

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

Index No.

Date purchased:

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EVA VIOLANTE,

Plaintiff(s),

Plaintiff(s) designate(s)

KINGS

County as the place of trial.

-against-

The basis of the venue is

CPLR §503(a)

Summons

ANGIE WONG a/k/a ANGIE WONG SIE YING,

Defendant(s).

Plaintiff(s) reside(s) at

80 Joralemon Street

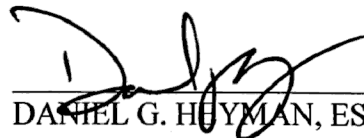
Brooklyn, NY

County of Kings

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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 by default for the relief demanded in the complaint.

Dated: Scarsdale, New York
September 17, 2020



DANIEL G. HEYMAN, ESQ.
Attorney for Plaintiff
670 White Plains Road, Suite 121
New York, New York 10583
(914) 723-5500

Defendant's Address:

Angie Wong a/k/a Angie Wong Sie Ying
255 Hudson Street, Apt 9A
New York, New York 10013

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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EVA VIOLANTE,

Plaintiff,

-against-

ANGIE WONG a/k/a ANGIE WONG SIE YING,

Defendant.
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VERIFIED COMPLAINT

Index No.:

Plaintiff, by her attorney, Daniel G. Heyman, Esq., complaining of the defendant herein, respectfully sets forth and alleges, upon information and belief, as follows:

ALLEGATIONS COMMON TO ALL CAUSES OF ACTION

1. At all times hereinafter mentioned, plaintiff, Eva Violante (“Plaintiff”), was and still is a resident of the County of Kings, State of New York.

2. Upon information and belief, at all times hereinafter mentioned, defendant Angie Wong a/k/a Angie Wong Sie Ying (hereinafter “Wong”) was and still is a resident of the County, City and State of New York.

3. Upon information and belief, at all times hereinafter mentioned and at present, defendant Wong owns, uses and/or possesses real property situated within the State of New York.

4. On or about July 25, 2020, at a pet store operated by Citipups NYC Corp. (“Citipups”), Plaintiff and Citipups entered into a written agreement for the purchase and sale of a male “Morkie” puppy and Plaintiff made a down payment to Citipups.

5. Upon information and belief, a “Morkie” is a cross-breed (hybrid) of two pedigreed dogs: an American Kennel Club (“AKC”) “Yorkshire Terrier” and an AKC “Maltese”.

6. On or about July 25, 2020, Wong was also present at the Citipups pet store with her daughter.

7. On or about July 25, 2020, a Citipups employee told Plaintiff that Wong was purchasing a female Morkie puppy from the same litter as Plaintiff’s dog.

8. On or about July 25, 2020, the Citipups employee suggested that Plaintiff and Wong exchange phone numbers to arrange for the two dogs to play together to become accustomed to socializing with other dogs.

9. On or about July 25, 2020, Plaintiff met Wong at the Citipups pet store and they exchanged telephone numbers.

10. On or about July 25, 2020, at the Citipups pet store, Wong asked Plaintiff if she could photograph Wong’s daughter with Plaintiff’s dog and Plaintiff consented.

11. On or about July 27, 2020, Plaintiff returned to the Citipups store to complete the payment and purchase of the dog and take him home with her.

12. At the Citipups store on or about July 27, 2020, Plaintiff completed the purchase of her dog and Citipups transferred ownership of the dog to Plaintiff.

13. On or about July 27, 2020, Wong contacted Plaintiff via text seeking to arrange a play date for the dogs.

14. Over the following week, Wong, Plaintiff and another woman who had purchased a female Morkie from the same litter, whom Wong had contacted, arranged to meet at Wong's apartment with their dogs on Friday evening, August 7, 2020.

15. On or about Friday, August 7, 2020, Plaintiff brought her dog, whom she had named "Louie" (hereinafter "Louie"), to Wong's apartment for the play date.

16. Also present at the play date at Wong's apartment on or about August 7, 2020, was the other female Morkie and her owner.

17. During the visit to Wong's apartment, Plaintiff mentioned that she would be very busy with work the following week.

18. During the visit to Wong's apartment, Wong stated that she would be very happy to look after Louie, to "dog-sit" any time that Plaintiff would need such assistance.

19. Over the weekend of August 8 and 9, 2020, Plaintiff and Wong communicated and they arranged for Louie to stay with Wong during August 11 and 12, 2020, while Plaintiff had a work project.

20. Wong stated that she might want Plaintiff to look after Wong's dog, whom she had named "Daisy", on occasion, in the future.

21. Pursuant to their prior discussion, on the evening of Monday, August 10, 2020, Plaintiff brought Louie to Wong's apartment to stay there with Daisy for the following two (2) days.

22. On Wednesday, August 12, 2020, Plaintiff went to Wong's apartment to visit with Louie and to apply a flea & tick treatment on him.

23. The following day, Thursday, August 13, 2020, Plaintiff advised Wong, via text messaging, ("text") that she would come by to pick Louie up that morning.

24. In response, by text, Wong asked Plaintiff if "it would be ok for us to keep Louie", stating that "[Wong's] kids had really taken to him" and that "the two pups are kind of

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