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**Attorney for Plaintiff, Nasyia Drayton**

	) Superior Court of New Jersey
NASYIA DRAYTON,	) Middlesex County–Law Division
	) Docket No:
Plaintiff,	)
vs.	)
	) Civil Action
HABBA MADAIO & ASSOCIATES, LLP,	)
ALINA HABBA, (A/K/A ALINA SAAD HABBA, )	) COMPLAINT
ALINA EYET, and ALINA HABBA EYET), )	) DEMAND FOR JURY TRIAL
MICHAEL MADAIO, JOHN & JANE DOES 1-10, )	)
and XYZ CORPORATION,	)
Defendants.	)
_____	)

Plaintiff, NASYIA DRAYTON, by and through her attorneys, Lewis Tillmann Law Offices, by way of Complaint against Defendants, HABBA MADAIO & ASSOCIATES, LLP, ALINA HABBA (a/k/a ALINA SAAD HABBA, ALINA EYET, and ALINA HABBA EYET), MICHAEL MADAIO, JOHN & JANE DOES 1-10, and XYZ CORPORATION, alleges and states as follows:

**PARTIES**

1. Plaintiff, NASYIA DRAYTON (African-American) (referred and pronounced herein as NA'SYIA DRAYTON) is a resident of the City of Fords, County of Middlesex, State of New Jersey.

2. At all relevant times, Plaintiff, NA'SYIA DRAYTON, was employed by Defendant, HABBA MADAIIO & ASSOCIATES, as a Legal Assistant.

3. At all relevant times, Plaintiff NA'SYIA DRAYTON was the only African- American and the only African-American woman employed by the Defendant HABBA MADAIIO & ASSOCIATES.

4. Defendant, HABBA MADAIIO & ASSOCIATES, LLP ("HABBA MADAIIO & ASSOCIATES") is a privately owned, New Jersey Law Firm which provides litigation and counselling services to its clients in a wide range of civil, commercial and business related matters.

5. Defendant, HABBA MADAIIO & ASSOCIATES', principal place of business is located at 1430 US 206, in the City of Bedminster, County of Somerset, State of New Jersey.

6. Defendant, ALINA HABBA (Caucasian American/Arabic decent), is a resident of the City of Bernardsville, County of Somerset, State of New Jersey.

7. Defendant, ALINA HABBA, is an attorney admitted to the New Jersey State Bar in December 2010, and the founding and managing partner of Defendant, HABBA MADAIIO & ASSOCIATES law firm.

8. At all relevant times, Defendant ALINA HABBA owned, operated, managed and controlled the day-to-day operations of the HABBA MADAIIO & ASSOCIATES firm, and according to the firm's current website, is responsible for all firm business, including human resources and financial matters.

9. At all relevant times, Defendant ALINA HABBA was and is a high ranking individual within the HABBA MADAIO & ASSOCIATES firm, and as such maintained supervisory control over Plaintiff, NA'SYIA DRAYTON.

10. At all relevant times, Defendant ALINA HABBA was Plaintiff NA'SYIA DRAYON's immediate and direct supervisor.

11. Defendant, MICHAEL MADAIO (Caucasian American) is a resident of the City of Basking Ridge, County of Somerset, State of New Jersey.

12. Defendant, MICHAEL MADAIO, was and is an attorney admitted to the New Jersey State Bar in November 2013, and a partner within the HABBA MADAIO & ASSOCIATES law firm.

13. At all relevant times, Defendant MICHAEL MADAIO owned, operated, managed and controlled the day-to-day operations of the HABBA MADAIO & ASSOCIATES firm along with his partner, Defendant ALINA HABBA.

14. At all relevant times, Defendant MICHAEL MADAIO was and is a high ranking individual within the HABBA MADAIO & ASSOCIATES law firm.

15. At all relevant times, Defendant MICHAEL MADAIO was Plaintiff, NA'SYIA DRAYON's, superior at work and, as such, maintained supervisory control over Plaintiff, NA'SYIA DRAYTON.

16. Defendant, JOHN DOES 1-10, is a fictitious name or trade name utilized pursuant to Rule 4:26-4, solely to protect the Plaintiff's interests in this matter. It is Plaintiff's intention to amend this Complaint as discovery reveals any of the Defendants' identities.

17. Defendant, XYZ CORPORATION, is a fictitious name or trade name utilized pursuant to Rule 4:26-4, solely to protect the Plaintiff's interests in this matter. It is Plaintiff's intention to amend this Complaint as discovery reveals any of the corporate Defendants' identities.

**FACTUAL BACKGROUND**

18. Plaintiff hereby repeats, reiterates and realleges the allegations contained in Paragraphs 1 through 15 as though fully set forth herein.

19. Plaintiff, NA'SYIA DRAYTON, was employed as a Legal Assistant to Defendant, ALINA HABBA, during two separate periods of time:

- (a) First, between 2017 and 2019, at the Sandelands Eyet Law Firm in Bedminster, New Jersey, where Defendant ALINA HABBA worked as an attorney and managing partner; and later
- (b) between November 2021 and June 2022, for Defendant ALINA HABBA's newly formed law firm, HABBA MADAIIO & ASSOCIATES.

20. In both Legal Assistant positions, Plaintiff NA'SYIA DRAYTON's duties and responsibilities generally included typing and assisting Defendants with calendaring and preparing legal documents, handling phones and responding to client calls and communications.

21. In or around October of 2021, Plaintiff NA'SYIA DRAYTON was surprised to receive a telephone call from her former supervisor, Defendant ALINA HABBA. During the call, Defendant ALINA HABBA:

- (a) informed Plaintiff NA'SYIA DRAYTON, that she had opened a new law firm, and
- (b) asked Plaintiff, NA'SYIA DRAYTON, if she would be interested in joining the small firm, and returning to work for her as a Legal Administrative Assistant.

22. During the discussions, Defendant ALINA HABBA informed Plaintiff NA'SYIA DRAYTON that she always had been impressed with Plaintiff's performance



and work ethic and, for this reason she wanted Plaintiff NA'SYIA DRAYTON to resume work with her.

23. Although Plaintiff, NA'SYIA DRAYTON, initially had some reservations about returning to work for Defendant ALINA HABBA, she ultimately pushed aside her intuition and agreed to resume working with Defendant ALINA HABBA because she:

- (a) felt that she had learned a lot, grown professionally and increased her skills while working under Defendant ALINA HABBA; and of greatest importance
- (b) was unemployed at the time of the offer (having been recently laid off during the Covid-19 Pandemic) and therefore, needed the income and benefits for herself and her family.

**DEFENDANTS' RACIALLY CHARGED and SEXUALLY EXPLICIT  
REMARKS CREATED A HOSTILE WORK ENVIRONMENT WITHIN  
THE HABBA MADAIO & ASSOICATES LAW FIRM**

24. The first couple of months at HABBA MADAIO & ASSOCIATES, were like to a honeymoon. Plaintiff NA'SYIA DRAYTON enjoyed her work, invested time learning the requirements of her role, and settled into her new position. During this period, Plaintiff NA'SYIA DRAYTON performed well and frequently received positive feedback from her superiors.

25. However, by January of 2022, the honeymoon phase at Defendants' law firm, had come to an abrupt end, when Plaintiff NA'SYIA DRAYTON's supervisors began exhibiting a preference for listening to, and loudly singing music

in the office which had lyrics that were highly sexually explicit and/or racially insensitive/derogatory.

26. Although Plaintiff NA'SYIA DRAYTON, did not have a problem with music being played in the office environment per se, the specific songs that her supervisors, Defendants ALINA HABBA and MICHAEL MADAIO chose to listen to **(and, moreover, to loudly sing and repeat), within in the office environment,** were patently offensive and/or inappropriate to Plaintiff, NA'SYIA DRAYTON because of:

- (a) the repeated use of the derogatory racist term "**nigger**" (including its variations);
- (b) the inferred sexual objectification of women in the songs and finally;
- (c) the explicit, highly sexualized language.

27. Defendants ALINA HABBA and MICHAEL MADAIO, seemed to particularly enjoy listening to, and rapping along with what is generally perceived and classified as gangster and hip-hop music, to energize, motivate and otherwise 'pump themselves up' prior to making court appearances.

28. On this occasion(s), the Caucasian Defendants would gather in one of their offices with the office door wide open, along with the firm's only Associate Attorney (an Caucasian male), and loudly rap song lyrics - often while aggressively whooping and laughing.

29. On at least one occasion, Defendants even called out to Plaintiff, NA'SYIA DRAYTON during one of the rap songs - suggesting that the song was being played expressly for her.

30. Plaintiff NA'SYIA DRAYTON, **who was the firm's only African American employee**, felt shocked, embarrassed and humiliated.

31. Plaintiff NA'SYIA DRAYTON felt completely disregarded and disrespected by her supervisors.

32. Plaintiff NA'SYIA DRAYTON felt as though she were invisible.

33. Plaintiff NA'SYIA DRAYTON felt that her supervisors gave no consideration to the fact that the racial epithet "**nigger**" (and all of its variations) held significant negative historic connotations in the United States.

34. As time progressed, Plaintiff NA'SYIA DRAYTON felt as though the offensive booming music went on endlessly - as she struggled to block it out and continue her work.

35. By way of example, on January 26, 2022, Defendants ALINA HABBA and MICHAEL MADAIO played, and loudly sung, several songs in the office with sexually explicit lyrics, which Plaintiff NA'SYIA DRAYTON felt were both racially offensive and sexually inappropriate - within the office setting, including but not limited to:

- (1) ***Ruff Ryders Anthem*** by DMX;
- (2) ***Niggas in Paris*** by Kanye West and Jay Z;

(3) ***Rich Ass Fuck*** by Lil Wayne;

(4) ***Lollipop*** by Lil Wayne; and

***(Lyrics to each of the aforementioned songs are attached hereto to this Complaint as “Exhibit A”).***

36. In some of the songs played and sung by the Defendants that day, *the word “nigger” (and its variations) was used so many times* that Plaintiff NA’SZIA DRAYTON was unable to keep count. The songs similarly contained highly sexual content and portrayed women as mere objects of male sexual gratification.

37. On each occasion, that the word ***“nigger” (and its variations)*** was used, Plaintiff NA’SZIA DRAYTON felt demeaned and violated.

38. On each occasion, the songs played and sung by Defendants that included highly sexual lyrics that portrayed women as objects of male sexual gratification, Plaintiff NA’SZIA DRAYTON felt humiliated, embarrassed and uncomfortable in the office.

**PLAINTIFF’S SUPERVISOR, DEFENDANT ALINA HABBA, USES DERROGATORY RACIAL SLUR TO DESCRIBE FEMALE, AFRICAN AMERICAN ADVERSARY**

39. In or around April of 2022, Defendant ALINA HABBA unsuccessfully argued a legal issue in the New York Court of Appeals against the Attorney General of New York, Letitia James, Esquire (an African American woman).

40. When Defendant ALINA HABBA learned that she lost her matter, and that the Judge rejected her legal argument, Defendant ALINA HABBA emerged irate from her office (where she and Defendant MICHAEL MADAIIO were meeting) and shouted, **“I HATE THAT BLACK BITCH!”**

41. Thereafter, Defendant ALINA HABBA began parading around the office seething about the Judge, and complaining that she had lost her argument.

42. Plaintiff NA'SYIA DRAYTON was appalled about the racist remarks made about the Attorney General, Letitia James and felt astonished that her supervisor, Defendant ALINA HABBA, felt comfortable and entitled to make such statements in the workplace, in her presence.

43. Around this time, Plaintiff NA'SYIA DRAYTON began to suffer panic attacks particularly when preparing to report to work.

44. For this reason, and because of Defendants' pervasive insistence on playing racially and gender inappropriate and offensive music in the workplace – Plaintiff NA'SYIA DRAYTON began to instinctively withdraw within herself – which included reducing her in-person, social inactions at work.

45. In or around May of 2022, Defendant ALINA HABBA noticed the change in Plaintiff NA'SYIA DRAYTON's demeanor and called Plaintiff into her office.

46. During the meeting, Defendant ALINA HABBA told Plaintiff NA'SYIA DRAYTON that she sensed that Plaintiff seemed unhappy, was isolating herself and had withdrawn from the team. Defendant ALINA HABBA shared that she initially believed that Plaintiff NA'SYIA DRAYTON would be a 'good fit' for the office, but based on Plaintiff's recently changed demeanor, she was beginning to think that she had made a mistake in recruiting her. Defendant ALINA HABBA even indicated that if things did not improve, she reluctantly would have to let Plaintiff NA'SYIA DRAYTON go.

47. In addition, Defendant ALINA HABBA complained to Plaintiff NA'SYIA DRAYTON that she [DRAYTON] did not seem focused when she worked remotely from home, but that on the other hand, that she [NA'SYIA DRAYTON] seem unhappy and disengaged at work. Defendant ALINA HABBA told Plaintiff NA'SYIA DRAYTON:

***I feel like you hate it here. Do you hate it here? Do you not like your cases, are you not interested in your cases?***

Thereafter, Defendant ALINA HABBA, offered to allow Plaintiff NA'SYIA DRAYTON to accompany her to court and to reassign her to cases and matters that [HABBA] suspected Plaintiff would find more interesting.

48. Feeling too fearful to share with her supervisor the true reason that she had become withdrawn<sup>1</sup>, Plaintiff NA'SYIA DRAYTON told her supervisor that the reason that she frequently worked in her office, behind closed doors, was because she found the temperature in the overall office to be uncomfortably cold – and, that the temperature inside her office was warmer and more comfortable to her.

49. In the days that followed her meeting with her supervisor, Plaintiff NA'SYIA DRAYTON began to admonish herself for not being more transparent with her supervisor about the true reason that she had become withdrawn.

50. Reasoning that the situation would not improve if she did not speak up and share her concerns, on or around June 9, 2022, Plaintiff NA'SYIA DRAYTON, summoned her courage and wrote her supervisors, Defendants ALINA HABBA and MICHAEL MADAIO, an email detailing her concerns. ***(Attached hereto as “Exhibit B” to the herein Complaint is a copy of the aforementioned complaint from Plaintiff, NA'SYIA DRAYTON.)***

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<sup>1</sup> Although Plaintiff, NA'SYIA DRAYTON, admired her supervisor, Defendant ALINA HABBA's strong work ethic, she found her to be unapproachable because of her explosive temper. During Plaintiff's previous tenure with Defendant, ALINA HABBA, she experienced instances when Defendant ALINA HABBA would become displeased with a group of her subordinates, and would walk around the office loudly threatening the group that, ***“I have a feeling that SOMEONE here is going to get fired today!”***

51. In her letter, Plaintiff NA'SYIA DRAYTON specifically complained that she felt that the atmosphere at work had become hostile and unwelcoming to her as an African-American woman because of:

- (a) The repeated playing of inappropriate gangster rap and hip-hop music in the office;
- (b) Defendants' repeatedly singing and using the racial slur "**nigger**" (*and its variations*);
- (c) Her supervisor referring to Letitia James, Esq., New York's Attorney General as a "**Black Bitch**"; as well as
- (c) A comment that her supervisor, Defendant ALINA HABBA had made to her during a staff luncheon at a restaurant, wherein Defendant HABBA loudly recommended to Plaintiff NA'SYIA DRAYTON that she order the fried chicken meal because it was good, and because "***you people like fried chicken.***"

52. Plaintiff also mentioned in her letter that there were additional instances and interactions that had occurred at work that contributed to her feeling uncomfortable and indicated that she was willing and available to discuss same.

53. Shortly after sending the letter, Plaintiff NA'SYIA DRAYTON received a call from her supervisors, Defendants ALINA HABBA and MICHAEL MADAIO. The firm's Human Resources Manager, Randee Ingram, was excluded from the call.

54. Prior to entering into the discussion with her supervisors, Plaintiff NA'SYIA DRAYTON anticipated that the discussion would be difficult. Despite this, she hoped that if she were open and transparent about her feelings, that her supervisors would listen, understand her feelings and validate her concerns.

55. Plaintiff NA'SYIA DRAYTON hoped that the disconnect with her Caucasian supervisors was due to the fact that they simply did not appreciate the impact of their choices, with regard to the music and their racist remarks and

comments, and that once they were made aware of same, that they would take corrective action.

56. Plaintiff NA'SYIA DRAYTON hoped that after the conversation with her employers, the air would clear, they would be able to repair their relationship, and that a better workplace environment would result.

57. Unfortunately, what Plaintiff NA'SYIA DRAYTON hoped the difficult conversation would achieve, and what it actually achieved, were *polar opposites*.

58. In fact, what followed was a discussion that began with a thin veneer of concern for Plaintiff NA'SYIA DRAYTON's well-being, but that quickly morphed into a defensive tirade in which Plaintiff's supervisor, Defendant ALINA HABBA:

- (a) skirted responsibility or accountability for her own statements and actions; and
- (b) criticized and attacked Plaintiff NA'SYIA DRAYTON for being combative, hyper-sensitive, and ungrateful.

59. In fact, as the discussion progressed, Defendant ALINA HABBA (*who did the vast majority of speaking*) became increasingly emotional, animated and aggressive.

60. Specifically, during the conversation, Defendant ALINA HABBA repeatedly stated the following:

- (a) It was "***unacceptable to her***" that Plaintiff NA'SYIA DRAYTON believed that her (HABBA'S) workplace behavior was inappropriate, offensive and racially insensitive;
- (b) That she could not possibly be racist because, "***I am a fucking minority myself;***"
- (c) That it was impossible for her to be racist because "***I'm not White***" and because "***I love all people;***"



- (d) *That she loved Plaintiff NA'SYIA DRAYTON;*
- (e) *"I'm not White. I used to be bullied because I am Arab;"*
- (f) That her comments about Letitia James, Esq. *were not meant for you [DRAYTON];*
- (g) That Plaintiff NA'SYIA DRAYTON was interpreting things incorrectly;
- (h) That Plaintiff NA'SYIA DRAYTON was *"trying to be offended?;"*
- (i) That Plaintiff NA'SYIA DRAYTON was being confrontational with her [HABBA] because she [HABBA] is a minority;
- (j) That Plaintiff NA'SYIA DRAYTON's complaint had resulted in making her [HABBA] *"uncomfortable"* working with Plaintiff NA'SYIA DRAYTON, and that now she [HABBA] needed reassurance in order to feel as though Plaintiff, NA'SYIA DRAYTON, was *"not looking for a problem"*.
- (k) That Plaintiff NA'SYIA DRAYTON needed to understand that she had made [HABBA] feel uncomfortable.

61. Thereafter, Defendant ALINA HABBA defiantly declared to Plaintiff NA'SYIA DRAYTON that she [HABBA] could *"listen to what ever music I want to listen to, and I'm not going to feel uncomfortable for that!"* Defendant ALINA HABBA went on to characterize Plaintiff NA'SYIA DRAYTON's complaints as *"ridiculous"* because *"everybody listens to Kanye West - and, I'm not allowed*

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<sup>2</sup> Plaintiff, NA'SYIA DRAYTON felt further insulted by her supervisor's suggestion that by making a discrimination complaint, she [DRAYTON] was *"trying to be offended."*

Defendant, NA'SYIA DRAYTON, not only found this comment to be patently offensive, but felt that her supervisor was embracing pejorative racial stereotyping, namely that African Americans are hyper-sensitive, lazy opportunists who sought out any opportunity to file frivolous lawsuits in order to avoid work.

*to??”* Thereafter, Defendant HABBA shouted at Plaintiff NA’SZIA DRAYTON, saying *“Do you understand how I feel now?! I love hip hop – always have, always will... I’m taking serious offense to this, frankly. Very serious offense<sup>3!</sup>”*.

62. During the course of the discussion, Defendant ALINA HABBA asked Plaintiff NA’SZIA DRAYTON why she had not complained earlier, Plaintiff responded that she remained silent because she was “afraid”<sup>4</sup>.

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<sup>3</sup> During the course of aforementioned conversation, Plaintiff NA’SZIA DRAYTON attempted to explain to her supervisor, Defendant ALINA HABBA’s that she was not seeking to censor her supervisors’ choice of music; and that she would *never* dictate to someone else what kind of music was acceptable to listen to, but that the choice of music that Defendants chose to listen *to, and sing out loud, in the office*, with its pejorative gender stereotypes and racial epithets, saturated the work environment and made her uncomfortable. Although she was cut off and prevented from speaking by her employers, Plaintiff NA’SZIA DRAYTON further tried to explain to her supervisors that she, herself, believed that the hip-hop rappers were artists and talented musicians, but that she felt extremely uncomfortable (given the nature of the lyrics) hearing the music played *in the workplace*.

<sup>4</sup> Defendants so dominated the conversation about Plaintiff NA’SZIA DRAYTON’s discrimination and hostile work environment complaints, that Plaintiff, NA’SZIA DRAYTON, was unable to further share her additional reasons for her delayed complaint. Specifically, Plaintiff NA’SZIA DRAYTON did not feel comfortable or confident sharing her discrimination concerns with Defendants’ Human Resources Manager, Randee Ingram. Although Plaintiff liked Ms. Ingram personally, on several occasions in the past, Defendant ALINA HABBA made derogatory, anti-Semitic remarks about an associate attorney in the office (repeatedly, disdainfully referring to him as a *“cheap Jew”*), in the presence of Plaintiff and Ms. Ingram (who happens to be Jewish). On each occasion, Ms. Ingram failed to object, complain, or otherwise take corrective action with regard to Defendant ALINA HABBA and her remarks. Although the co-workers never discussed the matter, Plaintiff NA’SZIA DRAYTON assumed that Ms. Ingram repeatedly failed to address the matter with Defendant ALINA HABBA, because of her [HABBA’s] temper and because Ms. Ingram directly reported to Defendant ALINA HABBA.

63. Upon hearing this, Defendant ALINA HABBA forcefully responded, ***"Afraid of what!?"*** Thereafter, Defendant HABBA added that if ***anyone needed to be afraid, it was she*** [HABBA].

64. Shockingly, by the conclusion of the conversation, Defendant ALINA HABBA informed Plaintiff NA'SYIA DRAYTON that the ***"ball was in [Plaintiff's] court,"*** essentially charging Plaintiff NA'SYIA DRAYTON with the responsibility to fix the situation and repair the dispute, so that Defendants - once again - could be comfortable at work.

65. During the course of the conversation, neither Defendant ALINA HABBA nor her partner, Defendant MICHAEL MADAIO:

- (a) Asked Plaintiff NA'SYIA DRAYTON about the additional instances of discrimination and/or hostile work environment that she experienced which were referenced in her letter;
- (b) Discussed Plaintiff NA'SYIA DRAYTON'S complaints of gender discrimination and the fact that Plaintiff felt uncomfortable with the sexually explicit song lyrics, and Defendant ALINA HABBA denigrating and referring to another African-American woman as a ***"Black Bitch"***; or
- (c) Reassured Plaintiff NA'SYIA DRAYTON that she would not suffer retaliation because of her complaints.

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Therefore, instead of addressing the issue, Ms. Ingram would wait for Defendant ALINA HABBA to walk away, and would turn and look at Plaintiff NA'SYIA DRAYTON, roll her eyes in an exasperated manner and exclaim conspiratorially, ***"Did you just hear that?!"*** or ***"I can't believe that she [HABBA] just said that?!"***

66. During the course of the conversation, *neither* Defendant ALINA HABBA nor her legal business partner, Defendant MICHAEL MADAIO, informed Plaintiff NA'SYIA DRAYTON that:

- (a) Her complaints were being taken seriously;
- (b) an internal investigation would be conducted into her discrimination and hostile work environment complaints;
- (c) an independent, third-party would be looking into her complaints; or
- (d) she would not suffer any retaliation or adverse employment action because of her discrimination complaints.

67. When Plaintiff NA'SYIA DRAYTON emerged from the meeting with her supervisors, she was devastated and heartbroken.

68. Defendants wholly denied responsibility for their actions, had refused to self-reflect and/or be accountable for their choices and, instead affirmed that they were unwilling to listen to Plaintiff's perspective, unwilling to alter their behavior and, in fact, were steadfastly committed to *not* changing or otherwise taking corrective action.

69. For all of the aforementioned reasons, Plaintiff NA'SYIA DRAYTON felt that she had no other recourse but to resign and, indeed was convinced that she would suffer adverse employment action if she remained at Defendants' firm. This is true especially in light of the fact that the Defendants failed to initiate any efficient remedial efforts to end the hostile work environment.

70. Moreover, Defendants intentionally relinquished their investigative responsibilities by advising Plaintiff, NA'SYIA DRAYTON that the "*ball was in her court*".

71. Plaintiff NA'SYIA DRAYTON reluctantly tendered her resignation on June 14, 2022. ***(Attached hereto as "Exhibit C" is a copy of Plaintiff NA'SYIA DRAYTON'S Resignation Letter.)***

72. After emailing her resignation letter to her supervisors, Plaintiff NA'SYIA DRAYTON went into Defendant MICHAEL MADAIIO'S office to turn in her laptop. While there, Defendants gathered to speak with Plaintiff about her resignation.

73. During the discussion, Plaintiff NA'SYIA DRAYTON began to cry and informed Defendants that following their conversation about her discrimination complaints, felt that things had gotten worse, that nothing would change at work, and that she continued to feel uncomfortable at work.

74. To this, Defendants offered a dismissive, inauthentic apology and said that they were **"sorry that [Plaintiff NA'SYIA DRAYTON] felt that way."**

75. Thereafter, Defendant ALINA HABBA characterized herself as a ***good person***, and repeated the refrain that she could not possibly be racist *because she "wasn't White"*. Then, Defendant ALINA HABBA informed Plaintiff NA'SYIA DRAYTON that she had spoken to her other Black employee, a personal chauffeur (*an African American man*) and that he loved Kanye West and frequently played hip hop music *for her* when she was being chauffeured around by him.

76. Hearing this, Plaintiff NA'SYIA DRAYTON felt hopeless - and resolved - that she would never be respected by her supervisors at HABBA MADAIIO & ASSOCIATES and that despite her pleas, explanations and complaints, nothing would ever change.

**COUNT ONE**

**HARASSMENT & DISCRIMINATION ON THE BASIS OF RACE**

77. Plaintiff hereby repeats, reiterates and realleges the allegations contained in Paragraphs 1 through 76 as though fully set forth herein.

78. The actions of the Defendants constitutes unlawful discrimination on the basis of race in violation of the New Jersey Law Against Discrimination (“NJLAD”) 10:5-1 et seq.

79. As a direct and proximate result of the Defendants unlawful acts and practices, Plaintiff, NA’SYIA DRAYTON, has suffered and continues to suffer substantial losses of income, other pecuniary losses, humiliation, mental anguish, emotional pain and suffering, and is incurring legal and other expenses.

WHEREFORE, Plaintiff, NA’SYIA DRAYTON demands entry of judgment in her favor and against Defendants for the following:

- a. Back pay;
- b. Front pay;
- c. Punitive damages;
- d. Such other equitable relief as may be deemed appropriate; and
- e. Reasonable attorney’s fees and costs, pursuant to 29 U.S.C. Section 1132(g).
- f. Such other relief as the Court may deem appropriate.

**COUNT TWO**

**HARASSMENT & DISCRIMINATION ON THE BASIS OF GENDER**

80. Plaintiff hereby repeats, reiterates and realleges the allegations contained in Paragraphs 1 through 79 as though fully set forth herein.

81. The actions of the Defendants constitutes unlawful discrimination on the basis of gender in violation of the New Jersey Law Against Discrimination (“NJLAD”) 10:5-1 et seq.

82. As a direct and proximate result of the Defendants unlawful acts and practices, Plaintiff, NA’SZIA DRAYTON, has suffered and continues to suffer substantial losses of income, other pecuniary losses, humiliation, mental anguish, emotional pain and suffering, and is incurring legal and other expenses.

WHEREFORE, Plaintiff, NA’SZIA DRAYTON demands entry of judgment in her favor and against Defendants for the following:

- a. Back pay;
- b. Front pay;
- c. Punitive damages;
- d. Such other equitable relief as may be deemed appropriate; and
- e. Reasonable attorney’s fees and costs, pursuant to 29 U.S.C. Section 1132(g).
- f. Such other relief as the Court may deem appropriate.

**COUNT THREE**

**CONSTRUCTIVE DISCHARGE**

83. Plaintiff hereby repeats, reiterates and realleges the allegations contained in Paragraphs 1 through 82 as though fully set forth herein.

84. As a direct and proximate result of Defendants' wrongful and illegal conduct, Plaintiff NA'SYIA DRAYTON's working environment was so offensive, intimidating and oppressive that a reasonable employee in her position would have felt to compelled to resign.

85. Defendants had knowledge, or should have had knowledge, that the working environment within the office was offensive, intimidating and oppressive to Plaintiff, NA'SYIA DRAYTON.86. Defendants intentionally or recklessly forced Plaintiff, NA'SYIA DRAYTON's resignation.

87. As a result of Defendants wrongful and illegal conduct, Plaintiff, NA'SYIA DRAYTON, suffered and continues to suffer, financial loss and severe emotional distress with physical consequences.

87. As a direct and proximate result of the Defendants unlawful acts and practices, Plaintiff, NA'SYIA DRAYTON, has suffered and continues to suffer substantial losses of income, other pecuniary losses, humiliation, mental anguish, emotional pain and suffering, and is incurring legal and other expenses.

WHEREFORE, Plaintiff, NA'SYIA DRAYTON, demands entry of judgment in his favor and against Defendants for the following:

- a. Back pay;
- b. Front pay;
- c. Compensatory damages;
- d. Punitive damages;



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- e. Reasonable attorney's fees and costs; and
- f. Such other relief as this Court may deem just and appropriate

#### **COUNT FOUR**

##### **UNLAWFUL RETALIATION FOR ENGAGING IN PROTECTED ACTIVITY**

88. Plaintiff hereby repeats, reiterates and realleges the allegations contained in Paragraphs 1 through 87 as though fully set forth herein. 89.

Defendants harassed and otherwise took negative employment action against Plaintiff, NA'SYIA DRAYTON, wholly or partially, in retaliation for her complaining about discrimination and/or harassment in the workplace.

90. As a result of Defendants wrongful and illegal conduct, Plaintiff, NA'SYIA DRAYTON, suffered and continues to suffer, financial loss and severe emotional distress with physical consequences.

91. As a direct and proximate result of the Defendants unlawful acts and practices, Plaintiff, NA'SYIA DRAYTON, has suffered and continues to suffer substantial losses of income, other pecuniary losses, humiliation, mental anguish, emotional pain and suffering, and is incurring legal and other expenses.

WHEREFORE, Plaintiff, NA'SYIA DRAYTON, demands entry of judgment in his favor and against Defendants for the following:

- a. Back pay;
- b. Front pay;
- c. Compensatory damages;
- d. Punitive damages;
- e. Reasonable attorney's fees and costs; and
- f. Such other relief as this Court may deem just and appropriate.

**COUNT FIVE**

**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

92. Plaintiff hereby repeats, reiterates, and realleges the allegations contained in Paragraphs 1 through 91 as though fully set forth herein.

93. The actions of the Defendants constitutes negligent infliction of emotional distress upon Plaintiff, NA'SYIA DRAYTON

94. As a direct and proximate result of the Defendants actions, Plaintiff, NA'SYIA DRAYTON, has been caused to sustain severe emotional distress.

WHEREFORE, Plaintiff, NA'SYIA DRAYTON, demands entry of judgment in his favor and against Defendants for the following:

- a. Back pay;
- b. Front pay;
- c. Compensatory damages;
- d. Punitive damages;
- e. Reasonable attorney's fees and costs,
- f. Such other relief as the Court may deem appropriate.

**COUNT SIX**

**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

95. Plaintiff hereby repeats, reiterates, and realleges the allegations contained in Paragraphs 1 through 94 as though fully set forth herein.

96. The actions of the Defendants, constitutes intentional infliction of emotional distress upon Plaintiff, NA'SYIA DRAYTON.

97. As a direct and proximate result of the Defendants' actions, Plaintiff, NA'SYIA DRAYTON, has been caused to sustain severe emotional distress.

WHEREFORE, Plaintiff NA'SYIA DRAYTON, demands entry of judgment in his favor and against Defendants for the following:

- a. Back pay;
- b. Front pay;
- c. Compensatory damages;
- d. Punitive damages;
- e. Reasonable attorney's fees and costs,
- f. Pre and post judgment interest,
- g. Such other relief as the Court may deem appropriate.

Dated: July 19, 2022

Jacqueline L. Tillmann

Jacqueline L. Tillmann, Esquire  
Attorney for Plaintiff, NA'SYIA DRAYTON

**DEMAND FOR JURY TRIAL**

Plaintiff, NA'SYIA DRAYTON, hereby demands trial by jury on all issues raised herein so triable.

Dated: July 19, 2022

Jacqueline L. Tillmann

Jacqueline L. Tillmann, Esquire  
Attorney for Plaintiff, NA'SYIA DRAYTON

**DESIGNATION OF TRIAL COUNSEL**

Plaintiff, pursuant to the Rule 4:25-4, hereby designates Jacqueline Tillmann, Esquire as trial counsel.

**DEMAND FOR DISCOVERY OF INSURANCE COVERAGE**

Pursuant to Rule 4:10-2(b), demand is hereby made for a copy of all insurance agreements or policies, including but not limited to any and all declaration sheets maintained by the Defendants during the period of Plaintiff, NA'SYIA DRAYTON's, employment. This demand shall be deemed to include and cover Comprehensive General Liability Coverage, Workers Compensation and Employer's Liability Coverage, and any and all Excess, Catastrophic and Umbrella Policies.

Dated: July 19, 2022

*Jacqueline L. Tillmann*

Jacqueline L. Tillmann, Esquire  
Attorney for Plaintiff, NA'SYIA DRAYTON

**DEMAND TO PRESERVE EVIDENCE**

Defendants are hereby directed to preserve all physical and electronic information pertaining in any way to Plaintiff's employment, cause of action and/or prayers for relief, and to any defenses to same, including but not limited to, electronic data storage, closed circuit television footage, digital images, cache memory, searchable data, emails, spread sheets, employment files, memos, text messages, and any and all online social or work related websites, entries on social networking sites (including,

but not limited to Facebook, Twitter, Myspace, etc.), and any other information and/or data that may be relevant to any claim or defense in this litigation.

Dated: July 19, 2022

*Jacqueline L. Tillmann*

Jacqueline L. Tillmann, Esquire  
Attorney for Plaintiff, NA'SYIA DRAYTON

**CERTIFICATIONS**

Pursuant to Rule 4:5-1, the undersigned hereby certifies that all necessary parties have been jointed and that there is no other proceeding, Court or arbitration, involving the subject matter of this litigation which is pending or threatened.

Dated: July 19, 2022

*Jacqueline L. Tillmann*

Jacqueline L. Tillmann, Esquire  
Attorney for Plaintiff, NA'SYIA DRAYTON

# **EXHIBIT A**

*Ruff Ryders' Anthem* by DMX

**[Intro]**

Uh  
Something new

**[Chorus]**

Stop, drop, shut 'em down, open up shop  
Oh, no, that's how Ruff Ryders roll  
Stop, drop, shut 'em down, open up shop  
Oh, no, that's how Ruff Ryders roll

**[Verse 1]**

Niggas wanna try, niggas wanna lie  
Then niggas wonder why niggas wanna die  
All I know is pain, all I feel is rain  
How can I maintain with that shit on my brain?  
I resort to violence, my niggas move in silence  
Like you don't know what our style is, New York niggas the wildest  
My niggas is with it, you want it? Come and get it  
Took it then we split it, you fuckin' right we did it  
What the fuck you gon' do when we run up on you?  
Fuckin' with the wrong crew, don't know what we goin' through  
I'ma have to show niggas how easily we blow niggas  
Lemme find out there's some more niggas that's runnin' with your niggas  
Nothin' we can't handle, break it up and dismantle  
Light it up like a candle just 'cause I can't stand you  
Put my shit on tapes like you bustin' grapes  
Think you holdin' weight then you haven't met the apes

**[Chorus]**

Stop, drop, shut 'em down, open up shop  
Oh, no, that's how Ruff Ryders roll  
Stop, drop, shut 'em down, open up shop  
Oh, no, that's how Ruff Ryders roll

**[Verse 2]**

Is y'all niggas crazy? I'll bust you and be Swayze  
  
Stop actin' like a baby, mind your business, lady

Nosy people get it too, when you see me spit at you  
You know I'm tryin' to get rid of you, yeah I know, it's pitiful

That's how niggas get down, watch my niggas spit rounds  
Make y'all niggas kiss ground just for talkin' shit, clown  
Oh, you think it's funny? Then you don't know me, money  
It's about to get ugly, fuck it, dawg, I'm hungry  
I guess you know what that mean, come up off that green  
Rob niggas on Ravine, don't make it a murder scene  
Give a dog a bone, leave a dog alone  
Let a dog roam and he'll find his way home  
Home of the brave, my home is a cage  
And, yo, I'm a slave 'til my home is the grave  
I'ma pull capers, it's all about the papers  
Bitches caught the vapors and now they wanna rape us

**[Chorus]**

Stop, drop, shut 'em down, open up shop  
Oh, no, that's how Ruff Ryders roll  
Stop, drop, shut 'em down, open up shop  
Oh, no, that's how Ruff Ryders roll

**[Verse 3]**

Look what you done started, asked for it, you got it  
Had it, shoulda shot it, now you're dearly departed  
Get at me, dawg, did I rip shit? With this one here I flip shit  
Niggas know when I kick shit it's gon' be some slick shit  
What was that look for when I walked in the door?  
Oh, you thought you was raw? Boom, not anymore  
'Cause now you on the floor wishin' you never saw  
Me walk through that door with that four-four  
Now it's time for bed, two more to the head  
Got the floor red, yeah, that nigga's dead  
Another unsolved mystery, it's goin' down in history  
Niggas ain't never did shit to me, bitch-ass niggas can't get to me  
Gots to make a move, got a point to prove  
Gotta make 'em groove, got 'em all like, "Ooh"  
So 'til the next time you hear this nigga rhyme  
Try to keep your mind on gettin' pussy and crime



**[Chorus]**

Stop, drop, shut 'em down, open up shop

**[Outro]**

Talk is cheap, motherfucker!

*Niggas in Paris* by Kanye West and Jay Z

[Intro]

*We're gonna skate to one song, one song only*  
Ball so hard, motherfuckers wanna fine me

[Verse 1: JAY-Z]

So I ball so hard, motherfuckers wanna fine me  
But first niggas gotta find me  
What's fifty grand to a motherfucker like me? Can you please remind me?

(Ball so hard) This shit crazy  
Y'all don't know that don't shit faze me  
The Nets could go 0 for 82  
And I'd look at you like this shit gravy

(Ball so hard) This shit weird  
We ain't even 'posed to be here  
(Ball so hard) Since we here  
It's only right that we'd be fair

Psycho, I'm liable to go Michael, take your pick  
Jackson, Tyson, Jordan, Game 6

(Ball so hard) Got a broke clock  
Rollies that don't tick-tock  
Audemars that's losing time  
Hidden behind all these big rocks

(B-ball so hard) I'm shocked too  
I'm supposed to be locked up too

You escaped what I escaped  
You'd be in Paris getting fucked up too

(B-ball so hard) Let's get faded  
Le Meurice for like six days

Gold bottles, scold models

Spillin' Ace on my sick J's  
(Ball so hard) Bitch, behave  
Just might let you meet Ye

Chi-Town's D. Rose  
I'm moving the Nets, BK

**[Chorus: JAY-Z & Kanye West]**  
Ball so hard, motherfuckers wanna fine me

*That shit cray, that shit cray, that shit cray*

B-ball so hard, motherfuckers wanna fine me

*That shit cray, that shit cray, that shit cray*

**[Verse 2: Kanye West & JAY-Z]**  
She said, "Ye, can we get married at the mall?"  
I said, "Look, you need to crawl 'fore you ball"  
Come and meet me in the bathroom stall  
And show me why you deserve to have it all

*(Ball so hard)*  
That shit cray, ain't it, Jay?

*(B-ball so hard)*  
What she order, fish fillet?

*(B-ball so hard)*  
Your whip so cold, this old thing?  
*(Ball so hard)* Act like you'll ever be around motherfuckers like this again

Bougie girl, grab her hand  
Fuck that bitch, she don't wanna dance

Excuse my French, but I'm in France, ahah, I'm just sayin'

Prince Williams ain't do it right, if you ask me  
'Cause I was him, I would have married Kate and Ashley

What's Gucci, my nigga? What's Louis, my killer?  
What's drugs, my dealer?  
What's that jacket, Margiela?

Doctors say I'm the illest 'cause I'm suffering from realness

Got my niggas in Paris and they going gorillas, huh

**[Interlude]**

*I don't even know what that means  
No one knows what it means, but it's provocative  
No, it's not, it's gross  
Gets the people going*

**[Chorus: JAY-Z]**

Ball so hard, motherfuckers wanna fine me  
B-ball so hard, motherfuckers wanna fine me

**[Outro: Kanye West, JAY-Z & Both]**

You are now watching the throne  
Don't let me get in my zone  
Don't let me get in my zone  
Don't let me get in my zone

These other niggas is lyin'  
Actin' like the summer ain't mine

*(I got that hot bitch in my home)*  
You know how many hot bitches I own?

Don't let me get in my zone  
Don't let me get in my zone  
Don't let me get in my zone  
Don't let me get in my zone

The stars is in the building

The hands is to the ceiling

I know I'm 'bout to kill it

How you know? I got that feeling  
You are now watching the throne  
Don't let me into my zone  
Don't let me into my zone  
**(I'm definitely in my zone)**

*Rich Ass Fuck* by Lil Wayne

[Verse 1: Lil Wayne]

Ugh, AK on my nightstand, right next to that Bible  
But I swear, with these fifty shots, I'll shoot it out with Five-O  
Pockets gettin' too fat, no Weight Watchers, no lipo

Money talks, bullshit walks on a motherfucking tightrope  
And I make that pussy tap out  
, I knock that pussy out cold  
Nigga, you get beat the crap out, but that's just how the dice roll

These hoes want that hose-pipe, so I give all these hoes pipe  
She get on that dick and stay on, all night, like porch lights  
Let's do it, fuck talking, we out here, we ballin'  
And I'm spraying at these rusty niggas like WD-40

We fucked up, we Truk'd up; no if, ands, or butt-fucks  
Bitch niggas go behind your back like nunchucks, and that's fucked up

But my hoes down, my cups up, my niggas down for whatever  
These bitches think they're too fly, well, tell them hoes I pluck feathers  
I'm Tunechi, Young Tunechi, I wear Trukfit, fuck Gucci  
She blowing kisses at me with her pussy lips, smooches  
And that's 2 Chainz

[Chorus: 2 Chainz, Lil Wayne & Both]

Look at you (*Aw*), now look at us

**All my niggas look rich as fuck (*Yeah*)**

All my niggas live rich as fuck (*Yeah*)

All—All my niggas look rich as fuck (*Yeah*)

**Look at you (*Look at you*), now look at us (*Now look at us*)**

**All my niggas look rich as fuck (*Bitch*)**

All my—All my niggas live rich as fuck (*You hoe-ass bi—*)

All my—All—All my ni—

[Verse 2: Lil Wayne]

Ugh, never talk to the cops, I don't speak Pig Latin  
I turned a penny to a motherfuckin Janet Jackson  
Tell the bitches that be hatin' I ain't got no worries



I just want to hit and run like I ain't got insurance, ho  
What's your name? What's your sign? Zodiac Killer

All rats gotta die, even Master Splinter  
Yeah, murder, one-eighty-seven  
I be killing them bitches, I hope all dogs go to heaven  
And I got Xanax, Percocet, promethazine with codeine  
Call me Mr. Sandman, I'm sellin' all these hoes dreams  
Got a white girl with big titties, flat-ass, TV screen  
I keep a bad bitch, call me "The B.B. King"  
And you know I got that mouth out her,  
Then put that bitch out like a house fire  
I'm killing these hoes like Michael Myers

I eat that cat just like a lion  
And I can't trust none of these niggas  
Can't trust none of these hoes  
And I see your girl when I want  
I got that ho TiVo'd, ugh

Got a red-ass bitch with a red-ass pussy

Nigga try me, that's a dead-ass pussy  
Since y'all motherfuckers so blind to the fact  
To tell you the truth, I don't care who's lookin'  
All I know is I love my bitch  
And pussy feel just like Heaven on Earth  
Six feet deep, dick shovelin' the dirt  
RIP: Rest In Pussy

Light that shit, then pass that shit  
, we gon' get so smoked out  
And then I went, got locked up; every night, I dreamt I broke out  
One time for them pussy niggas—that's that shit I don't like

We eatin' over here, nigga—fuck around and have a food fight  
And that's 2 Chainz

[Chorus: 2 Chainz, Lil Wayne & Both]

Look at you (*Uh*), now look at us (*Yeah*)

**All my niggas look rich as fuck (*What?*)**

All my niggas live rich as fuck *(What?)*

**All-all my niggas look rich as fuck** *(Yeah)*

Look at you, now look at us *(Get the fuck out y'all bitches, straight up)*

All my niggas look rich as fuck *(Any bitch who don't wanna give me no pussy)*

All my-all my niggas live rich as fuck *(Fuck you in your asshole, bitch)*

All my-all-all my niggas look rich as fuck

**[Outro: Lil Wayne]**

And your nigga a hoe



**Lollipop** by Lil Wayne

**[Intro: Lil Wayne]**

Oww! Hahahaha

Uh-huh

No homo

(Young Mula, baby)

I said, "He's so sweet, make her wanna lick the wrapper"

(Go! Go! Go! Go! Go! Go!)

So I let her lick the rapper (Hahaha!)

**[Refrain: Static Major]**

She-She-She licked me like a lollipop (*Yeah*)

She— She licked me like a lollipop, l-lollipop (*Yeah*)

Sh-Sh-She licked me like a lollipop (*Yeah*)

She— She licked me like a lollipop, lollipop

**[Chorus: Static Major]**

Shawty want a thug (*Yeah, yeah, yeah*)

Bottles in the club (*Yeah, yeah, yeah*)

Shawty wanna hump (*Yeah*)

You know I like to touch (*Yeah*)

Your lovely lady lumps, lumps, lumps (*She lick me like a lollipop*)

Shawty wanna thug, thug, thug (*I like that*)

Bottles in the club, club, club (*I like that, hahaha*)

Shawty wanna hump

You know I like to touch

Your lovely lady lumps, lumps, lumps (*C'mon, yeah!*)

**[Verse 1: Lil Wayne]**

Okay, lil' mama had a swag like mine (*Yeah*)

She even wear her hair down her back like mine (*Yeah*)

I make her feel right when it's wrong, like lying (*Yeah*)

Man, she ain't never had a love like mine (*Yeah*)

But man, I ain't never seen a ass like hers (*Go!*)

That pussy in my mouth, had me lost for words (*Go!*)

So I told her back it up like, "urp— urp—" (*Yeah*)

And I made that ass jump like, "jerm— jerm—" (*Hahaha! Yeah!*)

And that's when she...

**[Refrain: Static Major & Lil Wayne]**

She-She-She lick me like a lollipop (*Oh yeah, I like that*)

She— She lick me like a lollipop (*Oh yeah, I like that*)

She-She-She lick me like a lollipop (*Yeah, I like that*)

She— She lick me like a lollipop (*Lil' mama!*)

**[Chorus: Static Major, Lil Wayne, & Both]**

Shawty want a thug (*Shawty want a thug, yeah!*)

Bottles in the club

Shawty wanna hump

You know I like to touch (*Yeah*)

Your lovely lady lumps (*Yeah, shawty wanna*)

Shawty want a thug (*I like that*)

Bottles in the club (*Hey, I like that*)

Shawty wanna hump (*I like that*)

You know I like to touch (*I like that! Haha!*)

Your lovely lady lumps (*Yeah*)

**[Post-Chorus: Static Major & Lil Wayne]**

Okay (*Yeah*), after you back it up, don't stop (Drop it!)

Drop it, shawty (*Yeah*) drop it like it's hot

Ooh, drop— dr-dr-dr— drop it like it's hot (*Yeah*)

Do-Do-Do— Do it, shawty, don't stop (*Yeah*)

**[Verse 2: Lil Wayne]**

Shawty say the nigga that she with ain't shit (*Yeah*)

Shawty say the nigga that she with ain't this (*Yeah*)

Shawty say the nigga that she with can't hit (*Yeah*)

But, shawty, I'ma hit it, hit it, like I can't miss

And he can't do this (Ugh), and he don't do that (Ugh)

Shawty need a refund (*Yeah*), need to bring that nigga back (Ugh)

Just like a refund (Ugh), I make her bring that ass back (Ugh, ugh)

And she bring that ass back, because I like that (Ugh, ugh)

[Chorus: Static Major & Lil Wayne]

Shawty want a thug (*Yeah, yeah I like that*)

Bottles in the club (*Yeah, I like that*)

Shawty wanna hump (*Yeah, I like that*)  
You know I like to touch (*Yeah*)  
Your lovely lady lumps (*Yeah*)

**[Refrain: Static Major, Lil Wayne & Both]**

**Shawty wanna lick, lick, lick, lick, lick me** like a lollipop  
*I said, shawty wanna lick, lick, lick, lick, lick me* like a lollipop  
**Shawty wanna lick me... Like a lollipop**  
(*So I let her lick the rapper*) She— She lick me **like a lollipop**

**[Chorus: Lil Wayne]**

Shawty want a thug (Shawty want a thug)  
Bottles in the club (Bottles in the club)  
Shawty wan' hump (Shawty wan' hump)  
You know I like to touch  
Your lovely lady lumps (Hahaha)  
Stat!

**[Bridge: Static Major & Lil Wayne]**

Call me, so I can make it juicy for you (*Go!*)  
Call— Ca-Call me, s— so I can get it juicy for you (*Go!*)  
Call— Ca-Call me, so I can make it juicy for you (*Go!*)  
Call— Call me, s-s-so I can get it juicy for you  
Call— Call me, so I can make it juicy for you (*I said, hmm, mmm*)  
Call— Ca-Call me, s-so I can get it juicy for you (*Hmm, mmm*)  
Call me, so— so I can make it juicy for you (*Mmm, mmm*)  
Call— Call me, so-so-so I can get it juicy for you (*Mm-hm*)

**[Chorus: Lil Wayne & Static Major; Lil Wayne]**

Shawty want a thug, thug, thug (*I like that*)  
Bottles in the club, club, club (*Yeah, I like that*)  
Shawty wanna hump  
You know I like to touch  
Your lovely lady lumps

I say, shawty want a thug  
Bottles in the club  
Shawty wanna hump  
You know I like to touch (*Yeah*)

Your lovely lady lumps, lumps, lumps

**[Verse 3: Lil Wayne]**

I get her on top (Yeah), she drop it like it's hot (Yeah)  
And when I'm at the bottom, she Hillary Rodham (Ha)

The middle of the bed (Yeah), giving, gettin' head (Yuh)  
Givin', gettin' head (Huh), givin', gettin' head (Haha)  
I said hmm, mmm (I like that)  
Said hmm, mmm, mmm (Yeah, I like that)  
I said hmm, mmm, mmm (Yeah, I like that)  
Mm-hm

**[Bridge: Lil Wayne]**

Say, call me, so I can come and do it for you  
Call me, so I can come and prove it for you  
Call me, so I can make it juicy for you  
Call me, so I can get it juicy for you

**[Refrain: Static Major, Lil Wayne, & Both]**

*Shawty wanna lick, lick, lick, lick, lick me like a lollipop (Haha!)*  
She— She lick me like a lollipop, l-lollipop  
*I said he's so sweet, make her wanna lick the wrapper*  
She-She-She lick me like a lollipop  
*(What you do?) So I let her lick the rapper*  
She— She lick me like a lollipop

# **EXHIBIT B**

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From: [REDACTED]  
Subject: Fwd: Workplace environment feeling uncomfortable  
Date: [REDACTED]  
To: [REDACTED]

[REDACTED]

[REDACTED]

----- Forwarded message -----

From: Na'Syia Drayton <[nsyiam@gmail.com](mailto:nsyiam@gmail.com)>  
Date: Thu, Jun 9, 2022 at 6:04 PM  
Subject: Workplace environment feeling uncomfortable  
To: <[shabba@habbalaw.com](mailto:shabba@habbalaw.com)>  
CC: [mmadaio@habbalaw.com](mailto:mmadaio@habbalaw.com) <[mmadaio@habbalaw.com](mailto:mmadaio@habbalaw.com)>, <[ndrayton@habbalaw.com](mailto:ndrayton@habbalaw.com)>

Good Afternoon Alina,

I just want to follow up with you on our conversation we had last Friday. You mentioned to me that you felt like you needed to let me go because my energy was too low, that I seemed overly reserved in the office and because I did not properly acknowledge Melisa. During our meeting, I told you that the reason that I stay inside my office most of the time is because I am always cold. But truthfully, the main reason I stay secluded is because I feel uncomfortable. There have been several comments made that I feel were discriminatory and inappropriate. Please know that, I do not think you or anyone else in the office intentionally meant to harm me when these comments were made. But I feel extremely uncomfortable.

Some of the things that were said that made me feel uncomfortable are "I hate that black bitch" when you were referring to the attorney general of New York, Letitia James. The Judge ruled in favor of her position on a motion, and you walked out of your office, and passed mine while making this remark. The comment "black bitch" really made me feel extremely uncomfortable. At that moment, I felt that you held a hatred for African American people, specifically women.

Another instance when I felt uncomfortable was when you, Peter, and Mike were in

your office, and you were preparing to go to Court for one of the Trump cases and you started playing rap music. You played a series of explicit rap songs in which the word "nigga" was used throughout the songs. You then proceeded to play a song by Kanye West and Jay Z titled "Niggas in Paris." In the midst of playing these songs you yelled to me from your office suggesting that you were playing these songs for me and that I would like them. Both Mike and Peter begin to laugh and sing along. This made me feel uncomfortable because you assumed because I am Black that I listen to that kind of music. Not to mention, the word "nigga" being played in a room full of majority people, while a minority was in the next room.

I am not trying to hurt your feelings Alina, but these recent comments reminded me of similar comments that you made to me a couple of years ago during a staff meeting that we had at a restaurant. During lunch, you made a joke that I should order the chicken meal, because it was good and because I would probably really like the chicken. I recall being deeply embarrassed and hurt by the comment, but I did not say anything at the time because I was worried about how you would react, and I did not want to cause trouble. However, with the recent events, it all feels overwhelming. I was deeply affected by these comments and feel disrespected and unwelcome at work. I feel increasingly anxious and am concerned that my health is being affected.

There have been several other situations that caused me to feel uncomfortable at work, but these instances are the main and most recent instances that caused me to shut down and retreat to my office. I know now that you sensed a change in me, and I regret not being more transparent with you initially. However, as I am sure you can imagine, it is extremely difficult for me to share these things with you. I hope that by bringing this to your attention, we can reestablish a productive work environment.

Thank you,

Na'Syia Drayton

# **EXHIBIT C**

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**Sent:**  
**To:**  
**Cc:**  
**Subject:**

Na'syia Drayton  
Monday, June 13, 2022 4:28 PM  
Alina Habba, Esq.; Michael Madaio  
Randeel Ingram  
Letter of Resignation - Na'Syia Drayton

Good Afternoon Alina,

I just wanted to follow up with you on our conversation that I had with you, and Mike last Thursday. After our discussion about my discrimination complaints, I had a few days to reflect. Although, I am deeply saddened to say it, I feel convinced, now more than ever, that the atmosphere at work is forever changed between us. Although, I truly accept that you were not intentionally trying to hurt me, Alina, I do feel hurt. I also do not feel heard or respected, and after Thursday's conversation, I was left with the impression that nothing would change in the future. Prior to our conversation, I had hoped to receive reassurance that the slurs would not be repeated, and that the offensive music would no longer be played in the office, but that did not happen. For this reason, I feel that I have no choice but to resign effective immediately.

Despite how things ended, I do appreciate having the opportunity to work with you. I would never want to put you or the firm in a difficult situation, so please feel free to contact me with any questions about any of the cases that I have been working on.

Thanks,  
**NA'SYIA DRAYTON**  
Paralegal



**HABBA MADAILO**  
**& Associates LLP**

1430 US Highway 206, Suite 240  
Bedminster, New Jersey 07921  
Telephone: 908-869-1188  
Facsimile: 908-450-1881

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New Jersey Judiciary  
Civil Practice Division

## Civil Case Information Statement (CIS)

Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1. Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed, or attorney's signature is not affixed.

### For Use by Clerk's Office Only

Payment type <input type="checkbox"/> check <input type="checkbox"/> charge <input type="checkbox"/> cash	Charge/Check Number	Amount \$	Overpayment \$	Batch Number
Attorney/Pro Se Name Jacqueline Tillmann	Telephone Number (609) 688-9184 ext.	County of Venue Middlesex <input type="checkbox"/>		
Firm Name (if applicable) Lewis Tillmann Law Offices	Docket Number (when available)			
Office Address - Street 44 Fackler Road	City Princeton	State NJ	Zip 08540	
Document Type Complaint & Demand For Jury Trial	Jury Demand <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Name of Party (e.g., John Doe, Plaintiff) Na'Syia Drayton	Caption Na'Syia Drayton v. Habba Madaio & Associates, LLP, Alina Habba, and Michael Madaio			
Case Type Number (See page 3 for listing)	<u>618</u>			
Are sexual abuse claims alleged?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Does this case involve claims related to COVID-19?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Is this a professional malpractice case? If "Yes," see N.J.S.A. 2A:53A-27 and applicable case law regarding your obligation to file an affidavit of merit.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Related Cases Pending? If "Yes," list docket numbers	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Do you anticipate adding any parties (arising out of same transaction or occurrence)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Name of defendant's primary insurance company (if known)	<input type="checkbox"/> None <input checked="" type="checkbox"/> Unknown			

**The Information Provided on This Form Cannot be Introduced into Evidence.**

Case Characteristics for Purposes of Determining if Case is Appropriate for Mediation

Do parties have a current, past or recurrent relationship?  Yes  No


If "Yes," is that relationship:

Employer/Employee  Friend/Neighbor  Familial  Business

Other (explain) \_\_\_\_\_

Does the statute governing this case provide for payment of fees by the losing party?  Yes  No

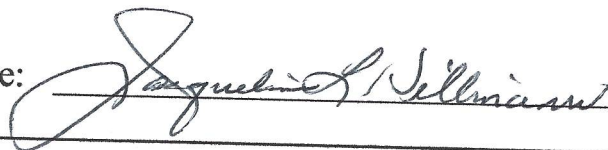
Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition.

 Do you or your client need any disability accommodations?  Yes  No  
If yes, please identify the requested accommodation:

Will an interpreter be needed?  Yes  No  
If yes, for what language?

**I certify that confidential personal identifiers have been redacted from documents now submitted to the court and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).**

Attorney/Self-Represented Litigant Signature:





## Civil Case Information Statement (CIS)

Use for initial pleadings (not motions) under *Rule* 4:5-1

### CASE TYPES

(Choose one and enter number of case type in appropriate space on page 1.)

#### Track I - 150 days discovery

- 151 Name Change
- 175 Forfeiture
- 302 Tenancy
- 399 Real Property (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 Book Account (debt collection matters only)
- 505 Other Insurance Claim (including declaratory judgment actions)
- 506 PIP Coverage
- 510 UM or UIM Claim (coverage issues only)
- 511 Action on Negotiable Instrument
- 512 Lemon Law
- 801 Summary Action
- 802 Open Public Records Act (summary action)
- 999 Other (briefly describe nature of action)

#### Track II - 300 days discovery

- 305 Construction
- 509 Employment (other than Conscientious Employees Protection Act (CEPA) or Law Against Discrimination (LAD))
- 599 Contract/Commercial Transaction
- 603N Auto Negligence – Personal Injury (non-verbal threshold)
- 603Y Auto Negligence – Personal Injury (verbal threshold)
- 605 Personal Injury
- 610 Auto Negligence – Property Damage
- 621 UM or UIM Claim (includes bodily injury)
- 699 Tort – Other

#### Track III - 450 days discovery

- 005 Civil Rights
- 301 Condemnation
- 602 Assault and Battery
- 604 Medical Malpractice
- 606 Product Liability
- 607 Professional Malpractice
- 608 Toxic Tort
- 609 Defamation
- 616 Whistleblower / Conscientious Employee Protection Act (CEPA) Cases
- 617 Inverse Condemnation
- 618 Law Against Discrimination (LAD) Cases

**Track IV - Active Case Management by Individual Judge / 450 days discovery**

- 156 Environmental/Environmental Coverage Litigation
- 303 Mt. Laurel
- 508 Complex Commercial
- 513 Complex Construction
- 514 Insurance Fraud
- 620 False Claims Act
- 701 Actions in Lieu of Prerogative Writs

**Multicounty Litigation (Track IV)**

- 271 Accutane/Isotretinoin
- 281 Bristol-Myers Squibb Environmental
- 282 Fosamax
- 285 Stryker Trident Hip Implants
- 291 Pelvic Mesh/Gynecare
- 292 Pelvic Mesh/Bard
- 293 DePuy ASR Hip Implant Litigation
- 296 Stryker Rejuvenate/ABG II Modular Hip Stem Components
- 299 Olmesartan Medoxomil Medications/Benicar
- 300 Talc-Based Body Powders
- 601 Asbestos
- 624 Stryker LFIT CoCr V40 Femoral Heads
- 625 Firefighter Hearing Loss Litigation
- 626 Abilify
- 627 Physiomesh Flexible Composite Mesh
- 628 Taxotere/Docetaxel
- 629 Zostavax
- 630 Proceed Mesh/Patch
- 631 Proton-Pump Inhibitors
- 632 HealthPlus Surgery Center
- 633 Prolene Hernia System Mesh
- 634 Allergan Biocell Textured Breast Implants
- 635 Tassigna
- 636 Strattice Hernia Mesh
- 637 Singulair
- 638 Elmiron

If you believe this case requires a track other than that provided above, please indicate the reason on page 1, in the space under "Case Characteristics".

**Please check off each applicable category**

**Putative Class Action**

**Title 59**

**Consumer Fraud**

# Civil Case Information Statement

## Case Details: MIDDLESEX | Civil Part Docket# L-003563-22

**Case Caption:** DRAYTON NASYIA VS HABBA MADAIO & ASSOCIATES, LL

**Case Initiation Date:** 07/19/2022

**Attorney Name:** JACQUELINE L TILLMANN

**Firm Name:** LEWIS TILLMANN LAW OFFICES

**Address:** 14 MURRAY PLACE SUITE #3

PRINCETON NJ 08540

**Phone:** 6096889184

**Name of Party:** PLAINTIFF : Drayton, Nasyia

**Name of Defendant's Primary Insurance Company**

(if known): Unknown

**Case Type:** LAW AGAINST DISCRIMINATION (LAD) CASES

**Document Type:** Complaint with Jury Demand

**Jury Demand:** YES - 12 JURORS

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

**Does this case involve claims related to COVID-19?** NO

**Are sexual abuse claims alleged by: Nasyia Drayton?** NO

## THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** YES

**If yes, is that relationship:** Employer/Employee

**Does the statute governing this case provide for payment of fees by the losing party?** YES

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category: Putative Class Action?** NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

07/19/2022

Dated

/s/ JACQUELINE L TILLMANN

Signed