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SUPERIOR COURT FOR THE STATE OF WASHINGTON

COUNTY OF KING

LAURA DANBOM, an individual, Plaintiff, vs. AMAZON.COM SERVICES, LLC. Defendant.	CASE NO.: COMPLAINT FOR DAMAGES **JURY DEMAND REQUESTED**

I. NATURE OF THE CASE

1.1 All too often, corporations protect powerful men at the expense of sexual assault survivors. Employers sweep credible accusations under the rug. They dismiss assaults as a "he said, she said." And they try to silence the survivors. This broken system has created an environment where women are afraid to speak up. More than two-thirds of survivors never report their sexual assaults. And Amazon's actions have shown they are part of the problem.

1.2 In late 2023, an Amazon Senior Manager raped a female employee in his organization. The survivor promptly reported the rape to an Amazon colleague, friends, her therapist, the police, and Amazon Human Resources. She put herself through police and Amazon HR interviews. She provided the police with a condom the Senior Manager left behind after the rape, containing his DNA. She underwent a rape kit.

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The hospital bracelet from the rape exam

1.3 For his part, her attacker couldn't keep his story straight. On a recorded line, he claimed he was "200 percent" sure he had never had sex with her, not even consensual sex. Days later, he changed his story. He told the police he was "so drunk" that "he couldn't remember" whether they had sex.

1.4 The survivor asked Amazon to protect her. But Amazon refused. After a rushed, shoddy investigation Amazon claimed there was a "lack of evidence" the high-earning Senior Manager raped the survivor, reasoning it was a "he said, she said."

1.5 But Amazon willfully ignored a wealth of evidence supporting the survivor's account. For example, they (and the police) failed to interview the witnesses the survivor reported the rape to immediately after it occurred, including an Amazon employee. They did so despite federal and state guidance providing that such witnesses are important corroboration. Amazon averted its eyes to protect a profitable, high-earning manager.

1.6 Contrary to Amazon's attempts to dismiss the survivor, a wealth of evidence supported her account. The Senior Manager said two things that can't be reconciled. First, nothing happened. Then, he couldn't remember. The survivor, however, said one thing—rape—and she never stopped saying it, in consistent and painstaking detail. She reported the rape to a work friend *the same day*. She reported it to others in the days that followed. She put herself through a re-traumatizing process, including reporting the rape to the police, cooperating with their investigation, going to the hospital to endure personal rape kit testing and sitting for interviews where she had to re-live the rape. Her account was also supported by physical

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evidence. She provided the police with a condom containing DNA showing the Senior Manager lied. These are the actions of someone who deserves protection. These are the actions of someone who deserves to be believed.

1.7 But Amazon ignored this evidence and gave the survivor an impossible choice: if you want to keep your job position, you must (1) keep working with the Senior Manager and (2) not speak out about the attack.

1.8 Amazon's proposed rules are untenable. In Amazon's eyes, if a manager sexually assaults an employee behind closed doors with no witnesses present, Amazon cannot corroborate it. Additionally, in Amazon's view, the employee survivor must continue having contact with her alleged rapist and remain quiet about the attack, preventing her from warning other women. But that is not the law. And it is not right.

1.9 Amazon also unreasonably tried to hide behind the police, saying they would only reopen their investigation if the police criminally charged the Senior Manager. But arrest rates and criminal standards expose the flaw in that reasoning. Only about 18 out of 100 rapes and sexual assaults reported to police result in an arrest at all, even though research shows the overwhelming majority of rape allegations are true. And the beyond-a-reasonable-doubt burden governs whether the government may imprison a defendant. It is a much higher evidentiary burden than the employment context. Given this, and the well-known flaws inherent in many police investigations, an employer that defers to police leaves a woman with no safe place to turn at work. That matters to the estimated seven million women who have reported sexual violence by a workplace-related perpetrator. Amazon should know better.

1.10 To escape working with her rapist, the survivor had to switch to a different department at Amazon, abandoning years of hard-earned progress. Over the following almost three years, the survivor continued working at Amazon, hoping Amazon would change and

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stand up for her and other women. But she realizes Amazon won't change unless it is forced to. So, the survivor, Plaintiff Laura Danbom, brings claims against her employer Amazon for hostile work environment and violations of Washington's Silenced No More Act.

1.11 When an employee reports that a manager sexually assaulted her, the employer must do a careful and complete investigation before deciding who to believe. It cannot ignore reasonably available corroborating evidence.

1.12 If an employee credibly reports that a coworker raped her, the employer must not force her to keep working with him. The company must move him, not her.

1.13 An employer must not tell an employee who reports a sexual assault that she must keep quiet about it.



Laura Danbom

II. PARTIES

2.1 Laura Danbom is Amazon's employee. At all relevant times to this Complaint, Laura regularly worked out of Amazon's physical location in King County, Washington.

2.2 Defendant Amazon is a professional corporation headquartered in Washington State. Amazon is Laura's "employer" within the meaning of Title 49 RCW and the Washington Law Against Discrimination ("WLAD"). At all times relevant hereto, Amazon has transacted business in King County. Key decisions related to this matter, including the decision to require Laura to continue working with her rapist, were made in King County.

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III. JURISDICTION AND VENUE

3.1 This Court has subject matter jurisdiction over this case under RCW 2.08.010.

3.2 This Court is the appropriate venue under RCW 4.12.020(1), (2) and RCW 4.12.025(1).

IV. FACTS

A. Sexual assault is a widespread problem. Sexist stereotypes lead companies to inappropriately dismiss credible sexual assault allegations.

4.1 One out of every six American women has been raped or experienced an attempted rape.[1] An American is sexually assaulted every 68 seconds.[2]

4.2 An estimated 7 million women have reported sexual violence by a workplace-related perpetrator.[3]

4.3 And approximately 38 percent of women report experiencing sexual harassment at work.[4]

4.4 But more than two-thirds of sexual assault survivors never report their sexual assaults.

4.5 Although scientific studies show 92 to 98 percent of sexual assault allegations are truthful,[5] survivors fear they will be re-traumatized or disbelieved.

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[1] *See, e.g., How Often Does Sexual Assault Occur in the United States?* (https://shorturl.at/unuRy).

[2] *Id.*

[3] *See, e.g., National Prevalence of Sexual Violence by Workplace-Related Perpetrator (https://shorturl.at/JQBzV).*

[4] *See, e.g., Ending Sexual Assault and Harassment in the Workplace* (https://tinyurl.com/578d3e26).

[5] *See, e.g., Less than 1% of Rapes lead to Felony Convictions.(https://shorturl.at/f3L5Y); False Reports: Moving Beyond the Issue to Successfully Investigate and Prosecute Non-Stranger Sexual Assault (https://tinyurl.com/yfhmncbh); What We Know About Rape Allegations (https://tinyurl.com/5b2p89vw); Are 99% of Rape Allegations "Absolutely Fabricated"? (https://tinyrl.com/mrfku77p).*

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4.6 Sadly, these fears are well founded. Police departments have a "common practice" of improperly "dismissing sexual violence" allegations.[6] For every 100 rapes and sexual assaults reported to the police, only approximately 18 results in an arrest.[7] Less than 1% result in a felony conviction.[8]

4.7 This is in part because sexist stereotypes frequently derail a survivor's ability to obtain justice if they deviate from the stereotypical concept of what rape "should" look like. If a woman is drinking, she "engaged in risky behavior." If a woman kisses a man, she was "leading him on." If a woman went to a bedroom with the man, she "must have wanted it." If a woman does not scream or physically attack her rapist, her concerns are dismissed—even though science shows that many survivors freeze involuntarily during or after a sexual assault.[9]

4.8 Laura Danbom learned this firsthand. When she reported that a manager raped her during a company trip, these same sexist views derailed Amazon's response.

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[6] *See, e.g., Unfounded Sexual Assault: Women's Experience of Not Being Believed by the Police* (*https://tinyurl.com/m4zexpw7*).

[7] *See e.g., Professors Find Prosecutors Sidelines Cases When Guilty Verdict is in Doubt* (*https://tinyurl.com/rx2zmzfk*).

[8] *See e.g., Less that 1% of rapes lead to felony convictions (https://tinyurl.com/mw4bf8dr).*

[9] *See e.g., See e.g., Social Biases Impede Justice for Sexual Assault Victims (https://tinyurl.com/wychxf58); How Rape Myths and Unconscious Biases Prejudice the Judicial System Against Women (https://tinyurl.com/36384ebp); Sexual Assault May Trigger Involuntary Paralysis* (*https://tinyurl.com/bdtpwm53*); *Tonic Immobility During Sexual Assault (https://tinyurl.com/3cpd7jsf*).

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B. Laura, a Seattle native, dedicated herself to working her way up at Amazon.

4.9 Laura, age 39, grew up just outside of Seattle, in Issaquah, Washington.

4.10 After attending school in New York from 2012 to 2016, she returned to her Pacific Northwest roots and her cherished family.



Laura Danbom with family and friends

4.11 In 2017, Laura joined Amazon. Through effort and merit, she worked her way up from a contractor to a full-time employee to a people manager. In that role, she maintained positive relationships with her coworkers, including during her time as a Marketing Manager, a role she began in June 2021.

4.12 But, in late 2023, Amazon and Amazon Senior Manager Michelangelo Simonte brought her hopes and dreams of a fulfilling Amazon career crashing down.

C. Amazon knew that the Senior Manager Michelangelo Simonte had a history of troubling behavior towards women.

4.13 Michelangelo Simonte was one of the "Senior Managers" in Laura's 400-person, worldwide organization. At Amazon, he built and led teams, managed over $1 billion in advertising budgets, and helped drive over 600% business growth within his organization.

4.14 But Plaintiff anticipates that discovery will show Amazon knew or should have known that Simonte posed a risk to female employees. Based on information and belief,

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Simonte's strong performance masked a history of troubling conduct toward women. Amazon ignored Simonte's behavioral red flags, based on information and belief.



Senior Manager Simonte

D. Hours after an Amazon-mandated work event, Senior Manager Simonte raped Laura in an Amazon-provided hotel room.

4.15 Before October 2023, Laura had regularly attended weekly, monthly, and annual remote group meetings with Senior Manager Simonte. She had never met him in person and did not know him directly. But their work contact was set to increase. Laura's new duties would require them to work more closely in 2024.

4.16 In late October 2023, Laura, Simonte, and other Amazon employees attended mandatory Amazon events during a work trip to New York city.

4.17 One evening, after an Amazon-hosted open-bar event ended, numerous Amazon employees and partners, including Laura and Simonte, continued the gathering at karaoke and bars, all paid for by Amazon.

4.18 Laura and Simonte flirted. They joked. They got along. Towards the end of the night, he kissed her. Simonte persuaded Laura to go back to her hotel room with her.

4.19 But Laura did not want to have sex with him. She refused to have sex with him.

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4.20 After all, this is not the 1800s. A man cannot demand a woman have sex with him because she drank, flirted, and was kissed.

4.21 Senior Manager Simonte, however, had other plans.

4.22 In Laura's hotel room, during the early morning hours, Simonte raped her. Before the rape started, she said no. During the rape, Laura asked him: "you realize this is," and Simonte finished her sentence saying "rape? Yes." He ignored her protests. He raped her.

E. Laura promptly reported the rape to a friend, the police, and Amazon. She provided the police with evidence.

4.23 At a dinner that same day, Laura reported the incident to a friend who worked at Amazon. Laura struggled with what to do. She knew that this happened to many women. She wondered, should she try to shrug it off—like most women feel forced to do? Should she bury her outrage and act like nothing had happened? How would speaking up affect her job? Her reputation?

4.24 Torn, she went to work and meetings—where she saw Simonte. He even hugged her and kissed her on the cheek. He asked her a ritual "how are you," as if rape did not happen. Frozen, she tried to pretend like she was fine. But she was not. She was a wreck.

4.25 Laura decided to report the incident to the police and Amazon. She knew it would be retraumatizing. But she wanted to stand up for herself and help prevent future attacks against other women. She was in shock. But she summoned the energy to fight back.

4.26 Two days after the rape, on October 27, 2023, she reported the rape to Amazon Human Resources.

4.27 Around the same time, Laura also reported the rape to other friends and a therapist.

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4.28 The next day, she again relived her nightmare and reported the incident to the New York Police Department. She underwent a rape kit. With the police's encouragement, she called her rapist to attempt to obtain a confession.

4.29 With a Detective listening in to the call, she questioned Simonte about what happened, employing advice about questioning him provided by the Police. Unsurprisingly, he denied ever having sexual intercourse with Laura, saying he was "200% sure."

4.30 Days later, however, he contradicted himself in a police interview, saying he was too drunk to remember.

4.31 Laura gave the police a condom Simonte left behind. The police failed to collect a reference sample from Simonte to compare against it. But the police lab tested the condom anyway. They found male DNA inside. Simonte was the only man in Laura's hotel room that night. He is the only person who could have left the sample. Under these circumstances, there is only one reasonable explanation: it is Simonte's DNA.

4.32 Yet in a call recorded by the police, Simonte denied having any sex with Laura at all. The condom tells a different story.

F. Laura's account is highly credible and corroborated by circumstantial evidence, but Amazon's shoddy investigation concluded it was a "he-said, she-said."

4.33 In early December 2023, Amazon's "investigation" concluded. According to Amazon, Laura's account of the rape was unfounded due to "a lack of evidence that [Simonte] violated Amazon policy":

> Amazon did not substantiate, due to a lack of evidence that Michelangelo violated Amazon policy. As stated on our call conducted December 1st, if charges are brought forward against Michelangelo by the NYC PD, Amazon will reopen the case to further investigate.

Excerpt of 12/15/23 email from Amazon Investigator to Laura

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4.34 Amazon reached that conclusion without pursuing reasonable investigative steps that were readily available.

4.35 For example, Amazon did not interview key witnesses, including others Laura reported the rape to, such as the Amazon employee Laura reported the rape to hours after the incident.

4.36 If Amazon had bothered to speak to this witness, they would have learned that Laura credibly reported the rape only hours after it happened, in detail consistent with what she told the police and Amazon.

4.37 If Amazon had bothered to speak with other witnesses Laura reported the rape to, they would have discovered the same. Laura reporting the rape to third parties in details consistent with what she told the police and Amazon is strong evidence that her story is truthful. Amazon, however, ignored this evidence.

4.38 Amazon's refusal to speak with witnesses runs contrary to federal guidance from the Equal Employment Opportunity Commission (EEOC) that was in force at the time of Amazon's investigation. That guidance told employers how to weigh credibility when the accused denies the complaint, including testimony from "people who discussed the incidents with [the survivor] at around the time that they occurred."

4.39 It also runs contrary to Washington case law that provides that, even in criminal sexual assault cases with higher evidentiary limitations, "the credibility of the" survivor, "irrespective of whether it is assailed or unassailed, may be supported by evidence of her timely prior out-of-court complaint."

4.40 Additionally, Amazon failed to investigate, or adequately investigate, Simonte's treatment of other women, based on information and belief.

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4.41 Also, Amazon never asked Laura to help Amazon obtain the police file before closing its investigation. Had it asked, it would have found the male DNA from inside the condom and Simonte's recorded denial that he had any sex with Laura at all, a denial contradicted by the condom and Simonte's statement to the Detective days later that he was too drunk to remember.

4.42 After this shoddy investigation, Amazon dismissed Laura's credible account of the rape without justification.

4.43 And why would Laura lie? She had nothing to gain. And everything to lose. She had no motive to do so. Even tired tropes sometimes used to dismiss women's accounts of sexual assault—like the scorned lover, the resentful underling, or the money-hungry liar—don't plausibly apply here.

4.44 Under these circumstances, Amazon should have fired Simonte. Amazon needed to protect Laura and other women.

4.45 In these circumstances, her account—supported by the corroboration described above—is enough evidence to show she was telling the truth. Simonte raped her.

4.46 During the investigation, Amazon asked inappropriate and re-traumatizing questions that suggested Laura did not do enough to stop the attack, including challenging Laura on whether she yelled "no". Before the rape began, she said no. No means no. This is shameful questioning by a leading employer in 2024.

4.47 Amazon refused to protect the survivor because she did not behave the way Amazon expected a rape victim to behave. In Amazon's eyes, if a woman drinks alcohol and goes to her room with her assaulter, she is likely lying about what happened behind closed doors. In Amazon's view if, after the assault, a woman freezes and lays next to her attacker rather than attacks or screams, she is not believable. It is hard to imagine anyone asking a pilot if they

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froze because they really wanted to crash the plane. Yet if a woman does not scream, run, and attack, her account is dismissed? That is what Amazon did here.

4.48 Further, Amazon inappropriately relied on the police's decision whether to criminally charge Simonte. Given the rarity of criminal arrests in rape reports, Amazon cannot absolve its responsibility to prevent and correct sexual harassment by looking to the police. Doing so places unreasonable risk on Amazon's female employees. And it has directly harmed Laura Danbom.

G. Amazon forbid Laura from speaking out about the rape.

4.49 After the investigation, Amazon told Laura not to speak about the rape at work, saying the allegation was "highly confidential." Laura was stunned. She knew speaking up was important for healing and preventing future attacks. Indeed, Washington's Silenced No More Act, Chapter 49.44 RCW, is explicit in its protection of a survivor's rights to speak up about workplace assault.

H. Amazon reinstated Laura's rapist; forcing her to attend meetings with him.

4.50 After instructing Laura not to speak about Simonte's rape in the workplace, Amazon reinstated Simonte to his role as a Senior Manager in Amazon's Global Partner and Development group in early December 2023.

4.51 Amazon confirmed Laura needed to have contact with her rapist, if she wanted to keep her position. Laura asked Amazon to protect her, including via this January 2024 email:

> This is my official complaint to HR to report that I will be on meetings with Michelangelo Simonte weekly, monthly, and quarterly, and working with him throughout the year in my new role. I am unwell and losing sleep over the outcome of the HR investigation.

Excerpt of January 2024 email from Laura Danbom to Amazon.

4.52 But Amazon refused to separate Simonte from Laura. Her new role kept her in regular contact with him in at least three ways:

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(a) Her duties required her to work with Simonte directly, by phone, by email, and in remote meetings.

(b) Once a year, she would attend in-person meetings with Simonte.

(c) She would attend weekly, monthly, and quarterly remote meetings that Simonte also attended. For Laura, no meeting was large enough to make sitting in one with the man who raped her bearable.

4.53 Beyond those required contacts, Amazon left Laura open to unplanned encounters with Simonte that she could neither predict nor avoid.

4.54 Indeed, Laura was expected to take on new job duties in 2024. Amazon confirmed that these duties would likely call for her to have increased contact with Simonte.

4.55 Seeing your rapist on work calls? Being forced to, every year, attend an in-person meeting where this person might approach—or attack—you? Needing to talk and interact with him to complete your job? This was unbearable. Any woman would live in fear and anguish.

4.56 As the law provides, "the mere presence [in the workforce] of an employee who has engaged in particularly severe or pervasive harassment can create a hostile working environment."

I. Laura is forced to resign her position to escape contact with her assailant.

4.57 To escape her assailant, Laura was ultimately forced to leave her position at Amazon. She protested this decision:

> I had hoped to remain in this position for a long time. I enjoyed my job. I loved my team. I had seen this as a career that I would be in for years. Apparently, advertising leadership refuses to remove him from my team, which would continue to expose me to him over and over. Yesterday, you confirmed that any role in advertising would expose me to him and that is unacceptable. This has been a letdown every step of the way. From the outcome of the investigation, to being told I would have support finding a role, and coming back from leave with no options available but to work with my harasser.

Excerpt of April 2024 email from Laura Danbom to Amazon

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4.58 But Amazon still failed to protect her.

4.59 Based on information and belief, Amazon's senior leadership team endorsed and approve Amazon's decision to protect Simonte rather than Laura.

J. Amazon's mistreatment caused Laura significant harm.

4.60 When Laura reported that a senior manager had raped her, she trusted Amazon to protect her. Instead, Amazon closed its investigation without gathering evidence that was there for the asking, and Amazon kept her tied to the man who raped her. That betrayal deepened the harm of the rape itself. It took the sense of safety Laura once had at work, her faith in the company she had given years to, and her peace of mind.

4.61 Amazon's conduct has also cost Laura far more than a paycheck. Before the rape, her career was thriving. When she changed roles, she lost seven years of hard work and advancement. She has lost wages too. But the betrayal is the harm she carries every day.

4.62 Laura has continued to work at Amazon. But she realizes that Amazon will never change and protect survivors like herself unless someone forces them to. So she brings this lawsuit.

4.63 As a direct result of Defendant's unlawful conduct, as detailed in the Cause of Action section below, Laura has suffered and continues to suffer lost wages and pecuniary benefits of her employment, future lost earnings, and emotional harm, including grief, loss of enjoyment, damage to reputation, fear, anxiety, anguish, embarrassment, humiliation, and other damages in amounts to be proved at trial. These harms are ongoing and are reasonably likely to be experienced in the future.

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V. FIRST CAUSE OF ACTION:

HOSTILE WORK ENVIRONMENT IN VIOLATION OF THE WLAD

5.1 Plaintiff realleges the paragraphs above as if fully set forth herein.

5.2 Amazon subjected Plaintiff Laura Danbom to unwelcome conduct concerning her gender that was so severe or pervasive that it altered the conditions of her employment, including without limitation Senior Manager Simonte's rape of her, Amazon requiring her to continue working with her rapist, Amazon refusing to fire her rapist, and Amazon demanding Laura stay silent in the workplace about the rape.

5.3 Senior Manager Simonte is a manager under Washington law, as based on information and belief, his authority at the time of the rape included hiring and firing authority, providing material feedback on promotion and demotion decisions, making work assignments, assigning daily activities, and managing how his team spent their workdays on Amazon projects. As such, Amazon is strictly liable for his sexual harassment under Washington law.

5.4 In the alternative, Amazon knew or should have known of the hostile work environment, including without limitation through Laura reporting the sexual assault. But Amazon failed to take reasonably effective measures designed to end the hostile work environment and deter future rapes, including without limitation through their inadequate and negligent investigation, their dismissing Laura's account of the rape, their refusing to protect Laura from having to work with her rapist, and their instructing Laura to not speak out about the rape while at work.

5.5 If discovery establishes Amazon should have known Simonte presented a risk to Laura and other women, it is also liable under those grounds.

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VI. SECOND CAUSE OF ACTION:

VIOLATION OF THE SILENCED NO MORE ACT

6.1 Washington's Silenced No More Act prevents employers from requiring employees to agree to refrain from discussing conduct that the employee reasonably believes to be sexual assault.

6.2 Amazon violated Washington's Silenced No More Act when they indicated that Plaintiff must not speak out about her sexual assault in the workplace, effectively making her silence about the sexual assault a condition of her continued employment.

6.3 Amazon's conduct violated the Silenced No More Act.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that the Court enter judgment against Defendant, awarding her:

1. Injunctive relief aimed at ensuring that current and future Amazon employees are protected from sexual assault and that sexual assault allegations are adequately investigated;

2. Lost wages, including front and back pay, lost bonuses, and other lost pecuniary benefits of employment, in an amount to be proven at trial;

3. Compensatory damages for non-economic harm in an amount to be proven at trial;

4. Reasonable attorneys' fees, expert witness fees, and costs pursuant to, among other statutes, RCW 49.60.030(2) and 49.48.030, and any other basis allowed by law;

5. Damages and penalties under Washington's Silenced No More Act, as allowed by law;

6. Pre- and post-judgment interest at the maximum rate allowed by law;

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7. Damages to make up for any adverse tax consequences for any award to Laura; and

8. Such other relief as this Court may deem appropriate.

Plaintiff hereby demands a jury trial on all the issues set forth herein.

Dated this 20th day of October, 2026.

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/s/ Beth Barrett Bloom

/s/ Jay Corker Free

/s/ Beth Kidd

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