

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

----- X
VLADISLAV DORONIN,
Plaintiff,
-against-
NAOMI CAMPBELL,
Defendant.
----- X

: Index No. _____
:
: Date Purchased: _____
:

: **SUMMONS WITH NOTICE**
:

: Plaintiff designates New York County as the
: place of trial
:

: Venue is proper pursuant to
: CPLR §§ 503, 509
:
:

TO THE ABOVE NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED and required to appear in this action by serving a copy of your notice of appearance upon the undersigned within twenty (20) days after the service of this summons, exclusive of the day of service, or within thirty (30) days after service is complete, if this summons is not personally delivered to you within the state of New York. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the notice set forth below.

This Court has jurisdiction over this proceeding pursuant to CPLR §§ 301 and 302.

Venue is proper in this Court pursuant to CPLR §§ 503 and 509, in that Plaintiff has designated New York County as the place of trial.

NOTICE:

The nature of this action is for damages, replevin of Plaintiff's personal property, conversion of Plaintiff's personal property, and declaratory relief, among other things, arising from Defendant's wrongful refusal to repay loans made by Plaintiff to Defendant, as well as her

refusal to return certain personal property belonging to Plaintiff, in contravention of, and in interference with, the rights of Plaintiff.

The remedies sought by Plaintiff in this action includes, but ultimately may not be limited to, monetary damages, injunctive relief and/or an order of seizure under Article 71 of the CPLR ordering the return of personal property valued in excess of \$3 million, as well as costs, and fees, and such other relief as this Court may deem just and proper.

Upon your failure to appear, judgment will be taken against you by default for the relief sought, including for compensatory damages in an amount to be determined at trial, together with interest, attorneys' fees and costs, and such other relief as the Court may award.

Dated: New York, New York
September 4, 2020

KASOWITZ BENSON TORRES LLP

By: /s/ Paul M. O'Connor III
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