

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

JANE DOE,

Plaintiff,

-against-

EAST MEADOW UNION FREE SCHOOL DISTRICT, EAST
MEADOW HIGH SCHOOL, NEW YORK INSTITUTE OF
TECHNOLOGY, AND PETER ZINNO,

Defendants.

Index No.: _____

SUMMONS

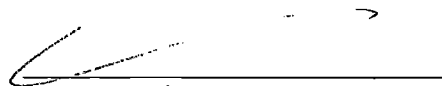
Plaintiff designates
COUNTY OF NASSAU
as the place of trial.

The basis of the venue is
**PLAINTIFF'S PLACE
OF RESIDENCE**

To the above-named Defendants:

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 to answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Carle Place, New York
August 10, 2021


Aaron Ferri
Attorney(s) for Plaintiff
LEEDS BROWN LAW, P.C.
One Old Country Road, Suite 347
Carle Place, New York 11514
(516) 873-9550

To: EAST MEADOW UNION FREE SCHOOL DISTRICT
718 The Plain Road
Westbury, New York 11590

EAST MEADOW HIGH SCHOOL
101 Carman Avenue
East Meadow, NY 11554

NEW YORK INSTITUTE OF TECHNOLOGY
PO Box 8000
Northern Boulevard
Old Westbury, NY 11568

PETER ZINNO
ADDRESS UNKNOWN

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

-----X
JANE DOE,

Plaintiff,

-against-

EAST MEADOW UNION FREE SCHOOL DISTRICT,
EAST MEADOW HIGH SCHOOL, NEW YORK
INSTITUTE OF TECHNOLOGY, and PETER ZINNO,

Defendants.
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COMPLAINT

Jury Trial Demanded

Plaintiff, JANE DOE, by and through her attorneys, LEEDS BROWN LAW, P.C., alleges upon knowledge as to herself and her own actions, and upon information and belief as to all other matters, as follows:

INTRODUCTION

1. This is a revival action brought pursuant to New York Child Victims Act, CPLR § 214-g. When she was a minor, Plaintiff was repeatedly sexually assaulted and abused by Peter Zinno (“Mr. Zinno”), a track coach at New York Institute of Technology (“NYIT”), and a teacher under the supervision and control of the East Meadow Union Free School District, who was assigned to East Meadow High School (“East Meadow H.S.”).

PARTIES

2. Plaintiff is an individual, who currently resides in Halesite, New York. Plaintiff was born on October 2, 1963. At all times relevant and material hereto, Plaintiff was a minor child. At all times relevant and material hereto, Plaintiff was a resident of Nassau County, Long Island, and a student of East Meadow H.S.

3. The Defendant, EAST MEADOW UNION FREE SCHOOL DISTRICT, (the “School District”) was and still is a domestic municipal corporation that is created, organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located at 718 The Plain Road, Westbury, New York 11590.

4. The Defendant School District controls nine schools within East Meadow and Westbury, Nassau County. At all times material to the Complaint, the School District was responsible for managing and directing the public schools located within its jurisdiction.

5. At all times material to the Complaint, the School District had the power to employ individuals working with and/or alongside children within the district, including those at East Meadow H.S. and, through their agents, servants, and/or employees, the School District had control over school related activities involving children.

6. At all times material to the Complaint, Defendant, East Meadow H.S., was and is a public educational institution, located at 101 Carman Avenue, East Meadow H.S., New York 11554. At all material times, East Meadow H.S. was and still is a New York State Public School, owned, operated, managed, supervised, overseen, governed and/or administered by Defendant School District.

7. At all times material to the Complaint, East Meadow H.S. was under the control of the Defendant School District and operated for their benefit.

8. The Defendant NYIT was and still is a private not-for-profit university that is created, organized, and existing under and by virtue of the laws of the State of New York, with its

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