

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION

**FELICIA M. SONMEZ** )  
c/o Alderman, Devorsetz & Hora PLLC )  
1025 Connecticut Ave., NW )  
Suite 615 )  
Washington, D.C. 20036 )

**Plaintiff,** )

v. )

Case. No. \_\_\_\_\_

**WP COMPANY LLC** )  
**(d/b/a THE WASHINGTON POST)** )  
1301 K Street, NW )  
Washington, DC 20071-7403 )

**MARTIN BARON** )  
1309 Q Street NW, Unit 2 )  
Washington, DC 20009 )

**CAMERON BARR** )  
1515 Swann Street, NW )  
Washington, DC 20009 )

**TRACY GRANT** )  
2141 Hidden Valley Lane )  
Silver Spring, MD 20904 )

**STEVEN GINSBERG** )  
6139 31st Place NW )  
Washington, DC 20015 )

**LORI MONTGOMERY** )  
3520 Albemarle Street NW )  
Washington, DC 20008 )

and )

**PETER WALLSTEN** )  
3718 Ingomar Street NW )  
Washington, DC 20015 )

**Defendants.** )

## **COMPLAINT**

**NOW COMES** Felicia Sonmez, by and through her undersigned counsel, states her Complaint against Defendants WP Company LLC (d/b/a The Washington Post), Martin Baron, Cameron Barr, Tracy Grant, Steven Ginsberg, Lori Montgomery and Peter Wallsten, as follows. Plaintiff brings this action against the Defendants under the common law and for violating her rights under the D.C. Human Rights Act, D.C. Code § 2-1401.01, *et seq.*

## **INTRODUCTION**

1. Plaintiff Felicia Sonmez (hereinafter “Plaintiff” or “Ms. Sonmez”), a reporter on the breaking political news team with the Washington Post, brings this action against her employer, the WP Company, LLC (d/b/a the Washington Post) (hereinafter, the “Post”), and the Editor Defendants: Martin Baron (“Baron”), Cameron Barr (“Barr”), Tracy Grant (“Grant”), Steven Ginsberg (“Ginsberg”), Lori Montgomery (“Montgomery”), and Peter Wallsten (“Wallsten”), for violating the District of Columbia Human Rights Act (DCHRA), D.C. Code § 2-1401.01, *et seq.* by subjecting her to unlawful discrimination and a hostile work environment based on her gender and her protected status as a victim of a sexual offense and retaliating against her for engaging in protected activity by protesting Defendants’ unlawful practices. Ms. Sonmez also asserts a claim under the common law against Defendant the Post for negligent infliction of emotional distress.

2. In September 2017, while living in Beijing, Ms. Sonmez was sexually assaulted by Jonathan Kaiman, who was the Los Angeles Times’ (“L.A. Times”) Beijing bureau chief at the time and president of the Foreign Correspondents’ Club of China. After a woman named Laura Tucker wrote a piece on Medium.com regarding her own allegations against Mr. Kaiman, Ms. Sonmez decided to come forward regarding her assault. She, along with several other

individuals, participated in two separate investigations conducted by Mr. Kaiman's employer, the L.A. Times, which led to his resignation in August 2018. By the time of his resignation, Ms. Sonmez had been reporter at the Post for two and a half months on its breaking political news team. Because there had been news coverage surrounding Mr. Kaiman's resignation from the FCCC and his suspension by the L.A. Times pending its investigation, Ms. Sonmez issued a statement, which Defendants reviewed and approved, in response to Mr. Kaiman's resignation. The day she issued her statement, her editors canceled her appearance on a nationally televised news program and banned her from covering one of the most prominent stories of 2018 — Christine Blasey Ford's accusations against Brett Kavanaugh. Defendants' justification for the ban was that the details of Ms. Ford's accusations were "too similar" to the assault Ms. Sonmez experienced in Beijing. This ban was later expanded to include all #MeToo-related coverage. In short, Defendants unlawfully and blatantly discriminated against Ms. Sonmez because she was a woman and victim of a sexual assault.

3. A year after Mr. Kaiman's resignation, an article about the accusations against him and the negative effect they had on his life unleashed a wave of abuse and threats from those who blamed Ms. Sonmez, and the other woman who came forward, for destroying Mr. Kaiman's reputation and livelihood. Ms. Sonmez made a public request for correction, detailing the numerous inaccuracies contained in the article, to set the record straight and to defend against the abuse that was directed towards her. Shortly thereafter, Defendants enacted another coverage ban with no expiration date, disciplined Ms. Sonmez and chastised her for trying to be the "star" of her own sexual assault. Months later, Ms. Sonmez received rape and death threats and her personal information was doxxed online after she shared a news story concerning rape allegations against Kobe Bryant in a tweet. Rather than come to her aid, her editors suspended

her and publicly disparaged her. And unlike other reporters who faced similar online threats and abuse, Ms. Sonmez had to repeatedly beg her editors to provide security for her as she moved to a hotel for her protection.

4. As a result of the coverage ban, Ms. Sonmez had to frequently explain to editors and colleagues that she could not cover stories because she is a victim of a sexual assault. Ms. Sonmez privately told her editors the ban was harming her health and pleaded with them to lift it, but Defendants dismissed her concerns. In March 2021, after Ms. Sonmez reached a breaking point, she publicly disclosed the harm Defendants' actions had caused her. Feeling the mounting public pressure and unable to justify their blatantly discriminatory actions, Defendants finally lifted the ban.

### **PARTIES**

5. Plaintiff Ms. Sonmez is a female resident of Washington, DC. She works as a reporter on the Post's national breaking political news team. Her beat includes covering breaking news from the White House, Congress and campaigns.

6. Defendant WP Company LLC d/b/a The Washington Post (the "Post") is a news organization based in Washington, DC, and organized as a Delaware Limited Liability Company. The Post publishes the leading daily newspaper, by print circulation, in the nation's capital, as well as the website [washingtonpost.com](https://www.washingtonpost.com), which typically reaches an audience of more than 80 million unique visitors per month.

7. Defendant Martin "Marty" Baron was the executive editor of the Post until his retirement on or about February 28, 2021. Defendant Baron resides in Washington, DC.

8. Defendant Cameron Barr is a managing editor of the Post. Defendant Barr served as the interim executive editor until Sally Buzbee started as executive editor on or about June 1, 2021. Defendant Barr resides in Washington, DC.

9. Defendant Tracy Grant is a managing editor in charge of staff development and standards. Given the male-dominated culture at the Post, it is not surprising that Grant is only the second woman in the history of the newspaper to serve in the role of managing editor. Defendant Grant is a resident of Silver Spring, MD.

10. Defendant Steven Ginsberg serves as the Post's national editor, overseeing coverage of national security, politics, health care and other topics. Defendant Ginsberg is a resident of Washington, DC.

11. Defendant Lori Montgomery is the Post's deputy national editor. Defendant Montgomery resides in Washington, DC.

12. Defendant Peter Wallsten is the Post's senior politics editor. Defendant Wallsten is a resident of Washington, DC.

### **JURISDICTION AND VENUE**

13. This Court has jurisdiction over this claim pursuant to D.C. Code § 11-921(a)(6).

14. This Court has personal jurisdiction over the Defendants pursuant to D.C. Code §§ 13-422 and 13-423(a)(1) and (3).

15. The acts alleged in this Complaint occurred in the District of Columbia; venue is therefore proper in this district.

### **BACKGROUND FACTS**

16. On Saturday, September 16, 2017, the Foreign Correspondents Club of China ("FCCC") held its annual summer party in Beijing, China. At the time, Jonathan Kaiman was

the Beijing Bureau Chief for the L.A. Times and President of the FCCC; Ms. Sonmez was a board member who had worked as a journalist and had recently completed a year-long language fellowship. After the party, Mr. Kaiman digitally penetrated Ms. Sonmez twice on a public street without her consent, attempted to take his pants off while she protested and later sexually penetrated her without protection in his apartment while she was too intoxicated to consent. Three days after this incident, Ms. Sonmez confronted Mr. Kaiman about his misconduct. She also raised the issue of sexually transmitted diseases because she was concerned that Mr. Kaiman did not wear protection when he sexually penetrated her. Mr. Kaiman apologized for his behavior.

17. The assault had profound effects on Ms. Sonmez's life thereafter. She struggled with depression, anxiety and trust issues. She stopped drinking in December 2017 because she wanted to avoid any situation where another person could take advantage of her intoxicated state.

18. In a January 10, 2018, post on Medium.com, Laura Tucker, a Texas-based law student, wrote that Jonathan Kaiman had pressured her into having sex after a night of drinking in Beijing, China. Ms. Tucker alleged that Mr. Kaiman refused to leave her apartment and coerced her to continue sexual relations after she told him that she wanted to stop. Ms. Sonmez was disturbed to learn that she was not the only victim of Mr. Kaiman's.

19. On January 11, 2018, during an FCCC Board meeting, the Board discussed Ms. Tucker's allegations against Mr. Kaiman. The Board asked Mr. Kaiman whether he was aware of any other allegations of misconduct against him. Mr. Kaiman said no, even though he knew that Ms. Sonmez had asserted allegations against him and that the incident involving her would be raised at the board meeting. After the Board voted to oust Mr. Kaiman as its President, Mr.

Kaiman issued a statement indicating that his decision to resign was voluntary and the result of a single accusation that “was not professional or club-related.”

20. On the same day that Mr. Kaiman was ousted as President of the FCCC, Ms. Sonmez again confronted him about the incident and his false claim at the board meeting that he was unaware of any other allegations against him. At one point during their discussion, Mr. Kaiman revealed that he was “haunted” by another incident that occurred in 2011 involving a female friend. He also disclosed that he had been asked by his employer, the L.A. Times, whether he expected further allegations to be made against him by other women. He said that he told the L.A. Times that there was a recent encounter with another woman (referring to Ms. Sonmez without naming her) in which the woman was “not happy.”

21. Ms. Sonmez was disturbed by Mr. Kaiman’s repeated misrepresentations of the incident involving her assault. Mr. Kaiman’s efforts to downplay his misconduct made Ms. Sonmez worry that he might continue to harm other women. She felt compelled to speak out. On May 14, 2018, she wrote a letter to the FCCC detailing her allegations of sexual assault against Mr. Kaiman. The Board sent the letter to its full membership on May 15th. Ms. Sonmez also sent her statement to the L.A. Times because they had failed to take any observable action months earlier when Ms. Tucker publicly disclosed her allegations and the newspaper was also made aware of the existence of Ms. Sonmez’s allegations.

22. On May 16, 2018, the L.A. Times reported that Mr. Kaiman had been suspended from his job pending its investigation. A Human Resources Director at Tronc, the then parent company of the L.A. Times, contacted Ms. Sonmez and asked her to participate in its investigation. Several other individuals who had their own allegations or information concerning

Mr. Kaiman's conduct reached out to Ms. Sonmez to share their support. Upon information and belief, several of these individuals participated in the L.A. Times investigation.

23. On May 23, 2018, Ms. Sonmez interviewed for a position with the Post as a politics reporter with the breaking news team. During a lunch interview, Defendant Peter Wallsten asked Ms. Sonmez why she decided to speak publicly about her assault. Ms. Sonmez explained that she was concerned Mr. Kaiman was not being truthful about his behavior, that other women had similar stories about him and that if she stayed silent, more women could be harmed by him.

24. Ms. Sonmez received and accepted an offer from the Post with an official start date of June 18, 2018. On June 15, 2018, three days prior to her first day at the Post, Ms. Sonmez contacted Defendant Tracy Grant to tell her that she had learned that the L.A. Times investigation concerning Mr. Kaiman was expected to conclude the following week.

25. Defendant Grant responded that she expected that Ms. Sonmez would be attacked online but that "this, too, shall pass." She gave Ms. Sonmez the option to speak to the Post's communications team should she wish to make a statement at the conclusion of the investigation.

26. During a discussion regarding the status of the L.A. Times investigation, Defendant Wallsten asked Ms. Sonmez why she did not go to the Beijing police after she was assaulted. Ms. Sonmez was troubled by the implication of Mr. Wallsten's question and his apparent lack of understanding regarding the consequences she could have faced as a female foreign journalist making a claim to the Chinese police of sexual assault against another foreign journalist.

27. On July 10, 2018, Ms. Sonmez received an email from a California-based lawyer informing her that the new owners of the L.A. Times had retained her firm to conduct their own

investigation into Mr. Kaiman's conduct. Tronc had sold the Los Angeles Times to Patrick Soon-Shiong. Ms. Sonmez continued to keep Defendants Wallsten, Grant and the other editors at the Post informed as the second investigation progressed.

28. Several weeks later, on August 30, 2018, Ms. Sonmez learned that the L.A. Times had concluded its second investigation and that Mr. Kaiman had resigned. Because there had been news coverage of Mr. Kaiman's resignation from the FCCC and his later suspension by the L.A. Times, Ms. Sonmez informed Defendants Wallsten and Grant that she would prepare a statement to be disseminated to the media responding to the news of his resignation.

29. After Ms. Sonmez submitted a draft statement to Defendants Wallsten and Grant and Shani George of the Post's communications team, Defendant Grant replied that the Post's lawyers had advised that they could prohibit Ms. Sonmez from issuing a statement, but that they had "no desire to do so." Ms. Sonmez asked Defendant Wallsten, "Are there any parts of the statement that you think I should perhaps reword? Also, Tracy mentioned to me last night that she has run things by the Post's lawyers as well...I'm happy to follow whatever recommendations they might have on how best to proceed."

30. Defendant Wallsten responded that he was "eager to hear what the lawyers told [Grant]" and that he was concerned because he did not want Ms. Sonmez's statement to be what informed media outlets of Mr. Kaiman's resignation from the L.A. Times.

### **The Post Institutes its First Ban on Ms. Sonmez**

31. On Sunday, September 16, 2018, the Post broke the news of Christine Blasey Ford's accusations against Brett Kavanaugh. Ms. Sonmez was working at the office and, understandably, found it difficult to read about Ms. Ford's accusations given her own history of assault. She went for a walk around the block to collect herself. Upon her return to the office,

she began working on a follow-up story regarding Mr. Kavanaugh that had been assigned to her and two of her colleagues, Sean Sullivan and Seung Min Kim.

32. On September 17, 2018, the same day that her team's article detailing the GOP and White House's response to Ms. Ford's accusations appeared in the paper, Ms. Sonmez was assigned to anchor the day's Kavanaugh story. She wrote an article that included her own reporting as well as material from three of her colleagues. That same day, she sent a note to Donna Cassata, who was then the Post's Congress editor, asking her to review a blog post regarding a lawmaker who mocked Blasey Ford's allegations. Ms. Cassata responded, "I think this has just the right tone." Later, Ms. Cassata thanked Ms. Sonmez for her work on the Kavanaugh article. She wrote, "Great work today."

33. After filing the Kavanaugh story, Ms. Sonmez again met with Defendant Wallsten regarding his review of her statement concerning Mr. Kaiman's resignation. Defendant Wallsten told her that he thought her statement was "too long" and suggested deleting a line concerning the role that news institutions play in combatting sexual misconduct. Defendant Wallsten also said that he was "hesitant" because, while the L.A. Times had reported Mr. Kaiman's suspension, it had not released the news of his resignation. Even though Defendant Grant and the Post's lawyers had signed off on her statement, Ms. Sonmez revised her statement based on Defendant Wallsten's feedback. Neither Defendant Wallsten nor Defendant Grant suggested to Ms. Sonmez that issuing her statement could result in a ban or otherwise limit the types of stories she would be allowed to cover for the Post.

34. During his meeting with Ms. Sonmez, Defendant Wallsten asked Ms. Sonmez how she was doing in the context of Christine Blasey Ford's accusations. Ms. Sonmez responded honestly that it was difficult to read the story and that she needed to take a walk

around the block on Sunday after reading it. She told Defendant Wallsten that upon her return to the office, she continued her work as usual.

35. As discussed and approved by Defendants, on September 18, 2018, Ms. Sonmez sent her revised statement to news outlets that had previously covered the story of her allegations and/or Mr. Kaiman, including the Hong Kong Free Press, the New York Times, the Associated Press and the L.A. Times. She wrote,

I am grateful to the L.A. Times for taking my allegation seriously and investigating Mr. Kaiman's behavior. The voices of women are a crucial part of the equation when it comes to combatting sexual misconduct. But the response of institutions is another essential part. In the case of the L.A. Times' handling of this situation, several questions remain unanswered. The newspaper has not been transparent about the results of its investigation. It has not made clear whether Mr. Kaiman was fired or resigned voluntarily. And it has not addressed questions about the extent of its knowledge of Mr. Kaiman's actions in January and its decision not to further investigate at the time.... Above all, I stand in solidarity with Laura Tucker, who took the brave step of speaking out first, paving the way for others to follow.

36. After Ms. Sonmez notified Defendants that she had sent out her statement, Defendant Wallsten emailed Ms. Sonmez and Defendants Ginsberg and Montgomery to request a meeting at 11:30 a.m. to discuss Ms. Sonmez's statement as it related to the Post's "coverage moving forward." Defendant Wallsten appeared to be referencing the Post's coverage of Christine Blasey Ford's accusations against Brett Kavanaugh. Ms. Sonmez responded that she was scheduled to go on MSNBC at 1 p.m. to discuss the latest in the Kavanaugh story. The story Ms. Sonmez co-wrote with her colleagues regarding the latest Kavanaugh developments appeared on the front page of the newspaper. Defendant Wallsten directed Ms. Sonmez to cancel the MSNBC appearance, denying her an opportunity for nationally televised exposure for her front-page story. Ms. Sonmez canceled her appearance as instructed.

37. At 11:30 a.m. on Tuesday, September 18, 2018, Defendants Ginsberg, Wallsten and Montgomery held a meeting in Montgomery's office wherein they informed Ms. Sonmez that she was barred from writing on the Kavanaugh story until further notice. Defendant Ginsberg told Ms. Sonmez that he believed the details of Christine Blasey Ford's accusations were "too similar" to the assault Ms. Sonmez experienced in Beijing. The editors suggested the ban was due to Ms. Sonmez's discussion with Defendant Wallsten wherein she revealed her initial reaction when she first learned about Ms. Ford's accusations against Mr. Kavanaugh. The editors also expressed their dissatisfaction with Ms. Sonmez's statement, even though she had received Defendant Grant and the Post legal team's approval and incorporated feedback from Defendant Wallsten before issuing her statement.

38. The Kavanaugh story was one of the biggest stories of 2018. It was a topic that was fully within the scope of Ms. Sonmez's coverage as a reporter on the Post's national breaking political news team, and now she was prohibited from covering it because of her status as a victim of a sexual offense.

39. Ms. Sonmez felt dejected, but she was also alarmed that Defendant Wallsten had used her initial reaction as a basis to question whether she could fairly report on a story. Ms. Sonmez responded that she had written at least seven stories that touched on issues of sexual misconduct that were in addition to her daily coverage of Donald Trump, a president who had been accused of sexual misconduct by at least a dozen women. Not a single complaint was lodged, inside or outside of the Post, regarding her reporting. Ms. Sonmez also cited the number and quality of stories she had written or co-written during her short 13-week tenure at the Post, including 13 front-page stories, a total of 41 print stories and more than 100 stories for the Post's

website. Ms. Sonmez was performing the duties of her position at a high level while navigating the L.A. Times investigation and the aftermath of her decision to speak out about her assault.

40. During a subsequent discussion in the newsroom later in the afternoon of September 18, 2018, Defendant Montgomery asked Ms. Sonmez about her assault. Specifically, she asked her why she did not go to the police in Beijing. Defendant Montgomery also told Ms. Sonmez that she was always taught that a woman should “just say no” if a man tries to assault her.

41. Ms. Sonmez raised the issue of the ban and how Defendant Wallsten had misinterpreted her comments to him. Defendant Montgomery, who was Defendant Wallsten’s supervisor, responded that it was hard to “unring the alarm” and that Defendant Wallsten had already “rung” it. In other words, Defendants’ decision to treat Ms. Sonmez differently on the basis of being a victim of sexual assault had already been made and would not be undone.

42. When pressed by the Post’s PR team for an explanation regarding why she could not attend the MSNBC appearance, Ms. Sonmez explained that she “experienced a case of sexual assault by another journalist last year and went public about it a few months ago,” and that her editors were discussing whether to take her off the Kavanaugh story. This is the first of many times that, due to Defendants’ action or inaction, Ms. Sonmez had to explain that she was barred from performing her duties as a politics reporter for the Post because she was a victim of a sexual assault.

43. On the afternoon of September 18, 2018, Ms. Sonmez sent a lengthy email to Defendants Ginsberg, Montgomery, Wallsten and Grant. She wrote, in part, “I think there was some misunderstanding about what I told Peter [Wallsten] in my chat yesterday. ... I never said that I was concerned about my ability to cover the story fairly, or that I was struggling to be fair.

The point I was trying to make to Peter was the exact opposite -- that while it was difficult to read the story, as it would be for any survivor of sexual assault, I prioritize my responsibility as a journalist to be fair and impartial and ‘just do the work.’ I made no statements about the merits of the Kavanaugh case, and before I left Peter’s office, I stressed that I felt comfortable and well-equipped to report on the Kavanaugh allegations and that it is my desire to continue to do so.”

Ms. Sonmez reiterated that she worked with Defendant Grant, the Post’s PR department, attorneys and Defendant Wallsten in drafting and obtaining approval for her statement on the L.A. Times situation and that the end result was not a controversial statement. She also wrote, “I now feel frustrated and uncomfortable being in the newsroom but unable to report on this story, and that newsroom management appears to have an incorrect idea of my own view of whether I can report fairly on it. I feel that I have been sidelined from this story based on what happened to me in Beijing, contrary to what [Defendant Grant’s] message to me was last week, and I strongly disagree with this decision.”

44. At the end of her email to her editors, Ms. Sonmez included links to eight stories she had written related to the issue of sexual misconduct over the past three months to emphasize the quality of her reporting on this issue.

45. During a meeting later that evening in Defendant Barr's office, Defendants Ginsberg, Barr and Grant reiterated to Ms. Sonmez that the ban would stay in place. Defendant Barr accused Ms. Sonmez of being an “activist” by speaking out on the issue of her own assault and the need for transparency by organizations like the L.A. Times and the FCCC. Defendant Barr stated that, by speaking out publicly, Ms. Sonmez had “taken a side on the issue” of sexual assault. He also told Ms. Sonmez she was “trying to have it both ways” by publicly disclosing her own assault and continuing to report on the topic. Defendant Ginsberg raised his voice and

told Ms. Sonmez that it would present “the appearance of a conflict of interest” if she continued to report on Kavanaugh or any other issues related to sexual misconduct. Ms. Sonmez attempted to respond that the ban would give her colleagues the false impression that she was unable or unwilling to do her job, which included covering stories related to the issue of sexual assault. Defendant Ginsberg angrily accused Ms. Sonmez of wanting news outlets to report on Mr. Kaiman’s resignation. When Ms. Sonmez attempted to explain her mindset, Defendant Ginsberg yelled, “Answer the question!” Defendant Barr stated, “We don’t have reporters who make statements on issues they are covering. We don’t want the external perception that we have an advocate covering something she has experienced. He added, “The work you do intersects with what you experienced in your life.” Ms. Sonmez noted that this is no different from any other reporter in the newsroom. Defendant Grant insinuated that Ms. Sonmez was a threat to the Post’s ability to win prizes for its coverage of Christine Blasey Ford’s accusations and that editors must “protect the story.”

46. The nature of Ms. Sonmez’s job requires her to regularly work with hundreds of journalists across the Post’s newsroom. Ms. Sonmez drafted an email to the reporters and editors that she worked closely with to inform them of the ban and sent it to Defendants Wallsten, Ginsberg and Montgomery for their review. Defendant Ginsberg instructed her not to send it. Ms. Sonmez was thereby forced to repeatedly explain, on the numerous occasions when a story related to sexual assault presented itself, that she was banned from covering such stories because she is a survivor of sexual assault and has spoken out about her own experience.

47. On September 19, 2018, Ms. Sonmez received an inquiry from a reporter with the South China Morning Post who was writing a story about Mr. Kaiman. The reporter told Ms. Sonmez that she had interviewed Mr. Kaiman and that he had asserted his own allegations

against her regarding the incident in Beijing. For example, he claimed that it was consensual sex, that he had used a condom (disputing Ms. Sonmez's assertion that he did not use protection during the assault), that Ms. Sonmez had a crush on him and that if it had truly been non-consensual sex, Ms. Sonmez would have gone to the Chinese police. Mr. Kaiman's allegations sickened Ms. Sonmez.

48. Ms. Sonmez forwarded the reporter's email to Defendants Grant, Ginsberg and Wallsten. During a meeting in Defendant Grant's office, Defendants Ginsberg and Grant told Ms. Sonmez that the Post would not play any role in advising her on how to respond. However, later that day, Defendant Wallsten forwarded the South China Morning Post reporter's email to editors including Defendant Montgomery and the Post's director of communications, Shani George, and wrote, "I am copying others here who should also be up to speed on this and involved in the deliberations regarding your response, as there are clear implications for the Post." The Post's decision to impose its control on Ms. Sonmez's response to Mr. Kaiman's accusations and institute a ban on her coverage of sexual assault-related stories was based solely on her status as a victim of a sexual offense.

49. Defendants Grant and Ginsberg instructed Ms. Sonmez to take a few days off. While she was on leave, Ms. Sonmez sought clarification on what, if any, role the Post was expecting to play in the crafting of her response to Mr. Kaiman's allegations because she had received conflicting information from the editors. Defendant Grant responded that the Post would like to continue to receive updates on any developments, but that it was up to Ms. Sonmez to decide how she wished to respond to Mr. Kaiman's assertions.

50. Ms. Sonmez was set to return to work her regular shift on Sunday, September 23, 2018. She emailed her editors on Friday, September 21 in preparation for her return. Defendant

Wallsten replied and instructed Ms. Sonmez to continue to stay home and to check back on Wednesday, September 26. Defendant Wallsten's response caused Ms. Sonmez to fear that her job might be in peril, on top of the distress she experienced due to the ban. During a phone call later that evening, Defendant Grant chastised Ms. Sonmez for failing to include in her letter to the FCCC some of the assertions that Mr. Kaiman made to the reporter from South China Morning Post. Ms. Sonmez reiterated that she was semi-conscious during the assault and that she vehemently disputed Mr. Kaiman's characterization of the encounter as consensual. At one point during the conversation, Defendant Grant told Ms. Sonmez, "I do think the only thing we have as journalists is our credibility and our willingness to be transparent."

51. Ms. Sonmez was finally allowed to return to work on Sunday, September 30, 2018, several days after Brett Kavanaugh and Christine Blasey Ford testified before the Senate Judiciary Committee.

52. On October 2, 2018, Defendants Ginsberg, Wallsten and Grant met with Ms. Sonmez in Defendant Grant's office. Defendant Grant voiced her anger at Ms. Sonmez's previous attempt to send an email to her colleagues explaining what she was told was the justification for banning her from covering the Kavanaugh story. In the email, which was never sent, Ms. Sonmez was careful to use Defendant Barr's precise explanation that it appeared to be a conflict of interest. Defendant Grant again raised Mr. Kaiman's allegations in support of his defense and said that she wanted this to be the last discussion they had on the issue of Ms. Sonmez's assault. In an email the next day, Defendant Grant wrote, "Just to reiterate what we discussed yesterday, we feel it's best for the public discussion of this to be in the rear-view mirror. If you feel the need to respond/discuss further publicly... doing so would potentially limit the stories you could handle."

53. Defendants' ban on Ms. Sonmez's coverage of stories related to sexual assault was consistent with the unequal treatment women experience at the Post in comparison to men. The vast majority of the Post's department heads are men, and historically there have been very few women at the top of the newsroom. Some of the men who are in charge manage their female subordinates based on outdated stereotypes, including that women are unable to be as "objective" as their male colleagues because, *inter alia*, they are too emotional. This has created a barrier to women's ability to ascend to and succeed in leadership roles. This male-dominated culture and stereotyping was in full force with respect to Ms. Sonmez's unlawful treatment.

54. For example, Ms. Sonmez was tasked with writing about a Trump rally that unexpectedly<sup>1</sup> involved the former president making derogatory statements about Mr. Kavanaugh's accuser. Defendant Wallsten cautioned Ms. Sonmez to "write it straight," as if to automatically assume that she was incapable of unbiased reporting. Defendant Wallsten's statement was eerily similar to a statement made by Defendant Baron when an editor sought his approval to bring in a female editor on a story about sexual misconduct allegations against Jeff Fager, the former executive producer of "60 Minutes." In a *New York Magazine* story titled "What Was the Washington Post Afraid of?" writer Irin Carmon described how, during the editing process for the Fager story, one of the Post's editors went to Defendant Baron and asked that female editors be included in reviewing the story. Ms. Carmon wrote, "Baron agreed but added that all decisions about the story would be made strictly on the 'basis of journalism,' which suggested that Baron believed that women were incapable of editing a story involving sexual misconduct in an objective and unemotional manner." As Ms. Carmon indicated in her

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<sup>1</sup> If Defendants had anticipated that this issue would come up at President Trump's rally, Ms. Sonmez would have been prohibited from writing the story at the outset.

article, in the case of these #MeToo stories, powerful male editors often empathize more with a man being accused of misconduct than a woman who has experienced mistreatment, which subjugates a woman's perspective in favor of the man's. Defendant Wallsten's concern that Ms. Sonmez's statement not be the initial disclosure regarding Mr. Kaiman's resignation exemplified this mentality. The Post ended up killing the Fager story. The New Yorker's Ronan Farrow ultimately ran a story about Mr. Fager, who was later forced out of his job.

55. Around the time that Ms. Sonmez was interviewing for her position at the Post, she was told about a male colleague who faced sexual misconduct accusations including sending an unsolicited photo of his underwear-covered crotch to a young woman. Defendant Baron never ordered that the reporter be banned from covering stories related to sexual misconduct or inappropriate behavior by men. Upon information and belief, none of the reporter's editors said his writing on the topic would present a "conflict of interest" or questioned whether he was capable of objective reporting. He was given a prominent position, wrote more than a dozen stories that touched on these issues and continues to do so today.

56. On October 10, 2018, Defendants Ginsberg and Wallsten met with Ms. Sonmez to inform her that even though the Kavanaugh story was out of the news, she was still prohibited from participating in any #MeToo-related coverage until the mid-term elections were over.

57. The ban continued to expand over time; Ms. Sonmez was now prohibited from reporting on stories that barely related to sexual misconduct. Sometimes, she was taken off multiple stories in one day. For example, due to the ban, Ms. Sonmez was not allowed to write about the latest developments in then-Sen. Heidi Heitkamp's (D-N.D.) reelection race on October 16, 2018, because the story involved a campaign ad in which Sen. Heitkamp inappropriately identified survivors of sexual abuse. A few hours later, Ms. Sonmez was

preparing to write a story about the resignation of Alaska's lieutenant governor when an editor informed her that she was being taken off the story because it involved inappropriate comments the lieutenant governor had made to a woman.

58. Every instance that Ms. Sonmez was prohibited from writing a story was an act of discrimination and/or retaliation. Each time, the ban served as a constant reminder that she was assaulted and that her editors viewed her as being somehow “defective” in comparison to her colleagues who were outside of her protected class. Ms. Sonmez also missed out on significant news stories that she was more than capable of covering, which would have elevated her professional profile as a national reporter on the political breaking news team. And on a personal level, the ban made it impossible for Ms. Sonmez to fully move on after her assault, as she was reminded of it at work on a daily basis and was forced to frequently mention it to colleagues when asked why she was not allowed to write certain stories.

59. On November 7, 2018 -- the day of the midterm elections -- the ban on writing any #MeToo-related stories expired without any announcement or discussion. After the ban was lifted, Ms. Sonmez wrote approximately two-dozen stories on topics related to sexual misconduct or #MeToo. Even though the ban was no longer in effect, Ms. Sonmez's treatment by her editors remained markedly different in comparison to her colleagues outside of her protected class, especially her male colleagues. For example, when Defendant Wallsten was present in Ms. Sonmez's workspace that she shared with her male teammate, John Wagner, Defendant Wallsten would often speak only to Mr. Wagner. Ms. Sonmez was similarly sidelined during team meetings with her editors. Moreover, for months, Mr. Wagner was allowed to describe himself as a "national reporter leading The Post's breaking political news team" in his official biography on the Post's website. This only changed after Ms. Sonmez and another

female team member — both of whom held the same job title as Mr. Wagner and did the same work as him — raised the issue with the editors.

### **The Post Institutes its Second Ban on Ms. Sonmez**

60. On or about August 7, 2019, writer Emily Yoffe requested to interview Ms. Sonmez for a story she was doing for Reason Magazine on the allegations against Mr. Kaiman. In an email that was meant for Ms. Yoffe's editor that she inadvertently sent to another potential interviewee, Ms. Yoffe made it clear that her story for Reason would attack Mr. Kaiman's accusers for speaking out. In her email to her editor, Ms. Yoffe wrote, *inter alia*, that women "convince themselves they are victims" and that "there is a thrill in publicly denouncing someone." Ms. Yoffe also wrote that she "loved" the details of the other potential interviewee's encounter with Mr. Kaiman, which was an alleged sexual assault.

61. On Friday, August 23, 2019, Ms. Yoffe's article was published in Reason Magazine. As foretold by the email intended for her editor, Ms. Yoffe's article was scathingly critical of Ms. Tucker and Ms. Sonmez and contained numerous inaccuracies used to support the predetermined direction of the article. Ms. Yoffe focused on the "injustice" that Mr. Kaiman suffered because his accusers came forward and the effect the allegations had on his life and career trajectory. Ms. Yoffe completely ignored the fact that Mr. Kaiman was responsible for his actions, which led to the accusations against him, and that he was also responsible for his response to the accusations and the repercussions that followed.

62. Dozens of abusive messages targeting Ms. Sonmez were posted online in the wake of the publication of Ms. Yoffe's article. Some described Ms. Sonmez as "evil" and "sociopathic." Some stated, "If any women deserve to be raped, these two do," referring to Ms. Sonmez and Ms. Tucker. Others urged Ms. Sonmez to kill herself.

63. Ms. Sonmez apprised her editors of the article and the negative attacks directed at her. On Sunday, August 25, 2019, she submitted a request for correction to Reason Magazine, and also posted her request for correction on her Twitter account. She later pinned it to the top of her Twitter profile in an effort to head off any further online attacks. None of her editors indicated that her Twitter posts violated the Post's Social Media Policy.

64. On Friday, August 30, 2019, the website Jezebel posted a story concerning the errors and omissions in Ms. Yoffe's article. On September 1, 2019, NPR's "All Things Considered" posted a radio segment online in which the host and guests discussed Ms. Yoffe's article and the #MeToo movement more broadly. During the broadcast, Mr. Kaiman's actions were described as "private encounters between two consenting adults." One of the guests, Atlantic contributing writer Caitlin Flanagan, made comments that grossly mischaracterized Ms. Sonmez's allegations and her reasons for speaking out about her assault.

65. On September 3, 2019, in a Twitter exchange with Ms. Sonmez, Ms. Flanagan tweeted, "Felicia, the person you're really angry at lost his job and his book contract. He's had suicidal episodes and no health insurance. He feels hopeless and he's living with his parents. What more do you want from him? You won." The tweet prompted another wave of online abuse directed at Ms. Sonmez by dozens of Twitter users who agreed with Ms. Flanagan and Ms. Yoffe's narrative concerning Mr. Kaiman's accusers.

66. The following day, on September 4, 2019, during a meeting in Defendant Montgomery's office, Defendants Ginsberg and Montgomery informed Ms. Sonmez that the Post was again suspending her indefinitely from covering any #MeToo-related topics. Defendants Ginsberg and Montgomery did not state or suggest that Ms. Sonmez was in violation

of any company policy, including the Post’s Social Media Policy. Ms. Sonmez vehemently protested the ban for essentially the same reasons she protested the first ban — again to no avail.

67. Ms. Sonmez was also forced to explain to her assignment editors and colleagues that she was yet again prohibited from covering #MeToo-related stories, thus republicizing the fact that the ban was enacted because she was a victim of a sexual offense and had spoken out against the same.

68. On October 2, 2019, Defendant Ginsberg instructed Ms. Sonmez to clear all future social media posts and responses related to her assault with her editors before posting them. The next day, he asked Ms. Sonmez to take down the tweet she had pinned on her Twitter profile containing her August 25 correction request to Reason Magazine because the tweet made him “uncomfortable.”

69. Ms. Sonmez explained that she kept the pinned tweet up to protect her against the false statements that Emily Yoffe, Caitlin Flanagan and others continued to make about her. Ms. Sonmez also told Defendant Ginsberg that publicly correcting the record helped others understand the consequences that sexual assault survivors face after speaking out. Mr. Ginsberg continued to voice concern about the tweet and stated that in general, it would be better if she tweeted more about impeachment and less about what happened to her. At no point did Defendant Ginsberg cite the Post’s Social Media Policy.

70. The next day, October 4, 2019, Defendant Ginsberg called Ms. Sonmez on her day off to again push her to remove the tweet regarding her response to the Reason article. He told her that if she removed it, the Post could meet her need to speak out publicly by allowing her to continue to tweet responses to any future attacks. Ms. Sonmez reiterated that keeping the tweet pinned was a safety measure designed *to prevent* future attacks. Ms. Sonmez was being

viciously harassed online, and instead of supporting her (if not publicly, then at least privately), the Post was further exacerbating her distress by asking her to remove one of the only protections she had against further online abuse.

71. Defendant Ginsberg continued to press Ms. Sonmez to take down the pinned tweet. After several minutes, Ms. Sonmez asked whether Mr. Ginsberg would put his request in writing. Defendant Ginsberg responded that he would get back to her as he had another phone call to take.

72. On October 17, 2019, almost two weeks after her phone conversation with Defendant Ginsberg, Ms. Sonmez was called in to a meeting with Defendants Grant and Barr, where she was issued a written warning for violating the Post's Social Media Policy by defending herself from the false accusations regarding her sexual assault. The warning cited Ms. Sonmez's pinned tweet and stated that "reporters should make every effort to remain in the audience, to be the stagehand rather than the star, to report the news, not to make the news." Ms. Sonmez was warned that future infractions would lead to her termination. In short, the Post disciplined Ms. Sonmez for making herself the "star" of her own sexual assault and for criticizing other news organizations. This was the first time that Defendants used the Post's Social Media Policy as a basis to discipline Ms. Sonmez.

73. During the meeting, Ms. Sonmez asked how she should proceed if she was attacked online again. Defendants failed to provide real guidance on what, if any, type of response she could make that would not run afoul of the Post's vague and inconsistently applied Social Media Policy. Ms. Sonmez reminded Defendant Barr that Columbia Journalism Review had recently interviewed her for a piece on the #MeToo movement and journalism. Defendant Barr sarcastically replied, "We have high hopes for that." Defendant Grant also offensively

characterized Ms. Sonmez's concerns regarding the coverage of her case as "errors real or imagined." At one point, Defendant Grant chastised Ms. Sonmez for taking notes during the meeting and told her to stop because "our words could be used against us."

74. On November 25, 2019, Ms. Sonmez and members of the Washington Post Guild attended a meeting with Defendant Grant and the Post attorney to discuss a grievance filed by the Guild concerning Ms. Sonmez's purported violation of the Social Media Policy. At the meeting, Ms. Sonmez and the Guild requested written guidance regarding how Ms. Sonmez could defend herself online from attacks without running afoul of the Post's Social Media Policy, which did not address this issue. Moreover, Plaintiff's editors had made conflicting statements regarding whether defending herself was a personal issue that did not involve the Post, whether she needed Defendants' approval before tweeting, whether the Post wanted to craft her responses, and finally, whether the Post had the authority to prevent Ms. Sonmez from posting on social media. Ms. Sonmez pointed out that Defendant Grant's instruction to not take notes during the October 17, 2019, meeting likely violated the Post's policies. Defendant Grant ended the grievance meeting shortly after this issue was raised without providing a response to the questions raised.

**Ms. Sonmez is Suspended for Tweeting an Article About  
Kobe Bryant's Sexual Assault Case**

75. On or about Sunday, January 26, 2020, Ms. Sonmez was working her regular Sunday shift in the newsroom when news broke that basketball star Kobe Bryant had died in a helicopter crash. Ms. Sonmez began reading stories about sexual assault allegations that were lodged against Mr. Bryant several years back, including a 2016 article from the Daily Beast that summarized the allegations against Mr. Bryant and the ensuing court case. Ms. Sonmez posted a link to the Daily Beast article on her Twitter feed. The tweet contained no commentary, only the title of the article: "Kobe Bryant's Disturbing Rape Case: The DNA Evidence, the Accuser's

Story, and the Half-Confession.” Posting articles from other news organizations is a typical social media practice for journalists at the Post and in virtually all other news organizations throughout the world.

76. Ms. Sonmez’s Twitter account and work email immediately became inundated with abusive messages. In an attempt to stem the barrage of harassment, Ms. Sonmez posted a follow-up tweet: “To the 10,000 people (literally) who have commented and emailed me with abuse and death threats, please take a moment to read the story — which was written 3+ years ago, and not by me. Any public figure is worth remembering in their totality, even if that public figure is beloved and that totality unsettling. That folks are responding with rage & threats toward me (someone who didn’t even write the piece but found it well-reported) speaks volumes about the pressure people come under to stay silent in these cases.”

77. At 5:38 PM on Sunday, January 26, 2020, Defendant Baron sent an email to Ms. Sonmez containing a screenshot of her original tweet in which she shared the link to the Daily Beast article. Defendant Baron copied Defendants Grant, Ginsberg and Barr on the email. “Felicia,” he wrote, “A real lack of judgment to tweet this. Please stop. You’re hurting this institution by doing this. Marty.” Upon information and belief, Defendant Ginsberg has claimed that it was Defendant Baron, and not he, who made the decisions to subject Ms. Sonmez to the coverage bans.

78. Ms. Sonmez emailed Defendants Grant and Wallsten to inform them that she was receiving threats via Twitter and email. She shared links to the tweets and described the abusive and threatening messages that were flooding her work inbox. Defendant Grant responded by instructing Ms. Sonmez to delete the initial tweet and her responses and to refrain from “further discussion on social media of a story that does not pertain to your coverage area.” It was

obvious that Defendant Grant was concerned exclusively with protecting the Post even it meant discriminating against Ms. Sonmez. Defendant Grant did not address the abuse and threats against Ms. Sonmez.

79. Ms. Sonmez responded that she would comply with deleting the tweets and asked what the Post suggested she do regarding the threats she was receiving, including one that mentioned her home address (referred to as doxxing). Defendant Grant responded that the Post's Director of Social and Operations "should be able to reach out to twitter [sic] to get that one taken care of." Again, she failed to address the abuse and threats against Ms. Sonmez.

80. Ms. Sonmez again asked about her security situation: "As I mentioned in my initial email, I am receiving a flood of threats. People are now emailing me with my home address and telling me I deserve to be raped/killed/etc. I would appreciate some further guidance from the Post's security team on what to do." Defendant Grant responded by instructing Ms. Sonmez to delete the tweets as she is "still seeing them" and wrote, "You are not helping your security situation by keeping them up. You are also in violation of a directive from a managing editor...The security protocol is to not respond to threats."

81. In a separate email, Ms. Sonmez confirmed that the tweets had been deleted. Defendant Grant responded, "Thank you for deleting the tweets. You might want to consider a hotel or a friend's place for this evening. I'll be in touch later tonight or tomorrow." It was apparent that Defendant Grant and the other Defendant editors viewed the deletion of the tweets as a more urgent issue than the death and rape threats (and sharing of Ms. Sonmez's home address). Instead of contacting the Post's security team, as is the protocol when a reporter is threatened, Defendant Grant urged Ms. Sonmez to ignore the threats.

82. Fearing for her safety, Ms. Sonmez copied the Post's Director of Security on her email exchange with the Defendant editors to include him in the discussion. She checked into a hotel that night because she was afraid to go home.

83. At 8:15 PM that night, Defendant Grant called Ms. Sonmez to inform her that she had been placed on administrative leave, effective immediately, while the Post investigated whether her tweets warranted disciplinary action. Defendant Grant stated, "We will be in touch as we need to be." When Ms. Sonmez asked about her security situation, Defendant Grant again appeared unconcerned.

84. Early the next morning, Monday, January 27, 2020, stories began appearing in the media indicating that Ms. Sonmez had been suspended and that the Post was investigating whether her tweets concerning Kobe Bryant violated the Post's Social Media Policy. The Daily Mail's story contained a quote from Defendant Grant: "National political reporter Felicia Sonmez was placed on administrative leave while The Post reviews whether tweets about the death of Kobe Bryant violated The Post newsroom's social media policy. The tweets displayed poor judgment that undermined the work of her colleagues."

85. Defendant Grant's public admonishment of Ms. Sonmez was met with criticism online. One Twitter user wrote, "This is a dangerous precedent. How could they suspend her for ONLY sharing a valid news report? Are they sure they're a publication?" Ms. Sonmez, who was living at a hotel and dealing with rape and murder threats, experienced severe emotional distress and embarrassment as a result of Defendants' actions, all of which were taken because of her status as a victim of a sexual offense.

86. The Washington Post Guild shared on Twitter a link to a letter it had drafted to Defendants Baron and Grant supporting Ms. Sonmez. "We write to share our alarm and dismay

that our newsroom leaders have chosen to place Felicia Sonmez on leave over a social media post, and to urge The Post to take immediate steps to ensure the safety of our colleague. This is not the first time that The Post has sought to control how Felicia speaks on matters of sexual violence. Felicia herself is a survivor of assault who bravely came forward with her story two years ago. When articles attacking her were published in other outlets, The Post did not release a statement in support of one of its respected political reporters. Instead, management issued a warning letter against Felicia for violating The Post's vague and inconsistently enforced social media guidelines." Dozens of Ms. Sonmez's colleagues initially signed the letter; over the next two days, more than 300 Post employees signed it.

87. On January 28, 2020, the Guild's stewards and Ms. Sonmez met with Defendants Grant and Barr regarding the Post's investigation into her suspension. Later that day, Defendant Grant informed Ms. Sonmez that there was no violation of the Post's Social Media Policy and that her suspension was lifted.

88. The Washington Post Guild issued a statement via Twitter that while the lifting of Ms. Sonmez's suspension was a "welcome development," the Guild remained concerned that the Post did not take swift action to provide Ms. Sonmez with protection and support and that it failed to apologize to Ms. Sonmez.

89. Later that evening, Defendant Grant issued a newsroom-wide memo to staff, signed by Defendants Baron, Barr and then-managing editor of digital Emilio Garcia-Ruiz that stated, *inter alia*, "We always endeavor to act quickly and thoroughly to protect and defend our colleagues from intimidation and threats." Defendant Grant acknowledged that the Post's policies concerning the use of social media were in need of an update because "individual cases that have arisen in recent years indicate to us that further guidance is needed."

90. In February 2020, Defendants Baron, Grant, Barr and Emilio Garcia-Ruiz held three "social media conversations" at which all newsroom employees were invited to share their views. At one of the meetings, an employee asked Defendant Baron whether matters such as murder and sexual assault can be viewed as issues with "two sides." Defendant Baron responded: "Murder is evil, okay? ... It's when you get to the point of advocacy of certain policies [that the line is crossed]."

91. In early April 2020, Ms. Sonmez received a lower rating for her 2019 Performance Evaluation, which resulted in a lower raise than what she would have been entitled to receive if she had not engaged in protected activity and/or if she was not in a protected class for victims of a sexual offense.

92. On April 29, 2020, Ms. Sonmez inquired about the status of the ban because she was tasked, as part of her team, with covering a story on Tara Reade's allegations against Joe Biden. On May 1, 2020, Defendant Ginsberg responded that the Post would stick with the "status quo."

93. Ms. Sonmez responded that she strongly disagreed with the decision. "I think it negatively impacts our coverage and reduces the effectiveness of our breaking news team... it's simply discriminatory for the Post to bar one of its reporters from covering sexual assault due to her identity as a sexual assault survivor who has publicly come forward." She also explained that the ban was having a negative impact on her well-being. "I believe it's important for you to know that The Post's decision on this matter has had negative repercussions for me personally in the past, and it will continue to do so. It is humiliating to again and again have to tell my colleagues and editors that I am not allowed to do my job fully because I was assaulted...It's the tortured explanations I have to give whenever there is breaking news on this topic and I'm not

allowed to cover it.” She also wrote, “just the knowledge that I am not seen by my editors as equal to my two teammates — who have been given no restrictions on their coverage areas — is humiliating in itself. I just want to do my job. I’ve already proven that I can write with clarity, speed and authority on this topic; if anything, I believe my experience gives me a better understanding of the nuances, sensitivities and responsibilities involved in covering sexual assault. Having to stand by helplessly and watch while my teammates write and I cannot makes me feel terrible.” Defendants did not respond to Ms. Sonmez’s email.

94. On May 19, 2020, Ms. Sonmez met via Zoom with Defendants Wallsten and Montgomery to discuss her 2019 Performance Evaluation, in which she received a low score of 2 out of 5 in the category of whether she takes ownership of her work. The basis for the low score was Ms. Sonmez’s tweets defending herself from false claims related to her sexual assault. During the Zoom meeting, Ms. Sonmez again asked for clarity on the prohibition on her writing about sexual assault. Defendant Montgomery responded by saying there is “concern about an appearance of a conflict on these issues.”

95. On May 26, 2020, Defendant Wallsten wrote Ms. Sonmez an email following up on their meeting about her performance review. He wrote, “You indicated that the limitation on what you could write was causing you emotional distress. I’m really sorry you are unhappy with the parameters of your assignment — which is to write about breaking political news with the exception of political news that involves sexual harassment and assault. But it is up to The Post to determine coverage assignments and I do not anticipate yours changing anytime soon. I hope that this provides the clarity you were requesting.” The ban continued, notwithstanding that it was blatantly discriminatory, taking a tremendous toll on her mental health, causing harm to Ms. Sonmez’s reputation as a reporter and denying her opportunities to advance.

96. On July 30, 2020, Ms. Sonmez's colleague, Alex Horton, an Iraq War veteran who covers the military for the Post, messaged Ms. Sonmez to give her a heads up that President Trump would be meeting in the afternoon with family members of slain Army soldier Vanessa Guillén. Mr. Horton asked Ms. Sonmez if she would be available to write about the meeting. Ms. Guillén's family stated that she had been sexually harassed before her death. Ms. Sonmez told Mr. Horton that she was unable to write on the story due to the ban. John Wagner, Ms. Sonmez's colleague on the breaking news team, wrote the story instead. Interestingly, the Post did not view Mr. Horton's military service as a disqualifying factor in his coverage of military affairs. To the contrary, upon information and belief, *because* Mr. Horton was a veteran, it made him uniquely qualified to cover stories on military affairs.

97. The same day, Ms. Sonmez was also barred from writing a story on former Republican presidential candidate Herman Cain's death from Covid-19. After offering to write the story via a message to the Post's #politics-breakingnews Slack channel (which has more than 400 members), Ms. Sonmez was prohibited from writing about it because Mr. Cain had previously been accused of sexual misconduct. John Wagner, her male colleague, again drafted the story.

98. Similarly, on February 24, 2021, a former aide to New York Governor Andrew Cuomo accused the governor of sexual misconduct. News outlets around the country, including the Post, covered this story, which continued to dominate the news for several weeks. Ms. Sonmez was not allowed to report on it due to the ban.

**The Second Ban is Lifted Because the Post  
Could No Longer Justify its Discrimination**

99. On February 24, 2021, a Huffington Post reporter tweeted a photo of Ms. Sonmez’s colleague, Seung Min Kim, questioning Sen. Lisa Murkowski (R-Alaska) about an old tweet by Biden OMB nominee Neera Tanden criticizing Ms. Murkowski. The post went viral. Ms. Kim’s inbox and Twitter feed became inundated with threatening messages. The online harassment was intense and lasted for days. Unlike when Ms. Sonmez was similarly attacked for her tweets about her own sexual assault or retweeting a news article concerning Kobe’s Bryant’s sexual assault allegations, Ms. Kim was immediately offered assistance by the Post’s editors. Defendants Ginsberg, Wallsten and Montgomery publicly voiced their support of Ms. Kim through Twitter and other platforms. For example, Defendant Ginsberg tweeted, “@seungminkim has been subjected to hateful attacks simply for doing her job—a job she does with integrity, upholding the highest journalistic standards. No one should have to endure the racist, sexist, ill-informed comments that have flooded her inbox.”

100. On March 3, 2021, Ms. Sonmez’s colleague Michelle Ye Hee Lee hosted a “Washington Post Live” virtual event with actors Daniel Dae Kim and Daniel Wu. The 30-minute event was about the recent rise in anti-Asian discrimination and violence. Until July 2021, like Ms. Sonmez, Ms. Lee was a reporter on the Post’s National desk. She covered campaign finance and is also president of the Asian American Journalists Association. Ms. Lee has reported on anti-Asian hate crimes for the Post; she has also frequently issued statements via her social media condemning such crimes and discussing ways that news outlets can do a better job about reporting on issues related to the Asian American community. Ms. Lee was rightfully praised by Defendants for her work and given a prominent platform to discuss and report on

issues related to violence against Asian Americans. For example, Ms. Lee appeared on CNN's "Reliable Sources" to discuss shortcomings in news organizations' recent coverage of anti-Asian violence. Rather than chastise Ms. Lee for criticizing other news organizations, Defendants praised her. "So proud to call @myhlee a colleague," Defendant Wallsten tweeted. "She's a stellar journalist, and her leadership is an inspiration." Ms. Sonmez, meanwhile, was repeatedly punished, prohibited from doing her job and chastised for "trying to have it both ways" by publicly revealing her own assault and continuing to report on the topic. She was also denounced as an "activist" for calling on news organizations to do a better job of reporting on sexual misconduct and protecting female journalists.

101. The hypocrisy to which Ms. Sonmez was subjected to hit a breaking point during a March 16, 2021 Zoom Town Hall meeting titled, "Newsroom Conversation: Let's talk about race, trust and newsroom culture." During this virtual meeting that was attended by hundreds of Post employees, Defendant Ginsberg spoke about the importance of being an ally, and the need for managers to give their employees agency in handling online harassment. Defendant Ginsberg recounted the steps that he took in handling Ms. Kim's situation. Others who spoke at the meeting held Defendant Ginsberg up as a role model for how to defend employees who are being harassed. Ms. Sonmez, who was still subject to the ban, was understandably uncomfortable with the praise being heaped on Defendant Ginsberg and the other editors who instituted the ban and who had also been silent when she fled to a hotel for her safety. She sent a message to the entire Zoom chat: "I wish editors had publicly supported me in the same way when I was being harassed rather than suspending me." At one point, an attendee asked the senior editors about the difference between Ms. Sonmez's situation and Ms. Kim's. After being asked at least two times, Defendant Barr dismissed the question, stating that this was not the time

or place to compare cases. Ms. Sonmez was exhausted from having to repeatedly remind people of Defendants' discriminatory actions. She was similarly distressed by Defendants' efforts to rewrite the roles they had played in order to burnish their reputations. After the Zoom meeting, Ms. Sonmez took several days off, as she was experiencing symptoms associated with post-traumatic distress.

102. Upon Ms. Sonmez's return to work on Monday, March 22, 2021, she was set to write on the news that former Missouri governor Eric Greitens was running for Senate. In gathering background for the story, Ms. Sonmez learned that Mr. Greitens had resigned as governor in 2018 amid sexual misconduct allegations. She was unable to write the story as a result. In a private message to Campaign Editor Cathy Decker, Ms. Sonmez expressed her frustration and the emotional toll the Defendants' actions had taken on her. She wrote, "I've explained to Steven, Peter and Lori how harmful this is to me, but the response was basically, sorry you feel that way...Peter's last email to me on the topic was so final - basically, the ban is never being lifted - I just haven't raised it since then. And I've just kept doing my job. But the town hall was so painful, and coupled with this it has been hard to deal with."

103. On March 26, 2021, Vanity Fair published an article quoting Defendant Ginsberg discussing the importance of supporting female journalists who face hostility online. The introductory paragraph was as follows:

"It started late one day, and you could see it kind of building on social media," Washington Post national editor Steven Ginsberg recalled of the torrent of online abuse directed last month at Seung Min Kim. The Post reporter had been photographed showing Senator Lisa Murkowski a critical tweet sent by Neera Tanden and seeking comment, a standard journalistic practice somehow interpreted as out of bounds or even unethical. The first thing Ginsberg and other Post editors did was reach out to Kim—"just to say: We're here, we see it, we care, and how are you doing?" But the racist and sexist attacks only escalated, propelling Ginsberg to put out a statement to not only take a stand against harassment, but to try to move the ball

forward by explaining why what Kim was doing was completely appropriate. “She and other minority women endure vile, baseless attacks on a daily basis, no matter what story they are working on or tweeting about,” he wrote. “The attacks on her journalistic integrity were wildly misguided and a bad faith effort at intimidation.” Ginsberg’s goal, he told me, was “to defend and educate.”

104. Ms. Sonmez was stunned to see that the same editor who had silenced her from defending herself online, said nothing when she had to leave her home amid threats and continued to bar her from doing her job was being quoted as an authority on protecting female journalists. Defendant Ginsberg was aware that his remarks at the March 16 town hall had caused Ms. Sonmez extreme emotional distress, yet he continued to promote his handling of Ms. Kim's situation in the Vanity Fair article, knowing full well that he not only had done nothing to defend Ms. Sonmez but instead had actively discriminated against her, punished her and ignored her pleas for help amid escalating threats of rape and murder.

105. While the Post and its editors were basking in the positive coverage surrounding their defense of their reporters who were attacked online, Ms. Sonmez was experiencing symptoms of acute stress disorder, including intrusive thoughts, dissociation, significant distress, an inability to focus, and fluctuations in her ability to eat and sleep. To be clear, Ms. Sonmez fully supported the Post’s actions with respect to Ms. Kim. Defendants’ unlawful actions towards her led her to post on Twitter, “Wish the same Post editor who is quoted in this piece supported me when I was doxxed and had to leave my home. Instead, they were silent, and I was suspended. They continue to prevent me from fully doing my job, by barring me from covering sexual assault—an action so harmful that I haven’t been able to work for much of the past two weeks, am taking sick leave next week and have experienced a recurrence of the same debilitating symptoms that I had when I came forward about my assault 3 years ago. Yes, supporting your staff matters, @stevenjay.”

106. On Sunday, March 28, 2021, Politico wrote a story about the Post's mistreatment of Ms. Sonmez. Along with posting a link to the story, Ms. Sonmez wrote on Twitter, "I'm not planning on going anywhere. The Washington Post needs to do better. I just want to do my job." She made additional posts on Twitter that day that stated, in part, "I've tried to keep my head down and just do my job the best I can, despite having to take myself off sexual assault-related stories at least once every week or two, sometimes even more often." Ms. Sonmez also wrote: "I faced no ban my first three months on the job. I wrote #MeToo-related stories with no problem. It was only once the Kavanaugh story broke in Sept. 2018 that the editors enacted one. It was lifted several months later, then reinstated in late 2019 when I was being attacked online after the publication of a story about the man who assaulted me. The ban has been in place ever since, for more than a year now....If I am attacked online by an army of misogynist trolls, that does not harm The Washington Post any more than my awesome colleague @seungminkim harms the Post by facing a relentless swell of racism online. Neither of us is less capable of doing our job due to our identity."

107. The following day, on Monday, March 29, 2021, Ms. Sonmez was informed that the coverage ban had been lifted, effective immediately.

108. The Post's Guild issued a statement on the reversal of the ban: "We're glad to see The Post reverse its harmful stance and allow our colleague Felicia Sonmez to do her job. But this decision came only after much public criticism and at the expense of Felicia's mental health. The Post must do better."

## **INJURY TO PLAINTIFF**

109. As a result of Defendants' discriminatory conduct, Ms. Sonmez has suffered, and in the future will continue to suffer, irreparable loss and injury, including, but not limited to, economic loss, humiliation, embarrassment, mental and emotional distress, and the deprivation of her rights to equal employment opportunities. At various times, Ms. Sonmez became severely depressed, developed intense anxiety and received treatment from therapists and psychiatrists who she continues to see today. She also experienced physical pain, including severe pain in her jaw from grinding her teeth at night. Ms. Sonmez eventually developed temporomandibular joint (TMJ) disorder because of Defendants' actions and had to undergo two oral surgery procedures to relieve the pain in her jaw. She was prescribed anti-depressants that she takes to this day.

110. Ms. Sonmez was denied the opportunity to cover many stories that were newsworthy and received widespread attention that would have led to further exposure and career advancement. Collectively, the two bans imposed by Defendants lasted almost two years. Instead of being able to do her job like her colleagues outside of her protected class, Ms. Sonmez was chastised, silenced and subjected to humiliation on a repeated basis for being a victim of sexual assault, for defending herself against false accusations and for her opposition to Defendants' attempts to depict her as unworthy or unable to perform the duties of her position. Defendants repeatedly subjected Ms. Sonmez to emotional distress and continued their unlawful conduct even after they were aware that it was causing her substantial harm.

111. Through Defendants' actions described above, Defendants acted intentionally, maliciously, oppressively and with willful, callous, wanton and reckless disregard for Plaintiff's rights under D.C. law.

**COUNT I:**  
**Discrimination Under the D.C. Human Rights Act**  
**Against all Defendants**

112. Ms. Sonmez realleges and incorporates by reference all of the allegations set forth in the above paragraphs of this Complaint.

113. Defendants Baron, Barr, Grant, Ginsberg, Montgomery and Wallsten and the Post are “employers” as defined by the D.C. Human Rights Act (DCHRA) §§ 2-1401.02 (10).

114. Under the DCHRA is unlawful for an employer to discriminate against an employee based on that person’s status as a victim of a sexual offense. D.C. Code § 2-1402.11.

115. Defendants’ unlawful conduct included, *inter alia*, precluding and removing Ms. Sonmez from covering major stories involving sexual misconduct, suspending her for posting an article about Kobe Bryant’s sexual assault allegations, failing to offer her the Post’s security services when she was doxxed and threatened with rape and murder and giving her a lower annual rating and less compensation.

116. Defendants’ unlawful actions constituted adverse employment actions and were done because of because of Ms. Sonmez’s actual or perceived status as a victim of a sexual offense, in violation of the DCHRA.

117. There was no business justification for issuing the ban and discriminating against Ms. Sonmez. It would be virtually impossible for any actual or imagined bias to appear in a published article because most, if not all, of Ms. Sonmez’s stories were co-written with one or more of her colleagues and all stories undergo layers of editorial review before publication. Even if Defendants attempt to justify their unlawful conduct due to a perceived conflict of interest, this rationale is inconsistent with the Post’s treatment of those outside of Ms. Sonmez’s protected class. For example, Michelle Ye Hee Lee frequently issued statements via her social

media condemning anti-Asian hate crimes and discussing ways in which news outlets (including competitors of the Post) could do a better job in reporting on issues related to the Asian American community. Ms. Lee was not only permitted to report on anti-Asian hate crimes for the Post; she was given a prominent platform in which to disseminate her personal views. This treatment was unequal and entirely different than that Ms. Sonmez received.

118. Defendants engaged in intentional discrimination against Ms. Sonmez with malice and/or with reckless indifference to Ms. Sonmez's protected rights under D.C. law.

119. As a direct and proximate result of Defendants' discriminatory treatment, Ms. Sonmez suffered injuries including significant mental anguish and emotional distress, humiliation and inconvenience and diminished career advancement because of the inability to cover the major news stories of her time.

**COUNT II:**  
**Gender Discrimination Under the D.C. Human Rights Act**  
**Against all Defendants**

120. Ms. Sonmez realleges and incorporates by reference all of the allegations set forth in the above paragraphs of this Complaint.

121. Defendants Baron, Barr, Grant, Ginsberg, Montgomery and Wallsten and the Post are "employers" as defined by the D.C. Code §§ 2-1401.02 (10).

122. Under the D.C. Human Rights Act it is unlawful for an employer to discriminate against an employee based on that person's gender. *See* D.C. Code § 2-1402.11.

123. Defendants' unlawful conduct included, *inter alia*, precluding and removing Ms. Sonmez from covering major stories involving sexual misconduct, suspending her for posting an article about Kobe Bryant's sexual assault allegations, failing to offer her the Post's security

services when she was doxxed and threatened and giving her a lower annual rating and less compensation.

124. Defendants' unlawful actions constituted adverse employment actions and were done because of because of Plaintiff's gender in violation of the D.C. Human Rights Act.

125. In an interview with New York Magazine, Defendant Baron described how he viewed objectivity. He stated, "[Objectivity] was a recognition that all of us as journalists, all of us as human beings, have preconceptions. Those preconceptions arrived from our own backgrounds, our life experiences, the people we associate with, you name it. And it's important as we go about our reporting that we try to set those preconceptions aside—and almost approach our work in as scientific a way as possible—and to be open-minded, to be honest, to be fair, to listen generously to people, to hear what they have to say, to take it seriously into account, to do a thorough job of reporting, to do a rigorous job of reporting."

126. Defendant Baron's recognition that all journalists have preconceptions that must be set aside must be viewed in the context of his and the other Defendant editors' decision to institute one or more of the coverage bans. He and the other Defendant editors treated Ms. Sonmez differently in comparison to her male colleagues. For example, around the time that Ms. Sonmez was interviewing for her position at the Post, she was told about a male colleague who faced sexual misconduct accusations including sending an unsolicited photo of his underwear-covered crotch to a young woman. Defendant Baron and the other editors never ordered that the reporter be banned from covering stories related to sexual misconduct or inappropriate behavior by men. Upon information and belief, none of the reporter's editors said his writing on the topic would present a "conflict of interest" or questioned whether he was capable of unbiased reporting. In fact, he went on to write more than a dozen stories that touched on these issues.

127. Defendants engaged in intentional discrimination against Ms. Sonmez with malice and/or with reckless indifference to Ms. Sonmez's protected rights under D.C. law.

128. As a direct and proximate result of Defendants' discriminatory treatment, Ms. Sonmez suffered injuries including significant mental anguish and emotional distress, humiliation and inconvenience and diminished career advancement because of the inability to cover the major news stories of her time.

**COUNT III:  
Retaliation Under the D.C. Human Rights Act  
Against all Defendants**

129. Ms. Sonmez realleges and incorporates by reference all of the allegations set forth in the above paragraphs of this Complaint.

130. Defendants Baron, Barr, Grant, Ginsberg, Montgomery and Wallsten and the Post are "employers" as defined by the D.C. Human Rights Act §§ 2-1401.02 (10).

131. Under the D.C. Human Rights Act it is unlawful for an employer to retaliate against an employee based on the employee's protected activity including opposing a practice made unlawful by the DCHRA. D.C. Code § 2-1402.61.

132. Ms. Sonmez engaged in protected activity by, *inter alia*, protesting Defendants' discriminatory actions against her because she was a victim of a sexual assault and defending against false claims concerning her assault. As a result of her protected activity, Defendants took adverse employment actions against Plaintiff including precluding and removing Ms. Sonmez from covering major stories involving sexual misconduct, suspending her, denying her security services when she was threatened and doxxed, threatening her termination if she continued to speak out and giving her lower performance ratings and less compensation.

133. Defendants' unlawful conduct was materially adverse because a reasonable newspaper reporter would have been dissuaded from complaining had she known she would be precluded from being assigned to cover major news stories, be suspended and/or denied other benefits afforded to reporters who did not engage in protected activity.

134. Defendants retaliated against Ms. Sonmez with malice and/or with reckless indifference to Ms. Sonmez's protected rights under D.C. law.

135. As a direct and proximate result of Defendants' discriminatory treatment, Ms. Sonmez suffered injuries including significant mental anguish and emotional distress, humiliation and inconvenience and diminished career advancement because of the inability to cover the major news stories of her time.

136. Defendants' unlawful conduct was willful and malicious such that Plaintiff is entitled to punitive damages under D.C. Code § 2-1403.16.

**COUNT IV**  
**Hostile Work Environment Under the D.C. Human Rights Act**  
**Against all Defendants**

137. Ms. Sonmez realleges and incorporates by reference all of the allegations set forth in the above paragraphs of this Complaint.

138. Defendants Baron, Barr, Grant, Ginsberg, Montgomery and Wallsten and the Post are "employers" as defined by the D.C. Human Rights Act §§ 2-1401.02 (10).

139. Under the D.C. Human Rights Act it is unlawful for an employer to discriminate against an employee based on her gender and/or because she is a victim of a sexual offense, including to subject them to a hostile work environment. See D.C. Code § 2-1402.11(a).

140. Defendants unlawfully harassed Ms. Sonmez based on her membership in these protected categories including enacting two bans on the stories she could report that lasted for

nearly two years, requiring her to repeatedly explain to her colleagues that she was unable to write stories because she was a victim of a sexual offense, suspending her, interrogating her on the details of her sexual assault, publicly commenting on her lack of judgment, failing to offer her the Post's security services when she was doxxed and threatened with rape and murder, silencing her and threatening her termination if she continued to defend herself against false accusations and giving her a lower annual rating and less compensation.

141. The harassment that she was subjected to was so severe and pervasive that it affected the terms, conditions and/or privileges of her employment.

142. As a direct and proximate result of Defendants' discriminatory treatment, Ms. Sonmez suffered injuries including significant mental anguish, emotional distress, humiliation, inconvenience and diminished career advancement because of the inability to cover the major news stories of her time.

143. Defendants' conduct of creating a hostile work environment because Ms. Sonmez is a woman and/or a victim of a sexual offense was done with malice and/or reckless indifference to Ms. Sonmez's rights and in violation of the DCHRA such that Plaintiff is entitled to punitive damages under D.C. Code § 2-1403.16.

**COUNT V**  
**Negligent Infliction of Emotional Distress**  
**Against Defendant The Post**

144. Ms. Sonmez realleges and incorporates by reference all of the allegations set forth in the above paragraphs of this Complaint.

145. Defendant the Washington Post, as Ms. Sonmez's employer, occupies a fiduciary relationship that requires them to honor the trust and confidence reposed on them because of its special relationship with its employee. The nature of the employer-employee relationship

necessarily implicates Ms. Sonmez's emotional wellbeing such that there is an especially likely risk that Defendant's negligence would cause serious emotional distress to Ms. Sonmez.

146. For example, the Post's decision to impose its control on the manner in which Ms. Sonmez responded to Mr. Kaiman's accusations and the erroneous coverage depicting their encounter as consensual created a duty to do no harm to Ms. Sonmez. Its decision to enact a ban on her coverage because she issued a statement (that the Post approved prior to being issued) and to threaten her termination constitutes a breach of its duty. Likewise, the Post's policy of defending reporters from online harassment created a duty to apply this policy in an evenhanded manner, such that its failure to do so when Ms. Sonmez was threatened with rape and murder constituted a breach of this special relationship. In fact, rather than defend her, the Post, through its agent, publicly commented that Ms. Sonmez lacked judgment, thereby publicly impugning her reputation and reinforcing the harassment directed at her. The Post also hired Ms. Sonmez knowing that she was a victim of a sexual assault by a fellow journalist. In deciding to hire her, the Post undertook a special duty to care for Ms. Sonmez's emotional well-being such that its decision to interrogate Ms. Sonmez regarding the details of her sexual assault, based on a narrative perpetrated by the person who assaulted her, was especially cruel and reckless and a breach of its fiduciary relationship with Ms. Sonmez.

147. As a result of the Defendant's negligence, Ms. Sonmez suffered serious and verifiable emotional distress, embarrassment and humiliation that has required, and will continue to require, medical treatment and medication. Her emotional distress also manifested into a physical condition and symptoms involving her jaw that required two oral surgery procedures.

148. Defendant was able to reasonably predict that its actions could result in the negative consequences experienced by Ms. Sonmez. Moreover, its conduct was motivated by

maliciousness, spite, ill will, vengeance and a deliberate intent to harm Ms. Sonmez, such that Ms. Sonmez is entitled to and demands punitive damages.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Felicia Sonmez respectfully prays that this Court enter judgment against Defendants as follows:

- a) enter a declaratory judgement finding that Defendants violated D.C. Code § 2-1401.01, *et seq.*;
- b) enter a permanent injunction directing Defendants to take all affirmative steps necessary to remedy the effects of the illegal, discriminatory and retaliatory conduct described herein and to prevent similar occurrences in the future;
- c) award compensatory damages in an amount to be determined by the jury that would fully compensate Plaintiff for the economic loss, humiliation, embarrassment, and mental and emotional distress caused by the conduct of Defendants as alleged herein;
- d) award punitive damages to Plaintiff in an amount to be determined by the jury that would punish Defendants for their willful, wanton, and reckless conduct alleged herein and that would effectively deter Defendants from engaging in similar conduct in the future;
- e) award Plaintiff reasonable attorneys' fees and costs incurred in this action;
- f) order such other relief as this Court deems just and equitable.

### **JURY DEMAND**

Plaintiff demands a trial by jury.

Respectfully submitted,

Date: July 21, 2021

/s/ Sundeep Hora

Sundeep Hora (D.C. Bar. No. 472944)  
Savanna L. Shuntich (D.C. Bar. No 1034411)  
ALDERMAN, DEVORSETZ & HORA PLLC  
1025 Connecticut Ave., NW  
Suite 615  
Washington, D.C. 20036

Tel. 202.969.8220  
Fax 202.969.8224  
E-mail: [shora@adhlawfirm.com](mailto:shora@adhlawfirm.com)

**Attorneys for Plaintiff**

# Superior Court of the District of Columbia

## CIVIL DIVISION- CIVIL ACTIONS BRANCH

### INFORMATION SHEET

Felicia M. Sonmez

Case Number: \_\_\_\_\_

Date: 7/21/21

WP Company LLC (d/b/a The Washington Post),  
Martin Baron, Cameron Barr, Tracy Grant,  
Steven Ginsberg, Lori Montgomery, Peter Wallsten

☐ One of the defendants is being sued  
in their official capacity.

Name: <i>(Please Print)</i> Sundeep Hora	Relationship to Lawsuit <input checked="" type="checkbox"/> Attorney for Plaintiff <input type="checkbox"/> Self (Pro Se) <input type="checkbox"/> Other: _____
Firm Name: Alderman, Devorsetz & Hora PLLC	
Telephone No.: (202) 969-8220	Six digit Unified Bar No.: 472944

TYPE OF CASE: ☐ Non-Jury ☒ 6 Person Jury ☐ 12 Person Jury  
Demand: \$ 2,000,000 Other: \_\_\_\_\_

#### PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: \_\_\_\_\_ Judge: \_\_\_\_\_ Calendar #: \_\_\_\_\_

Case No.: \_\_\_\_\_ Judge: \_\_\_\_\_ Calendar#: \_\_\_\_\_

#### NATURE OF SUIT: *(Check One Box Only)*

##### A. CONTRACTS

##### COLLECTION CASES

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> 01 Breach of Contract                   | <input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent | <input type="checkbox"/> 16 Under \$25,000 Consent Denied |
| <input type="checkbox"/> 02 Breach of Warranty                   | <input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent  | <input type="checkbox"/> 18 OVER \$25,000 Consent Denied  |
| <input type="checkbox"/> 06 Negotiable Instrument                | <input type="checkbox"/> 27 Insurance/Subrogation               | <input type="checkbox"/> 26 Insurance/Subrogation         |
| <input type="checkbox"/> 07 Personal Property                    | Over \$25,000 Pltf. Grants Consent                              | Over \$25,000 Consent Denied                              |
| <input checked="" type="checkbox"/> 13 Employment Discrimination | <input type="checkbox"/> 07 Insurance/Subrogation               | <input type="checkbox"/> 34 Insurance/Subrogation         |
| <input type="checkbox"/> 15 Special Education Fees               | Under \$25,000 Pltf. Grants Consent                             | Under \$25,000 Consent Denied                             |
|  | <input type="checkbox"/> 28 Motion to Confirm Arbitration       |   |
|  | Award (Collection Cases Only)                                   |   |

##### B. PROPERTY TORTS

- |   |   |                                      |
|---|---|--------------------------------------|
| <input type="checkbox"/> 01 Automobile                          | <input type="checkbox"/> 03 Destruction of Private Property | <input type="checkbox"/> 05 Trespass |
| <input type="checkbox"/> 02 Conversion                          | <input type="checkbox"/> 04 Property Damage                 |                                      |
| <input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102 (a) |   |                                      |

##### C. PERSONAL TORTS

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> 01 Abuse of Process            | <input type="checkbox"/> 10 Invasion of Privacy                            | <input type="checkbox"/> 17 Personal Injury- (Not Automobile, Not Malpractice) |
| <input type="checkbox"/> 02 Alienation of Affection     | <input type="checkbox"/> 11 Libel and Slander                              | <input type="checkbox"/> 18 Wrongful Death (Not Malpractice)                   |
| <input type="checkbox"/> 03 Assault and Battery         | <input type="checkbox"/> 12 Malicious Interference                         | <input type="checkbox"/> 19 Wrongful Eviction                                  |
| <input type="checkbox"/> 04 Automobile- Personal Injury | <input type="checkbox"/> 13 Malicious Prosecution                          | <input type="checkbox"/> 20 Friendly Suit                                      |
| <input type="checkbox"/> 05 Deceit (Misrepresentation)  | <input type="checkbox"/> 14 Malpractice Legal                              | <input type="checkbox"/> 21 Asbestos   |
| <input type="checkbox"/> 06 False Accusation            | <input type="checkbox"/> 15 Malpractice Medical (Including Wrongful Death) | <input type="checkbox"/> 22 Toxic/Mass Torts                                   |
| <input type="checkbox"/> 07 False Arrest                | <input type="checkbox"/> 16 Negligence- (Not Automobile, Not Malpractice)  | <input type="checkbox"/> 23 Tobacco  |
| <input type="checkbox"/> 08 Fraud                       |  | <input type="checkbox"/> 24 Lead Paint   |

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# Information Sheet, Continued

## C. OTHERS

- |   |   |
|---|---|
| <input type="checkbox"/> 01 Accounting                                  | <input type="checkbox"/> 17 Merit Personnel Act (OEA)   |
| <input type="checkbox"/> 02 Att. Before Judgment                        | (D.C. Code Title 1, Chapter 6)  |
| <input type="checkbox"/> 05 Ejectment                                   | <input type="checkbox"/> 18 Product Liability   |
| <input type="checkbox"/> 09 Special Writ/Warrants<br>(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,<br>Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 10 Traffic Adjudication                        | <input type="checkbox"/> 29 Merit Personnel Act (OHR)   |
| <input type="checkbox"/> 11 Writ of Replevin                            | <input type="checkbox"/> 31 Housing Code Regulations  |
| <input type="checkbox"/> 12 Enforce Mechanics Lien                      | <input type="checkbox"/> 32 Qui Tam   |
| <input type="checkbox"/> 16 Declaratory Judgment                        | <input type="checkbox"/> 33 Whistleblower   |

## II.

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name                                 | <input type="checkbox"/> 15 Libel of Information                                    | <input type="checkbox"/> 21 Petition for Subpoena<br>[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic                      | <input type="checkbox"/> 19 Enter Administrative Order as<br>Judgment [ D.C. Code § | <input type="checkbox"/> 22 Release Mechanics Lien                   |
| <input type="checkbox"/> 08 Foreign Judgment/International                 | 2-1802.03 (h) or 32-151 9 (a)]  | <input type="checkbox"/> 23 Rule 27(a)(1)<br>(Perpetuate Testimony)  |
| <input type="checkbox"/> 13 Correction of Birth Certificate                | <input type="checkbox"/> 20 Master Meter (D.C. Code §                               | <input type="checkbox"/> 24 Petition for Structured Settlement       |
| <input type="checkbox"/> 14 Correction of Marriage<br>Certificate          | 42-3301, et seq.)   | <input type="checkbox"/> 25 Petition for Liquidation                 |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle)  |   |  |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) |   |  |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other)    |   |  |

## D. REAL PROPERTY

- |  |  |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate                | <input type="checkbox"/> 08 Quiet Title                                  |
| <input type="checkbox"/> 12 Specific Performance                     | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted           |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain)            | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied            |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale       | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) |  |

/s/ Sundeep Hora

Attorney's Signature

July 21, 2021

Date



**Superior Court of the District of Columbia**  
**CIVIL DIVISION**  
**Civil Actions Branch**  
**500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001**  
**Telephone: (202) 879-1133 Website: www.dccourts.gov**

Felicia M. Sonmez

Plaintiff

vs.

Case Number \_\_\_\_\_

Martin Baron

Defendant

**SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Sundeep Hora

*Clerk of the Court*

Name of Plaintiff's Attorney

1025 Connecticut Avenue, NW, Suite 615

Address

Washington, DC 20036

(202) 969-8220

Telephone

By \_\_\_\_\_

Deputy Clerk

Date \_\_\_\_\_

如需翻译,请打电话 (202) 879-4828

Veillez appeler au (202) 879-4828 pour une traduction

Để có một bản dịch, hãy gọi (202) 879-4828

번역을 원하 시면, (202) 879-4828로 전화주세요

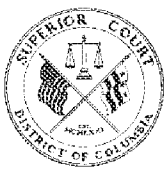
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**IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.**

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation

Vea al dorso la traducción al español



**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA**  
**DIVISIÓN CIVIL**  
**Sección de Acciones Civiles**  
 500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001  
 Teléfono: (202) 879-1133 Sitio web: [www.dccourts.gov](http://www.dccourts.gov)

\_\_\_\_\_ Demandante  
 contra \_\_\_\_\_

Número de Caso: \_\_\_\_\_

\_\_\_\_\_ Demandado

**CITATORIO**

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintidós (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

*SECRETARIO DEL TRIBUNAL*

Nombre del abogado del Demandante \_\_\_\_\_

Por: \_\_\_\_\_  
 Subsecretario

Dirección \_\_\_\_\_

Fecha \_\_\_\_\_

Teléfono \_\_\_\_\_

如需翻译, 请打电话 (202) 879-4828

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반국문자본문(202) 879-4828 국문본문(202) 879-4828

የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

**IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.**

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

Vea al dorso el original en inglés  
 See reverse side for English original



**Superior Court of the District of Columbia**  
**CIVIL DIVISION**  
**Civil Actions Branch**  
**500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001**  
**Telephone: (202) 879-1133 Website: www.dccourts.gov**

Felicia M. Sonmez

Plaintiff

vs.

Case Number \_\_\_\_\_

Cameron Barr

Defendant

**SUMMONS**

To the above named Defendant:

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Sundeep Hora

*Clerk of the Court*

Name of Plaintiff's Attorney

1025 Connecticut Avenue, NW, Suite 615

Address

Washington, DC 20036

(202) 969-8220

Telephone

By \_\_\_\_\_

Deputy Clerk

Date \_\_\_\_\_

如需翻译,请打电话 (202) 879-4828

Veillez appeler au (202) 879-4828 pour une traduction

Để có một bản dịch, hãy gọi (202) 879-4828

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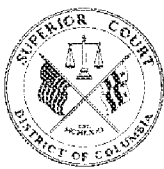
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See reverse side for Spanish translation

Vea al dorso la traducción al español



**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA**  
**DIVISIÓN CIVIL**  
**Sección de Acciones Civiles**  
 500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001  
 Teléfono: (202) 879-1133 Sitio web: [www.dccourts.gov](http://www.dccourts.gov)

\_\_\_\_\_ Demandante  
 contra \_\_\_\_\_

Número de Caso: \_\_\_\_\_

\_\_\_\_\_ Demandado

**CITATORIO**

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintidós (22) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

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*SECRETARIO DEL TRIBUNAL*

Nombre del abogado del Demandante \_\_\_\_\_

Por: \_\_\_\_\_  
 Subsecretario

Dirección \_\_\_\_\_

Fecha \_\_\_\_\_

Teléfono \_\_\_\_\_

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**Superior Court of the District of Columbia**  
**CIVIL DIVISION**  
**Civil Actions Branch**  
**500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001**  
**Telephone: (202) 879-1133 Website: www.dccourts.gov**

Felicia M. Sonmez

Plaintiff

vs.

Steven Ginsberg

Defendant

Case Number \_\_\_\_\_

**SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

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Sundeep Hora

*Clerk of the Court*

Name of Plaintiff's Attorney

1025 Connecticut Avenue, NW, Suite 615

Address

Washington, DC 20036

(202) 969-8220

Telephone

By \_\_\_\_\_

Deputy Clerk

Date \_\_\_\_\_

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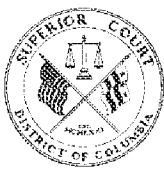
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**DIVISIÓN CIVIL**  
**Sección de Acciones Civiles**  
 500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001  
 Teléfono: (202) 879-1133 Sitio web: [www.dccourts.gov](http://www.dccourts.gov)

\_\_\_\_\_ Demandante  
 contra \_\_\_\_\_

Número de Caso: \_\_\_\_\_

\_\_\_\_\_ Demandado

**CITATORIO**

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*SECRETARIO DEL TRIBUNAL*

Nombre del abogado del Demandante \_\_\_\_\_

Por: \_\_\_\_\_  
 Subsecretario

Dirección \_\_\_\_\_

Fecha \_\_\_\_\_

Teléfono \_\_\_\_\_

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**Superior Court of the District of Columbia**  
**CIVIL DIVISION**  
**Civil Actions Branch**  
**500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001**  
**Telephone: (202) 879-1133 Website: www.dccourts.gov**

Felicia M. Sonmez

Plaintiff

vs.

Case Number \_\_\_\_\_

Tracy Grant

Defendant

**SUMMONS**

To the above named Defendant:

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*Clerk of the Court*

Name of Plaintiff's Attorney

1025 Connecticut Avenue, NW, Suite 615

Address

Washington, DC 20036

(202) 969-8220

Telephone

By \_\_\_\_\_

Deputy Clerk

Date \_\_\_\_\_

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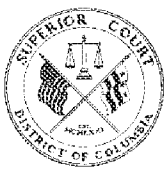
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**DIVISIÓN CIVIL**  
**Sección de Acciones Civiles**  
 500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001  
 Teléfono: (202) 879-1133 Sitio web: [www.dccourts.gov](http://www.dccourts.gov)

\_\_\_\_\_ Demandante  
 contra \_\_\_\_\_

Número de Caso: \_\_\_\_\_

\_\_\_\_\_ Demandado

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*SECRETARIO DEL TRIBUNAL*

Nombre del abogado del Demandante \_\_\_\_\_

Por: \_\_\_\_\_  
 Subsecretario

Dirección \_\_\_\_\_

Fecha \_\_\_\_\_

Teléfono \_\_\_\_\_

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የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

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Civil Actions Branch  
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Telephone: (202) 879-1133 Website: [www.dccourts.gov](http://www.dccourts.gov)

Felicia M. Sonmez

Plaintiff

vs.

Case Number \_\_\_\_\_

Lori Montgomery

Defendant

**SUMMONS**

To the above named Defendant:

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Sundeep Hora

*Clerk of the Court*

Name of Plaintiff's Attorney

1025 Connecticut Avenue, Suite 615

Address

Washington, DC 20036

(202) 969-8220

Telephone

By \_\_\_\_\_

Deputy Clerk

Date \_\_\_\_\_

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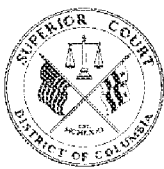
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\_\_\_\_\_ Demandante  
 contra \_\_\_\_\_

Número de Caso: \_\_\_\_\_

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*SECRETARIO DEL TRIBUNAL*

Nombre del abogado del Demandante \_\_\_\_\_

Por: \_\_\_\_\_  
 Subsecretario

Dirección \_\_\_\_\_

Fecha \_\_\_\_\_

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**IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.**

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

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**Superior Court of the District of Columbia**  
**CIVIL DIVISION**  
**Civil Actions Branch**  
**500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001**  
**Telephone: (202) 879-1133 Website: www.dccourts.gov**

Felicia M. Sonmez

Plaintiff

vs.

Case Number \_\_\_\_\_

Peter Wallsten

Defendant

**SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Sundeep Hora

*Clerk of the Court*

Name of Plaintiff's Attorney

1025 Connecticut Avenue, NW, Suite 615

Address

Washington, DC 20036

(202) 969-8220

Telephone

By \_\_\_\_\_

Deputy Clerk

Date \_\_\_\_\_

如需翻译,请打电话 (202) 879-4828

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Để có một bản dịch, hãy gọi (202) 879-4828

번역을 원하시면, (202) 879-4828로 전화주세요

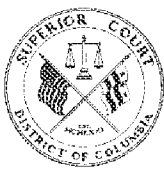
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**IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.**

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**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA**  
**DIVISIÓN CIVIL**  
**Sección de Acciones Civiles**  
 500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001  
 Teléfono: (202) 879-1133 Sitio web: [www.dccourts.gov](http://www.dccourts.gov)

\_\_\_\_\_ Demandante  
 contra \_\_\_\_\_

Número de Caso: \_\_\_\_\_

\_\_\_\_\_ Demandado

**CITATORIO**

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintidós (22) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

*SECRETARIO DEL TRIBUNAL*

Nombre del abogado del Demandante \_\_\_\_\_

Por: \_\_\_\_\_  
 Subsecretario

Dirección \_\_\_\_\_

Fecha \_\_\_\_\_

Teléfono \_\_\_\_\_

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Felicia M. Sonmez

Plaintiff

vs.

Case Number \_\_\_\_\_

WP Company LLC (d/b/a The Washington Post)

Defendant

**SUMMONS**

To the above named Defendant:

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Sundeep Hora

*Clerk of the Court*

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Address

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By \_\_\_\_\_

Deputy Clerk

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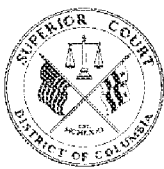
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\_\_\_\_\_ Demandante  
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