

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

NADINE SÉBAG,	-----X	:	
		:	
Plaintiff,		:	<u>SUMMONS</u>
		:	
v.		:	Plaintiff designates
		:	New York County
UNITED NATIONS INTERNATIONAL SCHOOL,		:	as the place of trial
		:	
		:	
Defendant.		:	
	-----X		

To the above-named Defendant:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney within twenty (20) days after 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.

Plaintiff hereby demands a trial by jury on all issues of fact and damages stated herein.

Dated: February 12, 2026
New York, New York

Respectfully Submitted,

NATIONAL JEWISH ADVOCACY
CENTER, INC.

By: /s/ Lauren Israelovitch

Lauren Israelovitch

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Attorneys for Plaintiff

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

NADINE SÉBAG,	-----X		
	:		
Plaintiff,	:		Index No.
	:		
v.	:		COMPLAINT
	:		
UNITED NATIONS INTERNATIONAL SCHOOL,	:		<u>Jury Trial Demanded</u>
	:		
Defendant.	:		
	-----X		

COMPLAINT FOR DAMAGES AND JURY DEMAND

Nadine Sébag (“Plaintiff”), by her undersigned counsel, brings this action against United Nations International School (“UNIS”), and alleges as follows:

PRELIMINARY STATEMENT

1. This action arises from UNIS’s prolonged and willful failure to address extensively reported antisemitic discrimination, harassment, and hostility directed at Plaintiff between September 2022 and June 2024. During that period, UNIS senior leadership—including its Executive Director—ignored her complaints, concealed the misconduct, and retaliated against her for reporting it.

2. The misconduct began with Plaintiff’s teaching colleague, Ms. Nehad Soliman, whose antisemitic and anti-French invective quickly escalated into a sustained and targeted campaign of harassment and discrimination against Plaintiff. That campaign proceeded with the knowledge and acquiescence of UNIS administrators and senior leadership, including Executive Director Dr. Dan Brenner.

3. Plaintiff's concerns about reporting Ms. Soliman proved well-founded. When she ultimately submitted formal complaints, UNIS failed to investigate or intervene. Instead, her complaints were met with silence and, ultimately, a baseless retaliatory investigatory process that was lodged against her.

4. Plaintiff did not receive a single substantive response from UNIS—or from its Board of Trustees—to any of her eight detailed, evidence-based complaints documenting the antisemitic and national origin discrimination she was experiencing and requesting intervention. Rather than address the misconduct, UNIS permitted it to continue and subjected Plaintiff to further scrutiny and retaliatory treatment. UNIS's refusal to act, in contravention of its own policies and basic employer obligations, materially contributed to the hostile environment she endured.

5. UNIS publicly represents itself as a secular international school committed to fostering mutual respect and inclusion among individuals of differing religions, nationalities, races, and cultural backgrounds. Plaintiff was drawn to UNIS because of those stated commitments and, over the course of her long and distinguished career, worked to advance that mission. The environment she encountered at the UNIS Manhattan campus, however—along with the experiences of other Jewish faculty members—stood in stark contrast to those professed principles. Rather than reflecting neutrality and inclusion, the workplace climate was hostile toward Jewish faculty, dismissive of their concerns, and tolerant of reported antisemitic conduct.

6. The events described herein occurred against the backdrop of UNIS's substantial financial relationships with foreign government donors, including the Sultanate of Oman and the State of Qatar. Public materials reflect that, since approximately 2011, UNIS has received and secured pledges totaling in excess of \$110 million from those governments. Public reporting

reflects that Oman contributed approximately \$10 million in 2011, with cumulative support reportedly exceeding \$55 million by 2020, and that Qatar pledged approximately \$60 million in 2023. The Permanent Representatives of those Member States to the United Nations serve as Honorary Trustees of the UNIS Board.


7. Oman has been publicly scrutinized for antisemitic rhetoric in state-affiliated institutions and for criminalizing communications or relations with Israelis. Qatar has been publicly identified as a financial sponsor and host of Hamas, a United States–designated foreign terrorist organization responsible for the October 7, 2023 terrorist attacks that resulted in the most extensive massacre of Jews since the Holocaust.

8. In July 2023, the United Nations General Assembly adopted Resolution A/RES/77/319 reaffirming Member-State support for the UNIS Capital Development Fund and expressly thanking the Sultanate of Oman for its financial contributions. Given UNIS’s acknowledged reliance on substantial foreign government funding and the formal role of Member-State representatives in its governance structure, it was reasonable to perceive that the School would be institutionally aligned with, or at minimum sensitive to, the interests of those governments. Notwithstanding that structural reality, UNIS has never publicly articulated how its policies, disciplinary processes, and investigative decisions are insulated from the influence—actual or perceived—of major foreign government donors, nor has it affirmatively declared its institutional independence from such influence.

9. During the same period in which Plaintiff’s documented complaints of antisemitic and anti-French harassment were repeatedly left uninvestigated, UNIS leadership publicly promoted and hosted a Ramadan Iftar event and prayer gathering on school property in the donor-funded Oman Assembly Hall. Faculty and guests were encouraged to attend and to bring prayer

mats and head coverings. UNIS identifies itself as a secular institution, yet no comparable on-campus religious observances were publicly promoted for other faith traditions during the fifteen-month period in which Plaintiff's documented complaints of antisemitic hostility were repeatedly left uninvestigated.

10. During the same period, UNIS disseminated routine school-wide communications to parents and faculty that prominently incorporated Islamic religious imagery in non-religious contexts. These included, for example, a tenured faculty appraisal communication and an arrival notice to parents providing logistical instructions regarding student drop-off and pick-up. Those communications, reproduced below, were presented as ordinary institutional messaging.



TENURED FACULTY APPRAISAL 2024-25

The appraisal process for tenured faculty is divided into a 3-year cycle. In Year 1 and 2, faculty must define learning goals, discuss them with their Team Leader by October 31, and reflect on these goals by May 31. In Year 3, in addition to defining learning goals, faculty must collect student feedback by January 31, peer feedback by February 31, complete a self-reflection form by March 30, and discuss this with their Team Leader and Principal by May 31. An in-depth appraisal is conducted every third year, including student feedback, peer appraisal, and a self-appraisal. Faculty unsure of their appraisal year or needing support should contact Human Resources or **Pascal**.



REMINDER: ARRIVAL MESSAGE TO PARENTS (FEEL FREE TO ADD IN YOUR TEAM NEWSLETTERS)

All JS students should arrive at 8:20 via Stairwell D. Arriving later disrupts learning. Parents should not escort children to homeroom or be on the 2nd floor unless invited. PreK, JA, and J1 students need adult supervision until 8:20. J2, J3, and J4 students can be dropped off at the gate, but parents should wait until they pass through security. Dismissal is not a time for parent-teacher conversations. If there are concerns about arrival or independence, email the homeroom teacher or guidance counselor.

11. UNIS publicly identifies itself as a secular institution. In the context of its substantial financial relationships with certain Member-State donors and its sustained refusal to investigate Plaintiff's complaints, the School's incorporation of overtly religious imagery into routine communications reinforced Plaintiff's reasonable perception that her concerns as a Jewish faculty member would not be addressed with institutional neutrality.

12. In light of UNIS's substantial and publicly acknowledged financial dependence on governments associated with anti-Israel and antisemitic rhetoric, its governance structure intertwined with United Nations Member States, its visible promotion of Islamic religious programming and imagery in a supposedly secular setting, and its sustained refusal to investigate corroborated reports of antisemitic misconduct directed at her, it was reasonable for Plaintiff to conclude that her complaints would not be addressed impartially—if at all. Over time, that conclusion rendered internal reporting futile in her view.

13. As set forth in detail below, UNIS's actions and omissions profoundly disrupted Plaintiff's professional life and caused substantial deterioration in her physical and emotional health. These harms were foreseeable and preventable and flowed directly from UNIS's failure to comply with its legal obligations and its own stated principles. The cumulative effect of that conduct rendered Plaintiff unable to continue her employment, resulting in her constructive termination.

JURISDICTION

14. This Court has jurisdiction pursuant to New York Civil Practice Laws and Rules CPLR § 301.

15. Venue is proper in New York County pursuant to CPLR § 503 because UNIS maintains its principal place of business in New York County and because a substantial part of the events giving rise to Plaintiff's claims occurred in this County.

PARTIES

16. Plaintiff is a sixty-five year old Jewish woman of French national origin. She was born and raised in France and immigrated to the United States in 1987. She was a devoted teacher for forty years, the last thirty of which she spent teaching French at UNIS.

17. UNIS is a private secular educational institution in the County of New York for pre-kindergarten through twelfth-grade students, and at all relevant times was Plaintiff's employer within the meaning of the New York State and City Human Rights Laws.

ADMINISTRATIVE REQUIREMENTS

18. Pursuant to New York City Human Rights Law ("NYCHRL") § 8-502, Plaintiff will serve a copy of the Complaint upon the New York City Commission on Human Rights and the New York City Law Department, Office of the Corporation Counsel within ten days of its filing, thereby satisfying the notice requirements of this action.

FACTUAL ALLEGATIONS

A. Plaintiff's Exemplary Career and Relationship with UNIS

19. Plaintiff was born and raised in France and immigrated to the United States in 1987. She has devoted more than forty years to the teaching profession, including approximately thirty years as a French teacher at UNIS.

20. Throughout her career, Plaintiff has been recognized for her commitment to fostering multilingualism and for her demonstrated ability to navigate diverse cultural perspectives in the classroom. Prior to the events involving Ms. Soliman, Plaintiff maintained an unblemished

professional record and, over the course of her decades-long career, was never the subject of a complaint or involved in a dispute with any student, parent, colleague, or supervisor.

21. By every objective measure, Plaintiff demonstrated sustained dedication to her students, to the teaching profession, and to UNIS's stated mission of promoting global peace through cultural exposure, tolerance, and mutual respect.

22. Following the closure of UNIS's Queens campus at the conclusion of the 2021–2022 academic year, Plaintiff was transferred to UNIS's Manhattan campus.

23. Upon arriving at UNIS's Manhattan campus in September 2022 following the closure of the Queens campus, Plaintiff was assigned to share an office with two other French teachers, one of whom was Nehad Soliman, a Muslim faculty member who wears a hijab. Prior to the assignment, colleagues cautioned Plaintiff that Ms. Soliman had an abrasive and confrontational disposition and a history of recurring conflicts with colleagues and administrators.

24. Shortly after they began sharing office space, Ms. Soliman herself described to Plaintiff a series of ongoing disputes with colleagues, including conflicts from the prior academic year, which she attributed to what she perceived as bias by students, parents, and faculty against her Muslim faith and her wearing of the hijab. Ms. Soliman further spoke openly about individuals at UNIS—both students and colleagues—whom she regarded as adversaries, and described contacting Mr. Pascal Vallet, Head of the Junior School, at his home during weekday evenings to press for disciplinary action against those she believed had wronged her.

B. Ms. Soliman's Antisemitic and Anti-French Harassment of Plaintiff

25. Almost immediately after they began sharing office space, Ms. Soliman began subjecting Plaintiff to repeated antisemitic and anti-French remarks grounded in long-standing, derogatory stereotypes. She asserted, among other things, that Jews are driven by money, that Jews

control UNIS and New York, and that French people are inherently racist. These statements invoked well-known antisemitic tropes and reflected overt hostility toward Plaintiff's Jewish identity and national origin.

26. On at least one occasion, Ms. Soliman acknowledged Plaintiff's visible discomfort with such remarks and indicated that she was aware that her derogatory comments about Jewish and French people were upsetting to Plaintiff.

27. Plaintiff was deeply disturbed by Ms. Soliman's hostile conduct but did not immediately report it. She feared retaliation based on Ms. Soliman's prior statements to Plaintiff and other colleagues that individuals who crossed her would suffer consequences.

28. On or about February 13, 2023, Ms. Soliman entered the shared office, thrust her cellphone in close proximity to Plaintiff's face, and demanded that Plaintiff respond to a cartoon from the French satirical publication *Charlie Hebdo*, which Ms. Soliman stated was offensive.

29. When Plaintiff did not immediately respond, Ms. Soliman escalated the confrontation by launching into an angry tirade regarding France's restrictions on religious attire in public schools and baselessly accusing Plaintiff of taking issue with her hijab.

30. Uncomfortable with Ms. Soliman's physical proximity and confrontational manner, Plaintiff responded in an effort to de-escalate the situation. She explained that she did not object to Ms. Soliman's hijab, but that, as a feminist, she opposed circumstances in which women were compelled to wear religious attire against their will when men were not subject to comparable requirements.

31. Following this incident, Ms. Soliman's conduct toward Plaintiff escalated beyond isolated remarks and into a broader pattern of intimidation, hostility, and targeted harassment, as described in further detail below.

C. Plaintiff's Reports of Harassment and UNIS's Failure to Investigate

32. On or about February 23, 2023, Plaintiff attended a meeting with her immediate supervisors, Paco Barba Moran, Head of the Languages Department, and Pascal Vallet, Head of the Junior School.

33. At that meeting, Plaintiff learned for the first time that Ms. Soliman had lodged a formal complaint against *her* arising from an interaction that had occurred approximately ten days earlier, which Plaintiff surmised related to Ms. Soliman's issue with the Charlie Hebdo cartoon. However, Mr. Barba-Moran and Mr. Vallet declined to identify the specific statements or conduct Plaintiff was alleged to have engaged in and provided no meaningful details regarding the accusation. Plaintiff was not informed of the nature of the complaint until she received a letter from UNIS Executive Director Dr. Dan Brenner three weeks later.

34. In response to questioning during the meeting, Plaintiff reported that she had endured months of antisemitic and anti-French harassment by Ms. Soliman. However, Mr. Moran and Mr. Vallet dismissed Plaintiff's reports of antisemitic and anti-French discrimination and failed to initiate any investigation or remedial action, notwithstanding UNIS's own policies requiring such steps.

35. During the discussion, Mr. Vallet repeatedly invoked his Muslim wife and Muslim mother-in-law—whom he characterized as “strong Muslim women”—despite the absence of any connection between their identities and the matter at issue. He framed the conversation in a manner that suggested Plaintiff's statements to Ms. Soliman reflected bias against Muslims, even though Plaintiff had never made any disparaging remarks about Muslims or Islam.

36. During the same meeting, Mr. Vallet informed Plaintiff that she would be required to attend an additional meeting with UNIS's Director of Diversity, Equity, and Inclusion (DEI),

Judith King-Calnek. He did not explain the purpose of that meeting or identify the specific allegations Plaintiff was expected to respond to. Plaintiff was therefore directed into a DEI-led process without notice of the claims against her or any meaningful understanding of the conduct at issue.

37. When Plaintiff asked Mr. Vallet and Mr. Moran whether she should file a complaint with UNIS Human Resources regarding Ms. Soliman's antisemitic and anti-French harassment and the conduct discussed during the meeting, they responded dismissively and advised her that she could do as she pleased.

38. Consequently, although UNIS policy required Mr. Vallet and Mr. Moran, as senior administrators and Plaintiff's supervisors, to report Plaintiff's complaints to Human Resources, Plaintiff feared that they would not do so.

39. The following day, on or about February 24, 2023, Plaintiff reported Ms. Soliman's antisemitic and anti-French harassment, as well as Mr. Vallet's conduct during the February 23 meeting, to Debora Belfield, UNIS's Director of Human Resources. Plaintiff memorialized that report in a written submission to Ms. Belfield dated March 5, 2023.

40. On or about February 28, 2023, acting on Plaintiff's behalf, her husband, Robert Weingrad, wrote to UNIS Executive Director Dr. Dan Brenner regarding Plaintiff's situation involving Ms. Soliman, Mr. Vallet, and Mr. Barba-Moran.

41. In that correspondence, Mr. Weingrad objected to Plaintiff being directed to attend a DEI-involved meeting without being informed of its purpose or the specific allegations asserted against her. Mr. Weingrad requested a meeting with Dr. Brenner to address these concerns. Dr. Brenner thereafter cancelled the scheduled DEI meeting and arranged a meeting for March 2, 2023 with Plaintiff, Mr. Weingrad, Mr. Vallet, and Barbara Kennedy, UNIS's Chief Academic Officer.

42. On or about March 1, 2023, the evening before the scheduled meeting with Dr. Brenner, Ms. Kennedy telephoned Plaintiff. During that call, Ms. Kennedy inquired about the purpose of the meeting and urged Plaintiff not to have her husband attend, stating that she could handle the matter herself. Plaintiff declined that suggestion. Ms. Kennedy further advised that she and Mr. Vallet intended to be present at the meeting.

43. Shortly before the March 2, 2023 meeting, while Plaintiff was present at UNIS awaiting the meeting, her colleague Isabelle Chu approached her and described an incident that had occurred earlier that day. Ms. Chu informed Plaintiff that Ms. Soliman had read a book to her second-grade class about a girl who wears a hijab and then directed the students to write notes to take home to their parents expressing their love and support for Ms. Soliman despite the presence of “racist people” at the school—conduct that appeared to reference Plaintiff in light of Ms. Soliman’s prior accusations.

44. Plaintiff raised this incident at the outset of the March 2, 2023 meeting with Dr. Brenner, Mr. Vallet, and Ms. Kennedy, with Mr. Weingrad present. Dr. Brenner stated that, if accurate, the conduct described would constitute a serious violation of faculty standards and UNIS policy.

45. On or about March 3, 2023, Mr. Weingrad followed up with Ms. Kennedy by email, expressing concern regarding Plaintiff’s emotional and physical distress, her fear of Ms. Soliman, and the impact of the classroom incident involving second-grade students required to write highly inappropriate notes to their parents. He further raised concern that the incident would be minimized or disregarded, notwithstanding its seriousness.

46. On or about March 4, 2023, Ms. Kennedy responded to Mr. Weingrad, stating that she held Plaintiff in extremely high regard and considered her a dear friend. Ms. Kennedy further

maintained that the classroom incident bore no connection to Plaintiff or to her ongoing dispute with Ms. Soliman. She asserted that it was another teacher—not Ms. Soliman—who had read the book about a girl who wears a hijab, and that the students had independently and coincidentally elected to write notes expressing support for Ms. Soliman.

47. On or about March 6, 2023, Mr. Weingrad responded that Ms. Kennedy’s explanation did not address the impropriety of involving second-grade students in messaging that accused unnamed individuals at UNIS of racism, and reiterated that Dr. Brenner himself had previously acknowledged the seriousness of the incident.

48. Ms. Kennedy’s account was directly contradicted by Ms. Chu’s detailed eyewitness statement, memorialized in an April 14, 2024 letter to Dr. Eeqbal Hassim, UNIS’s multicultural educational consultant. In that letter, Ms. Chu made clear that it was Ms. Soliman—not another teacher—who read the book to the students and then instructed them to prepare notes expressing their love and support for her in light of the “racist people” at the school.

49. When Plaintiff learned that Mr. Vallet had not disclosed to UNIS’s DEI Director her prior reports concerning Ms. Soliman’s alleged antisemitic and anti-French remarks, nor her earlier complaint to Human Resources regarding the same conduct, she submitted a formal written complaint to UNIS’s Human Resources Department on or about March 5, 2023. In that complaint, Plaintiff memorialized the February 13, 2023 incident and detailed months of remarks she perceived as derogatory toward her Jewish identity and French national origin, which she stated had increased in frequency and intensity over time.

50. The complaint also described conduct within the shared office space that Plaintiff characterized as disruptive and intimidating. With respect to the February 13 incident, Plaintiff stated that Ms. Soliman entered the office, held her cell phone in close proximity to Plaintiff to

display material from a French publication she found offensive, and initiated a discussion concerning religion and French law. Plaintiff stated that she attempted to de-escalate the exchange and did not make any disparaging remarks about Muslims or Islam.

51. Plaintiff further reported that, during a February 23, 2023 meeting with supervisors, she disclosed what she described as months of antisemitic and anti-French harassment. According to Plaintiff, no investigation was initiated following that meeting. She also stated that when she inquired about filing a formal complaint, she was discouraged from doing so.

52. Plaintiff reported that, as a result of these events, she experienced insomnia and anxiety and felt unsafe in her workplace. She further noted that, in nearly three decades of employment at UNIS, she had not previously experienced comparable—or indeed any—conflict with colleagues or supervisors.

53. UNIS Human Resources did not respond to Plaintiff's February 24, 2023 verbal complaint or her March 5, 2023 written complaint, and no investigation was initiated into the allegations set forth therein.

D. UNIS's Disparate Treatment of Plaintiff

54. On or about March 6, 2023, while Plaintiff and her colleague and office-mate, Tanya Le Bec, were present in the office they shared with Ms. Soliman, two non-French teachers entered the office, ostensibly to retrieve teaching materials at Ms. Soliman's request.

55. One of those teachers, Tracy Turner, launched into an unprovoked and racially charged verbal attack, accusing Plaintiff and Ms. Le Bec of being "privileged white women," and explicitly invoking Ms. Soliman's fabricated allegations of Muslim discrimination as purported justification for the attack.

56. On or about March 7, 2023, shortly after Plaintiff arrived at school, she was summoned to the Human Resources Department, where she was met in a cold and adversarial manner by Ms. Belfield, Mr. Vallet, and Mr. Moran and questioned regarding a complaint lodged against *her* by Ms. Turner. They questioned Plaintiff in a hostile and accusatory manner, treating her as the alleged wrongdoer rather than as the victim of an unprovoked racial attack. Plaintiff reported Ms. Turner's conduct during the meeting, but Ms. Belfield, Mr. Vallet, and Mr. Moran responded dismissively and UNIS never investigated or responded to her complaint.

57. Later that day, extremely concerned for Plaintiff's health and well-being, her husband, Robert Weingrad, emailed UNIS Executive Director Dr. Dan Brenner, copying Ms. Kennedy, to report the March 6, 2023 verbal assault against Plaintiff by Ms. Turner and to raise serious concerns regarding UNIS's handling of that incident and the earlier classroom episode involving notes written by second-grade students about Ms. Soliman. The email questioned why Plaintiff had not been protected from "unprovoked aggression and harassment," why documented antisemitic and anti-French remarks were being tolerated without investigation, and why her "basic and legal right to full due process" had been obstructed. The communication referenced a documented record of prior complaints and placed UNIS leadership on direct notice of the escalating situation. Concerned for his wife's health, he felt he had no choice but to intervene.

58. On or about March 8, 2023, Mr. Weingrad sent another email to Dr. Brenner expressing his concerns regarding Human Resources' hostile treatment of Plaintiff on March 7, and the severe toll the situation was taking on her. He further questioned whether Ms. Soliman was being subjected to any comparable scrutiny or accountability for the false allegations asserted against Plaintiff. Dr. Brenner did not respond.

59. Thereafter, UNIS Human Resources informed Plaintiff that Mr. Weingrad was no longer permitted to communicate directly with Dr. Brenner regarding Plaintiff's situation, and that all future communications must come solely from Plaintiff. Mr. Weingrad complied with this directive.

60. On or about March 16, 2023, a representative of the UNIS Staff Association approached Plaintiff and instructed her to report to Human Resources, where she was presented with a letter from Dr. Brenner and instructed to sign it.

61. Plaintiff objected to signing without first being permitted to review its contents. Despite her objection, Plaintiff was instructed to sign an acknowledgment of receipt.

62. Only after signing was Plaintiff provided a copy of the letter, which was signed by Dr. Brenner and dated March 9, 2023.

63. In the letter, Dr. Brenner acknowledged meeting with Plaintiff and her husband on March 2, 2023, and confirmed receipt of Plaintiff's written complaint to Human Resources. Although the letter was framed as a response to Plaintiff's complaint, it did not address her reports of antisemitic and anti-French harassment. He merely stated that Plaintiff's concerns "have not gone unheard" and characterized the situation as "sensitive" and requiring time for all parties to be heard. He then proceeded to discuss Plaintiff's statement to Ms. Soliman, in which she expressed that she did not object to Ms. Soliman's decision to wear a hijab, but that, as a feminist, she opposed circumstances in which women are compelled to wear religious attire when men are not subject to comparable requirements. Dr. Brenner conveyed that Ms. Soliman regarded the statement as discriminatory and directed Plaintiff to refrain from further discussion of the matter during working hours.

64. Notwithstanding his assurances that all parties would be heard, no investigation was ever initiated into Plaintiff's complaints, no findings were communicated to her, and no corrective measures were implemented. The only formal action reflected in the March 9 letter was a directive imposed on Plaintiff, while her documented reports of discrimination remained unaddressed.

65. The letter concluded by advising Plaintiff that if she found herself in an uncomfortable situation, she should meet with school administration or Human Resources.

66. That assurance proved illusory. By the time of Dr. Brenner's letter, Plaintiff had already reported Ms. Soliman's discriminatory conduct on at least four occasions and had received absolutely no response, intervention, or protection from UNIS, other than Dr. Brenner's acknowledgement that he received her complaint.

67. Notwithstanding Plaintiff's unblemished professional record and nearly three decades of service to UNIS—and despite Ms. Soliman's significantly shorter tenure and documented history of interpersonal conflicts with students, staff, and colleagues—UNIS accepted Ms. Soliman's account and imposed restrictions on Plaintiff's speech.

68. On or about May 1, 2023, Plaintiff hand-delivered a letter to Dr. Brenner through Human Resources following up on her prior complaints. In that correspondence, she detailed the ongoing and escalating harm she had experienced since being required to acknowledge receipt of the March 9, 2023 letter and again inquired whether any action had been taken in response to her documented reports of antisemitic and anti-French remarks and other misconduct by Ms. Soliman. Plaintiff further reported that Ms. Soliman had continued making false and disparaging statements about her to colleagues within the school community, contributing to Plaintiff's increasing isolation and reputational harm. She stated that no one from UNIS had contacted her regarding her

complaints, that she did not feel safe at school, and that Ms. Soliman's ongoing conduct had caused her growing fear and distress. Plaintiff also questioned whether Ms. Soliman had been subjected to any investigation or discipline comparable to that imposed on Plaintiff. UNIS did not respond to this letter.

69. On or about May 25, 2023, Plaintiff again followed up with Dr. Brenner, this time copying Ms. Kennedy and Ms. Belfield, seeking information regarding UNIS's response to her prior complaints. She reiterated that she had received no follow-up and expressed that she remained fearful, isolated, and that her health was significantly impacted. Plaintiff never received any response to this communication either.

E. UNIS's Continued Investigatory Scrutiny of Plaintiff

70. Dr. Brenner's March 9, 2023 letter directed Plaintiff to cease further discussion of the subject of the hijab, notwithstanding that her remark had been made only in response to Ms. Soliman's insistence that she share her views. The letter did not address, investigate, or resolve Plaintiff's documented reports of antisemitic and anti-French harassment. Although Plaintiff adhered to Dr. Brenner's directive, the matter did not end there. Throughout the 2023–2024 academic year, Plaintiff was subjected to a prolonged and formalized investigatory process in which her own conduct was repeatedly scrutinized while UNIS failed to initiate any good-faith inquiry into the discrimination she had reported against Ms. Soliman. That process further intensified the hostile environment Plaintiff was forced to endure.

71. In or around late August 2023, prior to the start of the Fall 2023 semester, UNIS's DEI Department informed Plaintiff that she was required to attend a mandatory meeting at the outset of the school year. When Plaintiff asked about the purpose of the meeting and who would attend, she was provided only vague and non-responsive answers.

72. On or about September 3, 2023, Plaintiff attended the mandatory meeting, which was led by Dr. Eeqbal Hassim, a multicultural educational consultant retained by UNIS from Australia who was also charged with mediating the dispute between Plaintiff and Ms. Soliman.

73. Dr. Hassim was assigned by UNIS to oversee this process notwithstanding that his professional background, publications, and consultancy work focus primarily on Islamic education and teacher development rather than on workplace investigations, employment discrimination matters, or conflict resolution. According to publicly available biographical materials, Dr. Hassim's academic work centers on Islamic studies and Muslim education in schools. He does not appear to hold specialized credentials in workplace mediation, human resources investigations, or employment-law compliance. Nonetheless, he was placed in a central role in addressing the ongoing dispute between Plaintiff and Ms. Soliman.

74. The September 3, 2023 meeting was attended by Ms. Soliman, Mr. Vallet, Mr. Barba-Moran, and representatives from the DEI Department and Human Resources. During the meeting, Mr. Vallet required Plaintiff to explain her personal relationship with Judaism. Plaintiff was thereby compelled to discuss—and effectively defend—her religious identity in a formal setting, in the presence of the colleague whom she had repeatedly reported for directing antisemitic conduct toward her and whom she had previously reported she feared.

75. During that same meeting, Plaintiff asked Ms. Soliman directly whether she had ever made any comments to her concerning her religion or her hijab. In the presence of all those in attendance, and at a volume that was clearly audible to them, Ms. Soliman unequivocally responded, “No.”

76. Despite that unequivocal statement, UNIS did not issue any apology to Plaintiff and did not acknowledge that Ms. Soliman's prior accusation of anti-Muslim discrimination was unsupported by the facts.

77. Although Ms. Soliman expressly confirmed that Plaintiff had never made any negative remarks about her hijab or religion, UNIS continued to convene additional meetings and investigative sessions throughout the 2023–2024 academic year. No investigation was initiated into Ms. Soliman's conduct; Plaintiff alone remained the subject of ongoing review.

78. Throughout April and May 2024, Dr. Hassim scheduled individual meetings with Plaintiff and several of her colleagues, including Ms. Le Bec and Ms. Isabelle Chu. According to those colleagues, the meetings focused on Plaintiff's relationship with Ms. Soliman without any time spent investigating the discriminatory conduct Plaintiff had reported. During those sessions, colleagues reported Ms. Soliman's threatening and harassing behavior.

79. Ms. Soliman continued to assert, without any factual support or explanation, that she felt discriminated against by Plaintiff—despite her confirmation that Plaintiff had made no comments regarding her religion or hijab. During these meetings, Dr. Hassim declined to address the documented allegations of antisemitic or anti-French conduct and instead continued to frame Ms. Soliman as the aggrieved party.

80. Multiple teachers informed Dr. Hassim that they had personally observed Ms. Soliman engage in threatening and harassing conduct toward Plaintiff and others, and that they themselves had experienced similar behavior.

81. Ms. Chu memorialized her meeting in an April 14, 2024 letter to Dr. Hassim, recounting, among other matters, Ms. Soliman's expressed anger toward Plaintiff for being Jewish; her stated belief that UNIS and New York were controlled by Jews and that, as a result, landlords,

colleagues, parents, and administrators were discriminating against her because of her religion and hijab; and her repeated statements that individuals who crossed her would “pay accordingly.”

82. Ms. Chu also described an incident in which she had been physically assaulted by Ms. Soliman when she defended Plaintiff’s Jewish identity.

83. On or about May 3, 2024, during a recorded Zoom meeting between Dr. Hassim and Plaintiff, Dr. Hassim acknowledged that he had received a written statement from Ms. Isabelle Chu reporting that Ms. Soliman had physically assaulted her at UNIS and corroborating Plaintiff’s longstanding complaints regarding Ms. Soliman’s conduct. Dr. Hassim instructed Plaintiff to keep Ms. Chu’s letter “confidential” and to “separate” those allegations from Plaintiff’s own matter involving Ms. Soliman. During that same meeting, Dr. Hassim suggested that Plaintiff participate in yet another joint meeting with Ms. Soliman and Mr. Vallet.

84. On or about May 14, 2024, Dr. Hassim and Mr. Vallet convened a meeting concerning the ongoing situation involving Plaintiff and Ms. Soliman. The meeting was attended by Dr. Hassim, Mr. Vallet, Mr. Barba-Moran, and several French teaching colleagues, including Tania Le Bec, Molida Khuon, Sébastien Raphaëlian, Isabelle Chu, Emilie Lauzy, and Danielle Ghousoub. During the meeting, multiple teachers raised concerns regarding Ms. Soliman’s aggressive and inappropriate conduct, consistent with the behavior Plaintiff had previously reported. Ms. Chu described—and physically demonstrated—how Ms. Soliman had assaulted her at UNIS in February 2023.

85. Ms. Le Bec questioned why the proceedings were continuing in light of Ms. Soliman’s prior statement that Plaintiff has not made any negative remarks about her religion or hijab. In response, Dr. Hassim stated that in Ms. Soliman’s culture, a “no” could mean “yes.” By

that point, the prolonged proceedings had affected not only Plaintiff but other faculty members, including Ms. Chu, who reported significant distress resulting from the ongoing process.

86. By the conclusion of the May 14, 2024 meeting, Dr. Hassim acknowledged that Ms. Soliman required immediate evaluation and professional intervention. No such intervention ever occurred and instead, Ms. Soliman was rewarded with tenure.

87. On or about May 15, 2024, Plaintiff wrote to Dr. Hassim and senior UNIS administrators, copying Dr. Brenner, stating that she could not continue to participate in what had become a prolonged and intolerable harmful process: “I simply cannot physically and emotionally handle this anymore. This terrible abuse of me at and by UNIS—unfathomably drawn out for the past 15 months—must stop.” Plaintiff also described the substantial physical and emotional harm she attributed to the ongoing scrutiny, including strong medications for increased blood pressure, weight gain, insomnia, fatigue, joint and muscle pain, anxiety and digestive issues.

88. In the same letter, Plaintiff objected to the lack of transparency in the investigative process and specifically questioned why, during the recorded May 3, 2024 Zoom meeting, she had been instructed to keep corroborating and exculpatory information from Ms. Chu confidential. Plaintiff further sought an explanation for the abrupt cancellation of previously scheduled meetings following Ms. Chu’s submission of her corroborating letter, and for being informed thereafter that she would no longer be permitted to meet with Ms. Soliman or colleagues regarding her situation. She questioned why Ms. Chu’s statements regarding Ms. Soliman were treated as “serious” while her own documented complaints had not been, pointing out that it was clear that it was because Ms. Chu is not Jewish. By that point, the work environment had become so distressing that Plaintiff began using a restroom on another floor to avoid contact with Ms. Soliman and certain

administrators. UNIS leadership neither responded to her concerns nor undertook any corrective action.

89. Plaintiff's supervisors, Mr. Vallet and Mr. Barba-Moran, remained distant and unsupportive throughout the investigatory process. The cumulative effect of these actions further isolated Plaintiff within the school community and contributed to the deterioration of her physical and emotional health.

F. Ms. Urieli's Reports of Antisemitic Hostility

90. On or about May 14, 2024, Michal Urieli, a Jewish UNIS teacher of Israeli origin, emailed Dr. Brenner reporting multiple incidents of antisemitic hostility she had experienced at the school. She stated that she had previously "kept quiet" but could no longer remain silent. Ms. Urieli described direct confrontations involving anti-Israel and antisemitic remarks, including vulgar references to the Holocaust and gas chambers. She further relayed a statement by a senior staff member expressing that only a small number of Israelis should exist in order to make the Middle East more peaceful:

... there is a person on staff, in a very high position, who has repeatedly approached me and said 'Michal, I wish there were only 20! Not even 100! ONLY 20 Israelis who could think like you. That way the Middle East would be more peaceful.' Imagine if I were to come to a Black person or Moslem person here in school and say something along those lines... 'I wish there were only 20 Black people. Not 100. Only 20, who believed in peaceful resolution and nonviolence. That would make NYC a more peaceful place' - If I were to ever say anything so degrading, I'd be rightfully out on the curb! But hey, I'm only Jewish. I haven't brought such issues to light (one of many) because I do seek peace, and I try to find all the good apples rather than the few rotten ones, but the number of rotten ones seems to be growing now.

91. In that same communication, Ms. Urieli reported that posters had been placed on the school's "Walls of Peace" by an organization publicly associated with support for Hamas, including QR codes linking to that organization. She copied members of the UNIS security team

and demanded to know who was responsible. She also informed Dr. Brenner that Jewish parents had approached her expressing concern about whether their children were safe at UNIS.

92. On or about May 17, 2024, Ms. Urieli met with Dr. Brenner in his office, with two witnesses present, to follow up on her written report. Dr. Brenner explained that he declined to discipline the students responsible for the posters, characterizing the matter as involving only a small number of students who purportedly did not understand the nature of the materials. He further stated that his own Jewish identity placed him in a “difficult situation” with respect to addressing the concerns raised. No corrective measures were implemented in response to Ms. Urieli’s reports of antisemitic remarks or the campus display of Hamas-associated materials.

93. During this same period, Ms. Urieli reported that Ms. Soliman engaged her in confrontational encounters in which she thrust her cellphone into Ms. Urieli’s face and compelled her to view seemingly AI-generated graphic images purporting to depict Israeli soldiers committing violence against children, while making derogatory anti-Israel remarks and demanding that Ms. Urieli respond on behalf of the State of Israel. Ms. Urieli described the interaction as aggressive and deeply distressing. This conduct mirrored Ms. Soliman’s prior behavior toward Plaintiff, in which Ms. Soliman similarly forced Plaintiff to view provocative content on her cellphone in a confrontational manner. Ms. Urieli further reported feeling increasingly isolated at UNIS as a Jewish Israeli teacher. UNIS failed to investigate or take any corrective action.

94. In an email to Plaintiff in May of 2024, Ms. Urieli informed Plaintiff that she had reported antisemitic conduct to the UNIS administration and expressed solidarity with Plaintiff: “We stand together. Otherwise, they will obliterate us-if not physically than emotionally. And I will not let that happen.”

G. Plaintiff's Notice to the UNIS Board of Trustees

95. Between February 2023 and June 2024, Plaintiff submitted a total of eight written complaints and reports to UNIS senior leadership, including Dr. Brenner, detailing the antisemitic harassment and retaliation she experienced at the hands of Ms. Soliman and UNIS administrators.

96. On or about June 6, 2024, Plaintiff's husband, Robert Weingrad, transmitted a detailed written communication to all members of the UNIS Board of Trustees outlining the documented discrimination, harassment, and intimidation Plaintiff had endured, the repeated complaints she had submitted, and the failure of UNIS administrators—including Dr. Brenner—to investigate or remediate the misconduct.

97. On or about June 10, 2024, UNIS counsel Caryn Pass contacted Mr. Weingrad to schedule a discussion, and they spoke on or about June 17, 2024. During that conversation, Ms. Pass represented that she and the UNIS Board took the matter seriously and would follow up regarding the issues raised.

98. No member of the UNIS Board contacted Plaintiff thereafter. No findings were communicated, no investigation was initiated, and no corrective action was taken in response to the concerns presented.

H. Plaintiff's Medical Decline and Constructive Discharge

99. In or around August 2024, following submission of a physician's letter and required documentation, Plaintiff's treating physician recommended extended medical leave due to her severe depression and related conditions, including anxiety, insomnia, elevated blood pressure, weight gain, gastrointestinal distress, and musculoskeletal pain. These conditions developed during and as a result of the prolonged harassment, discrimination, and retaliatory treatment Plaintiff experienced at UNIS between February 2023 and June 2024. UNIS granted Plaintiff six months of paid sick leave beginning on or about August 20, 2024.

100. During this period, Plaintiff remained under continuous medical care. Her physician provided written updates to UNIS dated August 20, 2024, October 3, 2024, and February 13, 2025, each confirming Plaintiff's ongoing severe depression and related medical conditions and advising that she was unable to return to work.

101. In or around October 2024, on medical advice, Plaintiff extended her leave for an additional four months. Prior to the events described herein, Plaintiff had no history of depression, anxiety, or other mental health disorders. Her mental and related physical conditions arose during and after the prolonged period in which she was subjected to antisemitic harassment, retaliatory investigations, institutional inaction, and the suppression of corroborating evidence concerning Ms. Soliman's conduct.

102. Upon the expiration of her paid leave, on or about February 28, 2025, Plaintiff informed UNIS that she was unable to return to work and tendered her resignation. In light of the hostile work environment, her reasonable belief that her concerns as a Jewish faculty member would not be addressed with institutional neutrality given the school's reliance on foreign government donors known to be antisemitic, the deterioration of her physical and mental health, and her physician's medical advice, Plaintiff concluded that returning to the workplace posed a substantial risk of further harm.

103. As a direct and foreseeable result of UNIS's conduct and its failure to address and remediate the discriminatory, hostile, and retaliatory work environment, Plaintiff suffered significant physical and emotional injury and was compelled to retire in or around March 2025, approximately three years earlier than she had planned.

FIRST CAUSE OF ACTION
(Hostile Work Environment Discrimination in Violation of the NYSHRL)

104. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation in the

preceding paragraphs, as though set forth fully herein.

105. UNIS is an “employer” and Plaintiff is an employee within the meaning of the NYSHRL.

106. UNIS discriminated against Plaintiff on the basis of her race, religion, and national origin in violation of the NYSHRL, including Executive Law § 296, by subjecting Plaintiff to disparate treatment based upon her Jewish identity and French national origin, including but not limited to, subjecting her to a hostile work environment.

107. As a direct and proximate result of UNIS’s unlawful and discriminatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, monetary and/or economic damages, including, but not limited to, loss of past and future income, as well as compensation and benefits, for which she is entitled to an award of monetary damages and other relief.

108. As a direct and proximate result of UNIS’s unlawful discriminatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, severe medical and physical harm, as well as mental anguish and emotional distress for which she is entitled to an award of monetary damages and other relief.

109. UNIS’s unlawful discriminatory conduct was intentional, done with malice and/or a deliberate, willful, wanton and reckless indifference to Plaintiff’s rights under the NYSHRL, for which Plaintiff is entitled to an award of punitive damages.

SECOND CAUSE OF ACTION
(Retaliation in Violation of the NYSHRL)

110. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation in the preceding paragraphs, as though set forth fully herein.

111. UNIS is an “employer” and Plaintiff is an employee within the meaning of the NYSHRL.

112. UNIS retaliated against Plaintiff in violation of the New York State Human Rights Law, including Executive Law § 296(7), after Plaintiff complained of discrimination and harassment, by subjecting Plaintiff to adverse actions, including exacerbating an already abusive and hostile work environment, because she engaged in such protected activity.

113. As a direct and proximate result of UNIS’s unlawful and retaliatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, monetary and/or economic damages, including, but not limited to, loss of past and future income, as well as compensation and benefits, for which she is entitled to an award of monetary damages and other relief.

114. As a direct and proximate result of UNIS’s unlawful retaliatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, severe medical and physical harm, as well as mental anguish and emotional distress for which she is entitled to an award of monetary damages and other relief.

115. UNIS’s unlawful retaliatory conduct was intentional, done with malice and/or showed a deliberate, willful, wanton and reckless indifference to Plaintiff’s rights under the NYSHRL, for which Plaintiff is entitled to an award of punitive damages.

THIRD CAUSE OF ACTION
(Hostile Work Environment Discrimination in Violation of the NYCHRL)

116. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation in the preceding paragraphs, as though set forth fully herein.

117. UNIS is an “employer” and Plaintiff is an employee within the meaning of the NYCHRL.

118. UNIS has discriminated against Plaintiff on the basis of her Jewish identity, in violation of the New York City Human Rights Law, including N.Y.C. Admin. Code § 8-107, by subjecting Plaintiff to disparate treatment, including but not limited to, subjecting her to a hostile work environment.

119. As a direct and proximate result of UNIS's unlawful and discriminatory conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, monetary and/or economic damages, including, but not limited to, loss of past and future income, as well as compensation and benefits, for which she is entitled to an award of monetary damages and other relief.

120. As a direct and proximate result of UNIS's unlawful discriminatory conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, severe medical and physical harm as well as mental anguish and emotional distress for which she is entitled to an award of monetary damages and other relief.

121. UNIS's unlawful discriminatory conduct was intentional, done with malice and/or showed a deliberate, willful, wanton and reckless indifference to Plaintiff's rights under the NYCHRL, for which Plaintiff is entitled to an award of punitive damages.

FOURTH CAUSE OF ACTION
(Retaliation in Violation of the NYCHRL)

122. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation in the preceding paragraphs, as though set forth fully herein.

123. UNIS is an "employer" and Plaintiff is an employee within the meaning of the NYCHRL.

124. UNIS has retaliated against Plaintiff after she complained of discrimination and harassment, in violation of the NYCHRL, including N.Y.C. Admin. Code § 8-107, by subjecting

Plaintiff to adverse actions, including exacerbating an already abusive work environment, because she engaged in such protected activity.

125. As a direct and proximate result of UNIS's unlawful and discriminatory conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, monetary and/or economic damages, including, but not limited to, loss of past and future income, as well as compensation and benefits, for which she is entitled to an award of monetary damages and other relief.

126. As a direct and proximate result of UNIS's unlawful retaliatory conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, severe medical and physical harm as well as mental anguish and emotional distress, for which she is entitled to an award of monetary damages and other relief.

127. UNIS's unlawful retaliatory conduct was intentional, done with malice and/or showed a deliberate, willful, wanton and reckless indifference to Plaintiff's rights under the NYCHRL, for which Plaintiff is entitled to an award of punitive damages.

FIFTH CAUSE OF ACTION
(Negligent Supervision or Retention)

128. Plaintiff hereby repeats and re-alleges each and every allegation in the preceding paragraphs as if set forth fully herein.

129. UNIS retained Dr. Hassim and employed Ms. Soliman, Dr. Brenner, Mr. Vallet, Mr. Barba-Moran, Ms. Barbara Kennedy, and Ms. Deborah Belfield. UNIS had a duty of care to properly hire, train, retain, supervise and discipline its employees and agents so as to avoid unreasonable harm to Plaintiff. Despite having actual and/or constructive notice, UNIS failed to take necessary, proper or adequate measures to prevent the violation of Plaintiff's rights and injury to Plaintiff. Among other acts and/or failures to act, UNIS retained Dr. Hassim and employed Dr.

Brenner, Ms. Soliman, Mr. Vallet, Mr. Barba-Moran, Ms. Barbara Kennedy, and Ms. Deborah Belfield and did not terminate their employment despite its knowledge of their propensity for conduct that caused Plaintiff harm, which she repeatedly reported.

130. UNIS breached its duty of care by failing to adequately train its employees and Dr. Hassim, who was engaged and retained by UNIS during the 2023–2024 academic school year, to refrain from discriminatory or retaliatory conduct against Plaintiff on the basis of her Jewish identity and French national origin.

131. This lack of adequate supervisory training and/or policies and procedures demonstrates a failure to make reasonable attempts to prevent discriminatory and retaliatory behavior toward Jewish and French employees. In addition, the retention of Dr. Hassim, Dr. Brenner, Ms. Soliman, Mr. Vallet, Mr. Barba-Moran, Ms. Barbara Kennedy, and Ms. Deborah Belfield was negligent.

132. UNIS had a duty to control those it employed and retained to ensure their conduct was lawful.

133. UNIS's negligent supervision and/or retention of Dr. Hassim, Dr. Brenner, Ms. Soliman, Mr. Vallet, Mr. Barba-Moran, Ms. Barbara Kennedy, and Ms. Deborah Belfield was a substantial factor in causing Plaintiff foreseeable harm.

134. UNIS's failure to adequately supervise, and its continued retention of, Dr. Hassim, Dr. Brenner, Ms. Soliman, Mr. Vallet, Mr. Barba-Moran, Ms. Barbara Kennedy, and Ms. Deborah Belfield constituted gross negligence.

135. As a direct and proximate result of UNIS's negligent conduct, Plaintiff has suffered and continues to suffer harm for which she is entitled to an award of damages, including

compensatory damages, to the greatest extent permitted under law, together with reasonable attorneys' fees and costs.

136. UNIS's conduct was wanton, malicious, willful, cruel and/or so reckless as to evince a conscious disregard for Plaintiff's rights, entitling Plaintiff to an award of punitive damages.

SIXTH CAUSE OF ACTION
(Negligent Infliction of Emotional Distress)

137. Plaintiff hereby repeats and re-alleges each and every allegation in the preceding paragraphs as if set forth fully herein.

138. Employers owe employees a duty to provide a safe work environment and to refrain from conduct that unreasonably endangers the physical or emotional well-being of their employees. UNIS breached this duty by failing to investigate or remediate known hostile conduct despite having actual notice through Plaintiff's repeated complaints, subjecting Plaintiff to biased retaliatory investigations, and failing to address discriminatory conduct, thereby creating a foreseeable and unreasonable risk of harm to Plaintiff.

139. As a direct and proximate result of UNIS's negligent conduct, Plaintiff suffered foreseeable medical harm and serious emotional distress, including physical manifestations, for which she is entitled to recover damages.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues of fact and damages stated herein.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that the Court enter judgment in her favor and against UNIS, containing the following relief:

- A. A declaratory judgment that UNIS's actions, conduct, and practices complained of herein violate the laws of the State of New York and the City of New York;
- B. An award of compensatory damages against UNIS, in an amount to be determined at trial, together with prejudgment interest, to compensate Plaintiff for all past and future monetary and economic losses, including but not limited to lost salary, lost benefits, and lost retirement income, which Plaintiff presently estimates to exceed \$750,000;
- C. An award of compensatory damages against UNIS, in an amount to be determined at trial, together with prejudgment interest, to compensate Plaintiff for non-economic injuries, including emotional distress and reputational harm;
- D. An award of damages against UNIS, in an amount to be determined at trial, together with prejudgment interest, to compensate Plaintiff for physical illness, pain and suffering, and deterioration of health caused by UNIS's unlawful conduct;
- E. An award of punitive damages against UNIS in an amount sufficient to punish and deter the willful, reckless, and discriminatory conduct alleged herein;
- F. Prejudgment interest on all amounts awarded, as permitted by law;
- G. An award of Plaintiff's costs, disbursements, and reasonable attorneys' fees, including expert fees, to the fullest extent permitted by law; and
- H. Such other and further relief as the Court deems just and proper.

Dated: February 12, 2026
New York, New York

Respectfully Submitted,

NATIONAL JEWISH ADVOCACY
CENTER, INC.

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