

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ROCKLAND

INDEX NO.

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FILED:

EMMIS RADIO, LLC D/B/A HOT97,

**SUMMONS**

Plaintiff(s),

Plaintiff(s) designate  
ROCKLAND COUNTY  
as the place of trial

-against-

WILLIAM BENSON GROUP, LLC D/B/A  
BILLIONAIRES ROW, AND D/B/A  
BILLIONAIRES ROW CHAMPAGNE, AND  
D/B/A BILLIONAIRES ROW, LLC,

The basis of venue is:  
CPLR §509 and  
Plaintiff's place of business

Defendant.

Plaintiff resides at:  
C/O The Terkell Law Firm, P.C.  
19 Bender Road  
New City, NY 10956

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**To the above named defendant(s)**

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the plaintiff's attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the 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 for the relief demanded in the complaint.

Dated: New City, NY  
October 6, 2020

The Terkell Law Firm, P.C.

By:   
JOSEPH I. TERKELL  
Attorneys for Plaintiff(s)  
19 Bender Road  
New City, NY 10956  
(845) 517-0670

Defendant's William Benson Group, LLC  
d/b/a Billionaires Row, and d/b/a Billionaires  
Row Champagne, and d/b/a Billionaires Row, LLC  
Place of Business:  
244 Fifth Avenue, Suite E15  
New York, NY 10001

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ROCKLAND

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EMMIS RADIO, LLC D/B/A HOT97,

Plaintiff,  
-against-

**VERIFIED  
COMPLAINT**

WILLIAM BENSON GROUP, LLC D/B/A  
BILLIONAIRES ROW, AND D/B/A  
BILLIONAIRES ROW CHAMPAGNE, AND  
D/B/A BILLIONAIRES ROW, LLC,

INDEX NO.

FILED:

Defendant(s).  
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Plaintiff, by its attorney, The Terkell Law Firm, P.C., as and for its Verified  
Complaint, respectfully alleges as follows:

**AS AND FOR A FIRST CAUSE OF ACTION**

1. That at all times hereinafter mentioned, the plaintiff was and still is a foreign limited liability company duly licensed to transact business in the State of New York.
2. That upon information and belief, that at all times hereinafter mentioned, the Defendant William Benson Group, LLC d/b/a Billionaires Row, and d/b/a Billionaires Row Champagne, and d/b/a Billionaires Row, LLC (hereinafter referred to as defendant "Billionaires Row"), was and still is a domestic limited liability company, authorized to do business in the State of New York.
3. That heretofore and on or about and between the 1<sup>st</sup> day of June, 2018, and the 15<sup>th</sup> day of August, 2018, and pursuant to a written agreement, a copy of which is annexed hereto as Exhibit A, the plaintiff, at the special instance and request of the defendant Billionaires Row, rendered an event and social media partnership, radio advertising and related goods and services, for the agreed price and reasonable value of \$70,000.

4. That after all payments and credits have been applied, the sum of \$50,000.00 remains due and owing but has not been paid despite due demand therefor.

**AS AND FOR A SECOND CAUSE OF ACTION**

5. Plaintiff repeats, reiterates, and realleges each and every allegation contained in paragraphs first through fourth with the same force and effect as if herein more fully at length set forth.

6. That on or about the 15<sup>th</sup> day of August, 2018, an account was stated between the plaintiff and defendant Billionaires Row, and upon such account stated, a balance of \$50,000.00 was due and agreed to be due to the plaintiff from the defendant.

7. That no part of the sum of \$50,000.00 has been paid, although duly demanded.

WHEREFORE, plaintiff demands judgment against the defendant William Benson Group, LLC d/b/a Billionaires Row, and d/b/a Billionaires Row Champagne, and d/b/a Billionaires Row, LLC in the sum of \$50,000.00 with interest from the 15<sup>th</sup> day of August 2018, together with costs and disbursements of this action.

Dated: New City, NY  
October 6, 2020

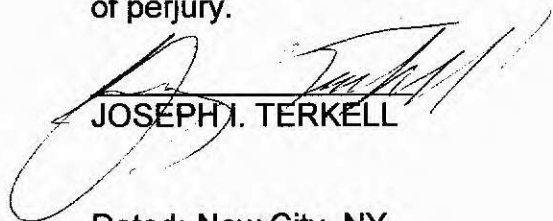
THE TERKELL LAW FIRM, P.C.

  
By: Joseph I. Terkell  
Attorneys for Plaintiff  
19 Bender Road  
New City, NY 10956  
(845) 517-0670

JOSEPH I. TERKELL, the attorney for the plaintiff, being duly admitted to practice in the courts of the State of New York, affirms that he has read the foregoing complaint and knows the contents thereof; that same is true to my own knowledge except as to those matters stated to be alleged upon information and belief, and as to those matters I believe it to be true.

This verification is made by me because Plaintiff is not now in the County where I have my office. The source of my belief as to all matters not stated upon knowledge is records of plaintiff in my possession.

The undersigned affirms that the following statements are true, under the penalties of perjury.



JOSEPH I. TERKELL

Dated: New City, NY  
October 6, 2020