

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

JODY KRISS,
Plaintiff,

v.

ADAM LOMBARDI, and JOHN DOES 1-20
Defendants

NOTICE

(TO ACCOMPANY SUMMONS)

DEFENDANTS PLEASE TAKE NOTICE YOU ARE HEREBY SUMMONED TO APPEAR in this action by serving a notice of appearance upon **Counsel of Record for Plaintiff Richard E. Lerner, and no other person, at the address below, and no other place**, within **20 days** after service of this summons (not counting the day of service), or within **30 days** after service is complete if the summons is not delivered personally to you within New York State.

March 14, 2014

/s/ Richard E. Lerner, Esq.
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Counsel of Record for Plaintiff

/s/ Frederick M. Oberlander, Esq.
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Co-Counsel

NOTICE

Plaintiff seeks relief against Defendants by reason of the publication of that certain article concerning Plaintiff as appeared online on or about March 12, 2014 in the collective work labeled variously or otherwise commonly known as “Queens-Politics” or “Queens-Politics.com.”

Plaintiff asserts liability, directly against Defendant Lombardi and vicariously as well as, where and as the case may be, directly against the Doe Defendants, including without limitation by conspiracy and aid and abettance, predicated on theories of libel, libel *per se*, false light, prima facie tort, and intentional interference with prospective advantage, and seeks the relief of:

First, compensatory money damages, in an amount to be determined at trial, noting that insofar as Plaintiff’s claims of libel *per se* special damages need not be pled as damages, including general damages, are presumed;

Second, attorneys’ fees, as well as costs;

Third, punitive money damages; and

Fourth, injunctive relief prohibiting Defendants and all those identified or in privity with them from disseminating in any place for any reason the same or similar statements in or alluded to in the article as shall have been adjudicated defamatory.

WHEREBY, DEMAND IS HEREBY MADE OF DEFENDANTS FOR \$20 MILLION. SHOULD DEFENDANTS NOT APPEAR, JUDGMENT MAY BE ENTERED IN DEFAULT IN THE AMOUNT SPECIFIED, OR SUCH AS MAY BE PROVEN.

VENUE

Plaintiff designates Queens County as the place of trial. The basis of this designation is CPLR § 503(a), to wit, Defendant Lombardi, at time of commencement, resides in the county.

DEFENDANTS

ADAM LOMBARDI

4243 191st Street
Flushing, NY 11358-2822
718-445-7542

JOHN DOES 1-20

To Be Determined