

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

THALIA GONZALEZ and “J.G.,”
an Infant by His Mother and Natural Guardian THALIA
GONZALEZ,

Plaintiffs,

-against-

LONG ISLAND JEWISH MEDICAL CENTER and
JANE DOE,

Defendants.

Index No.

COMPLAINT

JURY TRIAL DEMANDED

Plaintiffs Thalia Gonzalez and “J.G.,” an infant by his mother and natural guardian Thalia Gonzalez, as and for their complaint against Long Island Jewish Medical Center (“LIJ”) and Jane Doe, by their attorneys, Crumiller P.C., respectfully allege as follows:

PRELIMINARY STATEMENT

1. A hospital is supposed to be a safe place to receive care – especially for giving birth. Healthcare providers have a duty to look out for the interests of their patients and to treat all of them, including newborns and new parents, with dignity.
2. From the Hippocratic Oath to the New York State Patients’ Bill of Rights, an enormous body of ethics and governance constrains our healthcare providers, reflecting the tremendous amount of trust we are forced to place in them. At times, our lives are literally in their hands.
3. Medical providers have no right to unilaterally decide who among us is fit to parent. Yet, in collusion with New York City’s Administration for Children’s Services (“ACS”), they do so regularly – and did so in this case.
4. Especially egregious is where, as here, hospitals and medical providers blame survivors of domestic violence for the harm they suffered.
5. LIJ workers decided that Thalia Gonzalez was unworthy of being a mother. So, they kidnapped her baby and held him in the hospital, without medical justification, while they waited

for a court to agree with them. When Gonzalez tried to hold and kiss her baby, they snatched him from her arms. LIJ staff then prevented her from visiting her newborn, in contravention of court orders, mere days after she had given birth to him.

6. Gonzalez drove to LIJ, pregnant and hopeful, with a car seat and bassinet. She left the hospital alone and emptyhanded. She sat in her car, sobbing and in pain, her breasts rock hard, full of milk for her newborn. She may never recover from the trauma of being barred from visiting her baby or from having her baby torn from her arms – not by a rogue hospital worker, but by one supported and encouraged by the entire facility and in collusion with ACS.

7. LIJ appears to have felt confident that Gonzalez would not have the resources to fight back against its illegal, abhorrent, and traumatizing actions. It was wrong.

PARTIES

8. Plaintiff Thalia Gonzalez is a 27-year-old woman of Puerto Rican descent who resides in Brooklyn, New York. She is the mother of six children.

9. Plaintiff “J.G.” is an infant under pseudonym who resides in Brooklyn, New York. He is Gonzalez’s son.

10. Defendant LIJ is a domestic not-for-profit corporation which operates a hospital located at 270-05 76th Ave, Queens, NY 11040. It is a place and provider of public accommodation as defined by NY Exec Law § 291(2) and 296(2) and NYC Admin Code §8-107(2).

11. Defendant Doe is an individual employed by LIJ as a social worker whose identity is unknown to plaintiffs.

JURISDICTION AND VENUE

12. Jurisdiction is proper pursuant to CPLR § 301 et seq.

13. Venue is proper pursuant to CPLR § 503(a) in that a substantial part of the events of omissions giving rise to the claim occurred in this County.

FACTUAL ALLEGATIONS

I. Gonzalez's Lifelong Efforts to Escape a Cycle of Poverty and Violence

14. Gonzalez was one of seven children born to a teenage mother who struggled with drug abuse. At age 11, ACS removed her from her home. For part of her teenage years, she was homeless and in foster care. At age 16, she became pregnant. By age 19, she had two daughters.

15. At age 21, Gonzalez was pregnant with her third daughter, when she fled her then-boyfriend, who had become violent toward her, and moved into a shelter.

16. Even though she was a young mother, Gonzalez tried her best. Her daughters were very attached to her and – even though they had their own rooms – often slept in Gonzalez's room. Gonzalez had no other source of childcare and took care of her three daughters alone. She exclusively breastfed her children until they were at least one month old to strengthen their immune systems and bond with her babies.

17. However, the damage from having a relationship with an abusive ex-boyfriend was done. ACS removed custody of Gonzalez's three children.

18. Forestdale, a foster care agency that contracts with ACS, was tasked with the children's placement. ACS relies heavily upon Forestdale's reports for its decision-making; thus, by closely monitoring the family and reporting its information to ACS and the family court, Forestdale effectively controlled the fate of Gonzalez's children.

19. As Forestdale's stated goals include securing the family environment for a child's eventual return, it imposed regular requirements on Gonzalez, including mandatory domestic violence classes and counseling. Her compliance with these mandates was key to ensuring that

Forestdale sent favorable reports to the family court, preserving any likelihood of her children's return to her care.

20. Naturally, losing her three young children was devastating. For weeks, Gonzalez slept downstairs on her kitchen floor to avoid catching a glimpse of her daughters' empty bedrooms upstairs.

21. In 2019, at age 22, Gonzalez married. She gave birth to two more children: a son in May 2019 and a daughter in April 2020. But abusers seek out vulnerable targets they can manipulate and harm, and Gonzalez's husband was no exception: he became violent toward her. For the second time, she fled.

22. Alone and distraught, Gonzalez attempted to rebuild her life. In 2020, she secured a full-time job as a front desk night auditor in a Manhattan hotel. She rented her own apartment and even bought some furniture. She seemed to be doing well for the first time. She fell in love with a man, Hernan Suarez, who seemed kind and loving, and moved into his Queens apartment with him.

23. Gonzalez was elated when she discovered she was due to give birth to Suarez's son in July 2023. However, she soon came to the heartbreaking realization that he was no different than the men she had dated previously. In January 2023, early in the pregnancy, he, too, became violent toward her.

24. Gonzalez attempted to implement the lessons from her domestic violence counseling at Forestdale and comply with the instructions she had been given.

25. Forestdale workers led her to believe that she would be rewarded for transparency and that, so long as she disclosed abuse and took appropriate steps, she would not be punished for it.

Thus, in an effort to demonstrate compliance, Gonzalez began notifying Forestdale, as well as the police, of any violent or threatening behavior Suarez exhibited.

26. Forestdale workers did not, however, demonstrate any sympathy or concern whatsoever. Instead, they blamed Gonzalez for her own suffering. “We saw that coming a mile away,” they told her.

27. Forestdale did instruct Gonzalez that she must sever all contact with Suarez and that, if she failed to do so, her custody of her unborn child would be in jeopardy.

28. Gonzalez was determined and prepared to give birth to her child in safety. In May 2023, she went to court and obtained a no-contact Order of Protection against Suarez.

29. Suarez had a key to Gonzalez’s apartment, so she asked her landlord to change the locks. When he refused, she moved out of the apartment and into her godmother’s home until she could secure placement at a domestic violence shelter. She chose her godmother’s home because she knew that Suarez would not dare follow her to a location where she had other family members to protect her.

30. That month, she also changed her cell phone number and even her service provider and blocked Suarez’s number.

31. On June 13, 2023, she moved into a domestic violence family shelter for mothers.

II. Gonzalez Gives Birth to J.G.

32. On Thursday, July 6, 2023, Gonzalez drove to the hospital for her scheduled induction, prepared with a crib and a car seat for the ride home. Though she had great difficulty relying on others for help, she asked two relatives to join her at the hospital for support.

33. On Friday, July 7, Gonzalez gave birth to a healthy baby son.¹

¹ After the birth, Gonzalez noticed some of the nurses glancing nervously between her and her baby, whose skin was noticeably darker than hers. But, she paid little mind: she was glad to have delivered a healthy baby.

34. For each of her prior births, Gonzalez had listed the father on the birth certificate. To avoid any involvement with Suarez, she did not do so this time.

35. Nursing was extremely important to Gonzalez. Throughout the day, she consistently told LIJ staff that her plan was to breastfeed J.G. exclusively.

36. The next day, Saturday July 8, while Gonzalez was enjoying time with her baby and 21-year-old cousin, she received an unexpected visitor to her hospital room. A woman who introduced herself as Alexis Khandi, a hospital social worker, remained standing in the doorway.

37. Khandi did not express any congratulations or well wishes to Gonzalez, nor ask any questions about her or her baby's well-being. Instead, she peered at Gonzalez and around the room in a suspicious and hostile manner and asked Gonzalez a series of questions. She first pointed to Gonzalez's cousin and asked if he was the father. When Gonzalez answered that he was her cousin and that there was "no dad," Khandi simply stared at her in silence. She then went on to ask Gonzalez about how many other children she had and where they were.

38. Confused, Gonzalez answered truthfully about her five older children. Khandi immediately made a horrified and disgusted face before quickly leaving the room. She briefly returned a few minutes later to report, without explanation, that she had called ACS.

III. LIJ Staff Conspires to Unlawfully Detain Gonzalez's Newborn

39. Unbeknownst to Gonzalez, Khandi's brief visit marked the beginning of a relentless campaign by LIJ workers to seize custody of J.G. from Gonzalez.

40. Khandi had indeed called ACS to report "inadequate guardianship" of J.G. by Gonzalez. She claimed to somehow be aware that Gonzalez had "not been engaged with the infant since being brought to bedside" and falsely reported that Gonzalez had been uncooperative and refused to make a plan of safe care for the baby.

41. ACS assigned an emergency child safety worker, Brianna Edwards, to investigate Khandi's report, and a "child safety conference" was scheduled for Monday, July 11, to help ACS assess whether it should file a case seeking removal of J.G. from Gonzalez's custody.²

42. Edwards conferred with a Forestdale supervising case worker, who cited Gonzalez's history of intimate partner violence as a reason for removal. The Forestdale representative explained that Gonzalez "just makes silly decisions" when it comes to relationships and that, as a result, she supported removal even though she explicitly believed that Gonzalez was capable of caring for her child.

43. The next day, July 9 at 10:26 a.m., Khandi called ACS again seeking "immediate contact" on the basis that the baby was ready for discharge. ACS created an intake report reiterating LIJ's intention to "put a social hold" on J.G. in spite of no indication by Forestdale *or* ACS that it should do so.

44. That afternoon, an LIJ social work manager again advised ACS "that the child [was] being kept until placement can be secured." An LIJ nurse, "Lisa," also reiterated the same plan.

45. Notably, ACS's investigation yielded only positive information about J.G.'s health and safety. No concerns of domestic violence or mental health were reported. Only "positive interaction between the family" was observed; Gonzalez and J.G. were observed "bonding well" and engaged in "positive interaction." Further, ACS "reported speaking to medical staff who reported no concerns for the infant." LIJ staff also informed ACS that Gonzalez had been nursing the baby, who was in good health.

² At these conferences, participants from ACS, foster care agencies, and advocates for the parent discuss concerns about the child's wellbeing, the parents' strengths, ideas to keep the child safe, and possible outcomes. If everyone at the meeting agrees on what the outcome should be, then ACS will move forward with that goal; if not, then ACS decides.

IV. LIJ Staff Unlawfully Detains Gonzalez's Newborn and Assaults Gonzalez and Her Baby

46. On July 10, Gonzalez's cousin arrived at the hospital to bring mother and baby home.
47. The hospital discharged Gonzalez, but it refused to release J.G.
48. Hospital representatives did not offer Gonzalez paperwork, which would enable her to confirm that she was discharging J.G. against medical advice. Indeed, the hospital did not even pretend there was a medical justification for keeping J.G. in its care. Instead, hospital staff lied to Gonzalez, claiming that Forestdale and ACS workers had prohibited them from releasing J.G. because of Gonzalez's open ACS cases.
49. One nurse, who apparently took pity on Gonzalez, told her that she could come back the next day to visit and nurse. Gonzalez kept her hospital wristband on to avoid any undue delay.
50. Gonzalez left the hospital without her baby, bereft. She sat and cried in silence as her cousin drove her home with her empty crib and empty car seat.
51. Gonzalez was especially upset that nobody had asked her about expressing breastmilk to leave for the baby, and she had been too shocked to ask.
52. That night, just three days postpartum, though her body struggled to recover from giving birth, Gonzalez could think of nothing but her baby in the hospital alone. Her breasts ached with a pain she did not wish upon anyone, and her heart ached from sadness.
53. She returned to the hospital promptly the next morning. When she arrived at J.G.'s room, Gonzalez saw a nurse and an unfamiliar social worker holding J.G. and feeding him a bottle. Gonzalez stopped them abruptly and stated, "Oh! I got that. He's actually still receiving only breast milk right now." The staff exchanged confused glances but ultimately handed J.G. to Gonzalez.

54. The social worker, who eyed her with suspicion, instructed Gonzalez to leave the door open while she nursed J.G., needlessly depriving her of privacy. Still, she did, before rocking him to sleep and placing him in his bassinet.

55. That afternoon, the child safety conference was held. The history of violence that Gonzalez had suffered at Suarez's hands was the main topic of discussion concerning justification for removal. One ACS representative described ACS's concerns about Gonzalez's ability to parent her newborn "due to her behaviors and decisions."

56. A social worker from Brooklyn Defender Services, appointed to represent Gonzalez's interests, advised the group not to blame Gonzalez for the abuse she had previously suffered. She reminded them that Gonzalez had removed Suarez from her life entirely, had obtained an order of protection against him, had declined to bring him to the hospital or have him sign the birth certificate, that Gonzalez had moved into a domestic violence shelter, and that she intended to follow any court orders.

57. When Gonzalez had first contacted Forestdale about the abuse, representatives led her to believe that as long as she was honest with them, and avoided Suarez, she would not be forcibly separated from her son. However, their tune was completely different at the conference, as Forestdale and ACS continued to blame Gonzalez for "choosing" abusive partners.

58. Gonzalez felt only fear and uncertainty by the end of the conference. There was no indication of whether ACS intended to file a petition seeking custody removal, let alone whether any justification existed for separation other than her domestic violence history. The only positive note was that the BDS social worker reminded the group that there was no court order impeding Gonzalez's right to visit her newborn son at the hospital, and ACS agreed.

59. LIJ staff immediately contacted ACS for an update, which it apparently promptly chose to ignore. Indeed, J.G.'s attending physician, Dr. Vanessa Baptiste, wrote a note in the medical records that “[p]er social work, family not allowed to visit” – a completely unfounded inaccuracy.

60. Meanwhile, after the conference, Gonzalez simply wanted to spend time with her baby. She picked J.G. up from his bassinet to hold him in her arms. But her peace was short lived; just minutes later, a nurse and social worker, Jane Doe, charged in.

61. Startling Gonzalez, who was quietly cradling her baby, Doe admonished Gonzalez that she had “heard” that her visitation rights had been terminated at the conference just moments before. Gonzalez quickly tried to explain what had actually happened – to the contrary, ACS had specifically confirmed, to all participants, that she was entitled to visit her newborn.

62. LIJ staff refused to listen. Instead, Doe approached Gonzalez and physically grabbed J.G. directly out of her arms.

63. J.G. immediately started crying. Over the noise, Doe yelled at Gonzalez, demanding that she leave the premises. Adding insult to injury, she impatiently yelled, “now!”

64. Gonzalez’s heart dropped. She felt like she was going to faint. She disassociated and robotically started walking down the hall, as though in a trance.

65. As she and her cousin were leaving, she heard Doe yell, “wait!” For a split second, Gonzalez thought maybe LIJ had realized its mistake. But instead, Doe ran up to Gonzalez, pulled out a pair of scissors, and cut off her visitation band.

66. Once again, Gonzalez’s wishes to feed J.G. with breastmilk were flatly ignored, as nobody at LIJ bothered to coordinate delivery of breastmilk, simply presuming that formula would suffice.

67. Gonzalez left the hospital a second time bereft and without her baby. She called her family court lawyer at BDS and asked her to file something in family court as quickly as possible enabling her to visit, at the very least.

68. The next day, July 12, Gonzalez, by counsel, filed a petition in the family court for an emergency hearing seeking the return of J.G., who had been unlawfully removed from Gonzalez's care. She explained that LIJ had refused to let her visit, and removed her from the premises, even after ACS had agreed that she had full visitation rights. The court admonished ACS for the failures that had transpired and confirmed that Gonzalez had every legal right to visit J.G. in the hospital, especially as she was still nursing.

V. LIJ Flagrantly Violates Court Order by Refusing Gonzalez Access to Her Newborn Baby

69. After hearing the court's unequivocal order, Gonzalez returned directly to the hospital. Still just five days after birth, she was desperate to see, hold, and nurse her baby.

70. At the front desk, she provided her name for the creation of a visitor badge. In response, the front desk worker scowled, and turned to her coworkers. They all took out their phones and began typing while exchanging knowing glances. One employee rushed over to the security guard, where Gonzalez could see them speaking in hushed tones and looking over at her.

71. The guard immediately approached Gonzalez and told her that she was not allowed to be there. He grabbed Gonzalez's shoulder to forcibly usher her out, but Gonzalez assured him she would leave on her own.

72. Gonzalez returned to her car and drove back to the family shelter, inconsolable, with tears streaming down her face. To make matters worse, she knew her days at the family shelter were numbered, since she alone without her baby did not constitute a "family."

VI. The Sudden Loss Traumatized Gonzalez and Physically Injured Her

73. In the weeks that followed, J.G. was placed in the same foster home as his older sisters.

74. Unable to nurse consistently – her biggest postnatal priority – Gonzalez was unable to maintain her milk supply. She felt despondent and forced herself to accept that J.G. would simply have to be formula-fed right away against her wishes.

75. In the meantime, she experienced severe pain in her breasts, which became clogged and infected on multiple occasions, causing her to suffer flu-like symptoms including fever, chills, and hot and cold sweats. She could not afford to buy a pumping device, though she suffered such severe depression that she likely could not have expressed her milk anyway.

76. In general, Gonzalez suffered greatly. She experienced severe panic attacks and depression for weeks after J.G.'s birth. Out of necessity, she spoke to her therapist every day these first few weeks, instead of their regular weekly sessions.

77. Less than one month after giving birth, Gonzalez returned to work. She felt it was the only step she could take to maintain her sanity and distract her from her constant and unbearable thoughts about J.G.

78. To this day, Gonzalez avoids looking at newborn photos of J.G. on her phone because she knows she'll start sobbing if she does. Instead, she does her best to cherish her time with him at visits by holding him and kissing him as much as possible.

79. The trauma Gonzalez experienced due to LIJ's abhorrent conduct during and immediately after her stay at the hospital will haunt Gonzalez forever.

FIRST CAUSE OF ACTION:

Assault and Battery

(on behalf of both plaintiffs)

80. Plaintiffs repeat and reallege each allegation set forth above.

81. Doe intentionally and unlawfully touched and/or applied force to plaintiffs, in a harmful and/or offensive manner, and without their consent.

82. Doe acted carelessly, recklessly and/or intentionally, and knew that her actions against plaintiffs constituted assault, causing them apprehension of harmful or offensive contact.

83. Doe's acts were taken in furtherance of LIJ's business and within the scope of Doe's authority.

84. As a result, plaintiffs suffered emotional and psychological distress, physical injury, mental anguish, loss of enjoyment of life, humiliation, embarrassment, and pain and suffering.

85. Defendants' actions have the character of outrage associated with crime.

86. Plaintiffs are entitled to an award of compensatory and punitive damages.

SECOND CAUSE OF ACTION:

False Imprisonment

(on behalf of J.G.)

87. Plaintiffs repeat and reallege each allegation set forth above.

88. Defendants intentionally, unlawfully and falsely imprisoned J.G. at the hospital.

89. J.G. was conscious of the confinement, which was not otherwise privileged, and did not consent to it.

90. As a result, J.G. has suffered emotional distress.

91. Defendants' actions have the character of outrage associated with crime.

92. J.G. is entitled to an award of compensatory and punitive damages.

THIRD CAUSE OF ACTION:

Intentional Infliction of Emotional Distress

(on behalf of both plaintiffs)

93. Plaintiffs repeat and reallege each allegation set forth above.

94. Defendants' conduct was extreme and outrageous.

95. Defendants intended to cause, or disregarded a substantial probability of causing, severe emotional distress to plaintiffs, which they did.

96. As a result, plaintiffs have suffered emotional distress and have incurred compensatory damages and economic damages.

97. Defendants' actions have the character of outrage associated with crime.

98. Plaintiffs are entitled to an award of compensatory and punitive damages.

FOURTH CAUSE OF ACTION:
Domestic Violence Victim Discrimination in violation of the NYSHRL
(on behalf of Gonzalez)

99. Plaintiffs repeat and reallege each allegation set forth above.

100. Defendants unlawfully discriminated against Gonzalez in a place of public accommodation on the basis of on her status as a survivor of domestic violence, in violation of the New York State Human Rights Law (NY Exec Law § 296[2][a]) by treating her worse than non-survivors of domestic violence by, inter alia, refusing to release J.G. to her or allow her to visit J.G. at the hospital, despite the lack of court orders to the contrary, because of her status as a survivor.

101. As a place of public accommodation, defendants had no right to refuse, withhold from or deny to Gonzalez the accommodations or privileges of visitation rights at the hospital due to her status as a domestic violence survivor.

102. Doe aided, abetted, incited, compelled, and/or coerced LIJ's unlawful acts, or attempted to do so.

103. The discrimination was severe.

104. As a result, Gonzalez has suffered emotional and psychological distress, physical distress, mental anguish, loss of enjoyment of life, humiliation, embarrassment, and pain and suffering.

105. Gonzalez is entitled to an award of compensatory damages, punitive damages, attorney's fees, and costs.

FIFTH CAUSE OF ACTION:
Negligent Infliction of Emotional Distress
(on behalf of both plaintiffs)

106. Plaintiffs repeat and reallege all facts set forth above.

107. Defendants directly owed plaintiffs a professional duty of care.

108. Defendants unreasonably endangered plaintiffs' physical safety and caused them to fear for their physical safety.

109. As a result, plaintiffs suffered emotional and psychological distress, physical injury, mental anguish, loss of enjoyment of life, humiliation, embarrassment, and pain and suffering.

110. Defendants' actions have the character of outrage associated with crime.

111. Plaintiffs are entitled to an award of compensatory and punitive damages.

SIXTH CAUSE OF ACTION:
Negligence
(on behalf of both plaintiffs)

112. Plaintiffs repeat and reallege all facts set forth above.

113. Defendants owed plaintiffs a duty of reasonable care because they had a special relationship with plaintiffs.

114. Defendants owed plaintiffs a duty to protect them from Doe and/or other LIJ staff because they have a special relationship with Doe and/or other LIJ staff.

115. Defendants breached their duty to plaintiffs, creating a foreseeable risk of harm to plaintiffs.

116. As a result, plaintiffs suffered emotional and psychological distress, physical injury, mental anguish, loss of enjoyment of life, humiliation, embarrassment, and pain and suffering.

117. No negligence on the part of plaintiffs contributed to their injuries.
118. Defendants' actions have the character of outrage associated with crime.
119. Plaintiffs are entitled to an award of compensatory and punitive damages.

SEVENTH CAUSE OF ACTION:
Negligent Hiring, Supervision, Training and Retention
(on behalf of both plaintiffs, as against LIJ)

120. Plaintiffs repeat and reallege all facts set forth above.
121. LIJ negligently hired and/or retained Doe and/or other LIJ staff when they knew, or should have known, of their propensity for the misconduct which resulted in plaintiffs' injuries.
122. LIJ negligently placed Doe and/or other LIJ staff in the position to cause foreseeable harm, which plaintiffs would not have been subjected to had LIJ taken reasonable care in the hiring and retention of Doe and/or other LIJ staff.
123. LIJ negligently retained Doe and/or other LIJ staff and negligently placed them in a position to cause foreseeable harm, which plaintiffs would not have been subjected to had LIJ taken reasonable care in its supervision and/or retention of Doe and/or other LIJ staff.
124. As a result, plaintiffs suffered emotional and psychological distress, physical injury, mental anguish, loss of enjoyment of life, humiliation, embarrassment, and pain and suffering.
125. No negligence on the part of plaintiffs contributed to their injuries.
126. LIJ's actions have the character of outrage associated with crime.
127. Plaintiffs are entitled to an award of compensatory and punitive damages.

DEMAND FOR RELIEF

WHEREFORE, it is respectfully requested that the Court grant judgment awarding the following, in amounts to be determined by the finder of fact:

- a) on the First, Third, Fifth, and Sixth Causes of Action, compensatory and punitive damages to plaintiffs as against defendants;
- b) on the Second Cause of Action, compensatory and punitive damages to J.G. as against defendants;
- c) on the Fourth Cause of Action, compensatory damages, punitive damages, attorney's fees, and costs to Gonzalez as against defendants;
- d) on the Seventh Cause of Action, compensatory and punitive damages to plaintiffs as against LIJ; and
- e) such other relief as may be just.

Dated: Brooklyn, New York
February 21, 2024


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