

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

-----X
ANONYMOUS,

Plaintiffs,

-against-

WILLIAM COSBY, JR., NBCUNIVERSAL
MEDIA, LLC, KAUFMAN ASTORIA STUDIOS,
INC., ASTORIA STUDIOS LIMITED
PARTNERSHIP II, and THE CARSEY-WERNER
COMPANY, LLC,

Defendants.
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Index No. _____/2023

SUMMONS

Plaintiff designates
NEW YORK COUNTY
as place of trial.

Venue is based on the
location where a
substantial part of the
events giving rise to the
claims occurred.

To the above-named defendants:

WILLIAM COSBY, JR.
8210 New Second Street
Elkins Park, PA 01370

532 Bardwells Ferry Road
Shelburne Falls, MA 01370-9747

NBCUNIVERSAL MEDIA, LLC
30 Rockefeller Plaza
New York, New York 10112

KAUFMAN ASTORIA STUDIOS, INC.
34-12 36th Street
Queens, New York 11106

ASTORIA STUDIOS LIMITED PARTNERSHIP II
34-12 36th Street
Astoria, New York 11106

THE CARSEY-WERNER COMPANY, LLC
16027 Ventura Boulevard, Ste. 600
Encino, California 91436

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 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 your failure to appear or answer, judgement will be taken for the relief demanded herein.

A COPY OF THIS SUMMONS WAS FILED WITH THE CLERK OF THE COURT, NEW YORK COUNTY ON NOVEMBER 20, 2023 IN COMPLIANCE WITH CPLR §§ 305(a) AND 306(a).

Dated: November 20, 2023
New York, New York

MERSON LAW, PLLC

By: /s/Jordan Rutsky
Jordan Rutsky, Esq.
Jordan Merson, Esq.
Attorneys for Plaintiffs
950 Third Avenue, 18th Floor
New York, New York 10022
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SUPREME COUR OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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ANONYMOUS,

Index No. _____/2023

Plaintiff,

VERIFIED COMPLAINT

-against-

WILLIAM COSBY, JR., NBCUNIVERSAL
MEDIA, LLC, KAUFMAN ASTORIA
STUDIOS, INC., ASTORIA STUDIOS
LIMITED PARTNERSHIP II, and THE
CARSEY-WERNER COMPANY, LLC,

Defendants.

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Plaintiff Anonymous, complaining of William Cosby, Jr., NBC Universal Media, LLC, Kaufman Astoria Studios, Inc., Astoria Studios Limited Partnership II, and The Carsey-Werner Company, LLC, by and through her attorneys, Merson Law, PLLC, respectfully alleges:

1. This action is brought under the Adult Survivors Act, CPLR 214-j, by Anonymous, who was sexually abused by defendant William Cosby, Jr. (“Cosby”), when he used the power, authority, fame, resources, and prestige given to him by defendants NBCUniversal Media, LLC, Kaufman Astoria Studios, Inc., Astoria Studios Limited Partnership II, and The Carsey-Werner Company, LLC, to gain access to and sexually abuse Anonymous.

2. Over the course of several decades, Cosby engaged in the serial sexual assault of dozens of women for his sexual gratification while the co-defendants

enabled and aided these assaults to financially benefit from their association with Cosby.

3. In performing these sexual assaults, Cosby committed multiple torts, including, but not limited to, sexual assault, sexual battery, intentional infliction of emotional distress, and false imprisonment, pursuant to New York common law.

4. Defendants NBCUniversal Media, LLC, Kaufman Astoria Studios, Inc., Astoria Studios Limited Partnership II, and The Carsey-Werner Company, LLC are also culpable and liable because they knew and/or should have known Cosby was sexually abusing, preying on, grooming, assaulting, and/or battering women using the power, authority, resources, and facilities they provided to Cosby, but did nothing to stop it.

5. Defendants NBCUniversal Media, LLC, Kaufman Astoria Studios, Inc., Astoria Studios Limited Partnership II, and The Carsey-Werner Company, LLC did not investigate, reprimand, supervise nor in any way try to stop Cosby from sexually abusing, assaulting and/or battering women.

6. Moreover, defendants NBCUniversal Media, LLC, Kaufman Astoria Studios, Inc., Astoria Studios Limited Partnership II, and The Carsey-Werner Company, LLC condoned and encouraged Cosby's preying upon, grooming, and sexually assaulting women associated with *The Cosby Show*, including on company premises, by doing nothing to stop it despite knowledge of his serial sexual abuse of women, and by providing Cosby with power, authority, resources, and facilities to access, groom, and sexually abuse women.

7. Anonymous's claims against defendants NBCUniversal Media, LLC, Kaufman Astoria Studios, Inc., Astoria Studios Limited Partnership II, and The Carsey-Werner Company, LLC are for their negligence and negligent hiring, retention, and supervision because they knew or should have known that Cosby was preying upon, grooming, sexually assaulting, assaulting, and battering women using the power, fame, resources, and prestige they bestowed upon Cosby, but failed to stop it, investigate it, or protect Anonymous and other women.

PARTIES

8. When Anonymous was sexually abused by Cosby, Cosby was a resident of New York County, New York.

9. At all relevant times, Cosby was a serial sexual assaulter of women, by, among other things, drugging women so that he could engage in sexual acts with said women without their consent, raping women, forcibly touching women, and/or forcing women to engage in sexual acts with him without their consent.

10. NBCUniversal Media, LLC (hereinafter, "NBC") is a foreign limited liability company authorized to do business in the State of New York, with its principal place of business in New York County, New York.

11. To the extent that NBC was a different entity, corporation, or organization during the relevant time periods set forth herein, such entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit and is named in the caption and in this complaint as NBCUniversal Media, LLC.

12. To the extent that NBC is a successor to a different entity, corporation, or organization which existed during the relevant time periods set forth herein, including any entity, corporation, or organization that subsequently or eventually merged into NBC, such predecessor entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit and is named in the caption and in this complaint as NBCUniversal Media, LLC.

13. All such NBC-related entities, corporations, or organizations are collectively identified and referred to herein as “NBC” and are included within the designation, “Defendants.”

14. At all relevant times, Cosby was an agent, servant, and/or employee of NBC.

15. Kaufman Astoria Studios, Inc. (hereinafter, “Kaufman Astoria”) is a domestic business corporation with its principal place of business in New York County, New York.

16. To the extent that Kaufman Astoria was a different entity, corporation, or organization during the relevant time periods set forth herein, such entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit and is named in the caption and in this complaint as Kaufman Astoria Studios, Inc.

17. To the extent Kaufman Astoria is a successor to a different entity, corporation, or organization which existed during the relevant time periods set forth herein, including any entity, corporation, or organization that subsequently or

eventually merged into Kaufman Astoria, such predecessor entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit and is named in the caption and in this complaint as Kaufman Astoria Studios, Inc.

18. All such Kaufman Astoria-related entities, corporations, or organizations are collectively identified and referred to herein as “Kaufman Astoria” and are included within the designation, “Defendants.”

19. At all relevant times, Cosby was an agent, servant, and/or employee of Kaufman Astoria.

20. Astoria Studios Limited Partnership II (hereinafter, “ASLP II”) is a domestic limited partnership with its principal place of business in New York County, New York.

21. To the extent that ASLP II was a different entity, corporation, or organization during the relevant time periods set forth herein, such entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit and is named in the caption and in this complaint as Astoria Studios Limited Partnership II.

22. To the extent ASLP II is a successor to a different entity, corporation, or organization which existed during the relevant time periods set forth herein, including any entity, corporation, or organization that subsequently or eventually merged into ASLP II, such predecessor entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit and is named in the caption and in this complaint as Astoria Studios Limited Partnership II.

23. All such ASLP II-related entities, corporations, or organizations are collectively identified and referred to herein as “ASLP II” and are included within the designation, “Defendants.”

24. At all relevant times, Cosby was an agent, servant, and/or employee of ASLP II.

25. The Carsey-Werner Company, LLC (hereinafter, “Carsey-Werner”) is a foreign limited liability corporation with its principal place of business in California.

26. To the extent Carsey-Werner was a different entity, corporation, or organization during the relevant time periods set forth herein, such entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit and is named in the caption and in this complaint as The Carsey-Werner Company, LLC.

27. To the extent that Carsey-Werner is a successor to a different entity, corporation, or organization which existed during the relevant time periods set forth herein, including any entity, corporation, or organization that subsequently or eventually merged into Carsey-Werner, such predecessor entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit and is named in the caption and in this complaint as The Carsey-Werner Company, LLC.

28. All such Carsey-Werner-related entities, corporations, or organizations are collectively identified and referred to herein as “Carsey-Werner” and are included within the designation, “Defendants.”

29. At all relevant times, Carsey-Werner transacted business within New York State under which it supplied goods or services in the state.

30. At all relevant times, Carsey-Werner committed a tortious act within the state, as set forth below.

31. At all relevant times, Carsey-Werner committed tortious acts outside the state causing injury to persons within the state, as set forth below.

32. At all relevant times, Carsey-Werner regularly did or solicited business, or engaged in any other persistent course of conduct or derived substantial revenue from goods consumed or used or services rendered in New York.

33. At all relevant times, Carsey-Werner expected or should have reasonably expected that its actions would have consequences in the state of New York.

34. At all relevant times, Carsey-Werner derived substantial revenue from interstate or international commerce.

35. At all relevant times, Cosby was an agent, servant, and/or employee of Carsey-Werner.

36. At all relevant times, Cosby, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner were agents of each other.

37. From approximately 1984 through 1992, defendants Cosby, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner owned, operated, managed, controlled, and/or supervised the production of the television program *The Cosby Show*.

38. At all relevant times, *The Cosby Show* was filmed at a facility owned, operated, controlled, managed, and/or supervised by Kaufman Astoria, ASLP II, Carsey-Werner, and/or NBC, in Queens County, New York.

39. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner financially benefited from their relationship with Cosby and the success of *The Cosby Show*.

40. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner financially benefited from the public perception of Cosby as “America’s Dad,” and as a morally upstanding father figure.

41. At all relevant times, the employees, agents, and/or servants of NBC, Kaufman Astoria, ASLP II, and Carsey-Werner facilitated the sexual assault of women by Cosby by, among other things, bestowing Cosby with power or the appearance of power at *The Cosby Show* and beyond, despite his propensity toward sexual assault of women and his active serial sexual assaults of women associated with *The Cosby Show*; permitting Cosby access to women; providing women to Cosby to be sexually assaulted; providing Cosby with resources and staff to aid or cover up his sexual abuse of women; failing to protect the women involved in *The Cosby Show*, including employees and interns staffed on the *The Cosby Show*; encouraging women to interact with Cosby without adequate supervision; providing locations for Cosby to sexually assault women; covering up the sexual assaults of said women; and implicitly approving and ratifying the sexual assaults through inaction or the other actions set forth herein.

FACTS OF THE CASE

42. In or around the late 1980s, Anonymous was employed as a stand-in at *The Cosby Show*.

43. While employed as a stand-in at *The Cosby Show*, Anonymous first met Cosby.

44. After their first meeting, Cosby offered to act as Anonymous' mentor in her acting career.

45. Following their first meeting, Cosby acted as Anonymous' mentor. The mentorship included performing acting exercises in Cosby's dressing room at *The Cosby Show*, recommending changes to Anonymous' appearance, and offering to help Anonymous obtain acting roles.

46. After establishing a mentoring relationship with Anonymous at *The Cosby Show*, Cosby invited Anonymous to his home.

47. Based on the relationship that Cosby fostered with Anonymous at *The Cosby Show*, the professional relationship she had with Cosby through her employment at *The Cosby Show* and at the studio where *The Cosby Show* was filmed, and Cosby's wholesome image as "America's Dad," Anonymous accepted Cosby's invitation to his home.

48. Once in Cosby's home, Cosby provided Anonymous with wine.

49. Upon information and belief, Cosby had placed or had caused to be placed an unknown intoxicant in the wine, without Anonymous' consent or knowledge.

50. Anonymous drank the wine provided to her by Cosby.

51. Following dinner, Cosby took Anonymous upstairs, ostensibly for an acting exercise. By then, Anonymous was already feeling the effects of the wine and/or the unknown intoxicant in the wine.

52. During the acting exercise, Anonymous blacked out because of the wine and/or the unknown intoxicant in the wine.

53. When Anonymous awoke, she was partially undressed and vomiting into a toilet.

54. Upon information and belief, while unconscious Cosby sexually assaulted Anonymous, without her consent and when she was unable to consent.

55. After the assault, Anonymous spoke with an actor at *The Cosby Show* who expressed that Cosby could do whatever he wanted to do with impunity at *The Cosby Show*.

**AS AND FOR A FIRST CAUSE OF ACTION
FOR BATTERY AS AGAINST COSBY**

56. Plaintiff repeats, reiterates, and realleges every allegation contained in all preceding paragraphs with the same force and effect as if hereafter set forth at length.

57. Cosby's unlawful, abusive, manipulative, and predatory acts against Anonymous amounted to harmful and offensive contact to Anonymous's person, each of which was done intentionally by Cosby without Anonymous's consent.

58. Cosby willfully and lawfully used force or violence upon Anonymous.

59. Cosby touched Anonymous with the intent to harm or offend her.

60. Anonymous did not consent to the touching.

61. Cosby's conduct in touching Anonymous was harmful and offensive.

62. As a direct and proximate result of the battery, Anonymous sustained in the past and will continue to sustain in the future psychological injury, pain and suffering, serious and severe psychological and emotional distress, physical injury, mental anguish, embarrassment, and humiliation.

63. As a direct and proximate result of the aforementioned battery, Anonymous has incurred or will incur medical expenses and other economic damages to cure her of the injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

64. By reason of the foregoing, Anonymous is entitled to compensatory damages from Cosby in such sums as a jury would find fair, just, and adequate.

65. By reason of the foregoing, Anonymous is further entitled to punitive damages from Cosby in such sums as a jury would find fair, just, and adequate, to deter Cosby and others from future similar misconduct.

66. As a proximate result of the conduct alleged hereinabove, Anonymous has suffered damages, including special and general damages, according to proof.

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

68. This action falls within exceptions to Article 16 of the CPLR.

**AS AND FOR A SECOND CAUSE OF ACTION
FOR ASSAULT AS AGAINST COSBY**

69. Plaintiff repeats, reiterates, and realleges every allegation contained in all preceding paragraphs with the same force and effect as if hereafter set forth at length.

70. Cosby's predatory, abusive, manipulative, and unlawful acts against Anonymous created a reasonable apprehension in Anonymous of immediate harmful or offensive contact as to Anonymous person, all of which was done intentionally by Cosby to Anonymous without her consent.

71. Cosby unlawfully used physical force against Anonymous.

72. Cosby intentionally placed Anonymous in reasonable apprehension of immediate bodily harm.

73. Cosby intentionally placed Anonymous in reasonable apprehension of immediate bodily harm because of the conduct of Cosby.

74. As a direct and proximate result of the aforementioned assault, Anonymous sustained in the past and will continue to sustain in the future serious and severe psychological injuries and emotional distress, physical injury, mental anguish, embarrassment, and humiliation.

75. As a direct and proximate result of the aforementioned assaults, Anonymous has incurred or will incur medical expenses and other economic damages, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of the injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

76. By reason of the foregoing, Anonymous is entitled to compensatory damages from Cosby in such sums as a jury would find fair, just, and adequate.

77. By reason of the foregoing, Anonymous is further entitled to punitive damages from Cosby in such sums as a jury would find fair, just, and adequate.

78. As a proximate result of the conduct alleged hereinabove, Anonymous has suffered damages, including special and general damages, according to proof.

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

80. This action falls within exceptions to Article 16 of the CPLR.

AS AND FOR A THIRD CAUSE OF ACTION FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AS AGAINST COSBY

81. Plaintiff repeats, reiterates, and realleges every allegation contained in all preceding paragraphs with the same force and effect as if hereafter set forth at length.

82. Cosby engaged in outrageous and extreme conduct toward Anonymous with the intention to cause, or with reckless disregard for the probability of causing, Anonymous to suffer severe emotional distress.

83. Cosby knew Anonymous was incapacitated and could not consent, and he intended to sexually batter Anonymous with a complete disregard of the physical and emotional trauma caused to Anonymous.

84. As a proximate result of the outrageous and extreme conduct of Cosby in assaulting and battering Anonymous, Anonymous suffered and continues to suffer

from extreme mental distress, humiliation, anguish, and emotional and physical injuries, as well as economic losses, in amounts to be proven at trial.

85. Cosby committed the acts alleged herein maliciously, fraudulently, and oppressively with the wrongful intention of injuring Anonymous from an improper or evil motive amounting to malice and/or in conscious disregard of Anonymous's rights, entitling Anonymous to recover punitive damages from Cosby in such sums as a jury would find fair, just, and appropriate, to deter Cosby and others from future similar misconduct.

86. As a direct and proximate result of the intentional infliction of emotional distress, Anonymous sustained in the past and will continue to sustain in the future psychological injury, pain and suffering, serious and severe psychological and emotional distress, physical injury, mental anguish, embarrassment, and humiliation.

87. As a direct and proximate result of the aforementioned intentional infliction of emotional distress, Anonymous has incurred and will incur medical expenses and other economic damages in an effort to cure herself of the injuries and to alleviate her pain and suffering, emotional distress, physical injury, mental anguish, embarrassment, and humiliation. By reason of the foregoing, Anonymous is entitled to compensatory damages from Cosby in such sums as a jury would find fair, just, and adequate.

88. By reason of the foregoing, Anonymous is further entitled to punitive damages from Cosby, in such sums as a jury would find fair, and adequate.

89. As a proximate result of the conduct alleged hereinabove, Anonymous has suffered damages, including special and general damages, according to proof.

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

91. This action falls within exceptions to Article 16 of the CPLR.

**AS AND FOR A FOURTH CAUSE OF ACTION
FOR FALSE IMPRISONMENT AS AGAINST BILL COSBY**

92. Plaintiffs repeat, reiterate and reallege every allegation contained in all preceding paragraphs with the same force and effect as if hereafter set forth at length.

93. Bill Cosby, intentionally and without the right to do so, confined Anonymous.

94. Anonymous was aware of her confinement.

95. As a direct and proximate result of the false imprisonments, Anonymous sustained in the past and will continue to sustain in the future psychological injury, pain, and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment, and humiliation.

96. By reason of the foregoing, Anonymous is entitled to compensatory damages from defendant Bill Cosby in such sums as a jury would find fair, just, and adequate.

97. By reason of the foregoing, Anonymous is further entitled to punitive damages from defendant Bill Cosby in such sums as a jury would find fair, just, and adequate, to deter said Defendant and others from future similar misconduct.

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

99. This action falls within exceptions to Article 16 of the CPLR.

AS AND FOR A FIFTH CAUSE FOR NEGLIGENCE
AS TO NBC, KAUFMAN ASTORIA, ASLP II, AND CARSEY-WERNER

100. Plaintiff repeats, reiterates, and realleges every allegation contained in all preceding paragraphs with the same force and effect as if hereafter set forth at length.

101. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner owed a duty of care to Anonymous and others to properly supervise their employees, agents, and servants, including but not limited to Cosby, and the facility where *The Cosby Show* was produced, such that individuals working on or visiting *The Cosby Show* set were safe from sexual abuse.

102. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner owed a duty of care to Anonymous and others to ensure that their employees, agents, and servants, including but not limited to Cosby, were not using the power, authority, resources, and facilities provided to them by said Defendants to sexually assault, facilitate the sexual assault, and/or cover up the sexual assault of women.

103. At all relevant times, Cosby openly and notoriously engaged in the mistreatment, sexual abuse and sexual assault of women associated with, employed by, and/or visiting *The Cosby Show*.

104. At all relevant times, Cosby openly and notoriously engaged in the mistreatment and abuse of women in the presence of employees of defendants NBC, Kaufman Astoria, ASLP II, and Carsey-Werner.

105. At all relevant times, Cosby's propensity to mistreat and sexually abuse women was known by the employees, servants, and agents of NBC, Kaufman Astoria, ASLP II, and Carsey-Werner.

106. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner knew or should have known that Cosby was a serial sexual assaulter of women and/or had a predilection towards sexually abusing women.

107. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner knew or should have known that Cosby was preying upon and grooming women who were employed by or visiting *The Cosby Show* with the intention of abusing or assaulting said women.

108. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner knew or should have known that Cosby was sexual assaulting women.

109. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner knew or should have known that Cosby was a danger to women.

110. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner bestowed upon Cosby power and authority or the appearance of power and authority, which Cosby used to access, prey upon, groom, and sexually abuse women, including Plaintiff.

111. At all relevant times, Cosby used the power and authority bestowed upon him by NBC, Kaufman Astoria, ASLP II, and Carsey-Werner to access, prey upon, groom, and sexually abuse women, including Plaintiff.

112. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner knew or should have known that Cosby was using the power and authority bestowed upon him by NBC, Kaufman Astoria, ASLP II, and Carsey-Werner to prey upon, groom, and sexually assault women, including individuals working at or visiting the studio where *The Cosby Show* was produced.

113. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner provided Cosby with resources and facilities so that he could access, prey upon, groom, and sexually abuse women.

114. At all relevant times, Cosby used the resources and facilities provided to him by NBC, Kaufman Astoria, ASLP II, and Carsey-Werner to access, prey upon, groom, and sexually abuse women, including Plaintiff.

115. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner knew or should have known that Cosby was using the resources and facilities that they provided to Cosby to access, groom, prey upon, and sexually abuse women, including individuals employed at or visiting *The Cosby Show*, such as Plaintiff.

116. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner provided women to Cosby or arranged for Cosby to be provided with women so that he could prey upon, groom, and sexually abuse said women.

117. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner knew or should have known that Cosby was sexually abusing the women provided to him by NBC, Kaufman Astoria, ASLP II, and Carsey-Werner, including individuals working at or visiting the studio where *The Cosby Show* was produced.

118. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner provided and employed individuals to facilitate and cover up Cosby's serial sexual abuse and rape of women.

119. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner, their employees, agents, and/or servants facilitated and covered up Cosby's serial sexual abuse and rape of women.

120. At all relevant times, employees, servants and/or agents of NBC, Kaufman Astoria, ASLP II, and Carsey-Werner knew or should have known that Cosby was using the employees, agents, and/or servants of NBC, Kaufman Astoria, ASLP II, and Carsey-Werner to facilitate and cover up his sexual assault of women.

121. Even though NBC, Kaufman Astoria, ASLP II, and Carsey-Werner knew or should have known that Cosby was using their facilities, employees, and resources, and the power and authority bestowed upon Cosby by the aforementioned co-defendants, to access, groom, prey upon, sexually assault, sexually batter, rape, and cover up the sexual assault, rape, and battery of women, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner did nothing to address, prevent, or discourage Cosby's sexual assault, battery, and rape of women in a manner that implicitly permitted, approved, encouraged, and ratified such sexual assaults, batteries and rape.

122. Even though NBC, Kaufman Astoria, ASLP II, and Carsey-Werner knew or should have known of Cosby's propensity toward, history of, and ongoing serial sexual assault, battery, and rape of women, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner did nothing to address, prevent, or discourage Cosby's preying upon, grooming, sexual assault, battery, and rape of women in a manner that implicitly permitted, approved, encouraged, and ratified such sexual assaults, batteries, and rape.

123. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner and/or their agents, servants, and/or employees failed to have, enact, and/or enforce rules, regulations, policies or procedures regarding sexual abuse, assault, battery, and/or harassment at the workplace.

124. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner and/or their agents, servants, and/or employees caused, created, or, despite actual or constructive notice, permitted the existence of a dangerous condition to exist within their premises.

125. NBC, Kaufman Astoria, ASLP II, and Carsey-Werner created, through their actions and inaction, an environment in which the preying upon, grooming, and sexual assault of women by Cosby was permitted, accepted, institutionalized, and encouraged.

126. At all relevant times, NBC, Kaufman Astoria, ASLP II, and Carsey-Werner and/or their agents, servants, and/or employees breached the above-stated

duties in a negligent, reckless, willful and wanton manner, and caused Anonymous to be raped, sexually assaulted, sexually abused and molested.

127. As a result of the negligence of NBC, Kaufman Astoria, ASLP II, and Carsey-Werner, Anonymous suffered serious personal injuries, emotional distress, pain and suffering, mental anguish, and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.

128. By reason of the foregoing, Anonymous is entitled to compensatory damages from NBC, Kaufman Astoria, ASLP II, and Carsey-Werner in such sums as a jury would find fair, just, and adequate.

129. By reason of the foregoing, Anonymous is entitled to punitive damages from NBC, Kaufman Astoria, ASLP II, and Carsey-Werner in such sums as a jury would find fair, just, and adequate.

130. As a proximate result of the conduct alleged hereinabove, Anonymous has suffered damages, including special and general damages, according to proof.

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

132. This action falls within exceptions to Article 16 of the CPLR.

**AS AND FOR A SIXTH CAUSE OF ACTION FOR NEGLIGENT
HIRING, RETENTION AND SUPERVISION AS TO
NBC, KAUFMAN ASTORIA, ASLP II, AND CARSEY-WERNER**

133. Plaintiff repeats, reiterates, and realleges every allegation contained in all preceding paragraphs with the same force and effect as if hereafter set forth at length.

134. NBC, Kaufman Astoria, ASLP II, and Carsey-Werner negligently hired, retained and supervised Cosby and others, who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge, skill, and moral character to properly supervise the production and staff of *The Cosby Show*, enforce rules, and protect vulnerable persons employed by, seeking employment at, or visiting *The Cosby Show* from Cosby or those agents, servants and/or employees of NBC, Kaufman Astoria, ASLP II, and Carsey-Werner who aided, facilitated, and/or covered up Cosby's sexual assault of women.

135. As a result of such negligent hiring, supervising and/or retention, Anonymous suffered serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.

136. By reason of the foregoing, Anonymous is entitled to compensatory damages from NBC, Kaufman Astoria, ASLP II, and Carsey-Werner in such sums as a jury would find fair, just, and adequate.

137. By reason of the foregoing, Anonymous is entitled to punitive damages from NBC, Kaufman Astoria, ASLP II, and Carsey-Werner in such sums as a jury would find fair, just, and adequate.

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

139. This action falls within exceptions to Article 16 of the CPLR.

WHEREFORE, Plaintiff demands judgment against Defendants in such sum as a jury would find fair, adequate, and just.

Dated: New York, New York
November 20, 2023

MERSON LAW, PLLC

By: /s/ Jordan Rutsky
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ATTORNEY VERIFICATION

JORDAN RUTSKY, ESQ., an attorney duly admitted to practice in the Courts of New York State, and a member of MERSON LAW, PLLC., attorneys for Plaintiff in the within action, hereby affirms under 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 reason this verification is made by affirmant and not by the Plaintiff is that the Plaintiff are not within the County where the attorney has his office.

Dated: New York, New York
 November 20, 2023

/s/ Jordan Rutsky
JORDAN RUTSKY, ESQ.