

SUPREME COURTS OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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BARBARA BOWMAN,

Index No. \_\_\_\_\_/2023

Plaintiff,

VERIFIED COMPLAINT

-against-

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

Defendants

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

1. This action is brought under the Adult Survivors Act, CPLR 214-j, by Barbara Bowman who was sexually abused by defendant William Cosby, Jr. (“Cosby”), when he used the power, fame, 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 Ms. Bowman.

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, The Carsey-Werner Company, Kaufman Astoria Studios, Inc., and Astoria Studios Limited Partnership II 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, and resources they provided to Cosby, but did nothing to stop it.

5. Defendants NBCUniversal Media, LLC, The Carsey-Werner Company, Kaufman Astoria Studios, Inc., and Astoria Studios Limited Partnership II 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, The Carsey-Werner Company, Kaufman Astoria Studios, Inc., and Astoria Studios Limited Partnership II condoned and encouraged Cosby's sexual abuse, assault, and/or battery of women by doing nothing to stop it despite knowledge of his serial sexual abuse of women, and by providing Cosby with power, authority, and resources to access, groom, and sexually abuse women.

7. Ms. Bowman's claims against defendants NBCUniversal Media, LLC, The Carsey-Werner Company, Kaufman Astoria Studios, Inc., and Astoria Studios

Limited Partnership II are for their negligence and negligent hiring, retention, and supervision because they knew or should have known that Cosby was 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 Ms. Bowman and other women.

### PARTIES

8. At all times relevant, Ms. Bowman was a resident and domiciliary of the State of New York.

9. When Ms. Bowman was sexually abused by Cosby, Cosby was a resident of New York County, New York.

10. 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.

11. 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.

12. 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.

13. 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.

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

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

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

17. 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.

18. 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.

19. 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.”

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

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

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

23. 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.

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

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

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

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

28. 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.

29. 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.

30. 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.”

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

32. 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.

33. 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.

34. 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.

35. 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.”

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

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

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

39. 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.

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

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

42. At all relevant times, the employees, agents, and/or servants of Kaufman Astoria, ASLP II, Carsey-Werner, and NBC 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 actresses hired, offered, or seeking roles with *The Cosby Show* and visitors to *The Cosby Show*; encouraging women to meet with Cosby alone and 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

43. In or around 1985, when Barbara Bowman was approximately 17-years-old, Ms. Bowman was introduced to William Cosby, Jr. (“Cosby”) by her agent so that Cosby could assess her talent and determine if he wanted to mentor Ms. Bowman in her career as a model and actress.

44. Based on Cosby’s status in the entertainment industry from his role as Dr. Huxtable on *The Cosby Show* and his wholesome public image as “America’s Dad,” Ms. Bowman agreed to meet Cosby.

45. During their initial meeting, Cosby asked Ms. Bowman a myriad of questions regarding her personal life, including her relationship with her parents, her current living arrangement, whether she had a boyfriend, and her childhood.

46. During their initial meeting, Cosby asked Ms. Bowman to wet her hair, wear a t-shirt, keep her eyes closed, and act drunk, ostensibly as an acting exercise.

47. Following this initial meeting, Cosby flew Ms. Bowman around the country to be a guest at his shows, so that he could introduce her to industry professionals and act as her mentor.

48. Once Ms. Bowman turned 18-years-old, Ms. Bowman was sent by her agent to live in an apartment in Manhattan, New York for the purpose of advancing her career and continuing the mentorship with Cosby.

49. In New York, Cosby continued to mentor Ms. Bowman.

50. In approximately 1986, Cosby offered to arrange for Ms. Bowman to audition for a role on *The Cosby Show*.

51. Cosby invited Ms. Bowman to his brownstone ostensibly to prepare for the audition for *The Cosby Show*.

52. Ms. Bowman agreed to meet Cosby in his home because of his position of authority with *The Cosby Show*, his offer to arrange an audition to appear on *The Cosby Show*, and his wholesome public image as “America’s Dad” from his role on *The Cosby Show*.

53. After eating dinner with Cosby, Cosby gave Ms. Bowman a glass of wine.

54. Upon information and belief, Cosby had placed or had caused to be placed an unknown intoxicant in the beverage that Cosby provided to Ms. Bowman, without Ms. Bowman’s consent or knowledge.

55. Ms. Bowman took one or two sips of the wine and then lost consciousness.

56. Upon regaining consciousness, Ms. Bowman found herself in the bathroom, vomiting, while Cosby held her hair.

57. Upon regaining consciousness, Ms. Bowman was wearing a man’s t-shirt (which she was not wearing prior to losing consciousness), and her panties were askew, as if they were pushed to the side.

58. Upon regaining consciousness, Ms. Bowman felt as if she had been vaginally penetrated while unconscious.

59. Ms. Bowman continued to go in and out of consciousness, eventually finding herself back in her apartment.

60. Following the events at Cosby's home, Ms. Bowman told her roommate that Cosby raped her.

61. When Ms. Bowman's agent learned that Ms. Bowman had accused Cosby of raping her, Ms. Bowman's agent called Ms. Bowman a liar and moved Ms. Bowman out of the Manhattan apartment to an apartment in Roslyn, New York. Ms. Bowman's agent also instructed Ms. Bowman that she was forbidden to communicate with anyone other than the agent or Cosby, and that she was only to leave the apartment to go to classes or events involving the agent or Cosby.

62. In approximately 1987, Ms. Bowman was sent by her agent to a hotel in Atlantic City, New Jersey where Cosby had a show, ostensibly so that Ms. Bowman could meet industry professionals.

63. In Atlantic City, Ms. Bowman's luggage was taken from her, and she was brought to her room by one of Cosby's bodyguards. Her luggage was not brought to the room.

64. During the show, one of Cosby's bodyguards repeatedly provided and insisted that Ms. Bowman drink alcohol.

65. Upon information and belief, Cosby had placed or had caused to be placed an unknown intoxicant in the beverages that Cosby's bodyguard provided to Ms. Bowman, without Ms. Bowman's consent or knowledge, or had otherwise conspired to ensure that Ms. Bowman was intoxicated until the point that she lost consciousness.

66. Ms. Bowman blacked out due to the alcoholic beverages thrust upon her by Cosby's bodyguard.

67. During the blackout period, Ms. Bowman called a friend and told the friend that Ms. Bowman was hiding from Cosby and that he was relentless and would not stop. Following her friend's advice, Ms. Bowman called the front desk to ask for her luggage.

68. When Ms. Bowman awoke in the morning, her luggage was in her room, but she does not recall how it got there or who entered her room to bring it to her.

69. That same morning, Cosby called Ms. Bowman to his hotel room to speak with her.

70. Upon arriving at Cosby's room, Cosby scolded Ms. Bowman for calling the front desk and exposing that he had a 19-year-old girl in one of his rooms.

71. In his rage, Cosby threw Ms. Bowman onto his bed, put his elbow under her chin, and choked her; Ms. Bowman feared for her life.

72. Cosby then held Ms. Bowman down while he attempted to remove his and her pants.

73. While Cosby was assaulting Ms. Bowman, Ms. Bowman attempted to fight him off and screamed and begged for him to stop; however, her pleas were ignored by Cosby, who continued to hold her down, undress himself, and forcibly undress Ms. Bowman.

74. Ms. Bowman continued to resist Cosby until he suddenly and unexpectedly ended his assault, threatened that she "blew it" and was "done," and

that he never wanted to hear her name or see her fact again. He then threw her out of the room.

75. Following the events in Atlantic City, Ms. Bowman's agent immediately placed Ms. Bowman on a plane back to Colorado.

76. Ms. Bowman eventually moved back to the New York City area to continue her pursuit to enter the entertainment field; however, she made no effort to contact Cosby or her former agent.

77. When Ms. Bowman was in the New York City area, she unexpectedly received a telephone call from Cosby, in which he threatened Ms. Bowman's life and family and that she would be very sorry if she ever told anyone about him.

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

78. 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.

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

80. Cosby willfully and lawfully used force or violence upon Ms. Bowman.

81. Cosby touched Ms. Bowman with the intent to harm or offend her.

82. Ms. Bowman did not consent to the touching.

83. Cosby's conduct in touching Ms. Bowman was harmful and offensive.

84. As a direct and proximate result of the batteries, Ms. Bowman 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.

85. As a direct and proximate result of the aforementioned batteries, Ms. Bowman 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.

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

87. Cosby's conduct, set forth above, was wanton, reckless, and/or malicious.

88. By reason of the foregoing, Ms. Bowman 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.

89. As a proximate result of the conduct alleged hereinabove, Ms. Bowman 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 SECOND CAUSE OF ACTION  
FOR ASSAULT AS AGAINST COSBY**

92. 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.

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

94. Cosby unlawfully used physical force against Ms. Bowman.

95. Cosby intentionally placed Ms. Bowman in reasonable apprehension of immediate bodily harm.

96. Cosby intentionally placed Ms. Bowman in reasonable apprehension of immediate bodily harm because of the conduct of Cosby.

97. As a direct and proximate result of the aforementioned assault, Ms. Bowman 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.

98. As a direct and proximate result of the aforementioned assaults, Ms. Bowman 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.

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

100. Cosby's conduct, set forth above, was wanton, reckless, and/or malicious.

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

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

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

104. 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**

105. 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.

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

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

108. As a proximate result of the outrageous and extreme conduct of Cosby in assaulting and battering Ms. Bowman, Ms. Bowman 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.

109. Cosby committed the acts alleged herein maliciously, fraudulently, and oppressively with the wrongful intention of injuring Ms. Bowman from an improper or evil motive amounting to malice and/or in conscious disregard of Ms. Bowman's rights, entitling Ms. Bowman 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.

110. As a direct and proximate result of the intentional infliction of emotional distress, Ms. Bowman 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.

111. As a direct and proximate result of the aforementioned intentional infliction of emotional distress, Ms. Bowman 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, Ms. Bowman is entitled to compensatory damages from Cosby in such sums as a jury would find fair, just, and adequate.

112. Cosby's conduct, set forth above, was wanton, reckless, and/or malicious.

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

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

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

116. 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**

117. 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.

118. Cosby, intentionally and without the right to do so, confined Ms. Bowman.

119. Ms. Bowman was aware of her confinement.

120. As a direct and proximate result of the false imprisonments, Ms. Bowman 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.

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

122. Cosby's conduct, set forth above, was wanton, reckless, and/or malicious.

123. By reason of the foregoing, Ms. Bowman is further entitled to punitive 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.

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

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

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

126. 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.

127. At all relevant times, NBC, Carsey-Werner, Kaufman Astoria, and ASLP II owed a duty of care to Ms. Bowman and others to properly manage, control, operate and supervise *The Cosby Show*, including the authority or apparent authority it bestowed upon personnel involved in *The Cosby Show* including Cosby, the personnel involved in *The Cosby Show* including Cosby, and the audition process for *The Cosby Show*, such that individuals interested or auditioning for roles on *The Cosby Show* were safe from sexual abuse.

128. At all relevant times, NBC, Carsey-Werner, Kaufman Astoria, and ASLP II owed a duty of care to Ms. Bowman and others to ensure that its employees, agents, and servants, including but not limited to Cosby, were not using the power,

authority, and resources provided to them by said Defendants to sexually assault, facilitate the sexual assault, and/or cover up the sexual assault of women.

129. 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*.

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

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

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

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

134. At all relevant times, NBC, Carsey-Werner, Kaufman Astoria, and ASLP II 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.

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

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

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

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

139. At all relevant times, NBC, Carsey-Werner, Kaufman Astoria, and ASLP II knew or should have known that Cosby was using the resources that they provided to Cosby to access, groom, prey upon, and sexually abuse women, including individuals interested in or auditioning for roles on *The Cosby Show* such as Plaintiff.

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

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

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

143. Even though NBC, Carsey-Werner, Kaufman Astoria, and ASLP II knew or should have known that Cosby was using their employees, 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, Carsey-Werner, Kaufman Astoria, and ASLP II 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.

144. Even though NBC, Carsey-Werner, Kaufman Astoria, and ASLP II knew or should have known of Cosby's propensity toward, history of, and ongoing serial sexual assault, battery, and rape of women, NBC, Carsey-Werner, Kaufman Astoria, and ASLP II 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.

145. NBC, Carsey-Werner, Kaufman Astoria, and ASLP II created, through their actions and inaction, an environment in which Cosby's sexual assault of women by Cosby was permitted, accepted, institutionalized, and encouraged.

146. At all relevant times, NBC, Carsey-Werner, Kaufman Astoria, and ASLP II and/or their agents, servants, and/or employees breached the above-stated duties in a negligent, reckless, willful and wanton manner, and caused Ms. Bowman to be raped, sexually assaulted, sexually abused and molested.

147. As a result of the negligence of NBC, Carsey-Werner, Kaufman Astoria, and ASLP II, Ms. Bowman 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.

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

149. The conduct of NBC, Carsey-Werner, Kaufman Astoria, and ASLP II, set forth above, was wanton, reckless, and/or malicious.

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

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

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

153. 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  
KAUFMAN ASTORIA, ASLP II, CARSEY-WERNER, AND NBC**

154. 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.

155. NBC, Carsey-Werner, Kaufman Astoria, and ASLP II 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 seeking roles on and/or auditioning for roles on *The Cosby Show* from Cosby or those agents, servants and/or employees of NBC, Carsey-Werner, Kaufman Astoria, and ASLP II who aided, facilitated, and/or covered up Cosby's sexual assault of women.

156. As a result of such negligent hiring, supervising and/or retention, Ms. Bowman 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.

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

158. The conduct of NBC, Carsey-Werner, Kaufman Astoria, and ASLP II, set forth above, was wanton, reckless, and/or malicious.



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

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

161. 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 3, 2023

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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 3, 2023

/s/ Jordan Rutsky  
JORDAN RUTSKY, ESQ.