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

KATHY ABRAHAM,

Plaintiff

against

LEWIS EISENBERG and GOLDMAN, SACHS and CO.,

Defendant

Index No.

Plaintiff designates
New York
County as the place of trial

The basis of the venue is
Address of Defendants

Summons

Plaintiff resides at
147-22 68th Avenue
Kew Gardens, New York
County of Queens

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 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 by default for the relief demanded in the complaint.*

Dated, November 1, 1989

Defendant's address:
Lewis Eisenberg
895 Park Avenue, New York, NY

Goldman, Sachs and Co.
85 Broad Street, New York, NY

LIPSIG & ZELMAN, ESQS.
Attorney(s) for Plaintiff
Office and Post Office Address
233 Broadway, Suite 3501
New York, New York 10279
(212)385-3700

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

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KATHY ABRAHAM,

Plaintiff,

-against-

LEWIS EISENBERG, AND GOLDMAN, SACHS AND CO.

Defendants,

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COMPLAINT

Plaintiff, by her attorneys, Lipsig & Zelman, as and for her complaint, alleges, upon information and belief the following.

1. At all times hereinafter mentioned plaintiff, KATHY ABRAHAM, 37 years of age, resides at [redacted] and was in the employ of the defendant, GOLDMAN SACHS AND CO., as a Senior Administrative Assistant.

2. Upon information and belief at all times hereinafter mentioned GOLDMAN SACHS AND CO., a stock brokerage house, is a partnership duly organized and existing by virtue of the laws of the State of New York with offices at 85 Broad Street, New York, New York.

3. Upon information and belief at all times hereinafter mentioned up until sometime earlier this year Defendant, LEWIS EISENBERG, was a partner in the said firm of GOLDMAN SACHS AND CO. with his residence at 895 Park Avenue, New York, New York, 10021

AS A FIRST CAUSE

4. For some years heretofore the Defendant, LEWIS EISENBERG, in the course of his employment for Defendant, GOLDMAN SACHS AND CO. and otherwise did, taking advantage of his position of authority as her supervisor, sexually harass plaintiff, KATHY ABRAHAM, using the pressure of the need for her employment by GOLDMAN SACHS AND CO. as one of the means for causing her to suffer the same.

5. Said sexual harassment did exist over such a considerable period of time that defendant, GOLDMAN SACHS AND CO., knew or should have known of same and despite what should have been or what was their knowledge thereof, upon information and belief, did nothing whatsoever to prevent the continuance of same.

6. Plaintiff, KATHY ABRAHAM, has been damaged in the sum of one million ($1,000,000.00) dollars.

AS A SECOND CAUSE

7. Plaintiff alleges each and every allegation contained in paragraphs 1 to 6.

Paragraphs 8 and 9 hereof are upon information and belief.

8. One or another of said defendants hired an investigating agency to uncover embarrassing information about KATHY ABRAHAM,

which then on their behalf invaded the privacy of the plaintiff by such activities.

9. Defendant, LEWIS EISENBERG, invaded KATHY's right of privacy by maliciously investigating her private life for the purpose of obtaining information to use as a lever in forcing KATHY to abandon her rights against the same.

10. Plaintiff, KATHY ABRAHAM, has been damamged in the sum of four million ($4,000,000.00) dollars.

AS A THIRD CAUSE

11. Plaintiff realleges each and every allegation set forth in paragraphs 1 to 10.

12. Upon information and belief, during the course of the defendant, LEWIS EISENBERG's, partnership in GOLDMAN SACHS, and otherwise, has interferred with her status as a proper mother for her child with his conduct acting as a threat to her right to the custody of said child and did interfere in the relationship of her former husband and herself and the subject of her right to the custody of the said child constantly creating a condition of threat to the said right of custody and in connection therewith threatening to disclose and publicize the sexual conduct of KATHY had by her as alleged herein above with sexual conduct to which she was subjected by LEWIS EISENBERG.

13. Plaintiff was damaged in the sum of one million ($1,000,000.00) dollars.

AS A FOURTH CAUSE

14. Plaintiff realleges each and every allegation set forth in paragraphs 1 to 13.

15. KATHY has also been further harassed by telephone calls made to her by defendant, LEWIS EISENBERG, at the various hours of the day or night at which time KATHY happened to be home.

16. Plaintiff has been damaged in the amount of one million ($1,000,000.00) dollars.

WHEREFORE, plaintiff demands judgement against defendants as follows:

FIRST CAUSE	$1,000,000.00
SECOND CAUSE	$4,000,000.00
THIRD CAUSE	$1,000,000.00
FOURTH CAUSE	$1,000,000.00

and whereas the Defendants by reason of the foregoing with knowledge, and otherwise, did indulge in the foregoing malicious conduct, exhibiting thereby a wanton and willful disregard of Plaintiff's rights plaintiff is entitled to $100,000,000.00 in punitive damages the total amount of damages being $107,000,000.00 together with interest, costs and disbursements of this action.

Dated: New York, New York
October 31, 1989

Lipsig & Zelman
Attorneys for Plaintiff
New York, New York
Telephone: (212) 385-3700

V E R I F I C A T I O N

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

KATHY ABRAHAM, being duly sworn, deposes and says:

I am the plaintiff in the within action.

I have read the foregoing complaint and know the contents thereof, and the same is true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters, I believe them to be true.

Dated: New York, New York
November 1, 1989

KATHY ABRAHAM

Sworn to before me this 1st
day of November, 1989

Notary Public

KAREN D'AMBROSIO
Commissioner of Deeds
City of N. Y. No. 5-569
Cert. filed in New County
Comm. Expires June 1, 19__