

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

ANNA SCOLAVINO,

Plaintiff,

-against-

NAOMI CAMPBELL,

Defendant.

Index No. 1639/07

Plaintiff designates:

KINGS

County as the place of trial

The basis of the venue is:

RESIDENCE OF PLAINTIFF

SUMMONS

Plaintiff resides at:

314 BAY RIDGE AVENUE

BROOKLYN, NEW YORK

County of KINGS

To the above named Defendant

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 attorneys 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 by default for the relief demanded in the Complaint.

DATED: New York, New York
January 12, 2007

SULLIVAN PAPAIN BLOCK
McGRATH & CANNAVO P.C.

By: 

MICHAEL N. BLOCK

Attorneys for Plaintiff

Office & P.O. Address

120 Broadway - 18th Floor

New York, New York 10271

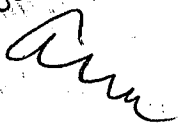
(212) 732-9000

Defendant's address:

CAMPBELL: 500 PARK AVENUE, NEW YORK, NEW YORK

FILED WITH THE CLERK OF THE COURT, KINGS COUNTY, ON: _____

(F-064966/MNB)

2007 JAN 12 PM 3:32
FILED
KINGS COUNTY CLERK


SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
ANNA SCOLAVINO,

Plaintiff,

VERIFIED COMPLAINT

- against -

Index No.

NAOMI CAMPBELL,

Defendant.

-----X

Plaintiff, by her attorneys, SULLIVAN PAPAIN BLOCK McGRATH & CANNAVO P.C., at all times hereinafter mentioned, upon information and belief, alleges:

FIRST CAUSE OF ACTION

1. Plaintiff, ANNA SCOLAVINO (hereinafter "SCOLAVINO"), is a resident of the City and State of New York, County of Kings.

2. Defendant, NAOMI CAMPBELL (hereinafter "CAMPBELL"), is a resident of the City and State of New York, County of New York.

3. On March 30, 2006, plaintiff SCOLAVINO was employed as a housekeeper/assistant by and for defendant CAMPBELL.

4. On March 30, 2006 and prior thereto, plaintiff SCOLAVINO performed her housekeeping/assistant duties at an

apartment owned and occupied by defendant CAMPBELL located at 500 Park Avenue, New York, New York.

5. On March 30, 2006, plaintiff SCOLAVINO was lawfully present and working at defendant CAMPBELL's apartment at 500 Park Avenue, New York, New York.

6. On that date, defendant CAMPBELL became visibly agitated and upset and verbally abusive toward plaintiff when she could not locate a pair of jeans.

7. Due to the verbal abuse being heaped upon her, plaintiff SCOLAVINO informed defendant CAMPBELL that she was unable to continue working for CAMPBELL that day and was leaving CAMPBELL's apartment.

8. As plaintiff SCOLAVINO was descending an interior stairway within the apartment in an effort to leave the premises, she was placed in imminent apprehension of physical harm and was then intentionally struck in the head with a cell phone by defendant CAMPBELL.

9. In striking plaintiff SCOLAVINO with her cell phone, defendant CAMPBELL acted maliciously and with reckless disregard for the safety of others, including plaintiff SCOLAVINO.

10. The aforesaid assault upon plaintiff SCOLAVINO was not consented to by plaintiff nor was it otherwise privileged.

11. As a result of the foregoing assault, plaintiff SCOLAVINO was injured.

12. As a result of the foregoing assault, plaintiff SCOLAVINO was seriously injured.

13. The limitations on liability as set forth in CPLR Section 1601 do not apply.

14. The limitations on liability set forth in CPLR Section 1601 do not apply by reason of one or more of the exceptions set forth in CPLR Section 1602.

15. By reason of the foregoing, plaintiff SCOLAVINO demands compensatory and punitive damages from the defendant CAMPBELL in a sum in excess of the jurisdictional limits of all lower Courts.

SECOND CAUSE OF ACTION

16. Plaintiff SCOLAVINO repeats, reiterates and realleges each and every allegation contained in paragraphs "1" through "9" and "13" and "14" as if set forth more fully at length herein.

17. The aforesaid battery upon plaintiff SCOLAVINO was offensive and was not consented to by plaintiff nor was it otherwise privileged.

18. As a result of the foregoing battery, plaintiff SCOLAVINO was injured.

19. As a result of the foregoing battery, plaintiff SCOLAVINO was seriously injured.

20. By reason of the foregoing, plaintiff SCOLAVINO demands compensatory and punitive damages from the defendant CAMPBELL in a sum in excess of the jurisdictional limits of all lower Courts.

THIRD CAUSE OF ACTION

21. Plaintiff repeats, reiterates and realleges each and every allegation contained in paragraphs "1" through "12" and "16" through "19" as if set forth more fully at length herein.

22. That instead of taking responsibility for her intentional, malicious and reckless acts, and instead of apologizing for her conduct, defendant CAMPBELL thereafter libeled and slandered plaintiff through, *inter alia*, a public press release.

23. With full knowledge that her statements were false and misleading, defendant CAMPBELL defamed the honesty and integrity of plaintiff SCOLAVINO, asserting:

The allegation that I hit or in any way injured my former housekeeper is completely untrue.

From the time she began working for me about two and one half months ago, I began questioning her about items I found missing. This morning, when I finally fired her for that and her erratic behavior, she screamed, "This is going to cost you a lot of money." After some more yelling and screaming on her part, she left the house. The next thing I knew, I got a call from the police. I have no idea how she was injured.

She is sadly mistaken if she thinks she can extract money from me by concocting lies by recycling old stories. I have asked my lawyer to look into filing both theft and extortion charges against her.

One more thing: Although there was no truth to the allegations, the police were just doing their job. The members of the NY Police Department were both courteous and professional.

24. The foregoing statements, which were made by defendant CAMPBELL with full knowledge of their false and malicious nature, constitute both slander, *per se*, and libel, *per se*.

25. By reason of the foregoing, plaintiff SCOLAVINO has suffered economic loss.

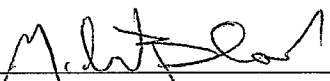
26. By reason of the foregoing, plaintiff SCOLAVINO demands compensatory and punitive damages from the defendant CAMPBELL in a sum in excess of the jurisdictional limits of all lower Courts.

WHEREFORE, plaintiff ANNA SCOLAVINO demands judgment against the defendant NAOMI CAMPBELL for both compensatory and punitive damages, together with the interest, costs and disbursements of this action.

DATED: New York, New York
January 12, 2007

Yours, etc.,

SULLIVAN PAPAIN BLOCK
McGRATH & CANNAVO P.C.

By: 
MICHAEL N. BLOCK
Attorneys for Plaintiff
Office & P.O. Address
120 Broadway - 18th Floor
New York, New York 10271
(212) 732-9000

(F-064966/MNB)

VERIFICATION

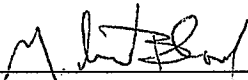
STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

MICHAEL N. BLOCK, being duly sworn, deposes and says:

I am a member of SULLIVAN PAPAIN BLOCK McGRATH & CANNAVO P.C., attorneys for the plaintiff herein.

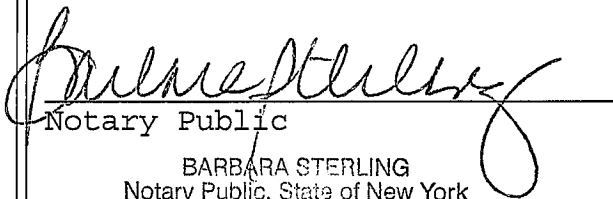
I have read the foregoing COMPLAINT and know the contents thereof, and upon information and belief, deponent believes the matters alleged therein to be true.

The reason this Verification is made by deponent and not by plaintiff is that the plaintiff herein resides in a county other than the one in which plaintiff's attorneys maintain their offices.



MICHAEL N. BLOCK

Sworn to before me this
12th day of January, 2007.



Notary Public

BARBARA STERLING
Notary Public, State of New York
No. 24-4962776
Qualified in Kings County
Commission Expires 02-26-10