

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

BRITTANY EADY,

Plaintiff,

v.

TRULY ORIGINAL, LLC, BRAVO
MEDIA, LLC, NBCUNIVERSAL
MEDIA, LLC, ENDEMOL SHINE
NORTH AMERICA, and JANE/JOHN
DOE 1-5 .

Defendants.

SUMMONS WITH NOTICE

Index No. _____

Date Purchased: June 5, 2025

Plaintiff designates New York County as the
place of the trial.

The basis of the venue is: Defendants'
Principal Place of Business; Situs of Events &
Damages; Contractual Choice of Venue
Provision

TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED and required to appear in this action by serving a copy of your notice of appearance upon the undersigned within twenty (20) days after the service of this summons, exclusive of the day of service, if this summons was personally delivered upon you in the State of New York, or within thirty (30) days after service is complete if this summons is not personally delivered to you within the State of New York. If you do not serve a notice of appearance or answer or otherwise respond within the applicable time limitation, a judgment may be entered against you, by default, for the relief demanded in the notice set forth below.

Dated: June 5, 2025

New York, New York



Benjamin D. White

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Defendants' Addresses:

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C T Corporation System
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New York, New York 10005

NBCUNIVERSAL MEDIA, LLC
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NOTICE


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1. The nature of this action is defamation, intentional infliction of emotional distress, false light, *respondeat superior*, and sexual harassment and hostile work environment in violation of the New York State Human Rights Law and the New York City Human Rights Law, in regards to an incident occurring during a June 6, 2024 taping of the reality television show “The Real Housewives of Atlanta” (“RHOA”) and the subsequent production and airing of an RHOA episode on April 6, 2025.
2. On June 6, 2024, at an event that was filmed for the production of RHOA, one of the show’s cast members willfully, intentionally, recklessly, and/or with gross negligence made false, defamatory, harassing, and damaging statements regarding the Plaintiff, another cast member on the show, in front of an audience of approximately 200 people. The cast member also displayed posters containing written false and defamatory statements regarding Plaintiff and her occupation as well as an explicit photograph depicting a woman engaged in graphic sexual conduct. The cast member falsely claimed that the photograph depicted the Plaintiff. Plaintiff was not present when the photograph was presented and did not see the explicit photograph until after certain of these events were aired on Bravo nearly a year later, as addressed below. Attendees of the event took photographs, video, and audio recordings of the cast member’s statements and circulated certain of them on social media sites including Instagram and TikTok, and the statements were subsequently circulated by media outlets. The foregoing actions of the cast member at issue were within the scope of the Defendants’ business and in furtherance of the Defendants’ business.
3. Defendants willfully, intentionally, recklessly, and/or with gross negligence republished certain of the cast member’s statements at issue. Specifically, Defendants willfully, intentionally, recklessly, and/or with gross negligence, produced, edited, and aired an episode of RHOA on April 6, 2025 that included footage of certain of the cast member’s

statements at issue as well as commentary from other cast members that described the photographs displayed. Further, the manner in which the episode was aired falsely yet unmistakably implied that the graphic sexual photograph presented by the cast member depicted Plaintiff. On information and belief, Defendants knew that the photograph did not depict Plaintiff or, at the least, were reckless or grossly negligent in failing to learn that the photograph did not depict Plaintiff. Despite Plaintiff's repeated requests prior to the airing of the episode at issue that Defendants show her the photograph, Defendants refused to do so. By way of the foregoing, Defendants contributed to a hostile work environment for Plaintiff and sexually harassed Plaintiff by subjecting the Plaintiff to unwelcome, offensive, and sexualized behavior and comments based on her gender by requiring her to continue working in an environment in which she had been subject to a gendered attack, creating an inferior condition or privilege of employment because of her gender.

4. The relief sought is as follows: (a) the immediate removal of the episode from public access on all platforms, networks, and media outlets in the Defendants' control; (b) a public statement by Defendants that the statements by the cast member and the depiction of those statements, including the impression that the explicit photograph depicted Plaintiff, were false; (c) a monetary award to be determined at trial, entered against the Defendants, jointly and severally and/or individually; (d) as well as punitive damages, entered against the Defendants, jointly and severally and/or individually; and (e) for the costs and fees of this proceeding, including legal fees, and for such other and further relief as this Court deems just and proper.
5. Should Defendant(s) fail to appear herein, judgment will be entered by default for the sum of not less than \$20,000,000.00, with interest, and the costs and fees of this action.
6. Plaintiff designates New York County as the place of trial. The basis of this designation is Defendants' principal place of business, the situs of where events relevant to this action occurred, and the venue selected in the employment contract governing the relationship between Plaintiff and Defendant Truly Original LLC, as well as the employment contract governing the relationship between the offending cast member and Defendant Truly Original LLC.

Dated: New York, New York
June 5, 2025

By: 
Benjamin D. White

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