

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

JANE DOE,

Plaintiff,

-against-

ANONYMOUS #1, As An Individual, and
ANONYMOUS #2-4 Corporate Entities,

Defendant(s)

Index No.: 520605/2020E

**AFFIDAVIT IN SUPPORT OF
DEFENDANTS' ORDER TO
SHOW CAUSE WITH
TEMPORARY RESTRAINING
ORDER**

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STATE OF NEW YORK)
 :
COUNTY OF BRONX)

ANONYMOUS #1 hereby deposes and says under penalty of perjury:

1. I am a defendant in this action and make this Affidavit in support of Defendants' Order to Show Cause with a Restraining Order.

2. On February 24, 2021, this Court granted Defendants' motion to proceed anonymously in this action. On March 11, 2021, Plaintiff filed a motion to vacate this Court's Order. On April 6, 2021, this Court denied Plaintiff's motion.

3. On April 7, 2021, Plaintiff retained Mark Shirian as counsel. One month later, on May 7, 2021, Mr. Shirian moved to be relieved as counsel. On June 10, 2021, oral arguments were held but Plaintiff did not appear – her parents appeared on her behalf and told the Court that she was too traumatized to appear. This Court granted Mr. Shirian's OSC to be

relieved as counsel and Plaintiff was granted a 30-day stay to retain new counsel. Plaintiff has not retained new counsel and is proceeding *pro se*.

4. The day after Plaintiff failed to appear at oral arguments because she was too traumatized, on June 11, 2021, Plaintiff contacted me by email. I did not respond and forwarded it to my attorney. On June 13th, Plaintiff again contacted me by email demanding that I pay her FIVE MILLION DOLLARS to settle the case. I forwarded the email to my lawyer, who sent an email to Plaintiff telling her to stop harassing me and to only contact his office. Plaintiff responded to my attorney in an email and wrote, **“Harmed and Healed. Go fuck yourself. This is now becoming fun for me. Go ahead.”** (True and correct copies of the emails are annexed hereto as Exhibit A) Plaintiff thinks that smearing my good name and ruining my reputation in this false lawsuit is **“fun”**.

5. On June 18, 2021, Plaintiff again sent me another email demanding that I **“disclose all of my assets”** to her before she would agree to a settlement. I never responded to any of her phone calls or emails and her settlement demands. After demanding that I pay her FIVE MILLION DOLLARS, she then sent a second email on June 18th demanding that I pay her a **“cash settlement [of] TEN MILLION DOLLARS**. In that email she threatened me; **“\$10,000,000 if you wish to remain anonymous.”** This is extortion. Plaintiff is using this lawsuit to blackmail me and if I don't pay her millions of dollars, she is threatening to ruin my good reputation. I again did not respond to any of her emails and instead forwarded them to my attorney. On June 21, 2021, my attorney sent an email to Plaintiff telling her to stop harassing me or I would report her threats to the police. Plaintiff flippantly responded to his email with,

8. In the Instagram video, she verbally accused me of being a felon and guilty of other crimes. Here's what she said: **"I was harmed by [my name redacted] the criminal energy worker . . ."** (*Id.*)


9. Since the posting on Instagram, I receive between 10-15 prank phone calls a day.

10. Not only is she using this lawsuit to ruin my reputation both personally and professionally in the Wellness field, she is also using it to solicit business for herself in the Wellness field. In that same Instagram posting she also wrote, **"So be real, feel and heal that shit with my healing presence, coaching, and harp sounds."** (Ex. D)

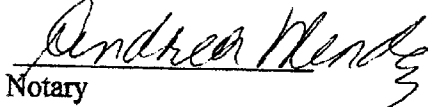
11. In our Counterclaims, Defendants sued Plaintiff for defamation *per se*. There is no disputing the fact that Plaintiff has made false written, oral and defamatory statements about me, my family, my employees, and the Defendant companies and disseminated those statements to the public at-large causing irreparable harm to my personal and professional reputation, as well as the corporate Defendants' reputations.

12. For these reasons, I respectfully ask this Court to (a) grant Defendants Anonymous #1, #2 and #4 summary judgment on their counterclaims for defamation *per se* and order an inquest to determine damages sustained by Defendants, (b) enjoin Plaintiff from disclosing and disseminating the names, addresses, emails, telephone numbers, websites and any contact information of the Defendants to any third party or the general public at-large either through social media, texts, emails, recordings, videos, mailings of any kind whatsoever or any other method or technology whatsoever, (c) order Plaintiff to remove the Defendants' names,

addresses and contact information from her social media platforms, (d) enjoin Plaintiff from falsely accusing Defendants, their families and employees of crimes and disseminating the allegations in the complaint to third parties and the public at-large by any means whatsoever, and (e) order Plaintiff to cease and desist communicating, contacting and harassing Defendants in any manner whatsoever.


ANONYMOUS #1

Sworn to before me this
16th day of August 2021


Notary

ANDREA MENDEZ
Notary Public - State of New York
No. 02ME6395289
Qualified in New York County
My Commission Expires 7/22/2023