADDEN and “MEDICAL ENTITIES” further acted in a manner that is criminal, premeditated, willful, grossly reckless, intentionally deceitful, and in reckless disregard of the safety and well-being of Plaintiff "JANE DOE #5" when their agents, servants, employees and/or legal teams made knowingly false, malicious and derogatory oral and written statements about the victims of ROBERT HADDEN’s serial sexual assaults, including the sexual assaults of “JANE DOE #5”.

676. As a result of the foregoing, Plaintiff "JANE DOE #5" sustained physical, emotional, and psychological injuries, along with pain and suffering.

AS AND FOR A SEVENTH CAUSE OF ACTION FOR
NEGLIGENT HIRING & NEGLIGENT SUPERVISION

677. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 676. inclusive, with the same force and effect as if hereinafter set forth at length.

678. Defendant “MEDICAL ENTITIES” prior to the granting or renewing of privileges or employment of defendants, residents, nurses and others personnel involved in plaintiff "JANE DOE #5"’s care, failed to investigate the qualifications, competence, capacity, abilities and capabilities of said defendants, residents, nurses and other employees, including but not limited to obtaining the following information: patient grievances, criminal investigations, governmental inquiries, negative health care outcomes, incidents injurious to patients, medical malpractice action commenced against said persons, including the outcome thereof, any history of association, privilege and/or practice at other institutions, and discontinuation of said association, employment, privilege and/or practice at said institution, and any pending professional misconduct proceedings in this State or another State, the substance of the allegations in such proceedings and any additional information concerning such proceedings and the findings of the proceedings and defendant “MEDICAL ENTITIES” failed to make sufficient inquiry of the physicians, nurses, employees other personnel and institutions which should and did have information relevant to the capacity, capability, ability and competence of said persons rendering treatment, including defendant ROBERT HADDEN - as well as the medical staff with which he was associated - upon defendants’s premises.

679. Further, defendant “MEDICAL ENTITIES” failed to timely and properly educate, train, supervise and/or monitor its agents, servants, and/or employees with regard to the policies and procedures that must be followed when sexual abuse by a physician is suspected or observed, and instead created an environment where sexual misconduct by physicians was tolerated.

680. Defendant "MEDICAL ENTITIES" further created an environment where its agents, servants and employees who suspected - or even witnessed - sexual misconduct by a physician were more fearful about their prospects of future employment if they said something, than they were about the safety and well-being of the patients who were being sexually abused.

681. Had defendant "MEDICAL ENTITIES" made the above stated inquiries, or in the alternative, had it reviewed and analyzed the information obtained in a proper manner, privileges and/or employment would not have been granted and/or renewed.

682. Defendant "MEDICAL ENTITIES" were additionally negligent, grossly reckless, wanton and willful, in failing to supervise, monitor, and/or investigate defendant ROBERT HADDEN's actions, and in failing to create, institute and/or enforce rules, policies, procedures and/or regulations for defendant ROBERT HADDEN's treatment of plaintiff "JANE DOE #5".

683. By reason of defendant "MEDICAL ENTITIES" failures to meet the aforementioned obligations, the plaintiff "JANE DOE #5" was treated by physicians, nurses, personnel and other employees who were lacking the requisite skills, abilities, competence, capacity and supervision as a result of which the plaintiff sustained injuries and complications.

684. The aforesaid injuries resulting therefrom were caused wholly and solely as a result of the defendant MEDICAL ENTITIES's negligent and reckless supervision of its employees, creating a foreseeable risk of harm to its patients.

685. Defendant "MEDICAL ENTITIES"'s negligence and recklessness lies in having placed Defendant ROBERT HADDEN in a position to cause foreseeable harm, of which plaintiff "JANE DOE #5" would have been spared, had the defendant "MEDICAL ENTITIES" taken reasonable care in the supervision of its employees - including, but not limited to, defendant ROBERT HADDEN, himself.

686. In a claim for negligent hiring and/or retention, the employer is held liable and responsible for its negligence or recklessness in hiring, retaining and/or supervising an employee, whereas under respondeat superior the employer is vicariously liable for the torts of the agent, servant or employee. Thus, while Defendant "MEDICAL ENTITIES" may or may not be vicariously liable under respondeat superior for an act of an employee that was committed outside the scope of the employee's employment, Defendant MEDICAL ENTITIES are nevertheless still liable for their failure to exercise reasonable care in hiring, retaining and/or supervising their agents, servants and/or employees - including, but not limited to, defendant ROBERT HADDEN, himself.

687. In a claim for negligent supervision, the employer is held liable and responsible for its negligence or recklessness in failing to timely and properly supervise an agent, servant, and/or employee, whereas under respondeat superior the employer is vicariously liable for the torts of the employee. Thus, while Defendant MEDICAL ENTITIES may or may not be vicariously liable under respondeat superior for an act of an agent, servant, or employee that was committed outside the scope of the employee's employment, Defendant MEDICAL ENTITIES are nevertheless still liable for their failure to exercise reasonable care in hiring, retaining and/or

supervising their agents, servants and/or employees - including, but not limited to, defendant ROBERT HADDEN, himself.

688. As a result of the foregoing, Plaintiff "JANE DOE #5" sustained physical, emotional, and psychological injuries, along with pain and suffering.

**AS AND FOR A EIGHTH CAUSE OF ACTION FOR "JANE DOE #5" FOR
FAILING TO INVESTIGATE CRIMINALLY SUSPICIOUS ACTIVITY - ALL DEFENDANTS**

689. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 688. inclusive, with the same force and effect as if hereinafter set forth at length.

690. Defendant "MEDICAL ENTITIES" failed to timely and properly investigate complaints made by the sexual assault victims of Robert Hadden, as well as suspicious circumstances wherein Robert Hadden and other medical staff, agents, servants, and/or employees placed patients in compromised and unprotected situations which either led, or should have led, to an investigation of defendant Robert Hadden and other medical staff, agents, servants, and/or employees's negligence, carelessness, recklessness, and/or criminal and wanton misconduct.

691. Defendant "MEDICAL ENTITIES" failed to timely and properly act upon complaints made by the sexual assault victims of Robert Hadden, as well as suspicious circumstances wherein Robert Hadden, and/or other medical staff, agents, servants, and/or employees, placed patients in compromised and unprotected situations, all of which caused and/or enabled further and additional negligent, careless, reckless, criminal and/or wanton acts and harm to be inflicted upon patients, including "JANE DOE #5".

692. By reason of defendant "MEDICAL ENTITIES" and/or their agents, servants, and/or employees's failures to meet the aforementioned obligations and duties, plaintiff-patient "JANE DOE #5", as well as other patients, were subjected to physical and mental injury, and further physical and mental injury, mental manipulation, harm, duress, sexual objectification and sexual abuse.

**AS AND FOR A NINTH CAUSE OF ACTION FOR "JANE DOE #5" FOR
DEFAMATION - ALL DEFENDANTS**

693. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 692. inclusive, with the same force and effect as if hereinafter set forth at length.

694. Since the time of the initial Civil filing in the Supreme Court through the present, the defendants, through their agents, servants, employees, lawyers and legal team, have made knowingly false and harmful judicial and extra-judicial statements - libelous written averments and slanderous verbal statements - wherein it has been asserted that the 5-sexual abuse survivors herein, as well as the 19-victims/criminal court witnesses in the criminal case, including plaintiff "JANE DOE #5", are variously: lying, promiscuous, infected with sexually transmissible

diseases, unattractive, unworthy of being believed, unworthy of being sexually abused, out to ruin a distinguished doctor's career for the money, were/and are somehow at fault for being sexually abused by ROBERT HADDEN, and not the actual victims of this criminal sexual predator.

695. Further, the defendants through their agents, servants, employees, lawyers and legal team, have judicially and publicly accused the named civil plaintiffs, the 19-criminal court witnesses, and the sexual assault crime victims, including "JANE DOE #5", their legal representatives (including each of plaintiff's counsel), the New York State Office of Medical Conduct, and the New York District Attorney's Office, of lying, being untruthful, after a "money grab" and on a "witch-hunt".

696. Defendants, their agents, servants, employees, lawyers and legal team, have further judicially and extrajudicially accused the named civil plaintiffs, the 19-criminal court witnesses, the sexual assault crime victims, including "JANE DOE #5", and their legal representatives of controlling, manipulating, commandeering, and illegally coercing and influencing both the New York State Office of Medical Conduct, and the New York District Attorney's Office, to criminally prosecute a "completely innocent" and "respected doctor" - who, in reality, is a criminal and sexual predator.

697. Defendants, their agents, servants, employees, lawyers and legal teams knew or should have known the their invective and personal attacks upon the sexual assault survivors and their counsel were untrue and were made with malicious intent.

698. As a result of their false and damaging statements, the named civil plaintiffs, the 19-criminal court witnesses, the sexual assault crime victims including "JANE DOE #5" have been further emotionally and psychologically injured and their reputations have been damaged and impaired.

699. Multiple versions of defendants' defamatory and scurrilous statements about the within named plaintiffs and plaintiffs's counsel have been circulated, many of which are, and will be, known to the plaintiffs's family members, neighbors, colleagues, friends, peers, and eventually their own children.

700. Plaintiffs can neither wind back the clock, nor can they unring the bell, on defendants's undignified, false, and malicious statements about their lack of veracity and ethical composition.

701. Defendants's injurious, untrue and malicious averments, attacks and knowingly false statements constitute defamation per se.

702. The within named defendants are all jointly and severally liable for defamation of the names and reputations of the plaintiffs named herein in an amount to be determined at trial.

AS AND FOR A TENTH CAUSE OF ACTION FOR "JANE DOE #5" FOR
PUNITIVE DAMAGES - ALL DEFENDANTS

703. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 702. inclusive, with the same force and effect as if hereinafter set forth at length.

704. Defendant ROBERT HADDEN's sexual assault of Plaintiff "JANE DOE #5" - along with other unnamed patients - as well as Defendant "MEDICAL ENTITIES"'s gross negligence, willfulness, and wantonness concerning the improper hiring, retention, lack of supervision, and other reckless acts and omissions set forth herein, constitute intentional, extreme, and outrageous conduct.

705. Such grossly reckless conduct was motivated by greed, self-seeking, self-interest, deliberate indifference, deviant sexual desire, and is the product of malicious and evil minds such that the imposition of punitive damages are warranted.

706. Punitive damages are justified in cases like this to both punish the wrongdoers - and also to hold them out as examples to the rest of the community - such that these defendants, and others that may be similarly situated, are clearly and explicitly discouraged from engaging in these kinds of grossly deviant and abhorrent behaviors in the future.

707. For purposes of particularization of the acts which constitute and mandate the imposition of punitive damages committed by the within named defendants, it is stated that defendant ROBERT HADDEN - while pretending to render medical care to obstetric and gynecology patients - serially, and criminally, sexually assaulted numerous female patients at defendant MEDICAL ENTITIES's obstetric and gynecologic clinics - both on the East and West sides of Manhattan. Further, evidence exists that defendant "MEDICAL ENTITIES" enabled ROBERT HADDEN to continue to sexually assault their patients, and instead of terminating him and reporting him to the Criminal Authorities, they simply moved him from one clinic to another clinic in an effort to conceal his criminal activity. Moreover, evidence has surfaced from the Criminal Action which demonstrates that defendant ROBERT HADDEN has been sexually assaulting and sexually abusing patients on the premises of defendant "MEDICAL ENTITIES" for approximately 15-20 years, - all the way back into the 1990's.

708. Defendant ROBERT HADDEN was already the subject of an active Criminal Investigation at the time that he sexually assaulted plaintiff "JANE DOE #5". However, defendant "MEDICAL ENTITIES" failed to act on the information and enabled defendant ROBERT HADDEN to continue to sexually assault other women on its premises - even while he was the subject of an active and on-going criminal investigation.

709. Said criminal investigation of ROBERT HADDEN occurred as a result of defendant ROBERT HADDEN's criminal sexual assault of another female patient at a clinic that was also affiliated with - or owned and operated by - defendant MEDICAL ENTITIES.

710. Despite defendant ROBERT HADDEN being the subject of a criminal investigation for the sexual assaults of a female patients, defendant "MEDICAL ENTITIES" failed to conduct an inquiry into the actions of defendant ROBERT HADDEN relative to the events surrounding the District Attorney's active criminal investigation.

711. Despite defendant ROBERT HADDEN being the subject of an active criminal investigation for the sexual assaults of female patients upon the premises of defendant "MEDICAL ENTITIES" - defendant "MEDICAL ENTITIES" continued to allow defendant ROBERT HADDEN to maintain his privileges at their hospitals, medical facilities, and clinics, without any restrictions, limitations, preceptors, chaperones or additional supervision - where defendant ROBERT HADDEN was allowed to continue preying on women.

712. While being allowed to continue preying on women at defendant "MEDICAL ENTITIES"'s hospitals, medical facilities, offices, and/or clinics without any restrictions, limitations, preceptors, chaperones or additional supervision, defendant ROBERT HADDEN continued to sexually assault female patients.

713. While sexually assaulting female patients - seemingly at will - due to the utter indifference of defendant "MEDICAL ENTITIES" as well as the indifference of "MEDICAL ENTITIES"'s agents, servants, and employees defendant ROBERT HADDEN sexually assaulted plaintiff "JANE DOE #5".

714. Plaintiff "JANE DOE #5" was a pregnant female patient of defendant COLUMBIA PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES; EAST SIDE ASSOCIATES; COLUMBIA UNIVERSITY MEDICAL CENTER, TRUSTEES, ROBERT HADDEN; and defendant "MEDICAL ENTITIES" at the time when defendant ROBERT HADDEN sexually assaulted and sexually abused her by performing excessive and non-medically indicated physical examinations, performing non-medically indicated breast examinations, performing non-consensual sexual touching, undressing her, making lewd, lascivious and denigrating remarks about her body, anatomy, marital relationship, and person, and forcibly sexually touching her sexual and intimate parts.

715. No chaperone was present when defendant ROBERT HADDEN, sexually assaulted "JANE DOE #5" on the premises of defendant MEDICAL ENTITIES.

716. The sexual assault of "JANE DOE #5" occurred over one month after defendant ROBERT HADDEN had become the subject of the criminal investigation for sexually assaulting other patients upon defendant MEDICAL ENTITIES's premises.

717. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees had knowledge and/or awareness of the prior sexual assault(s), and chose to do nothing to protect other female patients from being sexually assaulted by defendant ROBERT HADDEN

718. As a result of defendant "MEDICAL ENTITIES"'s gross indifference and wanton lack of regard for the safety and well-being of its female patients, plaintiff "JANE DOE #5" has become yet another one of the countless sexual assault victims of defendant ROBERT HADDEN and defendant "MEDICAL ENTITIES".

719. Defendant "MEDICAL ENTITIES"'s indolence and complicity - as well the prurient activities of defendant ROBERT HADDEN upon the premises of defendant "MEDICAL ENTITIES" - are abhorrent.

720. Punitive damages are necessary under these facts.

AS AND FOR THE FIRST CAUSE OF ACTION FOR "JANE DOE #6"

721. Plaintiff "JANE DOE #6", is identified and referenced heretofore as "JANE DOE #6" - which is the pseudonym for this plaintiff. Plaintiff requests permission to use a pseudonym because of the extremely private nature of this matter. Plaintiff was a resident of the State of New York at the relevant times herein.

722. Plaintiff "JANE DOE #6" is an adult with no legal disability.

723. At all times herein mentioned, "JANE DOE #6" was a patient of defendant ROBERT HADDEN.

724. At all times herein mentioned, "JANE DOE #6" was a patient of defendant TRUSTEES.

725. At all times herein mentioned, "JANE DOE #6" was a patient of defendant CUCPS.

726. At all times herein mentioned, "JANE DOE #6" was a patient of defendant NYPH.

727. At all times herein mentioned, "JANE DOE #6" was a patient of defendant CPMC-ESA.

728. At all times herein mentioned, "JANE DOE #6" was a patient of defendant ESA.

729. At all times herein mentioned, "JANE DOE #6" was a patient of defendant CPMC.

730. At all times herein mentioned, "JANE DOE #6" was a patient of defendant CUMC.

731. At all times herein mentioned, "JANE DOE #6" was a patient of defendant PHPSO.

732. At all times herein mentioned, "JANE DOE #6" was a patient of defendant CCNP.

733. At all times herein mentioned, "JANE DOE #6" was a patient of defendant CCC.

734. At all times herein mentioned, "JANE DOE #6" was a patient of defendant SLOANE.

735. On February 22, 2016 ROBERT HADDEN pled guilty to the Crime of FORCIBLE TOUCHING of JANE DOE #6 under the SIXTH COUNT of his criminal indictment in violation of Penal Law § 130.52 as follows: "The defendant - ROBERT HADDEN - in the County of New York, on or about May 7, 2012, intentionally and for no legitimate purpose, forcibly touched the sexual and other intimate parts of a fifth individual known to the Grand Jury for the purpose of degrading and abusing such person and for the purpose of gratifying the defendant's sexual desire."

736. Defendant ROBERT HADDEN was sentenced in Criminal Court on March 29, 2016.

737. This action is commenced within one-year of the termination of defendant ROBERT HADDEN's criminal case.

738. This action is timely filed as to each of the victims identified pseudonymously in ROBERT HADDEN's Criminal Indictment.

739. This action is timely filed as to "JANE DOE #6".

740. This action is filed within one-year of the termination of ROBERT HADDEN's criminal case which ended no earlier than the time of his sentencing on March 29, 2016.

741. Beginning in or about February 2009 through May 7, 2012, Plaintiff "JANE DOE #6" was under the medical care and treatment of Defendant ROBERT HADDEN for gynecologic care, monitoring and treatment, at the medical facilities maintained by the Defendant "MEDICAL ENTITIES" located at 161 Fort Washington Avenue, New York, NY 10022.

742. Beginning in or about February 2009 through May 7, 2012, and beyond, Plaintiff "JANE DOE #6" was under the medical care and treatment of Defendant "MEDICAL ENTITIES" as well as their agents, servants, and/or employees for gynecologic and obstetric care, monitoring and treatment, at the medical facilities maintained by Defendant "MEDICAL ENTITIES" located at 161 Fort Washington Avenue, New York, NY 10022.

743. Beginning in or about February 2009 through May 7, 2012, and beyond, Plaintiff "JANE DOE #6" was under the medical care and treatment of Defendant "MEDICAL ENTITIES" and ROBERT HADDEN, and their agents, servants, and/or employees, for gynecologic and obstetric care, monitoring and treatment, at the medical facilities maintained by the Defendant "MEDICAL ENTITIES" located at or about 161 Fort Washington Avenue, New York, NY 10022.

744. Beginning in or about February 2009 through May 7, 2012, Plaintiff "JANE DOE #6" was under the medical care and treatment of Defendant ROBERT HADDEN for gynecologic care, monitoring and treatment, at the medical facilities maintained by the Defendant "MEDICAL ENTITIES" located at 622 W. 168th Street, New York, NY 10022.

745. Beginning in or about February 2009 through May 7, 2012, and beyond, Plaintiff "JANE DOE #6" was under the medical care and treatment of Defendant "MEDICAL ENTITIES" as well as their agents, servants, and/or employees for gynecologic and obstetric care, monitoring and treatment, at the medical facilities maintained by Defendant MEDICAL ENTITIES located at 622 W. 168th Street, New York, NY 10022.

746. Beginning in or about February 2009 through May 7, 2012, and beyond, Plaintiff "JANE DOE #6" was under the medical care and treatment of Defendant "MEDICAL ENTITIES" and ROBERT HADDEN, and their agents, servants, and/or employees, for gynecologic and obstetric care, monitoring and treatment, at the medical facilities maintained by the Defendant

“MEDICAL ENTITIES” located at or about 622 W. 168th Street, New York, NY 10022.

747. Beginning in or about February 2009 through May 7, 2012, Plaintiff "JANE DOE #6" was under the medical care and treatment of Defendant ROBERT HADDEN for gynecologic care, monitoring and treatment, at the medical facilities maintained by the Defendant “MEDICAL ENTITIES” located at 630 W. 168th Street, New York, NY 10022.

748. Beginning in or about February 2009 through May 7, 2012, and beyond, Plaintiff "JANE DOE #6" was under the medical care and treatment of Defendant “MEDICAL ENTITIES” as well as their agents, servants, and/or employees for gynecologic and obstetric care, monitoring and treatment, at the medical facilities maintained by Defendant MEDICAL ENTITIES located at 630 W. 168th Street, New York, NY 10022.

749. Beginning in or about February 2009 through May 7, 2012, and beyond, Plaintiff "JANE DOE #6" was under the medical care and treatment of Defendant “MEDICAL ENTITIES” and ROBERT HADDEN, and their agents, servants, and/or employees, for gynecologic and obstetric care, monitoring and treatment, at the medical facilities maintained by the Defendant “MEDICAL ENTITIES” located at or about 630 W. 168th Street, New York, NY 10022.

750. While and under the gynecologic care, monitoring and treatment of Defendant ROBERT HADDEN, M.D. and defendant “MEDICAL ENTITIES” - and in the course of rendering treatment to Plaintiff "JANE DOE #6" - defendant ROBERT HADDEN did sexually assault Plaintiff "JANE DOE #6”.

751. Defendant ROBERT HADDEN sexually assaulted “JANE DOE #6” on May 7, 2012.

752. While under the gynecologic and obstetric care, monitoring and treatment of Defendant ROBERT HADDEN, the agents, servants, and/or employees of Defendant “MEDICAL ENTITIES” enabled and/or were complicit in ROBERT HADDEN sexually assaulting Plaintiff "JANE DOE #6".

753. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees failed to timely and properly monitor, supervise, and train the medical personnel accompanying ROBERT HADDEN while caring for patients upon their premises.

754. Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees failed to timely and properly monitor and supervise ROBERT HADDEN.

755. Prior to the time when plaintiff "JANE DOE #6” came under the care and treatment of defendant ROBERT HADDEN, defendant “MEDICAL ENTITIES” knew or should have know that ROBERT HADDEN had a history of sexually assaulting patients.

756. Prior to the time when plaintiff "JANE DOE #6” came under the care and treatment of defendant ROBERT HADDEN, defendant “MEDICAL ENTITIES” chose to take no

disciplinary actions against ROBERT HADDEN - which enable ROBERT HADDEN to continue to sexually assault patients upon their premises, including patient "JANE DOE #6".

757. The improper and tortious conduct of Defendant ROBERT HADDEN, was not performed for a valid medical purpose.

758. Defendant ROBERT HADDEN, performed the aforementioned actions for his own sexual gratification and without regard for the plaintiff's well-being.

759. Defendant ROBERT HADDEN, performed the aforementioned actions for his own sexual gratification and without plaintiff "JANE DOE #6"'s consent.

760. The aforementioned actions were performed by Defendant ROBERT HADDEN - under circumstances caused and permitted by the Defendant "MEDICAL ENTITIES" - which cloaked Defendant ROBERT HADDEN with the actual and apparent authority to perform gynecologic and obstetric treatment and enabled the sexual assaults to occur.

761. Defendant "MEDICAL ENTITIES" had knowledge of Defendant ROBERT HADDEN's sexual assaults of other patients and/or medical personnel prior to the time that "JANE DOE #6" came under the care and treatment of defendant ROBERT HADDEN.

762. Defendant "MEDICAL ENTITIES" had knowledge of Defendant ROBERT HADDEN's, sexual assaults of other patients and/or medical personnel before February 7, 2012.

763. Defendant "MEDICAL ENTITIES" had knowledge of Defendant ROBERT HADDEN's, sexual assaults of other patients and/or medical personnel before May 7, 2012.

764. Defendant "MEDICAL ENTITIES" had knowledge of Defendant ROBERT HADDEN's, sexual assaults of other patients and/or medical personnel before June 29, 2012.

765. Defendant "MEDICAL ENTITIES" had knowledge of Defendant ROBERT HADDEN's, sexual assaults of other patients and/or medical personnel before October 18, 2013.

766. The agents, servants and/or employees of Defendant "MEDICAL ENTITIES" had prior knowledge of Defendant ROBERT HADDEN's sexual assaults of other patients and/or medical personnel before the time that "JANE DOE #6" came under the care and treatment of defendant ROBERT HADDEN.

767. The agents, servants and/or employees of Defendant "MEDICAL ENTITIES" had prior knowledge of Defendant ROBERT HADDEN's sexual assaults of other patients and/or medical personnel February 7, 2012.

768. The agents, servants and/or employees of Defendant "MEDICAL ENTITIES" had prior knowledge of Defendant ROBERT HADDEN's sexual assaults of other patients and/or medical

personnel before May 7, 2012.

769. The agents, servants and/or employees of Defendant “MEDICAL ENTITIES” had prior knowledge of Defendant ROBERT HADDEN’s sexual assaults of other patients and/or medical personnel before June 29, 2012.

770. The agents, servants and/or employees of Defendant “MEDICAL ENTITIES” had prior knowledge of Defendant ROBERT HADDEN’s sexual assaults of other patients and/or medical personnel before October 18, 2013.

771. The agents, servants and/or employees of Defendant “MEDICAL ENTITIES” had a duty to offer plaintiff “JANE DOE #6” appropriate medical care, appropriate psychological counseling for victims of sexual assaults, and appropriate emotional support, upon learning that she was sexually assaulted by one of their own physicians - instead of ignoring her complaints and denying any knowledge that ROBERT HADDEN was a sexual predator - which caused “JANE DOE #6” to experience further self-doubt and trauma, and further emotional and psychological harm.

772. Defendant “MEDICAL ENTITIES” owed a duty to Plaintiff "JANE DOE #6" to ensure that qualified and competent personnel would render medical treatment to them and to have proper safeguards and procedures in place to prevent the occurrences of sexual assaults on patients as set forth herein.

773. Defendant “MEDICAL ENTITIES” are liable for the actions committed by Defendant ROBERT HADDEN under the doctrine of respondeat superior.

774. The Defendant “MEDICAL ENTITIES” are vicariously liable for the actions committed by Defendant ROBERT HADDEN.

775. The Defendant “MEDICAL ENTITIES” are directly liable for their own acts and/or omissions which were a proximate cause of plaintiff "JANE DOE #6" being sexually assaulted by defendant ROBERT HADDEN.

776. The Defendant “MEDICAL ENTITIES” are directly liable for their own acts and/or omissions which were a proximate cause of plaintiff "JANE DOE #6" suffering additional harm when she indicated that she was sexually assaulted by defendant ROBERT HADDEN to the agents, servants and/or employees of “MEDICAL ENTITIES”, and was told that they had never heard of anyone ever complaining about ROBERT HADDEN before - and failed to offer JANE DOE #6 timely and proper medical, psychologic and emotional care and support.

777. The Defendant “MEDICAL ENTITIES” were complicit in the criminal acts committed by Defendant ROBERT HADDEN.

778. The Defendant “MEDICAL ENTITIES”, their agents, servants, and/or employees,

attempted to cover-up the criminal sexual acts committed by Defendant ROBERT HADDEN.

779. Defendant ROBERT HADDEN had a duty to timely and properly care for and treat "JANE DOE #6".

780. Defendant "MEDICAL ENTITIES" had a duty to timely and properly care for "JANE DOE #6".

781. Defendant "MEDICAL ENTITIES" had a duty to timely and properly supervise Defendant ROBERT HADDEN.

782. Defendant "MEDICAL ENTITIES" had a duty to enact certain Policies governing the use of chaperones during gynecologic and obstetric examinations.

783. Defendant CUMC had a duty to enact certain Policies governing the use of chaperones during gynecologic and obstetric examinations.

784. Defendant SLOANE had a duty to enact certain Policies governing the use of chaperones during gynecologic and obstetric examinations.

785. Defendant TRUSTEES had a duty to enact certain Policies governing the use of chaperones during gynecologic and obstetric examinations.

786. Defendant ROBERT HADDEN, had a duty to properly care for "JANE DOE #6".

787. Defendant ROBERT HADDEN, had a legal duty to not sexually assault "JANE DOE #6".

788. Defendant ROBERT HADDEN, had a medical duty to not sexually assault "JANE DOE #6".

789. Defendant ROBERT HADDEN, had a moral duty to not sexually assault "JANE DOE #6".

790. Defendant ROBERT HADDEN, had an ethical duty to not sexually assault "JANE DOE #6".

791. A doctor may never sexually assault a patient.

792. Sexually assaulting a patient is a violation of the medical standard of care.

793. All medical personnel are required to report any incident or occurrence wherein a sexual assault by a doctor is suspected.

794. Defendant "MEDICAL ENTITIES" had a duty to ensure Defendant Robert Hadden did not sexually assault "JANE DOE #6".

795. Defendant “MEDICAL ENTITIES” had a duty to enact a Policy about how to protect and treat patients who are sexually assaulted by one of their doctors or medical personnel.

796. Defendant “MEDICAL ENTITIES” failed to enact a Policy about how to protect and treat patients who are sexually assaulted by one of their doctors or medical personnel.

797. Defendant “MEDICAL ENTITIES” failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #6" was under the care and treatment of defendant ROBERT HADDEN.

798. Defendant “CUMC” failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #6" was under the care and treatment of defendant ROBERT HADDEN.

799. Defendant “SLOANE” failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #6" was under the care and treatment of defendant ROBERT HADDEN.

800. Defendant “TRUSTEES” failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #6" was under the care and treatment of defendant ROBERT HADDEN.

801. Defendant “NYPH” failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #6" was under the care and treatment of defendant ROBERT HADDEN.

802. Defendant “ESA” failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #6" was under the care and treatment of defendant ROBERT HADDEN.

803. Defendant “CPMC-ESA” failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #6" was under the care and treatment of defendant ROBERT HADDEN.

804. Defendant ROBERT HADDEN failed to enact a Policy concerning the use of chaperones during examinations during the time when "JANE DOE #6" was under the care and treatment of defendant ROBERT HADDEN.

805. Defendant ROBERT HADDEN failed to follow policies and/or procedures of the defendant “MEDICAL ENTITIES” concerning the use of chaperones during examinations at the time when "JANE DOE #6" was under the care and treatment of defendant ROBERT HADDEN.

806. Defendant “MEDICAL ENTITIES” failed to enforce the Policy concerning the use of chaperones during examinations during the time when "JANE DOE #6" was under the care and treatment of defendant ROBERT HADDEN.

807. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to May 7, 2012.

808. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to October 18, 2013.

809. Defendant TRUSTEES were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to May 7, 2012.

810. Defendant CUCPS were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to May 7, 2012.

811. Defendant NYPH were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to May 7, 2012.

812. Defendant SLOANE were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to May 7, 2012.

813. Defendant CPMC-ESA were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to May 7, 2012.

814. Defendant ESA were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to May 7, 2012.

815. Defendant CPMC were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to May 7, 2012.

816. Defendant CUMC were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to May 7, 2012.

817. Defendant PHPSO were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to May 7, 2012.

818. Defendant CCNP were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to May 7, 2012.

819. Defendant CCC were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to May 7, 2012.

820. The answering defendant knew or should have known that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to May 7, 2012.

821. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to October 18, 2013.

822. Defendant TRUSTEES were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to October 18, 2013.

823. Defendant CUCPS were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to October 18, 2013.

824. Defendant NYPH were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to October 18, 2013.

825. Defendant SLOANE were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to October 18, 2013.

826. Defendant CPMC-ESA were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to October 18, 2013.

827. Defendant ESA were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to October 18, 2013.

828. Defendant CPMC were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to October 18, 2013.

829. Defendant CUMC were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to October 18, 2013.

830. Defendant PHPSO were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to October 18, 2013.

831. Defendant CCNP were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to October 18, 2013.

832. Defendant CCC were aware that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to October 18, 2013.

833. The answering defendant knew or should have known that defendant ROBERT HADDEN had been accused of sexual assault of another patient prior to October 18, 2013.

834. Defendant "MEDICAL ENTITIES" permitted defendant ROBERT HADDEN to examine patients at the premises of defendant "MEDICAL ENTITIES" without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault of another patient prior to May 7, 2012.

835. Defendant TRUSTEES permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by a patient prior to May 7, 2012.

836. Defendant CUCPS permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to May 7, 2012.

837. Defendant NYPH permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to May 7, 2012.

838. Defendant CPMC-ESA permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to May 7, 2012.

839. Defendant ESA permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to May 7, 2012.

840. Defendant CPMC permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to May 7, 2012.

841. Defendant CUMC permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to May 7, 2012.

842. Defendant PHPSO permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to May 7, 2012.

843. Defendant CCNP permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to May 7, 2012.

844. Defendant CCC permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to May 7, 2012.

845. Defendant SLOANE permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to May 7, 2012.

846. The answering defendant permitted defendant ROBERT HADDEN to examine patients without a chaperone present after defendant ROBERT HADDEN was accused of sexual assault by another patient prior to May 7, 2012.

847. The answering defendant had a duty to enact a policy concerning the presence of chaperones during examinations performed by ROBERT HADDEN upon their premises.

848. The answering defendant failed to enact a policy concerning the presence of chaperones during examinations performed ROBERT HADDEN upon their premises.

849. The answering defendant failed to enforce a policy concerning the presence of chaperones during examinations performed by ROBERT HADDEN upon their premises.

850. The answering defendant failed to timely and properly supervise defendant ROBERT HADDEN in regard to the examinations he performed of female patients upon the premises of defendant "MEDICAL ENTITIES" from in or about 1993 through September 2012, specifically including, but not limited to, the time period between April 4, 2008 and July 31, 2012.

851. Beginning on or about February 23, 2009 plaintiff "JANE DOE #6" came under the gynecologic and obstetric diagnosis, care and treatment of the defendants, their agents, servants, and/or employees, and in a continuous course of treatment through in or about May 7, 2012, and beyond, defendant ROBERT HADDEN sexually assaulted plaintiff "JANE DOE #6" upon the within named defendants' premises, and as a result of the foregoing, including the failure of the defendants, their agents, servants and/or employees to properly protect, treat, examine, diagnose, and care for plaintiff "JANE DOE #6", the failure to timely and properly monitor the actions of its agents, servants and/or employees, the failure to timely and properly supervise the actions of its agents, servants and/or employees, the failure to timely and properly provide chaperones during gynecologic and obstetric examinations, the failure to timely and properly require chaperones during gynecologic and obstetric examinations performed by ROBERT HADDEN, the failure to timely and properly investigate defendant ROBERT HADDEN, the failure to timely and properly suspend defendant ROBERT HADDEN, the failure to timely and properly limit the practice privileges defendant ROBERT HADDEN, the failure to timely and properly revoke the practice privileges defendant ROBERT HADDEN, the failure to timely and properly require the use of a preceptor for ROBERT HADDEN, the improper re-issuance of privileges and/or re-certification of defendant ROBERT HADDEN, the failure to stop the performance of serial vaginal and breast exams for no legitimate medical purpose, the failure to stop the inappropriate questioning of patient's sexual history, the performance of serial and medically inappropriate vaginal cultures and PAP smears, the failure to prevent defendant ROBERT HADDEN from engaging in criminal sexual contact with patients, including "JANE DOE #6", the fraudulent billing and revenues generated through illegal and unnecessary examinations, the failure to act upon complaints of sexual assaults committed by defendant ROBERT HADDEN, the failure to provide a chaperone to prevent ROBERT HADDEN from engaging in physical sexual contact with patients, the failure to provide a chaperone to prevent ROBERT HADDEN from engaging in criminal sexual contact with patients, the failure to timely and properly terminate defendant ROBERT HADDEN, the failure to provide appropriate psychological counseling and appropriate emotional support to "JANE DOE #6" upon learning and/or

suspecting that she was sexually assaulted by one of their own physicians, the failure to timely and properly report the actions of defendant ROBERT HADDEN for disciplinary review, the failure to timely and properly report the actions of defendant ROBERT HADDEN for criminal prosecution, and the failure to timely and properly cooperate with the criminal investigation of defendant ROBERT HADDEN, the plaintiff "**JANE DOE #6**" **was duped, betrayed, sexually abused, manipulated, exploited, objectified, and sexually assaulted by defendant ROBERT HADDEN, and was also deceived and betrayed by defendant "MEDICAL ENTITIES"**, and sustained severe injuries and complications as a result.

852. Said occurrence was due to the carelessness and negligence of the defendants, their agents, servants and/or employees in failing to treat the plaintiff in a good, accepted and proper medical manner, in failing to timely and properly supervise the actions of defendant ROBERT HADDEN, and without any fault or lack of care on the part of the plaintiff.

853. By reason of the foregoing, plaintiff sustained severe and serious personal injuries, a severe shock to her nervous system and certain internal injuries, and was caused to suffer severe physical pain, mental anguish, and psychological injuries as a result thereof.

854. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

855. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A SECOND CAUSE OF ACTION FOR "JANE DOE #6" FOR CIVIL
BATTERY

856. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 855. inclusive, with the same force and effect as if hereinafter set forth at length.

857. Defendant ROBERT HADDEN engaged in intentional, offensive, harmful, sexual misconduct and wrongful bodily contact of Plaintiff "JANE DOE #6", without Plaintiff "JANE DOE #6"'s consent on the aforementioned occasions.

858. As a direct and proximate result of the negligence, careless, and wanton recklessness by Defendant "MEDICAL ENTITIES" and that of their agents, servants and/or employees in allowing ROBERT HADDEN to commit serial sexual assaults upon multiple women over a prolonged period of time, ROBERT HADDEN was enabled, and did, sexually assault female patients - including "JANE DOE #6" - seemingly on an at will basis and without any consequences or oversight.

859. As a direct and proximate result of the aforementioned sexual batteries and utter lack of oversight, Plaintiff "JANE DOE #6" sustained in the past, and will sustain in the future, physical injury, pain and suffering, serious psychological and emotional distress, mental anguish, embarrassment and humiliation.

860. As a direct and proximate result of Defendant ROBERT HADDEN's, offensive and

wrongful physical contact of plaintiff "JANE DOE #6", without her consent, "JANE DOE #6" has suffered severe emotional and physical injuries and has been damaged in an amount to be determined at trial, and in an amount of damages which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A THIRD CAUSE OF ACTION FOR "JANE DOE #6" FOR CRIMINAL BATTERY

861. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 860. inclusive, with the same force and effect as if hereinafter set forth at length.

862. Defendant ROBERT HADDEN, intentionally engaged in criminal, offensive, harmful, sexual misconduct, sexual assault, and wrongful bodily contact of Plaintiff "JANE DOE #6", without Plaintiff "JANE DOE #6"'s consent on the aforementioned occasions.

863. Defendant ROBERT HADDEN was permitted and enabled to commit these criminal acts as a direct and proximate result of the negligence, careless, and wanton recklessness of Defendant "MEDICAL ENTITIES" and that of their agents, servants and/or employees through the failure to timely and properly train, supervise, monitor, discipline, terminate, and report ROBERT HADDEN to the Criminal Authorities.

864. As a direct and proximate result of the aforementioned sexual batteries, Plaintiff "JANE DOE #6" sustained in the past, and will sustain in the future, physical injury, pain and suffering, serious psychological and emotional distress, mental anguish, embarrassment and humiliation.

865. As a direct and proximate result of Defendant ROBERT HADDEN's criminal, offensive and wrongful physical contact of Plaintiff "JANE DOE #6", without her consent, "JANE DOE #6" has suffered severe emotional and physical injuries and has been damaged in an amount to be determined at trial, and in an amount of damages which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A FOURTH CAUSE OF ACTION FOR "JANE DOE #6" FOR NEGLIGENCE & PROFESSIONAL NEGLIGENCE

866. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 865. inclusive, with the same force and effect as if hereinafter set forth at length.

867. The defendant MEDICAL ENTITIES, their agents, servants, and/or employees, and Defendant ROBERT HADDEN, failed to treat and care for plaintiff "JANE DOE #6" in accordance with the standards of care and treatment generally accepted in the medical community and treated plaintiffs in a manner which violated the customary and accepted standards in the community.

868. The defendant MEDICAL ENTITIES, their agents, servants, and/or employees, and Defendant ROBERT HADDEN, committed acts of negligence, professional negligence, and

medical malpractice by negligently and carelessly failing to treat and care for plaintiff "JANE DOE #6" in a careful, skillful and medically acceptable manner.

869. Further, defendant "MEDICAL ENTITIES" by and through their personnel, administrators, agents, servants, and/or employees, failed to conduct themselves and operate their medical institutions, offices, hospitals, and clinics in accordance with the required standards to ensure that patients are safe and free from being sexually assaulted in the course of receiving medical care and treatment.

870. As a result of the foregoing, Plaintiff "JANE DOE #6" sustained physical, emotional, and psychological injuries, along with pain and suffering in an amount of damages which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A FIFTH CAUSE OF ACTION FOR
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

871. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 870. inclusive, with the same force and effect as if hereinafter set forth at length.

872. Defendant ROBERT HADDEN and defendant "MEDICAL ENTITIES" owed a duty to Plaintiff "JANE DOE #6" to not cause her emotional distress, the initiation of post-traumatic stress disorder, or other harm during the course of gynecological and/or obstetric examinations and other related treatment, which are very personal to the patient.

873. Defendant ROBERT HADDEN, was negligent as to the effect of his conduct in performing unwanted sexual acts without the consent of Plaintiff "JANE DOE #6" during the course and scope of his purported medical treatment of the Plaintiff.

874. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees were negligent as to the effect of their conduct in allowing and enabling defendant ROBERT HADDEN to perform unwanted sexual acts on patient "JANE DOE #6", as well as other patients, during the course and scope of his purported medical treatment of the patient.

875. Defendant "MEDICAL ENTITIES," as well as their agents, servants, and/or employees were further negligent and careless in failing to attend to "JANE DOE #6" in a timely and proper manner after she was sexually assaulted by ROBERT HADDEN, and after these facts were brought to the attention of the medical personnel upon the premises of defendant "MEDICAL ENTITIES".

876. Defendants ROBERT HADDEN and "MEDICAL ENTITIES", as well as their agents, servants, employees and/or legal teams were further negligent and careless in failing to timely and properly investigate the reports, claims and legal filings about the sexual assaults upon patients being committed by ROBERT HADDEN, and made false, disparaging and degrading oral and written statements about the lack of veracity of plaintiff "JANE DOE #6".

877. As a direct and proximate consequence of Defendants's negligence, Plaintiff "JANE DOE

#6" has suffered physical, emotional, and psychological injuries, along with pain and suffering.

AS AND FOR A SIXTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

878. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 877. inclusive, with the same force and effect as if hereinafter set forth at length.

879. Defendant ROBERT HADDEN, acted in a manner that was criminal, intentional, willful, shameful, grossly reckless, and for the purpose of causing serious and substantial emotional distress to Plaintiff "JANE DOE #6" and/or in reckless and wanton disregard for same.

880. Defendant "MEDICAL ENTITIES" acted in a manner that was likewise criminal, intentional, willful, shameful, grossly reckless, and in abject, wanton, and total disregard to the serious harm being inflicted upon Plaintiff "JANE DOE #6" - and other patients - through their complicity in allowing, enabling and permitting Defendant ROBERT HADDEN to perform unwanted and criminal sexual acts without the consent of Plaintiff "JANE DOE #6" during the course and scope of his so-called treatment of Plaintiff.

881. Defendant "MEDICAL ENTITIES" further acted in a manner that is criminal, intentional, willful, grossly reckless, intentionally deceitful, and in reckless disregard of the safety and well-being of Plaintiff "JANE DOE #6" when the agents, servants, and/or employees of defendant "MEDICAL ENTITIES" failed to timely and properly attend to plaintiff "JANE DOE #6" when she informed them of the sexual assault that had been committed by defendant ROBERT HADDEN.

882. Defendants ROBERT HADDEN and "MEDICAL ENTITIES" further acted in a manner that is criminal, premeditated, willful, grossly reckless, intentionally deceitful, and in reckless disregard of the safety and well-being of Plaintiff "JANE DOE #6" when their agents, servants, employees and/or legal teams made knowingly false, malicious and derogatory oral and written statements about the victims of ROBERT HADDEN's serial sexual assaults, including the sexual assaults of "JANE DOE #6".

883. As a result of the foregoing, Plaintiff "JANE DOE #6" sustained physical, emotional, and psychological injuries, along with pain and suffering.

AS AND FOR A SEVENTH CAUSE OF ACTION FOR
NEGLIGENT HIRING & NEGLIGENT SUPERVISION

884. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 883. inclusive, with the same force and effect as if hereinafter set forth at length.

885. Defendant "MEDICAL ENTITIES" prior to the granting or renewing of privileges or employment of defendants, residents, nurses and others medical personnel involved in plaintiff "JANE DOE #6"'s care, failed to investigate the qualifications, competence, capacity, abilities

and capabilities of said defendants, residents, nurses and other employees, including but not limited to obtaining the following information: patient grievances, criminal investigations, governmental inquiries, negative health care outcomes, incidents injurious to patients, medical malpractice action commenced against said persons, including the outcome thereof, any history of association, privilege and/or practice at other institutions, and discontinuation of said association, employment, privilege and/or practice at said institution, and any pending professional misconduct proceedings in this State or another State, the substance of the allegations in such proceedings and any additional information concerning such proceedings and the findings of the proceedings and defendant "MEDICAL ENTITIES" failed to make sufficient inquiry of the physicians, nurses, employees other personnel and institutions which should and did have information relevant to the capacity, capability, ability and competence of said persons rendering treatment, including defendant ROBERT HADDEN - as well as the medical staff with which he was associated - upon defendants' premises.

886. Further, defendant "MEDICAL ENTITIES" failed to timely and properly educate, train, supervise and/or monitor its agents, servants, and/or employees with regard to the policies and procedures that must be followed when sexual abuse by a physician is suspected or observed, and instead created an environment where sexual misconduct by physicians was tolerated.

887. Defendant "MEDICAL ENTITIES" created an environment where its agents, servants and/or employees who suspected - or even witnessed - sexual misconduct by a physician, were more fearful about their prospects for future employment if they said something, than they were about the safety and well-being of the patients who were being sexually abused.

888. Had defendant "MEDICAL ENTITIES" made the above stated inquiry, or in the alternative, had it reviewed and analyzed the information obtained and available to it in a timely and proper manner, privileges and/or employment would not have been granted and/or renewed.

889. Defendant "MEDICAL ENTITIES" were additionally negligent, grossly reckless, wanton and willful, in failing to supervise, monitor, chaperone and/or investigate defendant ROBERT HADDEN, and/or failed to create, institute and/or enforce rules, policies, procedures and/or regulations for defendant ROBERT HADDEN's treatment of plaintiff "JANE DOE #6".

890. By reason of defendant "MEDICAL ENTITIES" failures to meet the aforementioned obligations, plaintiff "JANE DOE #6" was treated by physicians, nurses, medical personnel and other employees who were lacking the requisite skills, abilities, competence, capacity and supervision, as a result of which the plaintiff sustained significant injuries and complications.

891. The aforesaid injuries resulting therefrom were caused wholly and solely as a result of the defendant "MEDICAL ENTITIES"'s negligent and reckless supervision of its agents, servants, and/or employees, and created a foreseeable risk of harm to its patients.

892. Defendant "MEDICAL ENTITIES"'s negligence and recklessness further lies in having placed Defendant ROBERT HADDEN in a position to cause foreseeable harm, of which plaintiff "JANE DOE #6" would have been spared, had the defendant "MEDICAL ENTITIES" taken reasonable care in the supervision and investigation of its employees - including, but not limited

to, defendant ROBERT HADDEN, himself.

893. In a claim for negligent hiring and/or retention, an employer is held liable and responsible for its negligence or recklessness in hiring, retaining and/or supervising an employee, whereas under respondeat superior the employer is vicariously liable for the torts of the agent, servant or employee. Thus, while Defendant "MEDICAL ENTITIES" may or may not be vicariously liable under respondeat superior for an act of an employee that was committed outside the scope of the employee's employment, Defendant "MEDICAL ENTITIES" are nevertheless liable for their failure to exercise reasonable care in hiring, retaining and/or supervising their agents, servants and/or employees - including, but not limited to, defendant ROBERT HADDEN, himself.

894. In a claim for negligent supervision, the employer is held liable and responsible for its negligence or recklessness in failing to timely and properly supervise an agent, servant, and/or employee, whereas under respondeat superior the employer is vicariously liable for the torts of the employee. Thus, while Defendant "MEDICAL ENTITIES" may or may not be vicariously liable under respondeat superior for an act of an agent, servant, or employee that was committed outside the scope of the employee's employment, Defendant "MEDICAL ENTITIES" are nevertheless liable for their own failure to exercise reasonable care in hiring, retaining, monitoring, investigating, and/or supervising their agents, servants and/or employees - including, but not limited to, defendant ROBERT HADDEN, himself.

895. As a result of the foregoing, Plaintiff "JANE DOE #6" sustained physical, emotional, and psychological injuries, along with pain and suffering.

**AS AND FOR A EIGHTH CAUSE OF ACTION FOR "JANE DOE #6" FOR
FAILING TO INVESTIGATE CRIMINALLY SUSPICIOUS ACTIVITY - ALL DEFENDANTS**

896. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 895. inclusive, with the same force and effect as if hereinafter set forth at length.

897. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees, failed to timely and properly investigate complaints made by the sexual assault victims of ROBERT HADDEN, as well as suspicious circumstances wherein ROBERT HADDEN and other medical staff, agents, servants, and/or employees placed patients in compromised and unprotected situations which either led, or should have led, to an investigation of defendant ROBERT HADDEN and other medical staff, agents, servants, and/or employees's negligence, carelessness, recklessness, and/or criminal and wanton misconduct.

898. Defendant "MEDICAL ENTITIES", their agents, servants, and/or employees, failed to timely and properly act upon complaints made by the sexual assault victims of Robert Hadden, as well as suspicious circumstances wherein ROBERT HADDEN, and/or other medical staff, agents, servants, and/or employees, placed patients in compromised and unprotected situations, all of which caused and/or enabled further and additional negligent, careless, reckless, criminal and/or wanton acts and harm to be inflicted upon patients, including "JANE DOE #6".

899. By reason of defendant "MEDICAL ENTITIES" and/or their agents, servants, and/or employees's failures to meet the aforementioned obligations and duties, plaintiff-patient "JANE DOE #6", as well as other patients, were subjected to physical and mental injury, mental manipulation, harm, duress, sexual objectification, sexual assault, and sexual abuse.

AS AND FOR A NINTH CAUSE OF ACTION FOR "JANE DOE #6" FOR
DEFAMATION - ALL DEFENDANTS

900. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 899. inclusive, with the same force and effect as if hereinafter set forth at length.

901. Since the time of the initial Civil filing in the Supreme Court through the present, the defendants, through their agents, servants, employees, lawyers and legal team, have made knowingly false and harmful judicial and extra-judicial statements - libelous written averments and slanderous verbal statements - wherein it has been asserted that the 5-sexual abuse survivors herein, as well as the 19-victims/criminal court witnesses in the criminal case, including plaintiff "JANE DOE #6", are variously: lying, promiscuous, infected with sexually transmissible diseases, unattractive, unworthy of being believed, unworthy of being sexually abused, out to ruin a distinguished doctor's career for the money, were/and are somehow at fault for being sexually abused by ROBERT HADDEN, and not the actual victims of this criminal sexual predator.

902. Further, the defendants through their agents, servants, employees, lawyers and legal team, have judicially and publicly accused the named civil plaintiffs, the 19-criminal court witnesses, and the sexual assault crime victims, including "JANE DOE #6", their legal representatives (including each of plaintiff's counsel), the New York State Office of Medical Conduct, and the New York District Attorney's Office, of lying, being untruthful, after a "money grab" and on a "witch-hunt".

903. Defendants, their agents, servants, employees, lawyers and legal team, have further judicially and extrajudicially accused the named civil plaintiffs, the 19-criminal court witnesses, the sexual assault crime victims, including "JANE DOE #6", and their legal representatives of controlling, manipulating, commandeering, and illegally coercing and influencing both the New York State Office of Medical Conduct, and the New York District Attorney's Office, to criminally prosecute a "completely innocent" and "respected doctor" - who, in reality, is a criminal and deviant sexual predator.

904. Defendants, their agents, servants, employees, lawyers and legal teams knew or should have known the their invective and personal attacks upon the sexual assault survivors and their counsel were untrue and were made with malicious intent.

905. As a result of their false and damaging statements, the named civil plaintiffs, the 19-criminal court witnesses, the sexual assault crime victims including "JANE DOE #6" have been further emotionally and psychologically injured and their reputations have been damaged and impaired.

906. Multiple versions of defendants' defamatory and scurrilous statements about the within named plaintiffs and plaintiffs's counsel have been circulated, many of which are, and will be, known to the plaintiffs's family members, neighbors, colleagues, friends, peers, and eventually their own children.

907. Plaintiffs can neither wind back the clock, nor can they unring the bell, on defendants's undignified, false, and malicious statements about their lack of veracity and ethical composition.

908. Defendants's injurious, untrue and malicious averments, attacks and knowingly false statements constitute defamation per se.

909. The within named defendants are all jointly and severally liable for defamation of the names and reputations of the plaintiffs named herein in an amount to be determined at trial.

AS AND FOR A TENTH CAUSE OF ACTION FOR "JANE DOE #6" FOR
PUNITIVE DAMAGES - ALL DEFENDANTS

910. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1. through 909. inclusive, with the same force and effect as if hereinafter set forth at length.

911. Defendant ROBERT HADDEN's sexual assault of plaintiff "JANE DOE #6" - and multiple other named and unnamed patients - as well as Defendant "MEDICAL ENTITIES"'s gross negligence, willfulness, and wantonness concerning the improper hiring, retention, lack of supervision, and other reckless acts and omissions set forth herein, constitute intentional, extreme, and outrageous conduct of the highest order.

912. Such grossly reckless conduct is motivated by greed, self-seeking, self-interest, deliberate indifference, deviant sexual desire, and is the product of malicious and evil minds such that the imposition of punitive damages are warranted.

913. Punitive damages are justified in cases like this to both punish the wrongdoers - and also to hold them out as examples to the rest of the community - such that these defendants, and others that may be similarly situated, are clearly and explicitly discouraged from engaging in these kinds of grossly deviant and abhorrent behaviors in the future.

914. For purposes of particularization of the acts which constitute and mandate the imposition of punitive damages committed by the within named defendants, it is stated that defendant ROBERT HADDEN - while pretending to render medical care to obstetric and gynecology patients - serially, and criminally, sexually assaulted numerous female patients at defendant MEDICAL ENTITIES's obstetric and gynecologic clinics - both on the East and West sides of Manhattan. Further, evidence exists that defendant "MEDICAL ENTITIES" enabled ROBERT HADDEN to continue to sexually assault their patients, and instead of terminating him and reporting him to the Criminal Authorities, they simply moved him from one clinic to another in an effort to conceal his criminal activity. Moreover, evidence has surfaced from the Criminal Action which demonstrates that defendant ROBERT HADDEN has been sexually assaulting and

sexually abusing patients on the premises of defendant "MEDICAL ENTITIES" for approximately 15-20 years, - all the way back into the 1990's.

915. Defendant ROBERT HADDEN should have already been the subject of an internal and Criminal Investigation by the time that he sexually assaulted plaintiff "JANE DOE #6". However, defendant MEDICAL ENTITIES failed to act on the information and enabled defendant ROBERT HADDEN to continue to sexually assault other women on its premises - despite a long history of sexually assaulting patients.

916. Said criminal investigation of ROBERT HADDEN occurred as a result of defendant ROBERT HADDEN's criminal sexual assault of another female patient at a clinic that was also affiliated with - and/or owned and operated by - defendant MEDICAL ENTITIES.

917. Despite defendant ROBERT HADDEN being the subject of a criminal investigation for the sexual assaults of a female patients, defendant MEDICAL ENTITIES failed to commence a timely and proper inquiry into the actions of defendant ROBERT HADDEN relative to the events surrounding the District Attorney's active criminal investigation.

918. Despite defendant ROBERT HADDEN being the subject of a criminal investigation for the sexual assaults of female patients, defendant MEDICAL ENTITIES continued to allow defendant ROBERT HADDEN to maintain his privileges at their hospitals, medical facilities, offices, and/or clinics, without any restrictions, limitations, preceptors, chaperones or additional supervision, where defendant ROBERT HADDEN was allowed to continue preying on unsuspecting women.

919. While being allowed to continue preying on women at defendant MEDICAL ENTITIES's hospitals, medical facilities, offices, and/or clinics without any restrictions, limitations, preceptors, chaperones or additional supervision, defendant ROBERT HADDEN continued to sexually assault female patients.

920. While sexually assaulting female patients - seemingly at will - due to the utter indifference of defendant MEDICAL ENTITIES as well as the indifference of MEDICAL ENTITIES's agents, servants, and employees, defendant ROBERT HADDEN sexually assaulted plaintiff "JANE DOE #6".

921. Plaintiff "JANE DOE #6" was an hiv-positive female gynecology patient of defendant ROBERT HADDEN and defendant "MEDICAL ENTITIES", their agents, servants, and/or employees at the time when defendant ROBERT HADDEN forcibly and criminally sexually assaulted her in the course of a purported examination on May 7, 2012 upon the premises of defendant "MEDICAL ENTITIES" and further exposed this patient, and other patients, to an increased risk of physical, emotional and psychological harm.

922. Defendant ROBERT HADDEN performed repeated and unneeded examinations and testing including vaginal exams and breast exams that were not consistent with the standard of care, and performed solely for his own sick sexual pleasure and defendant MEDICAL ENTITIES's financial gain. Despite the repeated sexual abuse being committed by defendant ROBERT HADDEN, nothing was done by DEFENDANT MEDICAL ENTITIES, their agents,

servants, and/or employees to stop ROBERT HADDEN from sexually assaulting patients, to the patients's detriment; to ROBERT HADDEN's sexual pleasure; and to the defendant MEDICAL ENTITIES's financial benefit.

923. Defendant MEDICAL ENTITIES, their agents, servants, and/or employees had knowledge and/or awareness of the prior and ongoing sexual assaults and sexual abuse being committed but chose to do nothing to protect their female patients from further sexual assaults by defendant ROBERT HADDEN.

924. Defendant MEDICAL ENTITIES, their agents, servants, and/or employees had knowledge and/or awareness of the sexual assault of patient JANE DOE #6 on May 7, 2012, but chose to do nothing to protect her.

925. As a result of defendant MEDICAL ENTITIES's gross indifference and wanton lack of regard for the safety and well-being of its female patients, plaintiff "JANE DOE #6" has become yet another one of the countless sexual assault victims - and now survivors - of defendant ROBERT HADDEN and defendant "MEDICAL ENTITIES".

926. Defendant MEDICAL ENTITIES's indolence and complicity - as well the prurient, deviant, and criminal sexual exploits of defendant ROBERT HADDEN on the premises of defendant "MEDICAL ENTITIES" - is abhorrent.

927. Punitive damages are necessary under these facts.

WHEREFORE, plaintiffs demand judgment against defendants in such sum as a jury would find fair, adequate, just and appropriately punitive.

Dated: New York, New York
March 15, 2017

Law Office of Anthony T. DiPietro, P.C.



By:
Anthony T. DiPietro
Attorney for Plaintiffs
The Woolworth Building
233 Broadway - Suite 2700
New York, New York 10279
(212) 233-3600

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

Index No.: 152438/2017

-----X
JANE DOE #3, JANE DOE #4, JANE DOE #5,
and JANE DOE #6,

Plaintiffs,

- against -

THE NEW YORK AND PRESBYTERIAN HOSPITAL;
COLUMBIA PRESBYTERIAN MEDICAL CENTER;
COLUMBIA UNIVERSITY MEDICAL CENTER;
COLUMBIA-PRESBYTERIAN MEDICAL CENTER,
EAST SIDE ASSOCIATES; EAST SIDE ASSOCIATES;
ROBERT HADDEN; THE TRUSTEES
OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK;
COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS
AND SURGEONS; PRESBYTERIAN HOSPITAL
PHYSICIAN SERVICES ORGANIZATION, INC.;
COLUMBIA-CORNELL CARE, LLC; COLUMBIA
CORNELL NETWORK PHYSICIANS, INC.;
SLOANE HOSPITAL FOR WOMEN,

**CERTIFICATE
OF MERIT**

Defendants.

-----X
STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

ANTHONY T. DIPIETRO, being duly sworn, deposes and states the following to be true under the penalties of perjury of the State of New York.

I have reviewed the facts of this case and have consulted with at least one physician who is licensed to practice medicine in the State of New York and who I reasonably believe is knowledgeable in the relevant issues involved in this matter. I have concluded on the basis of the review and the consultation that there is a reasonable basis for the commencement of this action.

Dated: New York, New York
March 15, 2017



Anthony T. DiPietro, Esq.

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

Index No.: 152438/2017

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JANE DOE #3, JANE DOE #4, JANE DOE #5,
and JANE DOE #6,

Plaintiffs,

- against -

THE NEW YORK AND PRESBYTERIAN HOSPITAL;
COLUMBIA PRESBYTERIAN MEDICAL CENTER;
COLUMBIA UNIVERSITY MEDICAL CENTER;
COLUMBIA-PRESBYTERIAN MEDICAL CENTER,
EAST SIDE ASSOCIATES; EAST SIDE ASSOCIATES;
ROBERT HADDEN; THE TRUSTEES OF
COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK;
COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS
AND SURGEONS; PRESBYTERIAN HOSPITAL
PHYSICIAN SERVICES ORGANIZATION, INC.;
COLUMBIA-CORNELL CARE, LLC; COLUMBIA
CORNELL NETWORK PHYSICIANS, INC.;
SLOANE HOSPITAL FOR WOMEN,

**ATTORNEY
VERIFICATION**

Defendants.

-----X
STATE OF NEW YORK) ss:
COUNTY OF NEW YORK)

ANTHONY T. DIPIETRO, an attorney duly admitted to practice law in the Courts of the State of New York, and attorney for the plaintiffs in the within action, hereby affirms under the penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the same is true to his own knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters he believes it to be true. That the sources of his information and knowledge are investigations and records in the file.

That the reasons this verification is made by affirmant and not by the plaintiffs is in order to protect the identity of the plaintiff under NY Civil Rights Law § 50-b.

Dated: New York, New York
March 15, 2017



Anthony T. DiPietro, Esq.

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

Index No.: 152438/2017

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JANE DOE #3, JANE DOE #4, JANE DOE #5,
and JANE DOE #6,

Plaintiffs,

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THE NEW YORK AND PRESBYTERIAN HOSPITAL;
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COLUMBIA UNIVERSITY MEDICAL CENTER;
COLUMBIA-PRESBYTERIAN MEDICAL CENTER,
EAST SIDE ASSOCIATES; EAST SIDE ASSOCIATES;
ROBERT HADDEN; THE TRUSTEES OF
COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK;
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AND SURGEONS; PRESBYTERIAN HOSPITAL
PHYSICIAN SERVICES ORGANIZATION, INC.;
COLUMBIA-CORNELL CARE, LLC; COLUMBIA
CORNELL NETWORK PHYSICIANS, INC.;
SLOANE HOSPITAL FOR WOMEN,

**NOTICE REGARDING
AVAILABILITY OF
ELECTRONIC FILING**

Defendants.
-----X

PLEASE TAKE NOTICE that plaintiff(s)/defendant(s) in the case captioned above consents and intends that this matter shall proceed as an electronically-filed case in the Filing by Electronic Means System (“FBEM”) in accordance with the procedures therefor, described below. Service of papers by electronic means cannot be made upon a party unless that party consents to use of the system. As soon as possible after service of this Notice, each party served must indicate whether it consents.

General Information

In New York State, actions may be commenced and cases processed by means of the FBEM system in (1) tax certiorari claims in the Supreme Court in New York City and in Monroe, Westchester, and Suffolk Counties; (2) tort claims, and commercial claims in the Commercial Division, in the Supreme Court in New York City and in Albany, Monroe, Nassau, Suffolk, and Westchester counties; (3) commercial claims in the Commercial Division of Supreme Court, and proceedings in Surrogate’s Court, in Erie County; and (4) selected claims against the State of New York.

Electronic filing offers significant benefits for attorneys and litigants, permitting papers to be filed with the court and served in a simple, convenient and expeditious manner. FBEM case documents are filed with the court by filing on the FBEM Website (go to “E-Courts” at

www.nycourts.gov), which can be done at any time of the day or night. The documents are deemed filed when they are received by the Unified Court System server. The use of FBEM is governed by Section 202.5-b (Supreme Court), and 206.5 and 206.5-aa (Court of Claims) of the Uniform Rules for the Trial Courts.

Instructions

1. The service of this Notice constitutes a statement of intent by the undersigned that the FBEM system be used in this case. When an action or proceeding is being commenced by means of the system, this Notice must accompany service of the initiating papers.

2. As soon as possible after service of this Notice, the party served shall advise all parties whether it will agree to have the matter proceed by FBEM. Where the party served agrees, that party must, as soon as possible after service, file with the court and serve on all parties a Consent to FBEM. A Consent form can be found in the "Forms" Section of the FBEM Website. The form and other aspects of FBEM are explained in the User's Manual, available on the Website. When this Notice Regarding Availability is served with papers initiating a lawsuit, the consent must be filed prior to service of or with the responsive pleadings or motion addressed to the pleadings.

3. Once parties agree that the case will be subject to FBEM, each must PROMPTLY submit a Filing User Registration form (see the "Forms" section of the Website) to obtain the confidential Filing User Identification Number and Password necessary to use the system. A party represented by an attorney who has previously registered as a Filing User in another case may file and serve the Consent to FBEM electronically by checking the designated box and following the instructions on the FBEM Website.

4. For additional information about FBEM, see the User's Manual and Frequently Asked Questions on the Website or contact the court in question or the FBEM Resource Center (at 646-386-3033).

Dated: New York, New York
March 15, 2017

Law Office of Anthony T. DiPietro, P.C.



By:
Anthony T. DiPietro
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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No.: 152438/2017

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JANE DOE #3, JANE DOE #4, JANE DOE #5,
and JANE DOE #6,

Plaintiffs,

- against -

THE NEW YORK AND PRESBYTERIAN HOSPITAL;
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COLUMBIA UNIVERSITY MEDICAL CENTER;
COLUMBIA-PRESBYTERIAN MEDICAL CENTER,
EAST SIDE ASSOCIATES; EAST SIDE ASSOCIATES;
ROBERT HADDEN; THE TRUSTEES OF
COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK;
COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS
AND SURGEONS; PRESBYTERIAN HOSPITAL
PHYSICIAN SERVICES ORGANIZATION, INC.;
COLUMBIA-CORNELL CARE, LLC; COLUMBIA
CORNELL NETWORK PHYSICIANS, INC.;
SLOANE HOSPITAL FOR WOMEN,

CONSENT TO FBEM

Defendants.

-----X
ANTHONY T. DIPIETRO, an attorney duly admitted to practice law before the Courts of the State of New York, and member of the **LAW OFFICE OF ANTHONY T. DIPIETRO**, attorney for the plaintiffs herein, hereby consents to the use of FBEM in this action. We further consent to be bound by the service and filing provisions of the FBEM Rules 22 N.Y.C.R.R. § 202.5-b and to comply with the User’s Manual approved by the Chief Administrator of the Courts.

We have designate and set forth below the following internet email address for the purposes of service and giving notice of each filing:

Cases@ATDLaw.com

Dated: New York, New York
March 15, 2017

Law Office of Anthony T. DiPietro, P.C.

A handwritten signature in black ink, appearing to read 'Anthony T. DiPietro', written over a light gray rectangular background.

By:
Anthony T. DiPietro
Attorney for Plaintiffs
The Woolworth Building
233 Broadway - Suite 2700
New York, New York 10279
(212) 233-3600

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK Index No.: 152438/2017

JANE DOE #3, JANE DOE #4, JANE DOE #5,
and JANE DOE #6,

Plaintiffs,

- against -

THE NEW YORK AND PRESBYTERIAN HOSPITAL;
COLUMBIA PRESBYTERIAN MEDICAL CENTER;
COLUMBIA UNIVERSITY MEDICAL CENTER;
COLUMBIA-PRESBYTERIAN MEDICAL CENTER,
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PHYSICIAN SERVICES ORGANIZATION, INC.;
COLUMBIA-CORNELL CARE, LLC; COLUMBIA
CORNELL NETWORK PHYSICIANS, INC.;
SLOANE HOSPITAL FOR WOMEN,

Defendants.

PLAINTIFFS' VERIFIED COMPLAINT

LAW OFFICE OF ANTHONY T. DIPIETRO, P.C.

Attorney for Plaintiffs

Office and Post Office Address and Telephone Number:

The Woolworth Building
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New York, New York 10279
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To: ALL PARTIES