

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

-----X
AARTHI RAJARAMAN,

Plaintiff,

-against-

MICHAEL BASS and NBC/UNIVERSAL MEDIA, LLC,

Defendants.

-----X

Index No.:

COMPLAINT

Jury Trial Demanded

The above-named Plaintiff, complaining of Defendants, by and through their attorneys,
GODDARD LAW PLLC, respectfully allege:

PRELIMINARY STATEMENT

1. This action is brought by Plaintiff under the Adult Survivors Act, CPLR 214-j. In 1996, Plaintiff was a college student with the dream of working in broadcast journalism in New York City-the mecca for this industry. Plaintiff attended one of the top journalism programs in the country at George Washington University, with an incredible faculty. Plaintiff did not aspire to work in political journalism, but instead in the sports, news and documentary genres. Plaintiff's career counselor, distinguished professors and senior peers all emphasized to her that landing an internship at one of the big networks (NBC, CBS, ABC) in New York City was the way to create the contacts and mentorship necessary to land a top job in New York City, post-graduation. To achieve her dream she focused early on (since freshman year) to achieve this goal. Apart from being on a Division I sports scholarship, Plaintiff wrote for the school newspaper and was sports editor for the university magazine. Plaintiff secured a coveted internship at USA Networks (specifically on live sports) after her freshman year (only two interns hired nationwide) and worked on the US Open. To this day, Plaintiff remains in contact with her ex-colleagues and has very good

relationships with them. In fact, they hired her several times after her summer internship to work as a paid, freelance employee at both the US Open and the French Open. In her sophomore year, Plaintiff continued on the same trajectory, excelling in the classroom and applying to every top broadcast journalism internship in New York City that she could find, specifically at the big three networks. During school, in her limited free time, she freelanced for ESPN on a couple of college basketball games and worked on tennis events, including the Davis Cup tie in the DC Metro area for ESPN. Plaintiff actively maintained friendly, professional relationships with her supervisors, as was recommended by her professors. This was the way to continue to learn and eventually land full-time employment in New York. In or around late Spring 1996, she was selected for an interview with NBC Sports in New York, and she came to be hired as a production associate (PA) for NBC at the 1996 Summer Olympics in Atlanta. For a college sophomore with no industry connections, this was a huge achievement. Many of the PAs hired for the Olympics at NBC (one of the most coveted live sports jobs) tended to be legacy hires or youngsters with top contacts at the network. Though it was an incredibly low paying job (approximately around \$300-400/week), and she would be required to work outrageous hours, and be housed off site (where she would have to pay for her own accommodation in the dorms) Plaintiff was thrilled to be hired. It was literally a “dream come true” and her college adviser and closest professors assured her as much. Once Plaintiff was hired as a summer production assistant by NBC’s New York office to work on the network’s coverage of the 1996 Summer Olympics in Atlanta, Plaintiff was thrilled. An opportunity to work with NBC’s New York office (and NBC sports headquarters), was widely known as a stepping stone into a coveted network job. Plaintiff had only ever focused on working in New York City and her post-graduation plans were to relocate to the Big Apple and work at one of the big three networks. It was understood that this internship was extremely likely to result in

an eventual full-time job for her at NBC New York after graduation. During an intense three weeks, Plaintiff seized on the extraordinary career opportunity, working long hours as a production assistant on her assigned NBC Olympics show, that entailed producing coverage that spanned across NBC's sports and non-sports programming, including coverage of a bombing that happened during those Olympics.

2. Also, during her time working for NBC at the Olympics, Plaintiff observed a free-wheeling, unchecked culture in which married, older, and more senior NBC employees regularly targeted far younger women, such as Plaintiff, for sexual harassment and, in the case of Plaintiff, assault. This was an eye-opening experience for her, as she had never seen such blatant abuse of power. In the immediate aftermath of the Olympic Bombing and with NBC's Olympic coverage winding down, Plaintiff was sexually assaulted by Defendant Michael Bass (hereinafter "Defendant Bass") after he tricked her into his hotel room in the middle of the night by pretending that his wife and newborn child were staying with him there when they had actually already flown home, and for years thereafter saw her life derailed by this incident, while Defendant Bass's career only thrived and grew in prominence, at NBC, CBS, and CNN.

3. Thereafter, Plaintiff, extremely emotionally scarred by the assault, and attempting to process what happened to her, and the impact that it had and continues to have on her career, contacted Defendant Bass on a number of occasions for him to apologize-and treat her fairly. Instead, Defendant Bass repeatedly refused to apologize and continued to punish her by thwarting her career prospects. Upon information and belief, Defendant Bass blackballed Plaintiff from ever working at NBC-New York-and later CBS, because she had refused to willingly engage with him sexually and because he was concerned that she would reveal his workplace sexual assault of her.

The power dynamic was unfairly stacked against her, and it took Plaintiff several years to understand and comprehend the severity of that imbalanced equation.

4. After a long process of therapy and healing, and because of the New York's Adult Survivors' Act, Plaintiff is now finally able to heal by seeking redress for what happened to her as a young PA for NBC.

5. As is set forth more fully below, Plaintiff alleges assault, battery, infliction of emotional distress, false imprisonment and gender discrimination, sexual harassment and retaliation under the New York City and New York State Human Rights Laws against Defendant Bass, as well as claims for gender discrimination, sexual harassment and retaliation under the New York City and New York State Human Rights Laws, negligence and wrongful retention against Defendant NBCUniversal, and seeks damages, compensatory and punitive, commensurate with that life-altering trauma that she experienced in 1996, the effects of which continue to haunt and constrain Plaintiff's career and personal life more than 20 years later.

PARTIES

6. During the times relevant to this Complaint, Plaintiff Aarthi Rajaraman was a production assistant for NBC.

7. At all relevant times, Plaintiff was a college student desperately seeking a job with a New York Network.

8. During the times relevant to this Complaint, Defendant Michael Bass ("Defendant Bass") was a coordinating producer for NBC, who worked in the New York City office and was assigned to NBC's coverage of the 1996 Summer Olympics in Atlanta as the Executive Producer of NBC's Olympic coverage "Late Show," at the time he was the Senior Coordinating Producer on the Today Show and he brought his New York team to Atlanta with him. Upon information

and belief, the Atlanta team conferred with its “Home Base” in New York City to produce each day’s content.

9. Plaintiff was sexually battered, assaulted, and abused by Defendant Bass via her employment with NBC. In performing these assaults, Defendant Bass committed multiple torts, including but not limited to, sexual assault, sexual battery, intentional infliction of emotional distress, and false imprisonment, pursuant to New York common law.

10. Upon information and belief, at all relevant times Defendant Bass was a resident of New York County, New York

11. Defendant NBC/Universal Media, LLC (“Defendant NBC”) is a foreign limited liability company authorized to do business in the State of New York, with its principal place of business in New York County, New York.

12. To the extent that Defendant NBC was a different entity, corporation, or organization during the relevant time periods set forth herein, such entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit and is named in the caption and in this Complaint as Defendant NBC.

13. All such Defendant NBC-related entities, corporations, or organizations are collectively identified as “NBC.”

14. At all relevant times, Defendant Bass was an agent, servant, and/or employee of Defendant NBC.

15. Defendant NBC is also culpable and liable because it knew or should have known that Defendant Bass was sexually abusing, assaulting, and/or battering Plaintiff, including on its premises, but did nothing to stop it. Defendant NBC also knew that many of its male employees,

from Matt Lauer down, regularly used their authority and power to sexually harass and assault young female interns and allowed them to do so with no recourse.

16. Plaintiff's claims against Defendant NBC are thus for Defendant NBC's negligence, including its negligent hiring, retention, and supervision because Defendant NBC is responsible for the acts of their employees.

FACTUAL ALLEGATIONS

Plaintiff Realizes Her Dream of Working in Sports Journalism and is Sent to Atlanta to be Part of NBC's Olympic Coverage

17. Plaintiff is a first-generation Indian-American and longtime lover of sports who envisioned a career in broadcast journalism, and entered college in or around 1994 with this goal. Her lifelong dream was to work in television and land a job in New York City, where she could climb the corporate ladder and achieve career stability.

18. Plaintiff attended college on a tennis scholarship, and was thriving academically, socially, and athletically before the events giving rise to this Verified Complaint.

19. In or around the summer of 1996, Plaintiff applied to a job to work as a production assistant for Defendant NBC. She interviewed for the position in New York City and was to work as a production assistant for Defendant NBC in connection with Defendant NBC's coverage of the 1996 Summer Olympic Games in Atlanta, which was run out of the New York office.

20. At the time, Plaintiff had just turned 20 (May 1996), and had long had the goal of working in television for one of the big three networks, and so the chance to be part of NBC's Olympic coverage was an actual "dream come true."

Plaintiff Arrives in Atlanta

21. It was with great excitement and enthusiasm, therefore, that Plaintiff made the trip for her three-week stay in Atlanta working for Defendant NBC and assisting with the network's Olympic coverage.

22. Plaintiff moved into college dorms in Decatur, Georgia, that Defendant NBC had provided to its more junior employees, including numerous other Defendant NBC production assistants. Plaintiff at times felt unsafe while waiting for public transportation to take her back to her dorm after work, often as late as 1 am in the morning, when she was forced to experience waits at the MARTA station.

Defendant NBC Has a Considerable Stake in Its Olympic Coverage

23. Defendant NBC had paid \$456 million for the broadcast rights to the 1996 Summer Olympics, and the head of Defendant NBC's sports division, Dick Ebersol, envisioned Defendant NBC's coverage as an opportunity to not only enhance the profile of Defendant NBC's sports coverage but a way to elevate the entire network. By all accounts, this was a successful strategy, as in addition to strong ratings for the Olympics, Defendant NBC realized major gains in its non-sports programming. See, e.g., <https://www.latimes.com/archives/la-xpm-1996-07-31-ca-29638-story.html>.

24. In addition to its live coverage of Olympic Events, Defendant NBC also scheduled considerable coverage related to the Olympics within its marquee non-sports programming, including the "NBC Nightly News," the "Tonight Show," the "Today Show," and the "Late Show."

Plaintiff is Assigned to Defendant NBC's "Late Show" Under Coordinating Producer Defendant Bass

25. Plaintiff was assigned to work on the "Late Show's" Olympic-related coverage.

26. Negligently, NBC housed its team of young, college student production assistants in a dorm in Decatur, Georgia even though they were working 10-to-12-hour shifts in NBC's makeshift Atlanta Studio. The production assistants were required to take public transportation, even though they got off work in the middle of the night, because a cab to their dorm cost almost as much as they made in a day as they were being paid minimum wage.

27. Plaintiff and her peers were regularly required to take the MARTA at odd hours, and they routinely discussed how unreliable it felt. Upon information and belief, Defendant NBC knew-but did not care- that the accommodations it provided their young interns caused them to regularly be in unsafe situations. In addition, NBC did not provide their young, female, production associates (particularly those with no inside connections or knowledge of the network) with training, HR guidelines or mechanisms on how to deal with the often hostile and sexist work environment. On more than one occasion, Plaintiff entered communal bathroom in Decatur dorms to hear complaints from fellow female PAs. On one occasion, a PA one year older than her was in the bathroom crying on a phone call with her married, older, staff producer she was "dating" while on the assignment.

28. Along with Plaintiff and other young production assistants, Defendant NBC brought numerous New York-based "Today Show" employees to work in Atlanta during the summer of 1996.

29. The coordinating producer of Defendant NBC's "Late Show" Olympic coverage was Defendant Bass. At the time, Defendant Bass was an up-and-coming producer on Defendant NBC's "Today Show," and a close colleague of "Today Show" host Matt Lauer. In his mid to late 30s, Defendant Bass was significantly older than Plaintiff. He presented as extremely serious and wielded significant authority over her and the other PAs.

30. Defendant Bass was known as a “Superstar” and “up and comer,” and Matt Lauer, Katie Couric and Al Roker regularly came to the Olympic Late Show office to talk to Defendant Bass.

31. Plaintiff knew that the best pathway to her dream job in New York City was to impress her boss, Defendant Bass, and to that end she worked tirelessly.

32. She regularly worked ten-to-twelve-hour days, as was expected of all staff. To secure her dream job in New York City after college, she knew this was the only way to create a favorable impression with her supervisors.

33. As Defendant NBC’s coordinating producer, Defendant Bass oversaw all aspects of the “Late Show’s” Olympics coverage.

34. Defendant Bass was the direct supervisor to Plaintiff and other production assistants.

35. Plaintiff and her fellow production assistants worked long hours, and often commuted together on MARTA, Atlanta’s public transit system.

36. Plaintiff was impressed with Defendant Bass’s professionalism, work ethic and talent. She was among the youngest, least experienced and least connected people on the team and she made a point of working extremely hard in the hopes of impressing Defendant Bass, since, if he liked her work, he could hire her as an intern on the Today Show in New York or at the very least, give her a recommendation. The Today Show was one of the most coveted shows and jobs in television at the time and based in New York City.

37. Defendant Bass regularly told Plaintiff that she was doing a great job and thanked her for her contributions. He regularly acknowledged that she was working hard and that he

appreciated it. Plaintiff, a 20-year-old minority female with no connections in the business, was confident that this internship would help her establish her career path.

Plaintiff Observes Defendant NBC's Apparent Tolerance of Sexually Inappropriate Conduct by Senior NBC Employees

38. Only a week into her assignment in Atlanta, Plaintiff became aware that one of her production assistant colleagues had become sexually involved with a prominent, married, and much older NBC director.

39. Plaintiff was astonished both by how openly the older NBC director conducted the affair and Defendant NBC's seeming indifference to the affair being conducted with a far more junior employee.

40. During her time in Atlanta with Defendant NBC, Plaintiff also came to be aware of prominent on-air NBC figures carrying on similar affairs with younger staffers.

41. In addition, Defendant NBC senior male employees openly talked about their visits to strip clubs and their sex lives, to the discomfort of Charging Party and the other PAs.

Defendant Bass's Family Comes to the Office to Meet the Team

42. On or about July 25 or July 26, 1996, Defendant Bass brought his wife and newborn baby to the Late Show office. Defendant Bass proudly introduced his family, and the team enjoyed a "feel good" moment. Plaintiff was extremely impressed that in addition to being notably talented and successful in his career, Defendant Bass also appeared to be a really good guy, and a family man, which was far different than the behavior she had observed from other married men at Defendant NBC. Defendant Bass regularly talked about being a first-time dad and talked about his lack of sleep due to the baby.

43. Plaintiff was further impressed that he had brought his wife and newborn from New York, because he didn't want to miss out on time with them, and so that he could help with parental duties even when working 13 hours a day.

**Defendant Bass Solidifies Plaintiff Respect and Trust by Calmly Overseeing His Staff
During the Bombing**

44. Toward the second week of Defendant NBC's Olympic approximately three-week Olympic coverage in Atlanta, Plaintiff continued to work long hours hoping to prove herself to Defendant Bass.

45. On July 27, 1996, a pipe bomb was detonated in Centennial Olympic Park, killing one person and injuring over 100.

46. At the time, Defendant Bass reacted calmly and with poise in both covering the bombing and ensuring the safety of his team and the scores of Defendant NBC employees who had been near the bombing. The entire show staff had to stay overnight in the Broadcast Compound out of fear of subsequent bombings or danger. Plaintiff was especially impressed that Defendant Bass was concerned about his team members because she believed that his wife and infant baby were also present in Atlanta at the time of the bombing since they had just been in the office.

Defendant Bass Assaults Plaintiff

47. The next day, Plaintiff returned to work, and that evening, as Defendant NBC's coverage was winding down, Defendant Bass invited the team for "dinner and drinks," which, upon information and belief, was intended to relieve some of the fear and tension from the bombing just a day before. Defendants knew that alcohol would be supplied to its young staff and also knew that its young staff would still have to commute home via public transportation in the desolate early morning hours. Defendants did not offer any transportation to the interns. Although she dreaded taking the MARTA home in the early, morning hours, Plaintiff felt that she could not

say no, and also felt that she needed to go to the “wrap dinner” in order to build connections and get to the next level-her dream job in New York City.

48. Dinner started well after midnight, as that was when the NBC teams’ workday ended. During the dinner, Defendants supplied its employees with alcohol and covered all the costs.

49. At about 5 am, Plaintiff, dreading her early morning commute on public transportation, said goodbye to her co-workers, and walked out to catch the MARTA train to take her back to Decatur. Almost immediately, Defendant Bass walked out behind her, began walking with her, and started engaging in conversation with her. No other employees were around.

50. Defendant Bass continued walking with her and talking to her as they arrived in the proximity of the MARTA train stop. Plaintiff realized that she had to go to the bathroom before her long train ride and began looking for a bathroom before she entered the train station.

51. Defendant Bass informed Plaintiff that his hotel was in the immediate vicinity and suggested that she use the rest room in his hotel suite.

52. Because it was approximately 5am, and she was having trouble locating a safe bathroom, and because she believed Defendant Bass to be an honorable family man whose family was staying in said hotel suite, Plaintiff accepted Defendant Bass’s offer to use the restroom in his hotel room, since it was her understanding that his wife and infant child were asleep there. He was also her boss; therefore, she trusted the significantly older, senior, authority figure to consider her safety and well-being in allowing her to use the toilet before heading home.

53. As she entered Bass’s large hotel suite, Plaintiff made a particular effort to be quiet on the way to the restroom. When she came out of the restroom, Plaintiff stated “thank you, I am going to go, I don’t want to wake up your newborn.”

54. Defendant Bass revealed to Plaintiff, who was now inside his hotel room, that his family had in fact returned to New York. Defendant Bass told Plaintiff to sit for a moment and have some water.

55. At this moment, Plaintiff's heart sank, and she began to fear for her personal safety, and her professional career. Plaintiff knew that she did not want to have a sexual interaction with Defendant Bass and she knew that she did not want to have a sexual interaction with a married man, or her boss, but she immediately feared that she was at a cross roads and that the opportunities that could be afforded to her in New York if Defendant Bass endorsed her would be gone when she refused him.

56. Plaintiff felt that she had no choice but to sit down and she began nervously chatting about work. Almost immediately, just as she feared, Defendant Bass attacked her. He began kissing and groping her without her consent and continued to do so even though she did not reciprocate the kissing or groping and instead was completely frozen in shock and fear.

57. Plaintiff felt sick, powerless, and immobilized. She was equally frightened of the circumstance she found herself in and the consequences of resisting and rejecting Defendant Bass's aggressive advances.

58. Defendant Bass continued to force himself on Plaintiff, putting his hands up her shirt and down her skirt. Even though Plaintiff was not responsive, Defendant Bass continued to force himself on her. Plaintiff was frozen with shock and fear and did not know what to do. Plaintiff feared that she would be raped by her boss, who she had been duped into believing was an honorable and upstanding family man.

59. After her initial shock wore off slightly, and while he continued to stick his tongue into her mouth and his hand inside of her, Plaintiff began to think about how she could escape without greatly angering her boss and risking her personal safety and professional career.

60. Defendant Bass paused and Plaintiff nervously stated, “Uhm, I am sorry, I uhm, have to catch the train because we have to be back to work soon,” and Defendant Bass responded, “Yeah, yeah, you’re right.” Plaintiff walked herself out of the hotel suite and ran out of the hotel. As soon as she left Defendant Bass’s room she began crying hysterically. Although she had no money and had never done so at any other time, Plaintiff took a taxi back to her dorm in Decatur, which cost her nearly a day’s pay because she was so upset and scared about the sexual abuse she had just endured.

61. Plaintiff cried hysterically in the taxi the entire way back to her dorm.

Defendant Bass Threatens Plaintiff Not to Tell Anyone About the Sexual Assault

62. Back in her dorm, Plaintiff tried to get a few hours rest and process what had happened. She felt extremely sick and anxious and did not know if there was any protocol or ability to report the incident. This had never happened to Plaintiff before and therefore she was in a state of shock.

63. After she finally managed to fall asleep, Plaintiff was awakened by a ringing telephone in her dorm room. It was Defendant Bass, who had never called her before. She was unsure how he had even managed to find her dorm’s telephone number, as she had only given it to her parents and the production manager. Plaintiff was immediately filled with fear.

64. Defendant Bass started off the conversation by telling Plaintiff, “That shouldn’t have happened,” as if she had had anything to do with his decision to sexually assault her. He then threatened her, “Don’t tell anyone.”

65. Implicit in his warning was the threat that Defendant Bass could ruin her career if she told anyone. Plaintiff was terrified as this was a side of Defendant Bass she had not experienced during working hours. Plaintiff, a college student, was powerless and speechless. She thought about the way that other Defendant NBC employees had been acting in public-including openly sexually harassing young women and talking about strip clubs and their sex lives-with no consequences at all.

66. Plaintiff, realizing that her career-which had not even truly started yet was on the line, responded, "Ok." She did not want to engage in further conversation with Defendant Bass, and still had a full day of work left in Atlanta. Plaintiff, a young college student, feared that she would be fired if she said anything but "Ok," and she feared that being fired from the NBC internship would ruin her career before it even started.

67. Indeed, at the time, Plaintiff sincerely believed that if she were to speak out at all, Defendant Bass would not only refuse to help her get a job in New York City, but also sabotage any prospects of a broadcast journalism career for her in New York City. He was a senior, star producer with a stellar reputation at the biggest and most commercially successful show in New York City. The odds were clearly stacked against her. In fact, it was clear to Plaintiff that if she had either complied with or participated in Defendant Bass's sexual demands her career would have benefitted, but because she rejected his advances, her opportunity to springboard from her NBC PA job into a job in New York City was nullified.

**Plaintiff's Returns to Work, Confides in a Friend About the Assault, and Suffers
Severe Consequences for Many Years**

68. Despite what had happened, Plaintiff returned to work the next day, facing her assaulter and boss, Defendant Bass.

69. Plaintiff feared that if she confronted him for the assault, Defendant Bass would not serve as a future reference for other jobs in New York. Plaintiff was only naively able to ask him that, despite what he had done, he respect her and their supervisor-supervisee relationship.

70. That night, Plaintiff had dinner with a close college friend, and confided to her about having been sexually assaulted by Defendant Bass. They both agreed that if she pursued legal action it would be very unlikely that anyone would believe a young, college student with no connections over a powerful NBC executive. Plaintiff felt utterly helpless and unable to assert her rights.

71. Plaintiff resumed college and continued to pursue her ambition of being a journalist in New York City. However, the assault in Atlanta triggered a downward spiral of excessive drinking, eating disorders, self-contempt, undermining romantic relationships, and even suicidal ideation. Plaintiff often wondered if she had done something to ask for this assault and punished herself.

Plaintiff Continues to Struggle with the Sexual Assault and Resulting Denial of Job Opportunities

72. Finally, in her last year of college, she hit absolute rock bottom and with the encouragement of family and friends, Plaintiff entered therapy, began the process of recovery, and regained her enthusiasm for school and life.

73. Plaintiff spoke to her therapist about how unfair it was that in addition to being sexually assaulted, she was also denied the New York City career opportunities that should have come out of her summer job with Defendant NBC.

Defendant Bass Blackballs Plaintiff in New York

74. Plaintiff, desperately seeking a television job in New York City, decided to go see Defendant Bass in New York City for the career assistance and mentorship that he should have

been happy to give to a successful, hardworking intern-and what he would have done if she had not refused his sexual advances-and then been assaulted by him. At the very least, she hoped that Defendant Bass, when faced with her, would afford her the same assistance that he afforded successful interns who he had not sexually assaulted. Plaintiff wanted to give the impression of being strong and confident in order to convey to Defendant Bass that she was a person that was capable of working in the high stakes world of the NBC New York headquarters.

75. Plaintiff contacted Defendant Bass who was, at the time the Senior Producer of the Today Show and reminded him that she was still actively seeking a television job in New York. Plaintiff told him that she was going to be interviewed in New York and would like to meet with him in New York to discuss opportunities at Defendant NBC. As Plaintiff had maintained excellent connections with all her other supervisors at both PA and internship opportunities (but NBC was the biggest and most influential network she had worked for and hoped to interview at), she felt confident that she would be treated in a professional and respectful manner.

76. Defendant Bass reluctantly agreed to meet with Plaintiff but acted as if he had to. It was clear that he was meeting with her out of obligation, and upon information and belief, because he feared that she would report his sexual assault if he did not. Defendant Bass was cold and rigid, and he refused to make eye contact with her. Plaintiff was extremely disappointed but hoped that if he saw that she was simply doing what PAs do-asking their supervisors/bosses for career help and mentorship, that he too would act professionally and do what a person in a significant position of power is supposed to do-help outstanding PAs get entry level jobs.

77. Plaintiff told Defendant Bass that she was graduating and was really interested in obtaining a job with Defendant NBC. Defendant Bass offered no assistance. Plaintiff felt humiliated and began to experience severe anxiety and self-loathing and felt that she was somehow

to blame for this treatment. Plaintiff eventually understood she was being punished for refusing to engage in sexual activity with her boss, and devastated that her sexual assault was continuing to hamper her career prospects and blocking her from an entry level job she should have had at NBC's New York Studio.

78. During the meeting he continued to refuse to make much direct eye contact with Plaintiff and was extremely cold and dismissive. He asked no questions and added no input to the conversation. He did not so much as review the resume she held out to him.

79. Defendant Bass curtly ended the meeting and made clear that he would not help her in her career efforts. Upon information and belief, Defendant Bass DID help other male PAs and female PAs who he did not sexually assault.

80. Plaintiff was devastated that she was still being punished for not engaging in Defendant Bass' quid pro quo sexual harassment, especially since she had made the difficult decision of NOT REPORTING his assault because she was so scared about the impact it would have on her career.

81. Plaintiff suffered extreme emotional distress as a result of the retaliation she suffered from Defendant Bass. She started with disordered eating behavior once again and was too anxious to sleep through the night for several months.

Plaintiff Learns that Defendant Bass Had Helped Other Former Interns Get Jobs

82. Plaintiff eventually obtained a job with HBO in New York City. She had worked for them for two consecutive summers as a logger on their live coverage of Wimbledon. Thanks to Plaintiff's outstanding work and professionalism, her supervisor happily recommended her for a PA job at HBO Sports. This was the experience she had always hoped for with NBC but was not afforded. Defendant Bass, meanwhile, had moved over to CBS in or about 1999. Plaintiff began

looking for a new job at a television show in or around late 2000. Plaintiff learned from one of her former HBO Colleagues, who had also worked as production associate at the Olympics that Defendant Bass had just hired her at CBS, and encouraged Plaintiff as another former production associate, to reach out to him as well.

83. Plaintiff, again exasperated that Defendant Bass was treating her worse than other former interns,, and continuing to hope that the ship would be righted-that Defendant Bass would take responsibility, apologize, and do the right thing-give her the same opportunity that he would have given her had she been a man or had he not sexually assaulted her.

84. To that end, Plaintiff reached out to Defendant Bass and communicated to him that she had gotten his email from the former Olympic PA and colleague he had just hired and learned that he had openings on his team which she would be interested in. Defendant Bass blew her off.

85. Plaintiff was retraumatized again-she was still paying the price for Defendant Bass's wrong-doing.

86. Upon information and belief, Defendant Bass refused to consider Plaintiff for jobs for which she was qualified and by refusing to assist her in her job hunt as he would otherwise do for a top performing PA.

87. Upon information and belief, Defendant Bass cut Plaintiff out of multiple job opportunities in New York, where he exerted great influence, in retaliation for refusing his sexual advances and his fear that she would out him for sexually assaulting her.

88. Still reeling from the aftermath of what Defendant Bass had done to her, in or around the same time period she had first emailed him regarding employment opportunities, Plaintiff summoned up the courage to confront Defendant Bass about what he had done to her-not only in the hotel room but throughout her career in the years that followed-and emailed him.

Plaintiff told him that she did not like what he did to her, and she did not like how he made her feel or how it was still impacting her so many years later.

89. Defendant Bass responded by asking Plaintiff to give him her phone number so that he could call her back at a later time to discuss what had happened. He never called her back.

90. For his part, Defendant Bass continued to experience considerable career success over the past two-plus decades, as he became a top producer at the “Today Show,” the senior vice president of strategic initiatives at Defendant NBC, a senior executive producer at CBS, and, most recently, programming chief at CNN.

91. More than 20 years passed until the #metoo movement and NBC’s ouster of Matt Lauer for similarly unchecked misconduct helped provide Plaintiff with the courage, understanding and resolve to, in 2020, contact a lawyer about Defendant Bass’s assault of her during the 1996 Summer Olympics. Plaintiff finally understood she had been a victim without a voice or recourse, not the one to blame. Defendant had used his power and clout to proceed as if nothing happened, while Plaintiff was made to pay the emotional and career damages.

92. It has become very clear over the years that Defendant NBC was well aware of the blatant Quid Pro Quo sexual harassment and sexual assaults that its male employees were subjecting their female employees to and nonetheless looked the other way and allowed them to do so, allowing countless women to be sexually assaulted and their lives and careers derailed because of it. Upon information and belief, Defendant Bass similarly abused and assaulted other women who reported to him at NBC and NBC allowed the unlawful behavior to go on.

CAUSES OF ACTION

This Action Is Timely Under CPLR 214-J (The Adult Survivors Act)

93. This action is timely because it falls under the Adult Survivors Act and is brought during the one-year time period set forth in CPLR Section 214-j. The claims brought here allege intentional and negligent acts and omissions for physical, psychological, and other injuries suffered as a result of conduct that would constitute sexual offenses as defined by § 130 of the New York Penal Law committed against a person who is eighteen years of age or older. Such claims have been revived by CPLR 214-j and may be commenced between November 24, 2022, and November 24, 2023.

94. The underlying conduct described herein constitutes the following crimes under New York Law: New York Penal Law § 130.52 (forcible touching); § 130.55 (sexual abuse in the third degree); Each of the acts constituting sexual conduct was done without Plaintiff's express or implied consent.

95. The Adult Survivors Act applies to revive the statute of limitations for each of the causes of action asserted below.

AND AS FOR A FIRST CAUSE OF ACTION

*(Gender Discrimination and Sexual Harassment in Violation of the New York City Human Rights Law and the New York State Human Rights Law)
Against All Defendants*

96. Plaintiff repeats and re-alleges each and every fact as set forth above, herein.

97. Plaintiff is a woman, and therefore is a member of a protected class. Plaintiff was qualified to work for Defendant NBC and satisfactorily performed the duties required by her position.

98. Defendants intentionally subjected to her to discrimination based on gender and a hostile work environment based on gender by allowing a sexually harassing work environment where Plaintiff was sexually harassed by her supervisor.

99. As a further direct and proximate result of said unlawful employment practices, Plaintiff has suffered extreme mental anguish, outrage, severe anxiety about her future and her ability to support herself and her family, harm to her employability and earning capacity, painful embarrassment among her family, friends, and co-workers, damage to her good reputation, disruption of her personal life, and the loss of enjoyment of the ordinary pleasures of everyday life.

100. Based on Defendants' discrimination, Plaintiff is entitled to all remedies in violation of NYSHRL and NYCHRL against all Defendants. Plaintiff shall seek attorney's fees and punitive damages.

AND AS FOR A SECOND CAUSE OF ACTION

*(Retaliation in Violation of the New
York City Human Rights Law and the New York State Human Rights Law)
Against All Defendants*

101. Plaintiff repeats and re-alleges each and every fact as set forth above, herein.

102. Plaintiff refused to be sexually harassed, refused to engage in quid pro quo sexual harassment, refused to engage in sexual activity with her Supervisor Michael Bass, and objected to the unlawful behavior of her Supervisor Michael Bass.

103. Due to her objections, Plaintiff suffered extreme retaliation in that she was no longer considered employable at Defendant NBC. The internship that should have opened doors for her at Defendant NBC and later at CBS instead slammed them shut in front of her because she objected to sexual harassment and sexual assault.

104. As a further direct and proximate result of said unlawful employment practices, Plaintiff has suffered extreme mental anguish, outrage, severe anxiety about her future and her ability to support herself and her family, harm to her employability and earning capacity, painful embarrassment among her family, friends, and co-workers, damage to her good reputation, disruption of her personal life, and the loss of enjoyment of the ordinary pleasures of everyday life.

105. Based on Defendants' discrimination, Plaintiff is entitled to all remedies in violation of NYSHRL and NYCHRL against all Defendants. Plaintiff shall seek attorney's fees and punitive damages.

AND AS FOR A THIRD CAUSE OF ACTION

*(Aiding and Abetting Discrimination in Violation of the New York State Human Rights Law)
Against the Defendant Bass*

106. Plaintiff re-alleges and incorporates by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

107. Defendants acted to aid and abet the discrimination complained of herein, in violation of the NYSHRL.

108. As a direct and proximate result of Defendants' discrimination, Plaintiff has suffered and continues to suffer damages including loss of pay and benefits and severe mental anguish and emotional distress.

109. Defendants acted intentionally and with malice and/or reckless indifference to Plaintiff's state-law protected rights, entitling Plaintiff to punitive damages.

110. Plaintiff will continue to suffer these damages and until the Court grants all of the relief which he is entitled that is requested herein. By reason of Defendants' discrimination, Plaintiff is entitled to all remedies available for these violations of law.

AS AND FOR A FOURTH CAUSE OF ACTION

*(Aiding and Abetting Discrimination in violation of the New York City Administrative Code)
Against Defendant Bass*

111. Plaintiff re-alleges and incorporates by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

112. Defendants acted to aid and abet the discrimination complained of herein, in violation of the New York City Administrative Code.

113. As a direct and proximate result of Defendants' discrimination, Plaintiff has suffered and continues to suffer damages including loss of pay and benefits and severe mental anguish and emotional distress.

114. Defendants acted intentionally and with malice and/or reckless indifference to Plaintiff's state-law protected rights, entitling Plaintiff to punitive damages.

115. Plaintiff will continue to suffer these damages and until the Court grants all of the relief which she is entitled that is requested herein. By reason of Defendants' discrimination, Plaintiff is entitled to all remedies available for these violations of law.

AS AND FOR A FIFTH CAUSE OF ACTION

*(Sexual Assault)
Against Defendant Bass*

116. Plaintiff re-alleges and incorporates by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

117. Defendant Bass's predatory, abusive, and unlawful acts against Plaintiff created a reasonable apprehension in Plaintiff of immediate harmful or offensive conduct and was done intentionally to Plaintiff by Defendant Bass without Plaintiff's consent.

118. As a direct and proximate result of the aforementioned assault, Plaintiff has sustained and will continue to sustain serious psychological injuries, emotional distress, mental anguish, embarrassment, and humiliation.

119. As a direct and proximate cause of the aforementioned assault, Plaintiff has incurred medical expenses and other economic damages, and is obligated to expend sums of money for medical care in an effort to cure herself of the injuries imposed by the assault in an effort to cure herself of the injuries and to alleviate her pain and suffering, emotional distress, mental anguish, and humiliation.

120. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendant Bass in such sum as a jury would find fair, just, and adequate.

121. By reason of the foregoing, Plaintiff is further entitled to punitive damages from Defendant Bass in such sum as a jury would find fair, just, and adequate.

122. The amount of damages sought exceeds the jurisdiction of all lower courts that would otherwise have jurisdiction.

123. This action falls within exceptions to Article 16 of the CPLR.

AS AND FOR A SIXTH CAUSE OF ACTION

(Battery)

Against Defendant Bass

124. Plaintiff re-alleges and incorporates by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

125. Defendant Bass's predatory, abusive, and unlawful acts against Plaintiff created a reasonable apprehension in Plaintiff of immediate harmful or offensive conduct and was done intentionally to Plaintiff by Defendant Bass without Plaintiff's consent.

126. As a direct and proximate result of the aforementioned battery, Plaintiff has sustained and will continue to sustain serious psychological injuries, emotional distress, mental anguish, embarrassment, and humiliation.

127. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendant Bass in such sum as a jury would find fair, just, and adequate.

128. By reason of the foregoing, Plaintiff is further entitled to punitive damages from Defendant Bass in such sum as a jury would find fair, just, and adequate to deter Defendant Bass and others from similar misconduct.

129. The amount of damages sought exceeds the jurisdiction of all lower courts that would otherwise have jurisdiction.

130. This action falls within exceptions to Article 16 of the CPLR.

AS AND FOR A SEVENTH CAUSE OF ACTION
(Intentional Inflection of Emotional Distress)
Against Defendant Bass

131. Plaintiff re-alleges and incorporates by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

132. Defendant Bass's engaged in outrageous conduct toward Plaintiff with the intention of causing, or with reckless disregard for causing, Plaintiff to suffer severe emotional distress.

133. As a direct and proximate result of the assault and battery to Plaintiff, Plaintiff has sustained and will continue to sustain serious psychological injuries, emotional distress, mental anguish, embarrassment, and humiliation.

134. Defendant Bass committed the acts alleged herein maliciously and oppressively, with the wrongful intention of injuring Plaintiff with an evil motive and in conscious disregard of Plaintiff's rights, entitling Plaintiff to recover punitive damages from Defendant Bass in such sum

as a jury would find fair, just, and appropriate, to deter Defendant Bass and others from similar misconduct

135. The amount of damages sought exceeds the jurisdiction of all lower courts that would otherwise have jurisdiction.

136. This action falls within exceptions to Article 16 of the CPLR.

AS AND FOR A EIGHTH CAUSE OF ACTION

(False Imprisonment)

Against Defendant Bass

137. Plaintiff re-alleges and incorporates by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

138. Defendant Bass intentionally and without the right to do so confined Plaintiff.

139. As a direct and proximate result of this false imprisonment, Plaintiff has sustained and will continue to sustain serious psychological injuries, pain and suffering, emotional distress, mental anguish, embarrassment, and humiliation.

140. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendant Bass in such sum as a jury would find fair, just, and adequate.

141. By reason of the foregoing, Plaintiff is further entitled to punitive damages from Defendant Bass in such sum as a jury would find fair, just, and adequate to deter Defendant Bass and others from similar misconduct.

142. The amount of damages sought exceeds the jurisdiction of all lower courts that would otherwise have jurisdiction.

143. This action falls within exceptions to Article 16 of the CPLR.

AS AND FOR A NINTH CAUSE OF ACTION

(Negligence)

Against Defendant NBC

144. Plaintiff re-alleges and incorporates by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

145. Plaintiff realleges every allegation in the preceding paragraphs.

146. At all relevant times, Defendant NBC owed a duty of care to Plaintiff and others to adequately and properly supervise its employees.

147. At all relevant times, Defendant NBC owed a duty of care to adequately and properly supervise its employees, agents and servants, and to ensure that its employees were not using the authority bestowed on them by NBC to commit sexually assault, facilitate sexual assault, and/or cover up sexual assault.

148. At all relevant times, Defendant NBC knew or should have known of Defendant Bass's assault of Plaintiff.

149. At all relevant times, Defendant NBC and its agents, servants, and/or employees failed to have, enact, and/or enforce rules, regulations, policies, or procedures regarding sexual assault, battery, and/or harassment in the workplace.

150. At all relevant times, Defendant NBC and its agents, servants, and/or employees caused, created or, despite active or constructive notice, permitted the existence of dangerous conditions to exist within their premises.

151. At all relevant times, Defendant NBC and its agents, servants, and/or employees breached the above-stated duties in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.

152. As a result of the negligence of Defendant NBC and its agents, servants, and/or employees caused Plaintiff serious personal injuries, emotional distress, mental pain and suffering, mental anguish, and/or physical manifestations thereof, and other losses, all of which have not yet been fully ascertained.

153. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendant NBC in such sum as a jury would find fair, just, and adequate.

154. By reason of the foregoing, Plaintiff is further entitled to punitive damages from Defendant NBC in such sum as a jury would find fair, just, and adequate.

155. The amount of damages sought exceeds the jurisdiction of all lower courts that would otherwise have jurisdiction.

AS AND FOR A TENTH CAUSE OF ACTION
(Negligent Hiring, Retention, and Supervision)
Against Defendant NBC

156. Plaintiff re-alleges and incorporates by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

157. Plaintiff realleges every allegation in the preceding paragraphs.

158. Defendant NBC negligently hired, retained, and supervised Defendant Bass.

159. As a result of such negligent hiring, supervising, and/or retention, Plaintiff suffered serious personal injuries, emotional distress, conscious pain and suffering, mental anguish, and/or physical manifestations thereof, and other losses, all of which have not yet been fully ascertained.

160. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendant NBC in such sum as a jury would find fair, just, and adequate.

161. By reason of the foregoing, Plaintiff is further entitled to punitive damages from Defendant NBC in such sum as a jury would find fair, just, and adequate.

162. The amount of damages sought exceeds the jurisdiction of all lower courts that would otherwise have jurisdiction

163. This action falls within exceptions to Article 16 of the CPLR.

AS AND FOR AN ELEVENTH CAUSE OF ACTION
(Victims of Gender-Motivated Violence Protection Act)
Against All Defendants

164. Plaintiff re-alleges and incorporates by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

165. New York City Administrative Code § 10-1104 provides an independent cause of action for plaintiffs who are injured by a party who enables, participates in, or conspires in the commission of a crime of violence motivated by gender.

166. Causes of action that would otherwise be barred due to a statute of limitations are revived for the period of March 1, 2023, to March 1, 2025.

167. Defendants enabled, participated in, and conspired in Defendant Bass's sexual assault of Plaintiff.

168. Defendant NBC enabled Defendant Bass's crimes when it paid for Defendant Bass's hotel room where Defendant Bass sexually assaulted Plaintiff.

169. Defendant NBC participated and enabled Defendant Bass's crimes by blackballing Plaintiff from further employment opportunities at NBC.

170. These actions constitute enabling, participating in, and conspiring to commit a crime of violence motivated by gender because Defendant Bass did not get Plaintiff's consent when he abused her, violating her bodily autonomy and showing contempt for her autonomy and animus toward her gender.

JURY DEMAND

171. Plaintiff demands a trial by jury in this action.

WHEREFORE, Plaintiff demands judgment against Defendants in such sum as a jury would find fair, adequate, and just.

Dated: New York, New York
June 22, 2023

Respectfully submitted,

GODDARD LAW PLLC
Attorneys for Plaintiff

By: */s/ Megan S. Goddard*

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