

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

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BALENCIAGA SAS and BALENCIAGA AMERICA, INC.,	:
	:
Plaintiffs,	:
	:
- vs -	:
	:
NORTH SIX, INC., NICHOLAS DES JARDINS, and NICHOLAS DES JARDINS LLC	:
	:
Defendants.	:
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SUMMONS WITH NOTICE

Index No.: _____

Plaintiff designates New York County as the place of trial.

TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to appear in this action by serving a notice of appearance on the attorney for the plaintiffs Balenciaga SAS and Balenciaga America, Inc. (together, "Balenciaga") within twenty (20) days after the service of this summons, exclusive of the day of service, or within thirty (30) days after service is complete if this summons is not personally delivered to you within the State of New York; and, in case of your failure to appear or answer, judgment will be taken against you jointly and severally by default for an amount to be determined according to proof, but no less than \$25,000,000, and for such other and further relief as the Court deems just and proper.

PLEASE TAKE NOTICE THAT the nature of this action is as follows:

Luxury fashion house Balenciaga brings this action against production company North Six, Inc. and its agent, set designer Nicholas Des Jardins d/b/a Nicholas Des Jardins LLC, to seek redress for extensive damages Defendants caused in connection with an advertising campaign Balenciaga hired them to produce. Upon information and belief, Defendants, without Balenciaga's knowledge or authorization, included certain documents in the campaign

photographs, including an excerpt from a court decision upholding a criminal prohibition against child pornography. Balenciaga believes that Defendants' inexplicable acts and omissions were malevolent or, at the very least, extraordinarily reckless. As a result of Defendants' misconduct, members of the public, including the news media, have falsely and horrifically associated Balenciaga with the repulsive and deeply disturbing subject of the court decision. Defendants are liable to Balenciaga for all harm resulting from this false association.

PLEASE TAKE FURTHER NOTICE THAT the relief sought by this action is monetary damages, plus interest and the costs and disbursements of this action (including attorneys' fees).

PLEASE TAKE FURTHER NOTICE THAT, upon your failure to appear, judgment will be taken against you jointly and severally by default for a sum to be determined according to proof, but no less than \$25,000,000, and for such other and further relief as the Court deems just and proper.

This action is brought in New York State Supreme Court, County of New York because, upon information and belief, each of the Defendants resides and/or has their primary place of business in the County of New York.

Dated: New York, New York
November 25, 2022

FRANKFURT KURNIT KLEIN & SELZ, P.C.

By: /s/ Caren Decter
Caren Decter

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*Attorneys for Plaintiffs
Balenciaga SAS and Balenciaga America, Inc.*

TO: North Six, Inc.
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New York, NY 10012

Nicholas Des Jardins
12 Willoughby Avenue Unit #4
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