

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

JAKE LEON KELLY, JR., individually and as Administrator
of the Estate of O'SHAE LEON SIBLEY,

Plaintiff,

-against-

BOLLA MARKET CORP., BOLLA MANAGEMENT CORP.,
BOLLA OPERATING CORP., BOLLA OIL CORP., BOLLA
OPERATING L.I. CORP., REMICA PROPERTY GROUP
CORP., EXXON MOBIL CORPORATION d/b/a MOBIL and
BURGER KING COMPANY LLC d/b/a BURGER KING,

Defendants.

SUMMONS

Plaintiff designates
Kings County as the
place of trial.

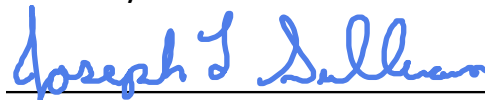
The basis of the venue
is the location of the
incident.

To the above-named Defendants:

You are hereby summoned to answer the complaint in this action and to
serve a copy of your answer on the Plaintiff's Attorneys within twenty (20) days
after the service of this summons, exclusive of the day of service (or within thirty
(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 against you by default for the relief demanded in
the complaint.

Dated: New York, New York
July 28, 2025

SULLIVAN & BRILL, LLP
Attorneys for Plaintiff



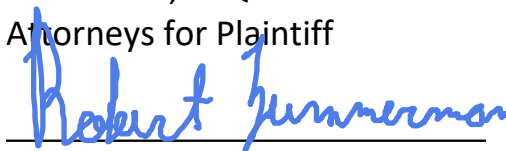
By: Joseph Sullivan, Esq.

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SALTZ MONGELUZZI BENDESKY P.C.¹

LARRY BENDESKY, ESQ.
ROBERT W ZIMMERMAN, ESQ.
SAM HAAZ, ESQ.

Attorneys for Plaintiff



By: Robert W. Zimmerman

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Philadelphia, PA 19103
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¹ Pending the Court's approval that the attorneys listed herein be admitted Pro Hac Vice.

Defendant's Address:

Bolla Market Corp.
809 Stewart Avenue
Garden City, NY 11530

Bolla Management Corp.
809 Stewart Avenue
Garden City, NY 11530

Bolla Operating Corp.
809 Stewart Avenue
Garden City, NY 11530

Bolla Operating L.I. Corp.
809 Stewart Ave.
Garden City, NY 11530

Bolla Oil Corp.
809 Stewart Avenue
Garden City, NY 11530

Remica Property Group Corp.
229 East 85th St #1010
New York, NY 10028

Exxon Mobile Corporation
c/o Corporation Service Company
80 State Street
Albany, NY 12207

Burger King Company LLC
5505 Blue Lagoon Drive
Miami, FL 33126

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

JAKE LEON KELLY, JR., individually and as
Administrator of the Estate of O'SHAE LEON SIBLEY,

COMPLAINT

Plaintiff,

-against-

BOLLA MARKET CORP., BOLLA MANAGEMENT
CORP., BOLLA OPERATING CORP., BOLLA OIL CORP.,
BOLLA OPERATING L.I. CORP., REMICA PROPERTY
GROUP CORP., EXXON MOBIL CORPORATION d/b/a
MOBIL and BURGER KING COMPANY LLC d/b/a
BURGER KING,

Defendants.

Plaintiff, JAKE LEON KELLY, JR., individually and as Administrator of the
Estate of O'SHAE LEON SIBLEY, by his attorneys, SULLIVAN & BRILL, LLP and SALTZ
MONGELUZZI BENDESKY P.C. complaining of the Defendants, alleges:

1. This lawsuit seeks compensatory and punitive damages against the
above-named Defendants for the horrific death of 28-year-old O'Shae Sibley, a
professional dancer and young African American member of the LGBTQ
community.



Decedent O'Shae Sibley

2. On July 29, 2023, O'Shae Sibley, deceased, was domiciled in Philadelphia County in Pennsylvania, and was living in Brooklyn, New York.
3. On July 29, 2023, O'Shae Sibley, at just 28 years old, was fatally stabbed on the premises of 1935 Coney Island Ave, Brooklyn, Kings County in the State of New York by an individual who loitered on site with a deadly weapon.

4. On October 13, 2023, Plaintiff, Jake Leon Kelly, Jr., was granted Letters of Administration for the Estate of O’Shae Leon Sibley by the Register for the Probate of Wills, in and for the County of Philadelphia in the Commonwealth of Pennsylvania.

5. Plaintiff, Jake Leon Kelly, Jr., is an individual residing in the County of Philadelphia in the Commonwealth of Pennsylvania.

6. Decedent O’Shae Sibley is survived by his father, Jake Leon Kelly, Jr., and his mother, Onetha Leverne Sibley, an individual residing in the County of Philadelphia in the Commonwealth of Pennsylvania.

7. The defendant, Bolla Market Corp., has a principal place of business at 809 Stewart Avenue, Garden City, NY, United States, 11530. Defendant owns and/or operates a chain of “gas stations, delis, and convenience stores” known as “Bolla Market” throughout New York and across the country.

8. The defendant, Bolla Management Corp., has a principal place of business at 809 Stewart Avenue, Garden City, NY, United States, 11530. Defendant owns and/or operates a chain of “gas stations, delis, and convenience stores” known as “Bolla Market” throughout New York and across the country.

9. The defendant, Bolla Operating Corp., has a principal place of business at 809 Stewart Avenue, Garden City, NY, United States, 11530. Defendant owns and/or operates a chain of “gas stations, delis, and convenience stores” known as “Bolla Market” throughout New York and across the country.

10. The defendant, Bolla Operating L.I. Corp., has a principal place of business at 809 Stewart Avenue, Garden City, NY, United States, 11530. Defendant owns and/or and operates a chain of “gas stations, delis, and convenience stores” known as “Bolla Market” throughout New York and across the country.

11. The defendant, Bolla Oil Corp., has a principal place of business at 809 Stewart Avenue, Garden City, NY, United States, 11530. Defendant owns and/or operates a chain of “gas stations, delis, and convenience stores” known as “Bolla Market” throughout New York and across the country.

12. At all relevant hereto, defendants, Bolla Management Corp., Bolla Market Corp., Bolla Operating Corp., Bolla Operating L.I. Corp., Bolla Oil Corp. (collectively, “Bolla Defendants”), operated, leased, managed, maintained, controlled and/or were otherwise responsible for the premises located at 1935 Coney Island Ave, Brooklyn, New York.

13. The defendant, Remica Property Group Corp. (“Remica”), is a domestic business corporation, incorporated in the County of Nassau in the State of New York, with a registered business address of 229 East 85th St #1010, New York, NY, United States, 10028.

14. At all times relevant hereto, defendant, Remica, owned, managed, maintained, controlled and/or was otherwise responsible for the premises located at 1935 Coney Island Ave, Brooklyn, Kings County in the State of New York.

15. The defendant, Exxon Mobil Corporation d/b/a MOBIL (“MOBIL”), was and still is a New Jersey corporation organized and existing under and by virtue the laws of the State of New Jersey.

16. At all times relevant hereto, defendant, MOBIL, operated, leased, managed, maintained, controlled and/or was otherwise responsible for the premises located at 1935 Coney Island Ave, Brooklyn, Kings County in the State of New York.

17. The defendant, Burger King Company LLC d/b/a Burger King (“Burger King”), was and still is a Florida limited liability company organized and existing under and by virtue the laws of the State of Florida.

18. At all relevant hereto, defendant, Burger King, operated, leased, managed, maintained, controlled and/or was otherwise responsible for the premises located at 1935 Coney Island Ave, Brooklyn, Kings County in the State of New York.

19. At all times relevant hereto, the Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, owned, operated, leased, managed, maintained, controlled and/or was otherwise responsible for the premises located at 1935 Coney Island Ave, Brooklyn, Kings County in the State of New York.

20. At all times relevant hereto, the Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, were otherwise responsible for the security of the premises located at 1935 Coney Island Ave, Brooklyn, Kings County in the State of New York.

21. At all times relevant hereto, the Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, possessed exclusive control over the premises located at 1935 Coney Island Ave, Brooklyn, Kings County in the State of New York.

FACTS

22. On July 29, 2023, O'Shae Sibley and his friends rented a car in New York and took a day trip to the New Jersey shore.

23. On their return, O'Shae Sibley and his friends stopped at the Bolla Market and Mobil gas station located at 1935 Coney Island Ave, Brooklyn, Kings County in the State of New York ("the premises").

24. O'Shae Sibley and his friends peacefully listened to music and danced while attempting to refuel their rental car.

25. On that date and at that location, a group of loiterers began harassing O'Shae Sibley and his friends at the premises.

26. On that date and at that location, one or more individuals from the group of loiterers possessed deadly weapons.

27. Upon information and belief, the group of loiterers directed racist slurs and/or homophobic vitriol at O'Shae Sibley and his friends at the premises.

28. Upon information and belief, one or more of the frequent loiterers began recording with his cellphone as he directed racist slurs and/or homophobic vitriol at O'Shae Sibley and his friends, with the intent to intimidate O'Shae Sibley and his friends.

29. Prior to July 29, 2023, and on the date of the incident, the Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, failed and/or refused to take measures or steps to terminate the loiterers' and their dangerous presence on the premises.

30. The failure by Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, to abate the loiterers' dangerous presence amounted to implicit authorization for the loiterers to be on the premises.

31. Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, valued the presence of loiterers on the premises above the safety of innocent customers on the premises.

32. On the night of July 29, 2023, as loiterers harassed and threatened O'Shae Sibley and his friends, Defendants' employee and/or agent observed and inserted himself in the altercation and had real-time notice of the racist and homophobic slurs spewed at O'Shae Sibley.

33. Upon information and belief, the Defendants failed to adequately train and provide resources to the Employee on the steps to be taken when racist and/or homophobic slurs were levied on the premises, when intimidation by loiterers of customers was used, and when confrontation was foreseeable.

34. Defendants were aware of foreseeable harm to decedent O'Shae Sibley as the harassment escalated in the open, under their direct observation.

35. Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, had a duty to provide adequate and reasonable security to protect invitees on the premises, including decedent O'Shae Sibley, based on the circumstances leading up to and surrounding the loiterers' frequent presence and the racist, homophobic, violent conduct that resulted in the decedent's ultimate harm.

36. The store employee, as agent, servant, and/or employee, acting on behalf of the Defendants, had and assumed a duty on behalf of the Defendants to provide reasonable protection for O'Shae Sibley and his friends lawfully on the premises.

37. Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, permitted the loiterers to harass O'Shae Sibley on the premises for an extended period of time while their agent watched the confrontation and hate filled speech escalate.

38. Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King's authorization, ratification, approval of the loiterers' harassment, through their agents, acted as a license for violence.

39. Upon information and belief, once the Defendants ratified the loiters' conduct, the instigator directed increasingly violent threats and slurs at decedent O'Shae Sibley.

40. Minutes passed as Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, stood idly as the altercation worsened and conflict escalated.

41. As more than five and half minutes passed, Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, took no action to deescalate, deter, or stop the loiterers from harassing or threatening O'Shae Sibley, or to call authorities.

42. Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King's authorization put O'Shae Sibley in greater danger as the loiterers' harassment grew to threats of physical violence.

43. Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King's agent created a heightened danger when he heard the hate filled speech, inserted himself next to the loiterers, and did nothing to deescalate the situation or alert authorities.

44. After minutes of hate filled speech and threats, one of the loiters proceeded to stab O'Shae Sibley in the chest with injury to his heart.

45. On July 30, 2023, at 12:33 AM, O'Shae Sibley was pronounced dead after horrific and significant pain and suffering.

46. At all relevant times hereto, there was a dangerous condition on the premises, as more fully set forth herein, and that dangerous condition created a reasonably foreseeable risk of the kind of injury incurred by Plaintiff's decedent, O'Shae Sibley.

47. Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, had actual notice and could reasonably be charged with notice under the circumstances of the aforesaid dangerous conditions.

48. Prior to the assault, the Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, should have taken measures to protect against the dangerous environment.

49. At all times relevant hereto, the Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, owed Plaintiff's decedent, O'Shae Sibley, who as a business invitee was lawfully on the premises, a duty of care to protect him from the foreseeable harm on the premises under Sections 324, 342, and 343 of the Restatement (Second) of Torts.

50. At all times relevant hereto, the Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, knew or had reason to know from past experiences, and the circumstances leading up to and surrounding the altercation and harassment directed at Plaintiff's decedent, O'Shae Sibley, which eventually led to his fatal injury, and had a duty to take protective measures.

51. At all times relevant hereto, the Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, took affirmative actions to insert himself in the altercation and harassment directed at Plaintiff's decedent, O'Shae Sibley, which eventually led to his fatal injury, and assumed a legal duty to act.

52. At all times relevant hereto, Plaintiff's decedent, O'Shae Sibley, was a business invitee lawfully on the premises.

53. As a result of the Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King's failures, Plaintiff's decedent, O'Shae Sibley, was caused to sustain devastating, catastrophic, and fatal injuries, and the Estate of O'Shae Sibley and Plaintiff, Jake Leon Kelly, Jr., suffered injuries and damages as set forth herein.

54. Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, are jointly and severally liable for the injuries and damages suffered by Plaintiff

and Plaintiff's decedent, O'Shae Sibley.

55. The incident and O'Shae Sibley's fatal injuries resulted from the negligence, carelessness, recklessness, willful and/or wanton conduct of one or more of the Defendants, Bolla Defendants, Remica, MOBIL, and/or Burger King, acting jointly and/or severally, by and through their agents, servants, workmen, employees, and/or independent contractors, and was due in no manner whatsoever to any act or failure to act on the part of Plaintiff's decedent.

**FIRST CAUSE OF ACTION FOR NEGLIGENCE AND NEGLIGENT FAILURE TO
PROVIDE ADEQUATE SECURITY
PLAINTIFF V. ALL DEFENDANTS**

56. Plaintiff incorporates herein by reference to all preceding paragraphs as though fully set forth at length herein.

57. At all times relevant hereto, upon information and belief, Defendants owned, operated, managed, leased, maintained, controlled, occupied, and advertised the premises known as "Bolla Market" rest stop and "Mobil" gas station.

58. At all times relevant hereto, Plaintiff's decedent, O'Shae Sibley, was a business invitee, lawfully on the premises of the "Bolla Market" rest stop and "Mobil" gas station, and Defendants owed O'Shae Sibley the highest duty of care.

59. At all times relevant hereto, Defendants, through their actions, had an affirmative duty to safeguard Plaintiff's decedent from foreseeable harm from loiterers on the premises.

60. At the time Plaintiff's decedent, O'Shae Sibley, was stabbed in the heart, Defendants knew that frequent loiterers on the premises were harassing O'Shae Sibley, that the premises were unsafe, that the premises were not adequately secured, and that no security measures were in place.

61. At the time Plaintiff's decedent, O'Shae Sibley, was stabbed in the heart, Defendants knew that frequent loiterers on the premises were harassing O'Shae Sibley, that the premises were unreasonably dangerous and unsafe for its business invitees, including O'Shae Sibley.

62. Defendants' failure to ensure the premises were safe, secure, and controlled was negligent, grossly negligent, careless, and reckless conduct and was a proximate cause of the decedent's death and the damages set forth herein.

63. Defendants, through its actions, had an affirmative duty to safeguard Plaintiff's decedent from foreseeable harm from loiterers on the premises.

64. Defendants' failure to act reasonably when intervening in the altercation placed Plaintiff's decedent in a worse and more dangerous position than if Defendants never acted at all.

65. Defendants' failure to act reasonably when intervening in the altercation gave the loiterers on the premises license to harass, threaten, and assault Plaintiff's decedent, O'Shae Sibley.

66. Defendants' failure to act reasonably when intervening in the altercation, which led to the fatal stabbing of Plaintiff's decedent, O'Shae Sibley, was negligent, grossly negligent, careless, reckless conduct and constituted a conscious disregard for the safety of others, including Plaintiff's decedent, O'Shae Sibley, and was a proximate cause of the decedent's death and the damages set forth herein.

67. Defendants had a duty to Plaintiff's decedent and all other lawful business invitees to maintain the premises and surrounding areas of the premises in a safe and secure condition and to guard against and/or warn of dangerous or potentially dangerous conditions existing at and about the premises and surrounding area.

68. Defendants had a duty to prevent access to the property from frequent loiterers who presented a danger to business invitees, including Plaintiff's decedent.

69. The injuries, damages, and losses suffered by Plaintiff and Plaintiff's decedent, as fully set forth above, were caused by the negligence, gross negligence, carelessness, recklessness, and conscious disregard for the safety of others, including Plaintiff's decedent, O'Shae Sibley, and other liability producing conduct of the Defendants, acting by and through their agents, servants, workers, and/or employees, both generally and in the following particular respects:

- a. Failing to protect Plaintiff's decedent from coming in contact with the loiterer who stabbed decedent while he was a business invitee at the premises, which duty Defendants breached by failing to provide adequate security so as to protect decedent from reasonably foreseeable harmful acts of third parties;
- b. failing to exercise reasonable care and caution in protecting decedent from the assault and violent acts;
- c. failing to exercise reasonable care and caution in intervening in the altercation so as to protect decedent from reasonably foreseeable harmful acts of third parties;
- d. failing to properly supervise the premises, specifically the areas of ingress and egress;
- e. failing to provide adequate protection for decedent while lawfully upon said premises;
- f. failure to provide a safe environment for decedent and other persons lawfully upon said premises;
- g. failure to provide a safe environment for decedent and other persons lawfully upon said premises, despite taking affirmative actions to undertake a duty to provide adequate security;

- h. failure to provide appropriate and sufficient supervisory security personnel to ensure the safety of decedent and persons similarly situated;
- i. failure to protect decedent and other persons similarly situated from foreseeable injuries and damages caused by allowing violent persons to remain on said premises after having knowledge of the dangerous properties through the loiterers' harassment and threats directed at business invitees on the premises, including Plaintiff's decedent;
- j. failure to provide appropriate security measures, systems, and/or personnel;
- k. failure to warn persons lawfully upon said premises of the dangerous conditions existing thereon;
- l. failing to perform necessary and adequate security screenings on individuals granted access to the premises;
- m. failure to properly train its agent, servants, workers, and/or employees on how to respond to situations involving the safety of a business invitee such as decedent;
- n. failing to have policies and procedures in place which could have been followed, and which would have ensured and assured that decedent would not have been attacked and suffered the injuries and damages described herein above;
- o. failing to have adequate security protocols and/or personnel on the premises to protect their employees, agents, contractors, and business invitees from known dangers of violence;
- p. failing to have an adequate number of trained, qualified security employees on duty;
- q. permitting non-business invitees and loiterers to have access to the premises;
- r. failure to secure the premises adequately;
- s. failure to investigate and act accordingly on the suspicious and dangerous presence of the loiterers;
- t. failure to develop a security plan;
- u. failure to revise, review, and implement a security plan;
- v. not having sufficient security to monitor who is entering the property;

- w. failure to inspect the property to determine the existence of dangerous condition such as the lack of adequate security
 - x. failure to hire a reputable and/or skilled security contractor
 - y. failure to have 24-hour security given the overnight hours of business operate and the nature of the area surrounding the premises;
 - z. failure to maintain a security premises at entrances and exits;
 - aa. failure to establish a sufficient security budget;
 - bb. liability under the Restatement, Torts 2d, s. 323;
 - cc. liability under the Restatement, Torts 2d, s. 324; and
 - dd. liability under the Restatement, Torts 2d, s. 344.
70. Defendants' actions and/or inactions were substantial factors and/or

factual causes and/or increased the risk of harm to Plaintiff's decedent, O'Shae Sibley.

71. The damages sought in this action exceed the jurisdictional limit of all lower courts which otherwise have jurisdiction.

72. The limitations on liability set forth in C.P.L.R. § 1601 do not apply.

73. The limitations on liability set forth in C.P.L.R. § 1601 do not apply by reason of one or more of the exceptions thereto set forth in C.P.L.R. § 1602.

SECOND CAUSE OF ACTION FOR WRONGFUL DEATH
JAKE LEON KELLY, JR., INDIVIDUALLY V. ALL DEFENDANTS

74. Plaintiff incorporates herein by reference to all preceding paragraphs as though fully set forth at length herein.

75. Decedent O'Shae Sibley died on July 30, 2023, as a result of the negligence, gross negligence, and/or reckless disregard for the safety of others of the Defendants.

76. Plaintiff, Jake Leon Kelly, Jr., brings this action as the personal representative of O'Shae Sibley, also brings this action on behalf of those entitled by law to recover for his wrongful death, pursuant to the N.Y. Est. Powers & Trusts Law § 5-4.1 (2003), and claim all damages recoverable under the statute.

77. The names of all persons who may be entitled to recover damages, as well as their relationship to decedent, O'Shae Sibley, are as follows:

- a. Jake Leon Kelly, Jr. (father), and
- b. Onetha Leverne Sibley (mother).

78. As a direct and proximate result of all Defendants, their agents, servants, and/or employees' negligent, careless, gross negligence and reckless conduct as set forth above, which is incorporated herein, O'Shae Sibley's Wrongful Death beneficiaries were deprived of the services and guidance of the decedent, sustained a pecuniary loss and a loss of financial support, and incurred and will continue to incur medical and other expenses.

79. The limitations on liability set forth in C.P.L.R. § 1601 do not apply.

80. The limitations on liability set forth in C.P.L.R. § 1601 do not apply by reason of one or more of the exceptions thereto set forth in C.P.L.R. § 1602.

THIRD CAUSE OF ACTION FOR SURVIVAL ACTION
JAKE LEON KELLY JR, AS THE ADMINISTRATOR OF THE ESTATE OF O'SHAE
SIBLEY V. ALL DEFENDANTS

81. All preceding paragraphs of this complaint are incorporated here by reference.

82. Plaintiff, Jake Leon Kelly, Jr., Individually and as the Administrator of the Estate of O'Shae Sibley, also brings this action on behalf of the Estate of O'Shae Sibley, deceased, by virtue of New York's "Survival Statute", N.Y. EPTL § 11-3.2, and claim all benefits on behalf of O'Shae Sibley's Estate and other persons entitled to recover under law.

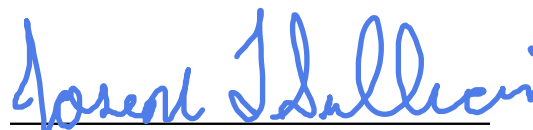
83. As a direct and proximate result of all Defendants' negligent, careless, and reckless conduct as set forth above, which is incorporated herein, Plaintiff claims on behalf of the Estate O'Shae Sibley, all damages suffered by the Estate by reason of the death of O'Shae Sibley, including without limit the generality of the following: the severe injuries to O'Shae Sibley, which resulted in his death; the anxiety, horror, fear of impending death, mental disturbance, pain, suffering and other intangible losses which O'Shae Sibley suffered prior to his

death, from the date of his death until the time in the future he would have lived had he not died as a result of the injuries he sustained; expenses for medical care; the loss and total limitation and deprivation of his normal activities until the time of his death.

WHEREFORE, the Plaintiff demands judgment for compensatory and punitive damages against the Defendants in an amount having a present value which exceeds the jurisdictional limit of all lower courts which would otherwise have jurisdiction of this matter, together with interest, costs and disbursements.

Dated: New York, New York
July 28, 2025

SULLIVAN & BRILL, LLP
Attorneys for Plaintiff



BY: Joseph Sullivan, Esq.

110 E. 59th Street, Floor 23
New York, New York 10022
Phone: (212) 566-1000
Email for Service of Papers:
emailservice@sullivanbrill.com


ATTORNEY VERIFICATION

State of New York)
) ss.:
County of New York)

JOSEPH SULLIVAN, an attorney duly admitted to practice law in the courts of the State of New York, hereby affirms the truth of the following under the penalty of perjury:

That I am an attorney with SULLIVAN & BRILL, LLP, the attorneys for the Plaintiff in the above captioned matter. I have read the foregoing Complaint and know the contents thereof to be true to my own knowledge, except as to those matters alleged upon information and belief, and as to those matters, I believe them to be true. The reason this verification is made by me and not the Plaintiff is that the Plaintiff resides in a county outside of the county where your deponents maintains his principle office for the practice of law. The grounds of my belief as to all matters not stated upon my own knowledge are as follows: Correspondence and conversations with my client and a review of the file maintained by my office regarding this matter.

Dated: New York, New York
 July 28, 2025


By: Joseph Sullivan, Esq.