

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

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JEAN CARLOS LEBRON STERLING, p/k/a SOSOBRYTA,

Plaintiffs,

- against -

SUMMONS

Index:

Basis of Venue: Occurrence of
Incident – 1564 Broadway, New
York, New York 10036

EMMANUEL REYES, p/k/a EL MAYOR CLASICO;

Defendant.

Jury Trial Demanded

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To the above-named defendant:

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer or, if the complaint is not served with this summons, to serve a Notice of Appearance on the plaintiff’s attorney within twenty days after service of this summons exclusive of the day of service where service is made by delivery upon you personally within the state, or within thirty days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: New York, New York
October 19, 2018

Law Offices of Javier A. Solano, PLLC
The Empire State Building
350 Fifth Avenue, Suite 5900
New York, New York 10118
(212) 714-6600 (tel)



Javier A. Solano, Esq.
Attorney for Plaintiff

Defendant’s Address:

EMMANUEL REYES, p/k/a EL MAYOR CLASICO: c/o Ulloa Productions, 37 Vermilyea Avenue, #1C, New York, New York 10034

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

INDEX No. _____/2018

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JEAN CARLOS LEBRON STERLING, p/k/a
SOSOBRITA,

COMPLAINT

Plaintiff,

Index Purchased: 10/19/2018

-against-

Basis of Venue: Occurrence of
Incident: 1564 Broadway, New
York, New York 10036

EMMANUEL REYES, p/k/a EL MAYOR CLASICO

Defendant.

Plaintiff, JEAN CARLOS LEBRON STERLING, p/k/a, by and through counsel, the
Law Offices of Javier A. Solano, Esq., PLLC, upon information and belief, alleges as follows:

JURISDICTION, VENUE, AND PARTIES

1. This action is being brought in Supreme Court, New York County, because the
amount in recovery exceeds the jurisdictional levels of all lower courts, and because the incidents
occurred in New York County.

2. Plaintiff JEAN CARLOS LEBRON STERLING, professionally known as
SOSOBRITA is a resident of the city of Santo Domingo, Dominican Republic.

3. Defendant EMMANUEL REYES, professionally known as EL MAYOR
CLASICO is a resident of the city of Santo Domingo, Dominican Republic.

STATEMENT OF FACTS

4. This action arises from Plaintiff JEAN CARLOS LEBRON STERLING, p/k/a
SOSOBRITA (hereinafter referred to as “SOSABRITA”) being violently attacked as a result of the
negligent, reckless and/or intentional conduct of Defendant EMMANUEL REYES, p/k/a EL MAYOR

CLASICO (hereinafter referred to as “EL MAYOR”) which legally caused severe and permanent injuries.

5. At all times relevant to this incident, the Plaintiff SOSOBRITA was the owner and operator of the company Sosobritamusic. SOSOBRITA has been the manager and/or promotor for successful artists within the Spanish-language music industry.

6. At all times relevant to this incident, the Plaintiff SOSOBRITA was a well-respected public figure within the Spanish-language music industry.

7. At all times relevant to this incident, the Plaintiff SOSOBRITA maintained a significant online presence on various social media platforms including FACEBOOK, TWITTER, INSTAGRAM and www.sosobritamusic.net. Currently the social media platforms created by and maintained by Plaintiff SOSOBRITA have more than 200 thousand active users.

8. Plaintiff SOSOBRITA and Defendant EL MAYOR were attending the Urban Awards Gala at the United Palace Theater on September 20, 2018.

9. Upon information and belief, the Defendant EL MAYOR had various forms of interest and/or motives to cause harm to Plaintiff SOSOBRITA.

10. Upon information and belief, the Defendant EL MAYOR, and others known and unknown conspired to create a plan to negligently, recklessly and/or intentionally cause the Plaintiff to suffer physical harm, suffering and intimidation. Defendant EL MAYOR engaged in these negligent, reckless and/or intention acts and/or omissions relating to the plan to attack the Plaintiff with a conscious disregard for public safety for purposes of (a) directly gaining financial profits or (b) for creating and/or supporting a reputation as a dangerous group of people who should not be disrespected or else they will cause physical or harmful consequences which Defendant EL MAYOR believed would indirectly result in gaining additional financial profits.

11. On September 20, 2018 at the United Palace Theater, suddenly and without any provocation or warning, Defendant EL MAYOR, who has a known history of being unable to control his impulsiveness, carelessness, thoughtlessness, incompetence, irrationality, intoxication or negligent, reckless and violent tendencies, noticed that Plaintiff SOSOBRITA was within the same part of the venue as he was.

12. The Defendant EL MAYOR negligently, recklessly and/or intentionally proceeded to run in the Plaintiff's direction and violently struck him about the face with full force which legally caused and proximately caused Plaintiff SOSOBRITA severe and permanent injuries, harms and losses some of which are known, others of which are unknown at this time.

13. The Defendant's actions caused and will continue to cause injury to the

14. There was no expectation of the attack by Plaintiff SOSOBRITA and there was no time or ability to avoid or prevent the attack by Defendant EL MAYOR.

15. Following the attack, upon information and belief, the Defendant EL MAYOR caused video recordings of the incident to be published on various social media platforms including but not limited to FACEBOOK, TWITTER, and INSTAGRAM.

16. The publishing of the video of the incident has caused and will continue to cause reputational damage to the Plaintiff SOSOBRITA.

17. As a direct and proximate result of Defendant's actions, the Plaintiff SOSOBRITA experienced personal and physical injuries, pain and suffering, fear, an invasion of privacy, psychological pain, emotional distress, mental anguish, embarrassment, humiliation, and financial loss.

18. The Plaintiff is also entitled to receive punitive damages from the Defendant because their actions were motivated by extreme recklessness and indifference to the plaintiffs' rights.

FIRST CLAIM
(INTENTIONAL AND NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS)

19. Plaintiff repeats and realleges all the foregoing paragraphs as if the same were fully set forth at length herein.

20. That by virtue of the occurrence and Defendant negligently and/or intentionally inflicted emotional harm upon Plaintiff.

21. The Defendant's actions against Plaintiff were extreme and outrageous and caused Plaintiff severe emotional distress.

22. The Defendant breached a duty owed to the Plaintiff that either unreasonably endangered Plaintiff's physical safety, or caused the Plaintiff to fear for his own safety.

SECOND CLAIM
(NEGLIGENCE, GROSS NEGLIGENCE)

23. Plaintiff repeats and realleges all the foregoing paragraphs as if the same were fully set forth at length herein.

24. Defendant are liable to Plaintiff because Defendant owed plaintiff a cognizable duty of care as a matter of law, and breached that duty.

THIRD CLAIM
(ASSAULT AND BATTERY UNDER STATE LAW)

25. Plaintiff repeats and realleges all the foregoing paragraphs as if the same were fully set forth at length herein.

26. Among other things, as described above, Defendant's attack against Plaintiff placed him in fear of imminent harmful and offensive physical contacts.

27. Among other things, as described above, Defendant's attack against Plaintiff was an illegal physical contact.

28. Accordingly, Defendant is liable to Plaintiff for assault and battery.

WHEREFORE, Plaintiff demands a jury trial and the following relief:

- (a) Compensatory damages in an amount to be determined by a jury;
- (b) Punitive damages in an amount to be determined by a jury;
- (c) Costs, disbursements, and legal fees.

Dated: October 19, 2018
New York, New York

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Attorney for Plaintiff