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<p>MARIA HADLEY</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>LAMINGTON FARM CLUB, LLC d/b/a TRUMP NATIONAL GOLF CLUB, BEDMINSTER; PATRICO NEIRA; POTHULA RAJESHWARA; ROBIN GUBANTES; DAVID SCHUTZENHOFER; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals),</p> <p style="text-align: right;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MORRIS COUNTY</p> <p>DOCKET NO.:</p> <p style="text-align: center;"><u>Civil Action</u></p> <p>COMPLAINT & DEMAND FOR TRIAL BY JURY; FIRST DEMAND FOR PRODUCTION OF DOCUMENTS AND FIRST SET OF INTERROGATORIES DIRECTED TO ALL DEFENDANTS</p>
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Plaintiff Maria Hadley (“Plaintiff”), by way of Complaint against Defendant Lamington Farm Club, LLC d/b/a Trump National Golf Club, Bedminster (“Defendant Trump National”), Defendants ABC Corporations 1-5 (fictitious names describing presently unidentified business entities) (along with “Defendant Trump National,” collectively referred to as the “Trump Defendants” or “Corporate Defendants”), Patrico Neira (“Defendant Neira”), Pothula Rajeshwara (“Defendant Rajeshwara”), Robin Gubantes (“Defendant Gubantes”), David Schutzenhofer

(“Defendant Schutzenhofer”) and John Does 1-5 (fictitious names describing presently unidentified individuals) (along with “Defendant Neira,” “Defendant Rajeshwara,” “Defendant Gubantes,” and “Defendant Schutzenhofer”) collectively referred to as the “Individual Defendants”), alleges as follows:

PRELIMINARY STATEMENT

Plaintiff Maria Hadley brings this case under New Jersey’s Conscientious Employee Protection Act, N.J.S.A. 34:19-1, et seq., (hereinafter referred to as “CEPA”) and the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1, et seq., (hereinafter referred to as the “NJLAD”). She does so after enduring open gender bias, routine sexual harassment, and steady retaliation at Trump National. Defendant Trump National hired Plaintiff in February 2025 as an Events Team Member and Banquet Server. She walked into a workplace that treated women as nothing but a prop. *Women were expected to look pleasing, work without complaint, and stay quiet. Managers and male coworkers treated Plaintiff and other women differently because of their gender. They harassed them. They crossed lines. They forced Plaintiff to wear a revealing uniform. They told women to “smile more.” They called teenage guests “sexy.” They brushed off harassment by guests because the men were “just men” and had paid a lot to be there.*

Plaintiff also spoke up about serious safety issues. She reported that Defendant Rajeshwara served alcohol to underage female employees without their consent. She asked to remain anonymous. *Within hours, Defendant Rajeshwara learned that Plaintiff made the report. Retaliation followed fast. Defendant Trump National cut her hours. It pushed her into worse assignments. Coworkers and supervisors shut her out. Management did nothing to fix the problem, even after her complaints.*

The pressure took a toll. Plaintiff's health declined. The conditions became unbearable. She had no real choice but to resign. Defendant Trump National forced her out. The law calls that constructive termination. Fortunately, the NJLAD and CEPA provide redress for employees like Plaintiff subjected to such egregiously unlawful treatment in the workplace. Accordingly, Plaintiff brings this lawsuit to expose Defendants' conduct and to seek redress for the discrimination and retaliation she faced while employed.

PARTIES

1. Plaintiff is a female and a domiciliary of the State of New Jersey currently residing in Long Valley, New Jersey. At all times relevant hereto, Plaintiff was employed by Defendant Trump National as an Event Team Member, Banquet Server.

2. Defendant Trump National is a foreign limited liability company located in Bedminster, New Jersey. At all times relevant hereto, Defendant Trump National is an "employer" as defined by the NJLAD and CEPA and directly employed Plaintiff and the Individual Defendants.

3. Defendant Neira, at all times relevant hereto, is a domiciliary of the State of New Jersey and Manager of Defendant Trump National. This claim is brought against Defendant Neira in his individual capacity and as an agent of Defendant Trump National who aided and abetted the Corporate and Individual Defendants in the discrimination, retaliation, and harassment referenced herein. At all times relevant hereto, Defendant Neira is an "employer" as defined by the NJLAD and CEPA.

4. Defendant Rajeshwara, at all times relevant hereto, is a domiciliary of the State of New Jersey and is employed as a bartender at Defendant Trump National. This claim is brought against Defendant Rajeshwara in his individual capacity and as an agent of Defendant Trump

National who aided and abetted the Corporate and Individual Defendants in the discrimination, retaliation, and harassment referenced herein. At all times relevant hereto, Defendant Rajeshwara is an “employer” as defined by the NJLAD and CEPA.

5. Defendant Gubantes, at all times relevant hereto, is a domiciliary of the State of New Jersey and Human Resources Representative of Defendant Trump National. This claim is brought against Defendant Gubantes in her individual capacity and as an agent of Defendant Trump National who aided and abetted the Corporate and Individual Defendants in the discrimination, retaliation, and harassment referenced herein. At all times relevant hereto, Defendant Gubantes is an “employer” as defined by the NJLAD and CEPA.

6. Defendant Schutzenhofer, at all times relevant hereto, is a domiciliary of the State of New Jersey and General Manager and Managing Director of Defendant Trump National. This claim is brought against Defendant Schutzenhofer in his individual capacity and as an agent of Defendant Trump National who aided and abetted the Corporate and Individual Defendants in the discrimination, retaliation, and harassment referenced herein. At all times relevant hereto, Defendant Schutzenhofer is an “employer” as defined by the NJLAD and CEPA.

7. Defendants ABC Corporations 1-5 are currently unidentified business entities that have acted in concert with Defendant Trump National, and/or currently unidentified business entities responsible for the creation and/or implementation of anti-discrimination and/or anti-retaliation policies of the corporate defendants, and/or currently unidentified business entities that may have liability for the damages suffered by Plaintiff under any theory advanced herein.

8. At all relevant times, Corporate Defendants have been single and joint employers of Plaintiff within the meaning of the NJLAD. Upon information and belief, Corporate Defendants’ operations are interrelated and unified, and they share common management,

centralized control of labor relations, common ownership, common control, common business purposes, and interrelated business goals. In addition, they jointly determine and manage the pay practices, rates of employee pay and method of payment, maintenance of employee records and personnel policies, practices, and decisions with respect to the employees.

9. Defendants John Does 1-5 are currently unidentified individuals who acted in concert with Defendants and/or currently unidentified individuals responsible for the creation and/or implementation of anti-discrimination and anti-retaliation policies of the Corporate Defendants and are currently unidentified individuals who may have liability for the damages suffered by Plaintiff under any theory advanced herein.

FACTS COMMON TO ALL CLAIMS

10. Defendant Trump National claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey policies and procedures prohibiting discrimination and retaliation.

11. Defendant Trump National claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey a zero-tolerance policy when it comes to discrimination and retaliation.

12. Defendant Trump National claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey policies and procedures requiring an employee who believes she was the victim of discrimination or retaliation to report the discrimination or retaliation to supervisory and management staff.

13. Defendant Trump National claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey policies and procedures whereby it

would engage in a timely and effective investigation of complaints of discrimination or retaliation brought to its attention by employees.

14. Defendant Trump National claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey policies and procedures committing it to engage in a timely and effective investigation of complaints of discrimination or retaliation brought to its attention by employees.

15. Defendant Trump National claims, at all times relevant hereto, that it had in effect at its facilities and locations within the State of New Jersey policies and procedures committing it to undertake prompt and effective remedial measures to put a stop to any discrimination or retaliation it found to exist.

16. Plaintiff began her employment as an Event Team Member, Banquet Server in or around February of 2025, and quickly proved herself a capable, hardworking, and dedicated employee who served both the Trump National Defendants and their patrons with professionalism and care. Her performance was never the problem. Instead, her hopes of long-term employment came to a grinding halt because she is a woman who dared to speak up. Despite her strong record, Defendants subjected her to a targeted campaign of discrimination and retaliation for whistleblowing, undermining her role, and ultimately constructively terminating her from her employment.

A. Plaintiff Witnesses And Is Subjected To Gender Based Discrimination and Sexual Harassment At The Hands Of The Defendant Trump National Employees

17. Immediately upon commencing employment with Defendant Trump National, Plaintiff was made aware of the rampant gender-based discrimination prevalent throughout the facility. Men were treated more favorably, were given more desirable work assignments, and put in leadership positions, despite their lesser experience, simply because of their gender.

18. On one occasion, female employees were tasked with moving chairs, tables, and other heavy furniture. While the females worked diligently to complete this task, the male employees stood by and did not assist. When Plaintiff pointed this out to Defendant Neira, stating, “This is disgusting, the strongest ones in the room are standing by as we move the furniture. Do you think someone can help?,” Defendant Neira simply stared at Plaintiff and failed to offer assistance or direct any male employees to do so.

19. Further, on or around Memorial Day weekend of 2025, Defendant Trump National employees worked on the golf course, serving members. Throughout the entirety of the weekend, only male employees were allowed to drive the golf carts, while female employees were forced to walk back and forth carrying heavy objects.

20. *On one occasion, when a female employee noted she was suffering from pain related to her menstrual cramps to Plaintiff, Defendant Neira walked over and boldly stated, “This is why women are so useless because once a month you have to listen to them cry about cramps.”*

21. In addition, as Plaintiff is highly experienced in the service industry, on one occasion, she pointed out to a Defendant Trump National Banquet Leader, Mr. Yusef LNU (“Mr. Yusef LNU”), that she did not think it was appropriate for raw fish items to be positioned on the buffet next to salads. *Instead of taking Plaintiff’s recommendation into consideration, Mr. Yusef LNU simply looked at Plaintiff and stated, “it is not your job to think.”* Clearly, demonstrating his belief in the stereotype that women should not think or have opinions of their own, let alone voice them.

22. The Defendant Trump National Defendants did not stop at gender discrimination. Instead, several employees also engaged in sexual harassment of employees and guests alike.

Specifically, Defendant Rajeshwara made it a habit to shamelessly comment on the appearances of young teenage female guests, often referring to them as “sexy,” in front of Plaintiff and other Defendant Trump National employees.

23. Further, when Plaintiff began her employment, she was provided with a uniform, which consisted of a polo and golf skirt. Upon receiving her uniform, Plaintiff noticed that the clothing she was given was entirely too small and tight. ***When Plaintiff brought this to the attention of Defendant Neira, noting he may have given her a junior size, instead of a woman’s size, he stated, “If they don’t fit, you don’t work,” and refused to give her a bigger size.*** Plaintiff was forced to wear the inappropriate and revealing clothing, until another Defendant Trump National female employee could secretly assist her in obtaining larger sizes.

24. When Plaintiff did finally receive her polos, Defendant Neira instructed her to wear her pink polo, instead of the black one because it “made her look younger.”

25. Defendants Neira and Schutzenhofer also made it a habit to constantly remind female employees to “smile more.” On one occasion, Defendant Schutzenhofer went as far as to walk over to another male employee who was standing next to Plaintiff and ask, “How is she doing?” When the employee responded that Plaintiff was doing great, Defendant Schutzenhofer completely ignored Plaintiff, acting as if she was not there and stated, “Well she should really smile more.”

26. Defendant Neira often make inappropriate and sexually harassing remarks to a younger male employee, in the presence of Plaintiff. ***Specifically, Defendant Neira commented that the employee’s face would get red when he talked to him so he must be a “homosexual.” In addition, when this employee was sitting on the floor or bending over, Defendant Neira would***

grab his head and hold it near his own genitalia. Defendant Neira seemingly acknowledged that he knew what he was doing was wrong as he would state “now don’t report me to HR.”

27. *When Plaintiff reported being touched on the buttocks by a Defendant Trump National guest to Defendant Neira, he attempted to silence Plaintiff, stating “they pay a lot of money to come here, just ignore it.”* Apparently, Defendant Neira believed just because someone paid a lot of money to attend the club, they had free range to touch and sexually harass female employees.

28. On another occasion, when walking to the linen closet, Defendant Trump National members approached Plaintiff and made comments insinuating they wanted her to go back to their rooms with them and engage in inappropriate sexual acts. Plaintiff adamantly objected and immediately informed Defendant Neira of same. *Instead of taking Plaintiff’s complaints seriously, Defendant Neira simply told Plaintiff, “They are just men,” once again down playing Plaintiff’s concerns and excusing the despicable behavior of the men who frequented Defendant Trump National.*

B. Plaintiff Objects To And Lodges Complaints Regarding Her Reasonable Belief Of Unethical Business Practices

29. In or around June of 2025, a female employee, who was under the age of twenty-one (21), the legal drinking age, disclosed to Plaintiff that Defendant Rajeshwara put alcohol in her Shirley Temple. To be clear, this employee did not ask for the alcohol in her drink and Defendant Rajeshwara put it in without her consent, claiming it would give the employee energy.

when he makes me shirley
temples i literally have to tell
him with sprite

and if i walk away and come
back for it there's vodka
always in it

Vodka in a Shirley
temple?????? What???

Omg what in the world???

yes he always makes me a
dirty shirley if i walk away and
not watch him make it

Great....cant wait for the 5 year
old to get that.....
get some rest i will calm to you
later

i'm like raj i didn't want vodka
in this and he's like it will give
you energy

30. Plaintiff was outraged to learn of this brazen violation of law, as she was concerned for this employee's, who was not of legal age, safety, and the dangers of her driving a vehicle after her long shift after consuming alcohol.

31. As such, on or about June 10, 2025, Plaintiff emailed Defendant Gubantes, outlining her concerns about alcohol being served to underage employees. Plaintiff's email complaint reads as follows:

From: **Maria Hadley** [REDACTED]
Date: Tue, Jun 10, 2025, 10:37 AM
Subject: Serious Concern Regarding Alcohol Service to Underage Employees
To: Robin Gubantes <robin.gubantes@trumpgolf.com>

Dear Robin,

I hope this message finds you well. I am reaching out to express a serious concern that came to my attention last night regarding one of our banquet bartenders. It has been reported that this individual is serving alcohol to underage employees, which poses significant legal and ethical issues for our establishment.

Specifically, I learned that the bartender provided alcoholic drinks to a young employee who had simply requested a Shirley Temple, a non-alcoholic beverage. The bartender allegedly justified this action by claiming it was to "give her energy," despite the fact that the employee did not ask for an alcoholic drink at any point. This behavior is not only inappropriate but also irresponsible, especially considering the potential consequences for both the employee and our organization.

I want to emphasize that I do not feel comfortable discussing this matter directly with Pat, as the bartender in question is involved in scheduling and paperwork that pertains to Pat's responsibilities. This complicates the situation further, as I believe there may be a conflict of interest that could prevent a fair assessment of the issue.

I believe it is crucial for us to address this matter promptly to ensure the safety and well-being of all employees, as well as to uphold the integrity of our establishment. I would appreciate your guidance on how to proceed with addressing this serious concern while maintaining confidentiality and professionalism.

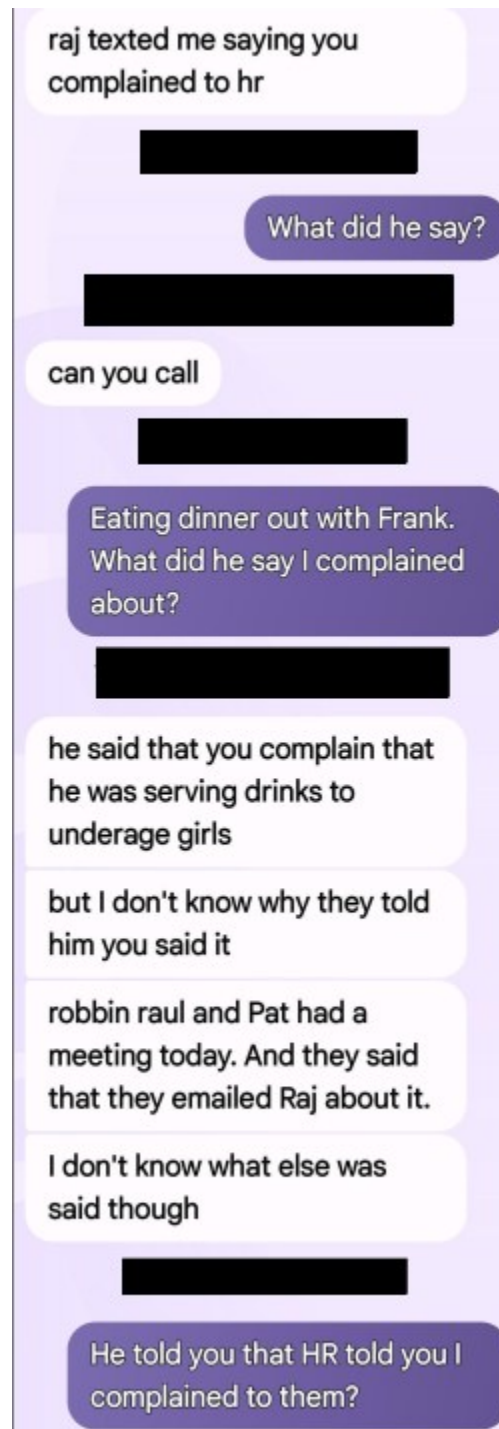
Thank you for your attention to this matter. I look forward to your advice on the best course of action.

Sincerely,

Maria Hadley
Banquet server

32. Important to note is that during a prior meeting, Defendant Gubantes informed all Defendant Trump National staff that if they were to make a complaint, they could request that their identities be kept anonymous. Plaintiff feared retaliation for her complaints, as she had personally witnessed other Defendant Trump National employees be retaliated against for lodging complaints, as such, she requested her identity be kept anonymous. However, Plaintiff quickly learned Defendant Gubantes' guarantee of anonymity was not a promise she intended to keep.

33. To be sure, just a few hours after lodging her complaint, Plaintiff received a text message from the underage employee, advising that Defendant Rajeshwara had texted her advising her that Plaintiff complained to Defendant Gubantes about his unlawful act of serving alcohol to an underage employee.



yeah, he said that you sent an email to HR complaining

34. In an attempt to intimidate the younger, female employee, Defendant Rajeshwara advised her that Defendant Neira said he would “take care of it,” and “had his back,” clearly demonstrating Defendant Neira’s lack of concern over the safety of the Defendant Trump National employees and patrons alike.

i'm more nervous because Raj said "pat will take care of it"

I could care less this isn't about the money. I dont need it. It's the legal, moral and ethical obligation I am concerned with.

35. After lodging her complaint, Plaintiff met with Defendant Schutzenhofer and Defendant Gubantes to further discuss her concerns. In the meeting, Plaintiff discussed her disappointment that her identity was disclosed and her concerns were ignored.

36. *Worse, when Plaintiff reiterated her complaints about Defendant Rajeshwara’s unethical behavior, Defendant. Schutzenhofer told her he “did not really believe it” because Defendant Rajeshwara is a “really good worker.”*

37. Plaintiff made it clear she did not appreciate Defendant Schutzenhofer's insinuation that she was lying about what had happened and reiterated her genuine concern for Defendant Trump National.

38. Eventually, Defendant Rajeshwara was temporarily terminated from his employment with Defendant Trump National because of his violation of law and policy.

39. Further, after the meeting, Plaintiff contacted Defendant Gubantes stating how she hoped she would not suffer any repercussions for voicing her legitimate concerns. Unfortunately, Plaintiff's concerns were realized.

C. The Trump National Defendants Retaliate Against And Constructively Terminate Plaintiff For Lodging Complaints

40. Immediately upon lodging her complaint and the termination of Defendant Rajeshwara, the Trump National Defendants commenced a campaign of retaliation against Plaintiff.

41. Several employees, including Defendant Neira and Defendant Schutzenhofer, refused to speak or acknowledge Plaintiff while at work. Specifically, another bartender, Ms. Grace LNU ("Ms. Grace LNU"), refused to make the beverages patrons at Plaintiff's tables had ordered, making it increasingly difficult for Plaintiff to complete her job and directly affecting Plaintiff's ability to receive tips.

42. On one occasion, President Donald J. Trump ("President Trump") spent time at the club. Afterwards, all Defendant Trump National employees were called to a meeting wherein President Trump boasted about how impeccable their service was. President Trump directed that management provide each employee with a \$1,000.00 bonus, specifically looking at Plaintiff when he gave this instruction. Despite same, every other employee, other than Plaintiff, was given the bonus.

43. As Plaintiff was a seasoned and dedicated employee, she typically was assigned to higher stakes job responsibilities, such as serving high-profile clientele who came in. However, after lodging her complaints, Plaintiff was stripped of her job duties and forced to work in the back house, folding napkins, polishing silverware, and moving furniture. If Plaintiff were given a table to serve, it was only one (1) table, compared to her typical four (4) tables a night. Once again, these new job responsibilities negatively affected Plaintiff's compensation.

44. Not only were Plaintiff's job responsibilities changed, but her hours were also reduced, and she was scheduled less frequently. Further, the employees of Defendant Trump National maintained a group chat allowing them to communicate about the job, especially when someone needed coverage for the day. After Plaintiff's complaints were made public, the employees made a separate group chat without Plaintiff, restricting her ability to seek coverage if needed or pick up shifts for extra money.

45. Unable to take the blatant retaliation any further, Plaintiff called Defendant Gubantes to lodge a complaint regarding same. Amongst other concerns, Plaintiff complained about how she was being isolated by employees, how her job responsibilities had been reduced, and the hostile manner in which Defendant Neira was treating her. Plaintiff called Defendant Gubantes several times, reiterating her concerns. Despite her detailed complaints, Defendant Gubantes failed to ever take any meaningful action to remediate the situation.

46. Plaintiff suffers from Mast Cell Activation Syndrome ("MCAS"). After making complaints and suffering retaliation, Plaintiff suffered such significant stress that her MCAS flared up, and she was hospitalized on two (2) separate occasions.

47. In or around August of 2025, no longer able to endure the discrimination, retaliation, and the toll it was taken on her physical health any further, Plaintiff contacted

Defendant Gubantes, advising her she no longer able to work for Defendant Trump National. The email reads as follows:

Subject: Formal Notice of Resignation

Dear Robin,

I had hoped it wouldn't come to this, but it has become painfully clear that since I reported the bartender for serving underage individuals, the way I am treated at work has changed dramatically.

Pat has reassigned me to setup shifts instead of allowing me to work directly with clients—despite being told numerous times by members what a great job I've done. Both Pat and Grace have ceased speaking to me entirely; Grace, who once greeted me warmly, now barely acknowledges me and intentionally delays service when I approach her bar.

I've also learned that a colleague suggested I be excluded from the group chat because I "would only tell HR." After I spoke up about how inappropriate that was, a new group chat was created, yet I was not included until just yesterday. The timing feels deliberate.

Recently, Pat made a remark about needing an EpiPen around guests with allergies. I shared that I carry one due to a new diagnosis of MCAS, and at his request, I sent him an email with details. Since then, he has repeatedly made sarcastic remarks about staff going home if they're "tired or sick"—comments clearly directed at me, despite the fact that I've never cited my condition as an excuse or missed work because of it.

Additionally, I received a message this week referencing workplace attire—seemingly targeted at me. Since my first day, I've worn antique jewelry to work, and have received nothing but compliments from Marissa and Raul. There has never been an issue until now.

I was also reprimanded in front of the entire crew for speaking with guests at an event—despite having been instructed during our pre-event meeting to "talk up" the club and its amenities. I was speaking with two restaurant owners who had questions, and I was simply following directions. The following day, Pat delivered a lecture about "not talking to people" while looking directly at me. I responded respectfully and clarified the situation in

and clarified the situation in front of the team.

Last night, I was removed at the last minute from working Trump's dinner event directly. When he left, he thanked us all and told Dave to give "all of these fine people a thousand-dollar bonus." However, I was not included on the bonus list—even though I carried dinner plates, served desserts, and helped clean the room just like everyone else.

Individually, any of these incidents might seem minor. But together, and in the context of everything that has happened since I spoke up, it has become unbearable.

It's with regret that I'm submitting my two weeks' notice. I truly enjoyed working here and took great pride in what we did. As they say, the road to hell is paved with good intentions.

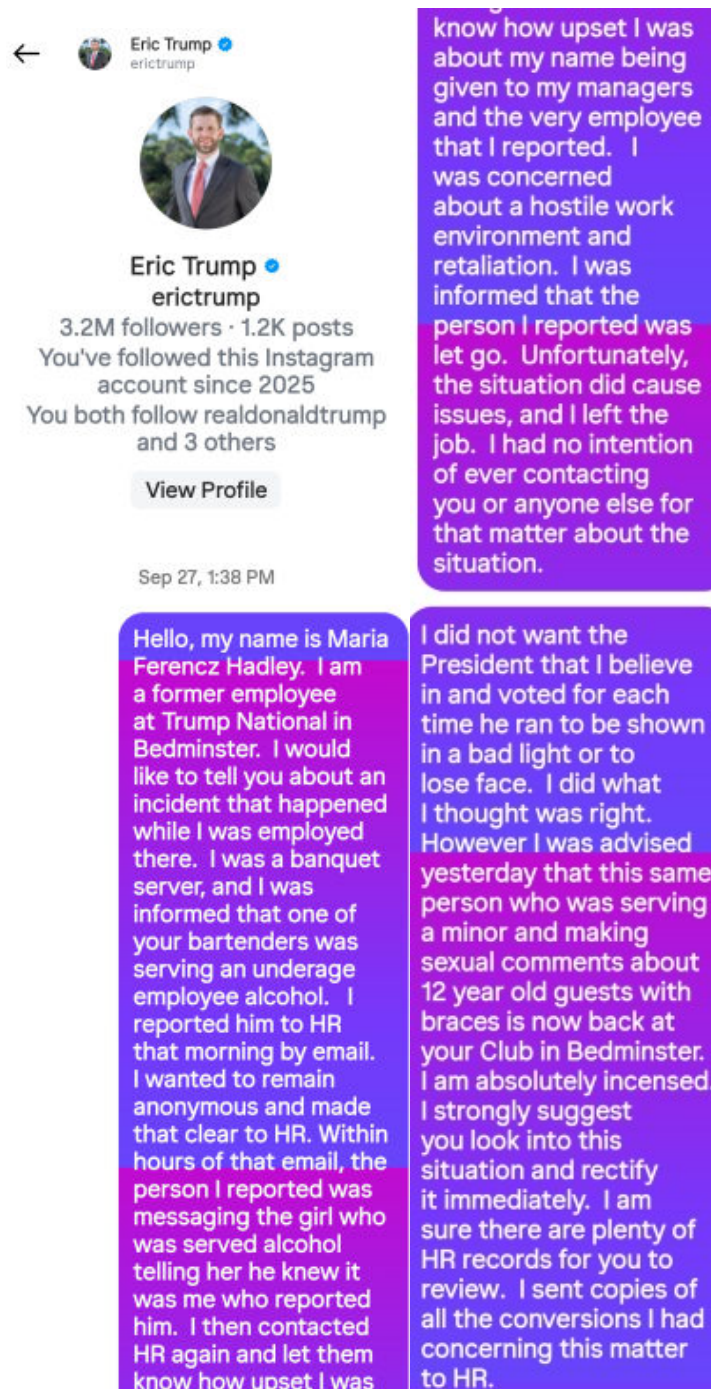
Please understand this decision has nothing to do with you. You've always done your job with integrity, and I appreciate that. The issue lies with how Pat chose to handle this situation, and I believe that needs to be acknowledged.

Thank you for the opportunity and for your support.

48. Instead of investigating her claims, the Trump National Defendants seized the opportunity to accept Plaintiff's resignation, effectively forcing her out and treating it as a victory in their effort to push her out. Plaintiff was constructively terminated.

49. Adding insult to injury, and upon information and belief, after her constructive termination, the Trump National Defendants re-hired Defendant Rajeshwara as a bartender, clearly demonstrating their lack of concern for his predatory and unlawful acts.

50. After learning of Defendant Rajeshwara's reinstatement at the Defendant Trump National, Plaintiff escalated her complaints to Mr. Eric Trump ("Mr. Trump"), Executive Vice President of Defendant Trump National. Despite her detailed complaints of discrimination and retaliation, Mr. Trump failed to respond and investigate Plaintiff's concerns.



51. Because of the joint and several acts and omissions of the Corporate Defendant, Individual Defendants, John Does (1-5), and ABC Corporations (1-5), Plaintiff has been and continues to suffer economic losses and pecuniary damage in the form of lost income and benefits past, present, and future.

52. Because of the joint and several acts and omissions of the Corporate Defendants, Individual Defendants, John Does (1-5), and ABC Corporations (1-5), Plaintiff has been and continues to suffer non-economic damages in the form of humiliation, stress, and anxiety, causing her mental and emotional anguish and dysfunction and physical manifestations of same, including, but not limited to, nightmares, inability to sleep, weight gain, headaches, panic attacks, crying, negative thoughts, nervousness, anxiousness, anxiety attacks, upset stomach, and stomach pains, all or some of which may be permanent.

COUNT ONE

NJLAD – SEXUAL HARASSMENT, GENDER DISCRIMINATION, DISPARATE TREATMENT & HOSTILE WORK ENVIRONMENT

53. Plaintiff repeats each and every allegation set forth above as if set forth fully herein at length.

54. The pattern and practice of discrimination, harassment, and retaliation directed at Plaintiff is outlined above.

55. Plaintiff was subjected to repeated, pervasive, severe, and continuing instances of disparate treatment and harassment based on her gender/sex.

56. The above-described conduct would not have occurred but for Plaintiff's gender/sex.

57. The harassing and discriminatory conduct was severe or pervasive enough to make a reasonable person, and employee, believe that the conditions of employment were altered, and the working environment was hostile and discriminatory.

58. As the employer and/or supervisor of Plaintiff, Defendants are vicariously, strictly, and/or directly liable to Plaintiff pursuant to the NJLAD, N.J.S.A. 10:5-1, et seq., in that the affirmative acts of harassment, discrimination, and retaliation committed by Individual Defendants occurred within the scope of their employment; the creation of a hostile work environment was aided by Corporate Defendants in delegating power to Individual Defendants to control the day-to-day working environment; and/or Corporate Defendants were deliberately indifferent, reckless, negligent, and/or tacitly approved the discrimination, hostile work environment, and/or retaliation; and/or Defendants failed to create and/or have in place well-publicized and enforced anti-harassment policies, effective formal and informal complaint structures, training, and/or monitoring mechanisms for same, despite the foreseeability of harassment, discrimination, and retaliation in the workplace; and/or by having actual knowledge of the harassment, discrimination, and retaliation of Plaintiff and failing to promptly and effectively act to stop it.

59. Defendants aided, abetted, incited, compelled, and/or coerced, and/or attempted to aid, abet, incite, and/or coerce Individual Defendants to commit acts and omissions that were in violation of the NJLAD by committing affirmatively harassing, discriminatory, and retaliatory acts toward Plaintiff in violation of the supervisory duty to halt or prevent harassment, retaliation, and discrimination, rendering all Defendants individually and collectively liable to Plaintiff pursuant to N.J.S.A. 10:5-12(e).

60. Individual Defendants and/or supervisors of Plaintiff aided, abetted, incited, compelled and/or coerced, and/or attempted to aid, abet, incite, compel and/or coerce Defendants

to commit acts and omissions that were in violation of the NJLAD by committing affirmatively harassing, discriminatory, and retaliatory acts toward Plaintiff in violation of their supervisory duty to halt or prevent harassment, retaliation, and discrimination rendering Defendants individually and collectively liable to Plaintiff pursuant to N.J.S.A. 10:5-2(e).

61. As a proximate result of the aforementioned acts and omissions set forth herein, Plaintiff has sustained damages.

WHEREFORE, Plaintiff demands judgment in her favor and against Defendants on this Count, together with compensatory and equitable relief, all remedies available under the law, punitive damages, emotional distress damages, pre- and post-judgment interest, and attorneys' fees and costs of suit. More specifically, Plaintiff demands judgment against Defendants for harm suffered in violation of the NJLAD as follows:

- A. Reinstatement of employment and all benefits;
- B. Back pay and benefits;
- C. Front pay and benefits;
- D. Compensatory damages;
- E. Consequential damages;
- F. Reinstatement;
- G. Punitive damages;
- H. Pre-judgment interest and enhancements to off-set negative tax consequences;
- I. Any and all attorneys' fees, expenses and/or costs, including, but not limited to, court costs, expert fees and all attorneys' fees incurred by Plaintiff in the prosecution of this suit (including enhancements thereof required to off-set negative tax consequences and/or enhancements otherwise permitted under law);
- J. Such other relief as may be available pursuant to the NJLAD and which the Court deems just and equitable;
- K. Ordering Defendants to take appropriate corrective action to stop and prevent retaliation at the workplace;
- L. Ordering Defendants to take appropriate corrective action to stop and prevent harassment at the workplace;
- M. Ordering Defendants to undergo anti-discrimination training;
- N. Ordering Defendants to undergo anti-retaliation training;
- O. Ordering Defendants to undergo anti-harassment training;
- P. Ordering Defendants to undergo workplace civility training;

- Q. Ordering Defendants to undergo bystander prevention training;
- R. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-discrimination training;
- S. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-retaliation training;
- T. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-harassment training;
- U. Ordering Defendants to engage a research organization to assess the effectiveness of their workplace civility training;
- V. Ordering Defendants to engage a research organization to assess the effectiveness of their bystander prevention training;
- W. Ordering Defendants to identify an appropriate professional to investigate any future complaints of discrimination;
- X. Ordering Defendants to identify an appropriate professional to investigate any future complaints of harassment;
- Y. Ordering Defendants to identify and appropriate professional to investigate any future complaints of retaliation; and
- Z. Such other relief as may be available and which the Court deems just and equitable.

COUNT TWO

NJLAD – RETALIATION/IMPROPER REPRISAL

62. Plaintiff repeats each and every allegation set forth above as if set forth fully herein at length.

63. Plaintiff complained and/or protested against the continuing course of harassing, discriminatory, and retaliatory conduct set forth at length above. Defendants had knowledge about those complaints and/or protests.

64. As a direct result, Defendants took retaliatory actions against Plaintiff, which are outlined above.

65. Defendants are vicariously, strictly, and/or directly liable to Plaintiff for unlawful retaliatory conduct in violation of the NJLAD pursuant to N.J.S.A. 10:5-12(d).

66. As a proximate result of the aforementioned acts and omissions set forth herein, Plaintiff has sustained emotional and pecuniary damages.

WHEREFORE, Plaintiff demands judgment in her favor and against Defendants on this Count, together with compensatory and equitable relief, all remedies available under the law, punitive damages, pre- and post-judgment interest, and attorneys' fees and costs of suit. More specifically, Plaintiff demands judgments against Defendants for harm suffered in violation of the NJLAD as follows:

- A. Reinstatement of employment and all benefits;
- B. Back pay and benefits;
- C. Front pay and benefits;
- D. Compensatory damages;
- E. Consequential damages;
- F. Reinstatement;
- G. Punitive damages;
- H. Pre-judgment interest and enhancements to off-set negative tax consequences;
- I. Any and all attorneys' fees, expenses and/or costs, including, but not limited to, court costs, expert fees and all attorneys' fees incurred by Plaintiff in the prosecution of this suit (including enhancements thereof required to off-set negative tax consequences and/or enhancements otherwise permitted under law);
- J. Such other relief as may be available pursuant to the NJLAD and which the Court deems just and equitable;
- K. Ordering Defendants to take appropriate corrective action to stop and prevent retaliation at the workplace;
- L. Ordering Defendants to take appropriate corrective action to stop and prevent harassment at the workplace;
- M. Ordering Defendants to undergo anti-discrimination training;
- N. Ordering Defendants to undergo anti-retaliation training;
- O. Ordering Defendants to undergo anti-harassment training;
- P. Ordering Defendants to undergo workplace civility training;
- Q. Ordering Defendants to undergo bystander prevention training;
- R. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-discrimination training;
- S. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-retaliation training;
- T. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-harassment training;
- U. Ordering Defendants to engage a research organization to assess the effectiveness of their workplace civility training;
- V. Ordering Defendants to engage a research organization to assess the effectiveness of their bystander prevention training;

- W. Ordering Defendants to identify an appropriate professional to investigate any future complaints of discrimination;
- X. Ordering Defendants to identify an appropriate professional to investigate any future complaints of harassment;
- Y. Ordering Defendants to identify an appropriate professional to investigate any future complaints of retaliation; and
- Z. Such other relief as may be available and which the Court deems just and equitable.

COUNT THREE
RETALIATION IN VIOLATION OF NEW JERSEY'S CONSCIENTIOUS EMPLOYEE PROTECTION ACT ("CEPA")

67. Plaintiff repeats each and every allegation set forth above as if set forth fully herein at length.

68. As set forth at length above, Plaintiff reported, complained of and/or refused to participate in Defendants' unlawful and/or unethical behaviors. This includes Plaintiff's reports of health and safety violations, discrimination, retaliation, and disparate treatment.

69. Defendants had knowledge of Plaintiff's complaints and/or protests.

70. As a direct result of Plaintiff raising complaints and/or threatening to disclose raising complaints and refusing to participate in Defendants' unlawful and/or unethical behaviors, Defendants took retaliatory action against Plaintiff as set forth above at length.

71. Defendants are vicariously, strictly, and/or directly liable to Plaintiff for an unlawful retaliation in violation of CEPA pursuant to N.J.S.A. 34:19-1, et seq.

72. As a proximate result of the aforementioned acts and omissions set forth herein, Plaintiff has sustained damages.

WHEREFORE, Plaintiff demands judgment in her favor and against Defendants on this Count, together with compensatory and equitable relief, all remedies available under CEPA, punitive damages, pre- and post-judgment interest, attorneys' fees and costs of suit, and for such other relief that the Court deems equitable and just. More specifically, Plaintiff demands judgment against Defendants for harm suffered in violation of CEPA as follows:

- A. Reinstatement of employment and all benefits;
- B. Back pay and benefits;
- C. Front pay and benefits;
- D. Compensatory damages;
- E. Consequential damages;
- F. Reinstatement;
- G. Punitive damages;
- H. Pre-judgment interest and enhancements to off-set negative tax consequences;
- I. Any and all attorneys' fees, expenses and/or costs, including but not limited to court costs, expert fees, and all attorneys' fees incurred by Plaintiff in the prosecution of this suit (including enhancements thereof required to off-set negative tax consequences and/or enhancements otherwise permitted under law);
- J. Such other relief as may be available pursuant to the CEPA and which the Court deems just and equitable;
- K. Ordering Defendants to take appropriate corrective action to stop and prevent retaliation at the workplace;
- L. Ordering Defendants to undergo anti-discrimination training;
- M. Ordering Defendants to undergo anti-retaliation training;
- N. Ordering Defendants to undergo anti-harassment training;
- O. Ordering Defendants to undergo workplace civility training;
- P. Ordering Defendants to undergo bystander prevention training;
- Q. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-discrimination training;
- R. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-retaliation training;
- S. Ordering Defendants to engage a research organization to assess the effectiveness of their anti-harassment training;
- T. Ordering Defendants to engage a research organization to assess the effectiveness of their workplace civility training;
- U. Ordering Defendants to engage a research organization to assess the effectiveness of their bystander prevention training;
- V. Ordering Defendants to identify an appropriate professional to investigate any future complaints of discrimination;
- W. Ordering Defendants to identify an appropriate professional to investigate any future complaints of harassment;
- X. Ordering Defendants to identify and appropriate professional to investigate any future complaints of retaliation; and
- Y. Such other relief as may be available and which the Court deems just and equitable.

COUNT FOUR
CONSTRUCTIVE TERMINATION

73. Plaintiff repeats each and every allegation set forth above as if set forth fully herein at length.

74. Defendants' actions created a work environment so intolerable that a reasonable person would rather resign than be forced to endure it.

75. Plaintiff reasonably felt Corporate Defendants' workplace was no longer a safe environment for her, and that she could no longer endure working for Defendants.

76. Plaintiff was constructively terminated by Defendants when Plaintiff was forced to resign and did not return to work following the harassment at the hands of Defendants.

77. As a proximate result of the aforementioned acts and omissions set forth herein, Plaintiff has sustained damages and will continue to suffer damages in the future.

WHEREFORE, Plaintiff demands judgment in her favor and against Defendants on this Count, together with compensatory and equitable relief, punitive damages, pre- and post-judgment interest, attorneys' fees and costs of suit, and for such other relief that the Court deems equitable and just.

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

Pursuant to Rule 4:10-2(b), demand is made that Defendants disclose to Plaintiff's attorney whether or not there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of the judgment which may be entered in this action or indemnify or reimburse for payments made to satisfy the judgment and provide Plaintiff's attorney with true copies of those insurance agreements or policies, including, but not limited to, any and all declaration sheets. This demand shall include and cover not only primary insurance coverage, but also any excess, catastrophe, and umbrella policies.

DEMAND FOR TRIAL BY JURY

Plaintiff demands a trial by jury on all issues.

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff Maria Hadley

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: January 12, 2026

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, PETER D. VALENZANO, ESQUIRE, is hereby designated as trial counsel for Plaintiff.

CERTIFICATION

Pursuant to Rule 4:5-1, it is hereby certified that, to the best of my knowledge, there are no other civil actions or arbitration proceedings involving this matter and/or with respect to this matter and no other parties need to be joined at this time.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff Maria Hadley

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: January 12, 2026

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Attorneys for Plaintiff Maria Hadley

MARIA HADLEY

Plaintiff,

vs.

LAMINGTON FARM CLUB, LLC d/b/a
TRUMP NATIONAL GOLF CLUB,
BEDMINSTER; PATRICO NEIRA;
POTHULA RAJESHWARA; ROBIN
GUBANTES; DAVID SCHUTZENHOFER;
ABC CORPORATIONS 1-5 (fictitious names
describing presently unidentified business
entities); and JOHN DOES 1-5 (fictitious names
describing presently unidentified individuals),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MORRIS COUNTY

DOCKET NO.:

Civil Action

**COMPLAINT & DEMAND FOR TRIAL
BY JURY; FIRST DEMAND FOR
PRODUCTION OF DOCUMENTS AND
FIRST SET OF INTERROGATORIES
DIRECTED TO ALL DEFENDANTS**

**PLAINTIFF'S FIRST SET OF DOCUMENT REQUESTS, INTERROGATORIES, AND
DISCOVERY DEMANDS RELATING TO PUNITIVE DAMAGES**

PLEASE TAKE NOTICE that McOmber McOmber & Luber, P.C., attorneys for Plaintiff, Maria Hadley (“Plaintiff”), demand that Defendants Lamington Farm Club, LLC d/b/a Trump National Golf Club, Bedminster (“Defendant Trump National”) Patrico Neira (“Defendant Neira”), Pothula Rajeshwara, (“Defendant Rajeshwara”), Robin Gubantes (“Defendant Gubantes”)

and David Schutzenhofer (“Defendant Schutzenhofer”) (collectively “Defendants”) produce true and complete copies of Documents responsive to the following Document Requests and answer under oath the following Interrogatories pursuant to the New Jersey Rules of Court.

DEFINITIONS

1. “Plaintiff” shall mean, individually and collectively, each Plaintiff identified in the above-captioned action. If more than one Plaintiff is identified in the caption as a party to this lawsuit, Defendants must respond to each request with specific responses applicable to each Plaintiff in this lawsuit.

2. “Defendant Trump National” or “Trump Defendants” shall mean Lamington Farm Club, LLC d/b/a Trump National Golf Club, Bedminster, and any of its officers, directors, employees, agents, representatives, successors, predecessors, assigns, divisions, affiliates, subsidiaries, and all persons acting or purporting to act on its behalf.

3. “Defendant Neira” shall mean Patrico Neira, Defendant in the above-captioned action.

4. “Defendant Rajeshwara” shall mean Pothula Rajeshwara, Defendant in the above-captioned action.

5. “Defendant Gubantes” shall mean Robin Gubantes, Defendant in the above-captioned action.

6. “Defendant Schutzenhofer” shall mean David Schutzenhofer, Defendant in the above-captioned action.

7. “Defendant(s)” shall individually and collectively mean all Defendants in the above-captioned action.

8. The term “Corporate Defendant(s)” shall individually and collectively mean any Defendant company, corporation, partnership, union, joint venture, sole proprietorship, association, government agency, or organization, or any other similar type of group through which business is conducted, or any director, officer, employee, or agent thereof.

9. The term “Individual Defendant(s)” shall mean any defendant in this matter sued in his/her individual capacity or as an agent/servant of any Corporate Defendant.

10. The terms “You,” “Your,” or “Yours” shall mean the party answering these interrogatory questions.

11. The term “Entity” shall mean any company, corporation, partnership, union, joint venture, sole proprietorship, association, government agency, or organization, or any other similar type of group through which business is conducted, or any director, officer, employee, or agent thereof.

12. The term “Person” shall mean any natural Person, partnership, corporation, or other business Entity and all present and former officers, directors, agents, employees, attorneys, and others acting or purporting to act on behalf of such natural Person, partnership, corporation, or other business Entity.

13. The term “Action” shall mean the civil action captioned above.

14. The term “Complaint” shall mean the Complaint filed by Plaintiff(s) in this Action.

15. The term “Answer” shall mean any Answer to the Complaint filed by any party in this Action, which specifically includes all Affirmative Defenses, Denials, and Counterclaims, that were filed with the Court in the above-captioned Action.

16. The term “Investigation” shall mean any investigation, inquiry, analysis, review, examination, research, study, interview, interrogation, and/or collection of evidence, statements (oral or written), and documents.

17. The term “Grievance” shall mean any complaint, grievance, accusation, allegation, protest, and/or objection (formal or otherwise) by Plaintiff(s) or any Person concerning any of the Defendant(s) and Plaintiff.

18. The terms “Document” and “Documents” are defined in accordance with R. 4:18-1 and includes the original and all drafts and any identical or non-identical copy, regardless of origin or location, of any written, reported, filmed, magnetically stored, or graphic matter, or record of any type or description, whether produced, reproduced, or producible on paper, cards, tapes, film, electronic facsimile, computer storage devices, or any other media, including, but not limited to, memoranda, schedules, lists, letter (sent or received), telephone Messages (including but not limited to reports of telephone conversations and conferences), transcripts of telephone conversations and any other retrievable data, magazines, booklets, circulars, bulletins, questionnaires, assignments, orders, checks, vouchers, notebooks, acknowledgments, instructions, records, stories, index, disc, data sheet or data processing card, notes, minutes, records, photographs, computer programs, correspondence, telegraphs, telegrams, diaries, bookkeeping entries, specifications, source code, object code, flow charts, financial statements, charts, studies, reports, tables, analyses, graphs, statements, notebooks, handwritten notes, application, feasibility studies, papers, books, pamphlets, periodicals, appointment calendars, calendar entries, diary entries, notes, records and recordings of oral conversations or voicemails, emails, inter-office or intra-office Communications, handwritten or other notices, diaries, invoices, purchase orders, bills, bills of lading, work papers, or any other written, recorded, transcribed, punched, taped, filmed,

photographed, videotaped or graphic matter, however produced or reproduced, and also including, but not limited to, originals and all copies which are different from the original, whether by interlineation, receipt stamp, notation, indication of copy sent or received, or otherwise, and drafts, which are in the possession, custody or control of the present or former agents, representatives, employees, or attorneys of Defendant(s), or all Persons acting on Defendant(s)' behalf, including Documents at any time in the possession, custody or control of such Individuals or entities who are known by Defendant(s) to exist. Include any catalog, brochure, or any other data compilations from which information can be obtained and translated if necessary, or any other written, recorded, stored, transcribed, punched, taped, filed or graphic matter however produced or reproduced, to which Defendant(s) have or have had access.

19. The term "Communication" means any conversation, correspondence, discussion, meeting, message, record of phone calls, or other occurrence in which data, conclusions, information, opinions, or thoughts are exchanged between two or more persons, whether it be written, oral, or electronically transmitted.

20. The term "Message" shall mean text messages, short messaging service (SMS), multimedia messaging service (MMS), iMessages, instant messages (IM) platform (such as Telegram, Skype, Zoom, Facebook Messenger, Instagram Messenger, LinkedIn, Google Meet/Chat, Discord, Signal, Slack, WhatsApp, Teams, and Salesforce Chatter), and other intranet Message platforms.

21. The "Relevant Time Period" is January 23, 2023, until present.

22. The term "concerning" is construed in the broadest possible sense to include comprising, constituting, containing, commenting on, dealing with, describing, discussing,

embodying, evidencing, illustrating, pertaining to, referring to, reflecting, regarding, relating to, responding to, stating, or supporting in any way, either directly or indirectly.

23. The phrases “relating to,” “relate to,” “relates to,” “refer to,” “refers to,” “referred,” “relating to,” and/or “regarding” shall be construed in the broadest possible sense to include, *inter alia*, concerning to, embodying, constituting, describing, connected with, commenting on, responding to, evidencing, identifying, supporting, contradicting, rebutting, pertaining to, and/or relating in any way.

24. The terms “including” and “include” shall be construed in the broadest possible sense to include “including without limitation.”

INSTRUCTIONS

1. The terms “all” and “any” shall both be construed as “any and all.”
2. The terms “and,” “or,” and “and/or” as used herein shall be construed conjunctively or disjunctively to bring within the scope of these topics and requests any and all information which might otherwise be construed as outside their scope.
3. In addition to the specific instructions contained herein, these Document Requests and Interrogatories shall be subject to the New Jersey Rules of Court.
4. If more than one Plaintiff is identified in the caption as a party to this lawsuit, Defendant(s) must respond to each request with specific responses applicable to each Plaintiff in this lawsuit.
5. Interrogatory answers shall be typed beneath the questions and the original shall be returned in accordance with R. 4:17-4(c).
6. If at any time prior to trial, You obtain information which renders any answer You provide incomplete or inaccurate, amended answers shall be served pursuant to R. 4:17-7.

7. When referring to a Person, “to identify” means to give, to the extent known, the Person’s full name, present or last known address, and last known place of employment.

8. These Document Requests and Interrogatories shall be deemed continuing in nature so as to require prompt supplementation if, as, and when You obtain additional information.

9. If anyone identified in response to any of the Document Requests and/or Interrogatories was formerly, but is no longer, employed by You, please so state in the answer and provide the former employee’s current address and telephone number (business or home), if known. If the current address and telephone number are not known, then please provide the former employee’s last known address and telephone number.

10. If You cannot respond to any of these Document Requests and Interrogatories in full after exercising due diligence to secure the information to do so, then respond to the extent possible and explain Your inability to provide a complete answer. State whatever information or knowledge You have about the unanswered portion of any Document Request and/or Interrogatories.

11. When a Document Request or Interrogatory asks for You to identify a date, state the exact day, month, and year, if ascertainable, or, if not, the best approximation thereof.

12. Document shall be produced in their original state, i.e., in their original file folders in the exact order as found, without removal or rearrangement of anything contained therein.

13. Each Document Request that seeks information relating in any way to Communications to, from, or within a business or Entity is hereby designated to mean, and should be construed to include, all Communications by and between that business and/or Entity’s present or former representatives, employees, agents, and servants of the business and/or Entity.

14. All Documents shall be organized and labeled to correspond with the numbered paragraphs of these Document Requests. If there are no Documents responsive to a particular Document Request, Defendant(s) shall so state in writing.

15. For each Discovery Request to which Defendant(s) are producing Documents, Defendant(s) shall identify in its written response the Bates range of Documents produced which are responsive to that request.

16. All electronically stored information shall be produced in a reasonably usable form, and it shall not be converted from the form in which it is ordinarily maintained to a different form that would make it more difficult or burdensome for Plaintiff to use such information.

17. In the event that any oral Communication, statement, Document or portion thereof is withheld on the basis of any privilege or otherwise claimed to be protected against production, such Document shall be identified with in a privilege log which includes: (a) the nature of the privilege or reason for withholding which Defendant(s) contend applied; (b) the factual basis for Defendant(s)' assertion of privilege or the reason for withholding; (c) the type of Document, e.g., letter, memorandum; (d) all authors and addressees; (e) all indicated and blind copies; (f) all Persons to whom the Document was distributed, shown, or explained; (g) the Document's date; (h) a summary description of the Document's subject matter; (i) the number of pages and attachments or appendices comprising the Document; and (j) its present custodian. Whenever a claim of privilege concerns any oral Communication or statement, identify the participants to the Communication and the Person giving and receiving the statement, and set forth the date and place of the Communication or statement and state the general subject matter thereof and state the basis for the claim of privilege.

18. If any Document was, but is no longer, in Defendant(s)' possession, or subject to Defendant(s)' control, or in existence, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred, voluntarily or involuntarily, to others; or (d) has been otherwise disposed of. In each instance, explain the circumstances surrounding any such disposition, including the authorization of the disposition, the date of destruction or discard, the manner of destruction or discard, the reason for destruction or discard, the Person(s) who authorized and carried out such destruction or discard, whether any copies of the Document presently exist, and, if so, the name of the custodian of each copy.

19. An objection or claim of privilege directed to part of a request does not constitute an excuse for failure to respond to the parts of the Document Request or Interrogatory for which no objection or claim of privilege is made.

20. If a refusal to answer a Document Request or Interrogatory is based on the grounds that the request is overly burdensome, identify the number and nature of Documents that need to be searched.

21. The Punitive Damages Requests relate to Corporate Defendant(s)' financial condition for purposes of punitive damages. "Case law recognizes the Defendant's financial condition as a relevant factor in all punitive-damage awards." Herman v. Sunshine Chem. Specialties, Inc., 133 N.J. 329, 339 (1993). In order to properly determine the appropriate punitive damage award amount, the trier of fact "must consider evidence of the Defendant's financial condition." Id. at 342. "The degree of punishment resulting from a judgment must be, to some extent, in proportion to the means of the guilty Person." McDonough v. Jorda, 214 N.J. Super. 338, 349 (App. Div. 1986) (citing Restatement (Second) of Torts 908 cmt. d (1977)), certif. denied, 110 N.J. 302 (1988) cert. denied, 489 U.S. 1065 (1989).

22. Masculine forms of any noun or pronoun shall embrace and be read to include feminine or neuter, as the context may make appropriate.

DOCUMENT REQUESTS
(Directed to All Defendants)

Insurance

1. Any and all Documents relating to any insurance policy or reinsurance policy that may be used to pay all or part of any judgment entered against Defendant(s) in this Action.

Personnel Files

2. A complete copy of the personnel file Defendant(s) maintained pertaining to Plaintiff, including, but not limited to, copies of Documents relating to the following: (a) medical records and reports; (b) pay and benefits provided to Plaintiff; (c) attendance, sick time, disability time, personal time and/or vacation time; (d) commendations and/or performance reviews regarding Plaintiff; (e) job title or job status changes; (f) Documents relating to any leave of absence; and (g) employer policy information provided to Plaintiff, if any.

3. Limited portions of the personnel file(s) Defendant(s) maintained pertaining to any and all Individual Defendant(s), including, but not limited to, copies of Documents (written or electronic) relating to the following: (a) disciplinary action (i.e., oral reprimand, written reprimand, suspension, demotion, loss of pay, termination) being taken against any Individual Defendant; (b) performance evaluations that were conducted for any Individual Defendant; and (c) job title or job status changes for any Individual Defendant.

4. Limited portions of the personnel file(s) Defendant(s) maintained pertaining to any

“job comparator”¹ of Plaintiff employed by Defendants during the term of Plaintiff’s employment, including, but not limited to, copies of Documents (written or electronic) relating to the following: (a) disciplinary action (i.e., oral reprimand, written reprimand, suspension, demotion, loss of pay, termination) being taken against such person; (b) performance evaluations that were conducted for any such person; and (c) job title or job status changes for any such person.

Allegations

5. Produce all documents reflecting any complaints, reports, investigations, or disciplinary actions relating to gender discrimination, sexual harassment, or retaliation at Defendant Trump National from 2023 through the present, including but not limited to complaints involving Defendants Neira, Schutzenhofer and Rajeshwara.

6. Produce all communications, including emails, text messages, instant messages, and group chats, involving Plaintiff and/or referencing Plaintiff from the start of her employment through her separation, including internal management communications.

7. Produce all documents reflecting work assignments, schedules, table assignments, cart usage, leadership roles, and job duties for male and female employees during Plaintiff’s employment.

8. Produce documents reflecting staffing decisions or policies regarding which employees were permitted to drive golf carts and which employees were required to walk or carry equipment during Memorial Day weekend 2025.

9. Produce all documents relating to uniforms provided to Plaintiff, including size charts, uniform orders, communications regarding uniform sizing, and any complaints or requests

¹ For purposes of this Document Demand, a “job comparator” can be defined as an employee who holds the same or similar job responsibilities as Plaintiff, reports to the same supervisor as Plaintiff, and is generally subject to the same standards and expectations as Plaintiff.

for different uniform sizes.

10. Produce documents reflecting any training provided to employees or management regarding sexual harassment prevention, discrimination, bystander intervention, or workplace conduct during Plaintiff's employment.

11. Produce documents reflecting any complaints made by Plaintiff, including but not limited to complaints regarding sexual harassment by guests, inappropriate comments by employees, underage alcohol service, retaliation, or constructive termination.

12. Produce all documents reflecting Defendant Gubantes' representations or policies regarding anonymous complaints and confidentiality, including communications concerning Plaintiff's request for anonymity.

13. Produce all documents relating to the investigation, discipline, termination, suspension, or reinstatement of Defendant Rajeshwara, including documents reflecting the decision to rehire him after his termination.

14. Produce all communications between Defendants Neira, Schutzenhofer, Gubantes, Rajeshwara, and any other management personnel concerning Plaintiff, her complaints, her job performance, or her work assignments.

15. Produce all documents reflecting tips, compensation, bonuses, or incentive payments for employees during Plaintiff's employment, including documents relating to the \$1,000 bonus directed by President Donald J. Trump and identifying which employees received such bonus.

16. Produce all documents reflecting changes to Plaintiff's work schedule, hours, tables served, or job responsibilities before and after she lodged complaints of discrimination or unethical conduct.

17. Produce all documents reflecting any employee group chats, messaging platforms, or communication channels used by Defendant Trump National employees during Plaintiff's employment, including documents reflecting Plaintiff's removal or exclusion from any such group.

18. Produce all documents reflecting communications between Plaintiff and Defendant Trump National executives, including Eric Trump, concerning Plaintiff's complaints of discrimination, harassment, retaliation, or constructive termination.

19. Produce all documents, including but not limited to emails, text messages, internal communications, incident reports, memoranda, notes, and complaints, concerning any allegation, complaint, report, or discussion from January 1, 2023 to the present regarding the provision, service, or furnishing of alcohol to any employee under the age of twenty-one (21) at Defendant Trump National.

20. Produce all documents relating to the June 2025 complaint made by Plaintiff concerning Defendant Rajeshwara placing alcohol in a non-alcoholic beverage provided to an underage employee, including but not limited to communications between or among Defendants Gubantes, Schutzenhofer, Neira, Rajeshwara, and any other management or human resources personnel.

21. Produce all documents reflecting any investigation, disciplinary action, suspension, termination, or corrective measures taken in response to complaints or allegations that Defendant Rajeshwara, or any other employee, provided alcohol to a minor, including documents concerning Defendant Rajeshwara's temporary termination referenced in the Complaint.

22. Produce all documents that evidence or reflect complaints made by employees—whether anonymous or identified—regarding the service of alcohol to minors, unsafe alcohol practices, or violations of alcohol-related laws or company policies, including documents showing

how such complaints were received, handled, disclosed, or resolved.

23. Produce all documents, including but not limited to written complaints, emails, text messages, online reviews, incident reports, internal communications, and memoranda, received from or concerning guests or patrons from January 1, 2023 to the present that relate to or reference (a) the service or provision of alcohol to minors, (b) improper or unlawful alcohol service, or (c) alcohol-related safety concerns at Defendant Trump National, including any documents reflecting the investigation, response, or resolution of such guest complaints.

Plaintiff's Hiring & Employment

24. Produce all documents related to Plaintiff's hiring and employment, including job applications, contracts, onboarding materials, handbooks, policies, and procedures, as well as documents concerning her compensation, benefits, performance, discipline, adverse actions, and termination, including use of any company-issued credit card.

Job Description & History

25. A written job description for each and every position that Plaintiff or any Individual Defendant held during Plaintiff's employment with Corporate Defendant(s).

Policies & Procedures

26. Produce all policies, practices, and procedures of Defendant(s) during the Relevant Time Period regarding discrimination, harassment, and retaliation; health and safety, food preparation, and DOH compliance; and the service of alcohol.

Training

27. Produce all statements, documents, or communications relating to any training or education completed by Defendant(s) during the Relevant Time Period, including anti-harassment, anti-discrimination, anti-retaliation, health and safety, food preparation, DOH compliance, alcohol

service, sensitivity, or appropriate workplace conduct.

Statement & Witnesses

28. Any and all statements, documents, or communications made by any person, including Defendant(s)' employees, coworkers, or Plaintiff, that relate to the allegations in the Complaint, the defenses or denials asserted in the Answer, and any admissions or information related to this action.

Trial & Experts

29. All documents Defendant(s) intend to use or may rely upon in this litigation, including, but not limited to, those for depositions or trial, expert reports, and any books, treatises, pamphlets, or other printed materials upon which Defendant(s) or their experts will rely to support their defenses.

Internal Complaints & Investigation

30. Produce all statements, documents, or communications relating to any complaints, protected conduct, or grievances made by Plaintiff, any investigations concerning Plaintiff or Defendants—including those related to discrimination, harassment, hostile work environment, retaliation, or NJLAD and CEPA claims—and all reports or drafts thereof.

Other Litigation

31. Produce all documents from the past ten years concerning internal complaints, grievances, lawsuits, claims, charges, arbitrations, or proceedings against Corporate Defendants relating to harassment, discrimination, hostile work environment, retaliation, or alleged violations of federal or state law, CEPA, NJLAD, or DOH compliance.

Communication

32. Produce all photographs, videos, recordings, messages, and communications between Defendant(s) and Plaintiff, between or among Individual Defendants regarding Plaintiff, and between Defendant(s) and their agents, servants, or representatives that relate to this litigation, including any communications with the Human Resources department, phone call logs, and teleconference/videoconference records (such as Zoom or Teams).

Other

33. Any and all Documents identified or referenced in Defendant(s)' Answers to Plaintiff's First Set of Interrogatories to Defendant(s).

Notices

34. Produce any and all notices, posters, bulletins, or other Documents Defendant(s) displayed in the workplace regarding federal, state, and local employment laws during the Relevant Time Period.

Job Comparators & Replacement

35. Produce all job descriptions for any positions held by Plaintiff's comparators during her employment, as well as all documents regarding job vacancies, postings, or promotional opportunities within three months before and after Plaintiff's termination, including those intended to fill or assume Plaintiff's former duties.

INTERROGATORIES
(Directed to All Defendants)

Insurance

1. Please set forth the existence and contents of any insurance agreement pertaining to the issues in the case, insuring the party answering this Interrogatory. This request is made pursuant to R. 4:10-2(b). Please also state the policy limits of any and all insurance policies naming

Defendant(s) as an insured which cover the claims in this litigation, along with the name of the insurance carrier and policy number, the amount of any applicable deductible, and if the claim is being defended under a Reservation of Rights Agreement or letter, attach a copy of said Reservation of Rights Agreement or letter.

Allegations

2. Identify all persons involved in making, enforcing, or overseeing employment policies related to discrimination, harassment, retaliation, and equal employment opportunity at Defendant Trump National during Plaintiff's employment.

3. Describe in detail all complaints of gender discrimination, sexual harassment, or retaliation made by any employee at Defendant Trump National from 2023 through the present, including the date of each complaint, the complainant, the accused, and the outcome.

4. State all facts supporting Defendants' contention that male and female employees were treated equally with respect to work assignments, leadership opportunities, and job duties during Plaintiff's employment.

5. Identify all persons who determined which employees were assigned to move furniture, carry equipment, or perform physically demanding tasks, and explain the criteria used to make those assignments.

6. Describe the policies or practices in effect during Memorial Day weekend 2025 regarding golf cart usage and identify all employees permitted to drive golf carts during that period.

7. Identify all persons who provided uniforms to Plaintiff and describe all communications or actions taken in response to Plaintiff's complaints regarding improper or ill-fitting uniforms.

8. Describe all training provided to Defendants' employees and management regarding discrimination, sexual harassment, and retaliation, including dates, duration, and attendees.

9. Identify each instance in which Plaintiff complained of discrimination, harassment, retaliation, unethical conduct, or unlawful activity, and describe Defendants' response to each complaint.

10. State all facts concerning Defendant Gubantes' representations regarding anonymity or confidentiality of employee complaints and explain how Plaintiff's identity was disclosed following her complaint.

11. Describe in detail the investigation, discipline, termination, suspension, and reinstatement of Defendant Rajeshwara, including the reasons for each employment action taken.

12. Identify all persons who made decisions affecting Plaintiff's work assignments, hours, tables, or compensation after she lodged complaints, and describe the reasons for those decisions.

13. Describe all facts relating to the \$1,000 bonus allegedly directed by President Donald J. Trump, including which employees received the bonus, which employees did not, and the reasons Plaintiff did not receive it.

14. State all facts supporting Defendants' contention that Plaintiff was not retaliated against for engaging in protected activity.

15. Identify all group chats, messaging platforms, or informal communication channels used by Defendant Trump National employees during Plaintiff's employment and explain Plaintiff's exclusion from any such group.

16. Describe all communications between Defendants and Eric Trump concerning Plaintiff, her complaints, or her separation from employment, including dates and participants.

17. Identify all complaints, reports, or allegations made from January 1, 2023 to the present concerning the provision, service, or furnishing of alcohol to any employee or guest under the age of twenty-one (21) at Defendant Trump National, including for each the date of the complaint, the identity of the complainant (if known), the person(s) accused, and the manner in which the complaint was made.

18. Describe in detail the facts and circumstances surrounding the June 2025 incident in which Defendant Rajeshwara allegedly placed alcohol in a non-alcoholic beverage provided to an underage employee, including the identities of all persons with knowledge of the incident and all actions taken by Defendants in response.

19. Identify all investigations conducted in response to any complaint or allegation that alcohol was provided to a minor at Defendant Trump National from January 1, 2023 to the present, including the investigator(s), dates, findings, conclusions, and any disciplinary or corrective actions taken.

20. State all policies, practices, or procedures in effect from January 1, 2023 to the present regarding (a) the prohibition on serving alcohol to minors, (b) employee consumption of alcohol, and (c) the handling, confidentiality, and anonymity of complaints related to alcohol or safety violations, and identify all persons responsible for enforcing such policies.

21. Identify all persons who participated in, were consulted regarding, or made decisions about the handling of Plaintiff's complaint concerning the provision of alcohol to an underage employee, including whether Plaintiff's identity was disclosed, who disclosed it, to whom it was disclosed, and the reasons for such disclosure.

22. Identify and describe all complaints, reports, or allegations made by guests or patrons from January 1, 2023 to the present concerning (a) the service or provision of alcohol to minors, or (b) improper, unsafe, or unlawful alcohol service at Defendant Trump National, including for each complaint the date, manner of complaint, substance of the complaint, identity of the guest (if known), persons involved, and the actions taken by Defendants in response.

Employment

23. State whether any forms were required to be completed by an applicant for original hire, promotion, transfer, or any other change in the terms and conditions of employment at the Corporate Defendant(s), and if so, identify each form by name and number, describe its purpose, and provide a copy. Further, state whether any collective bargaining agreement was in effect during the period referenced in the Complaint that governed, influenced, or had any direct or indirect effect on the hiring practices or procedures of the Corporate Defendant(s). Finally, with respect to the Plaintiff, provide the original date of hire, gross earnings or compensation for each year of employment from hire to present, all fringe benefits payable at the time of discharge—including, but not limited to, pension, welfare, health, retirement, savings, deferred compensation, bonus, and/or profit-sharing plans—and, if any benefit plans have changed since the time of discharge, describe all such changes.

Identification

24. Provide the full name, job title, duration of employment, last known address, last known telephone number, and last known e-mail for Pat Neira and Matt Zuckerman.

25. Describe the business relationship and corporate structure between Defendant Trump National and the Trump Organization.

Procedures & Policies

26. Identify and describe in detail Defendant(s)' policies, practices, and procedures relating to (a) employee complaints of discrimination, harassment, and/or retaliation, including any specific actions taken in response to such complaints, and (b) reprimanding, suspending, and terminating employees, including the steps followed during disciplinary actions and the criteria used to determine such actions. Additionally, identify and describe in detail Defendant(s)' policies, practices, and procedures for DOH compliance, including any relevant guidelines, restrictions, or limitations, and describe in full detail any investigations, determinations, and/or disciplinary actions taken by Defendant(s) related to any parties in this action in the past ten (10) years.

Investigation

27. Identify and provide full details concerning any Investigation relating to the allegations and claims in the Complaint, including, but not limited to, who was questioned or interviewed, what was discovered, and what corrective Action was taken. Identify those who Defendant(s) contacted or assigned to conduct each specific Investigation or inquiry, who was questioned, what was discovered, and what corrective Action was taken, to the best of Defendant(s)' knowledge. Provide copies of any examinations, audits, findings, reports, or notices in Individual Defendant(s)' possession.

28. Identify and provide full details concerning any Investigation relating to any denials or defenses asserted in the Answer, including, but not limited to, who was questioned or interviewed, what was discovered, and what corrective Action was taken.

HR & Training

29. Identify all persons employed by Defendant(s) who have been responsible for Human Resources, personnel matters, training, orientation, and personnel monitoring from the past five (5) years to the present, to the best of Defendant(s)' knowledge. For each individual identified,

provide the dates of employment and their job titles. Additionally, provide the name, last known address, last known job title, and last known telephone number of each Equal Employment Opportunity (EEO) officer employed by Defendant(s) during the same period, and for each EEO officer, state the dates of their employment.

30. State whether any Defendant(s) participated in an orientation program upon their hiring with Defendant(s) and describe the system(s) or procedure(s) used for orientation in the past five (5) years. Identify and provide full details regarding any harassment and discrimination prevention training conducted by Defendant(s) within the same period, including the dates of such training, the materials used, and if provided by a third party, the third party's name, business address, and qualifications. Additionally, describe any sensitivity training or training related to appropriate workplace language and conduct received by any Defendant(s) during the relevant time period.

Other Cases

31. Identify and describe in detail any and all lawsuits, claims, charges, arbitrations, investigations, inquiries, and/or proceedings, whether before state or federal courts, administrative agencies, commissions, boards, or departments—including but not limited to the U.S. Equal Employment Opportunity Commission, the New Jersey Department of Labor, and DOH—filed, charged, sought, or received against Defendant(s) in the past ten (10) years alleging harassment, discrimination, retaliation, or any employment-related matter. For each such Action, claim, notice, warning, investigation, or inquiry, provide the following information: (a) the name, last known address, last known telephone number, and job title of the complainant(s); (b) the title of the Action; (c) the name and address of the court, agency, or regulatory body where the Action was filed or investigated; (d) the docket number or reference number of the Action; (e) the date the

Action was filed or the notice, warning, or inquiry was received; (f) the nature and substance of the Action, notice, warning, investigation, or inquiry; (g) the disposition or present status of the Action, notice, warning, investigation, or inquiry; (h) whether the Action was tried and, if so, the verdict; (i) the amount of punitive damages, if any; (j) the amount of compensatory damages, if any; and (k) identify all documents that in any way touch upon, discuss, or pertain to any of the matters referred to in this Interrogatory.

Statement & Admissions

32. Set forth whether Defendant(s) have obtained a statement from any Person not a party to this Action. If Your answer is in the affirmative, state:

- a. Name and address of the Person who gave the statement, and date statement obtained;
- b. if written, whether signed by the Person;
- c. if oral, name and address of the Person who obtained the statement, and if recorded, the nature and present custody of recording;
- d. attach a copy of all said written statements; and
- e. if oral, set forth completely the substance of said statements.

Communication

33. State whether Defendant(s) or any of their agents communicated, orally or in writing, with any person or entity not a party to this litigation in connection with the subject matter of this lawsuit, and whether Defendant(s) ever taped or digitally recorded any communications with Plaintiff, whether face-to-face or telephonic. For all oral communications with non-parties, describe in detail the nature and substance of the communication, the date and place it occurred, and the names, last known addresses, and last known telephone numbers of all persons present. For all written communications with non-parties, provide true and accurate copies of each communication. For any communications with Plaintiff that were taped or digitally recorded, describe in detail: (a) the identity of each Defendant who recorded or participated in the recording; (b) the date, time, place, and manner of the recording; (c) the substance of the recorded

communications; (d) the device used to make such recordings; and (e) whether consent to record was obtained. Produce any such recordings.

Trial & Experts

34. State the name, last known address, and last known telephone number of each person whom Defendant(s) may expect to call as a witness at trial and indicate the facts to which each such witness is expected to testify. Additionally, provide the names and business addresses of any proposed expert witnesses whom Defendant(s) have retained for this matter, and with respect to each expert witness, describe their field of expertise, educational background, writings, any opinions rendered, documents reviewed or created, and any tangible things upon which they may rely as an exhibit at trial.

35. Identify and describe any persons other than those named in the previous interrogatory, who have been retained, specifically employed, or consulted by Defendant(s) in anticipation of litigation or preparation for trial and who may not be called as witnesses at trial. For each such person, state their subject matter of consultation, field of expertise, qualifications, training, professional experience, and education, and provide any written reports, opinions, or documents relied upon in formulating those opinions, including a summary of the grounds for each opinion.

Damages

36. If the party or parties answering these Interrogatories believes that some Person, not a party to this Action, is in some way responsible for the injuries and/or damages alleged, please set forth the name and address of such Person, and the acts or omissions and address of such Person, the acts or omissions of said Person which caused the injury or damage, and the facts which support the belief.

Legal & Other

37. State the name, last known address, and last known telephone number of each person who has knowledge of facts relating to this matter and specify the subject matter of each person's knowledge. Indicate whether the individual or individuals certifying these Interrogatory answers had the opportunity to review the typed responses, and if not, identify each person who provided information used to answer the questions and specify the numbers of the Interrogatories to which they contributed. Additionally, describe in detail the factual basis for each and every Affirmative Defense set forth in the Answer and the factual basis for each of Defendant(s)' denials of the allegations in the Complaint. State whether Defendant(s) know or believe there are any Documents related to the subject matter of this litigation that are not in Defendant(s)' possession, custody, or control, and if so, identify each such Document, the source of Defendant(s)' information regarding its existence, and the person or entity in whose possession, custody, or control the Document is believed to be.

Job Comparators & Post Termination

38. Please identify each individual who replaced Plaintiff or performed any of her job duties, including the name, address, qualifications, and dates of employment for each individual. Additionally, state whether the individual who replaced Plaintiff or assumed her duties was pregnant at the time of replacement. Furthermore, identify all mediums, including newspapers, employment agencies, online websites, and job boards, that Corporate Defendant used to advertise available jobs during the Relevant Time Period and within one year following Plaintiff's termination.

INTERROGATORIES TO INDIVIDUAL DEFENDANT(S)
(Directed to Individual Defendants)

1. Identify each and every Document of every kind and description of which Individual Defendant(s) has knowledge which is, in any way, intended to support any claim, defense, affirmative defense, or factual allegation, or to be used by Individual Defendant(s) in any manner in this matter, including, but not limited to, during the examination of any witness; describe the Document as to content and other characteristics, and state the present location of such Documents, or in lieu thereof, attach true copies to Individual Defendant(s)'s answers to these Interrogatories. For each and every such Document or tangible thing upon which Individual Defendant(s) will rely in support of Individual Defendant(s)'s claims/defenses/affirmative defenses, state:

- a. its description;
- b. its nature;
- c. the name and address of Person who has custody;
- d. its location; and
- e. its condition.

2. Identify any and all email addresses You have during the past five (5) years.

3. Identify any and all cell phone numbers You have used during the past five years and identify the carrier and current location of each and every cell phone. For any cell phone that is no longer in Your possession, identify the name and address of the Person's whose possession, custody, or control they are in.

4. Have You ever been convicted of a criminal offense? If so, for each and every conviction, identify and set forth in detail:

- a. the particular offense(s) or crime(s) of which You have been convicted;
- b. the date of each such conviction;
- c. the courts in which You were convicted;
- d. the facts surrounding and underlying each such conviction; and
- e. the punishment or sentence received.

5. State whether You are a supervisor. If so, (1) state all of Your supervisory responsibilities; (2) identify which department and which employees You supervise in any

capacity; (3) identify employees who You directly supervise; and (4) state whether You supervised Plaintiff and in what capacity.

PUNITIVE DAMAGES DOCUMENT REQUESTS

(Directed to Corporate Defendants)

1. Any and all financial statements prepared for the prior 10 years, up to and including the present, setting forth income, expenses, assets, liabilities, and profits of the Corporate Defendant(s).
2. Any and all tax returns filed by the Corporate Defendant(s) for each of the last ten (10) tax years.
3. Any and all Documents evidencing assets of the Corporate Defendant(s).
4. Any and all Documents evidencing the Corporate Defendant(s)' interest in any real estate.
5. Any and all Documents evidencing the financial obligations of the Corporate Defendant(s).
6. Any and all Documents evidencing any judgment against the Corporate Defendant(s) during the past ten (10) years and the amount of such judgment(s).
7. Any and all Documents evidencing bank accounts held by the Corporate Defendant(s) during the past ten (10) years, the location of those accounts, account numbers, and balances of those accounts.
8. Any and all Documents evidencing or setting forth accounts receivable and/or obligations owed by others to the Corporate Defendant(s) during the past ten (10) years.
9. Any and all Documents evidencing payments made by the Corporate Defendant(s) to creditors during the past ten (10) years.

10. Any and all corporate books or any other written memorandum setting forth income received by the Corporate Defendant(s) during the past ten (10) years.

11. Any and all inventories taken by the Corporate Defendant(s) of its property at any time during the past ten (10) years.

INTERROGATORIES RELATED TO PUNITIVE DAMAGES

(Directed to Corporate Defendants)

1. For each and every Corporate Defendant, set forth:
 - a. The full name of the Corporate Defendant;
 - b. The date of formation;
 - c. The state of formation;
 - d. All states in which the Corporate Defendant conducts its business;
 - e. All states in which the Corporate Defendants has registered to do business; and
 - f. The full name and residential address of any Person who has been a shareholder, member, or partner of Corporate Defendant during any part of the last two years;

2. For each and every Person identified in response to subsection (f) above, state the Person's ownership interest in Corporate Defendant:
 - a. The full name and residential address of any Person who has served as a director of Corporate Defendant during any part of the last two years, along with the specific period during which such Person served as director;
 - b. The full name and addresses of all any Person who served as an officer of the corporation during any part of the past two years, along with the title and specific period during which such Person served as an officer;
 - c. All trade or fictitious names under which Corporate Defendant has conducted business during any part of the past two years;
 - d. The complete street address of all locations where Corporate Defendant has conducted its business during any part of the past two years, along with the specific period during which it conducted such business at each location; and
 - e. The full name and address of the Person who has custody of this corporation's books and records.

3. Is a majority of the ownership interest in Corporate Defendant held by any single individual or Entity? If so, state for the individual or Entity:
 - a. The full name and address;
 - b. The state of formation, if applicable;

- c. The state(s) in which such individual or Entity does business;
- d. The address of each business office;
- e. The name and address of each current officer or director; and
- f. The nature of the business in which such individual or Entity is engaged.

4. For all real property owned by Corporate Defendant(s), state:

- a. The physical address (the "Location");
- b. The nature of the business conducted at the Location;
- c. The dates during which Corporate Defendant has owned the Location; and
- d. The number of individuals presently employed at the Location.

5. State the name, address, and telephone number of each and every Entity in which any individual identified in response to Interrogatory related to Punitive Damage No. 1(f) now has an interest, and set forth the nature of such interest.

6. For each and every bank account of Corporate Defendant, list the name of the bank, the bank's address, the account number, and the name in which the account is held.

7. State the present location of any and all books and records of Corporate Defendant(s), including financial records.

8. State the name and address of each and every Person/Entity who/that prepares, maintains, and/or controls the business records and checkbooks of Corporate Defendant.

9. List each and every physical asset of Corporate Defendant. For each and every physical asset identified, state the location of the physical asset and, if such asset is subject to a lien, state the amount of the lien and the name and address of the lienholder.

10. Does the Defendant(s) own any real estate?

11. If the answer for the preceding interrogatory is in the affirmative, please state for each and every property:

- a. Name(s) in which property is owned;
- b. Address of property;
- c. Date property was purchased;
- d. Purchase price;
- e. Name and address of mortgage holder, if any;

- f. Balance due on mortgage, if any; and
- g. The names and addresses of all tenants and monthly rentals paid by each tenant.

12. List any and all vehicles, equipment, and/or motor vehicles owned by the Defendant(s) and state the following for each vehicle:

- a. Make, model, and year;
- b. License plate number;
- c. Vehicle identification number; and
- d. If there is a lien on the vehicle, the name and address of the lienholder and the amount due on the lien.

13. List any and all accounts receivable due to the Defendant(s), stating the name, address, and amount due on each receivable.

14. For any transfer of business assets that has occurred within six months from the date of these Interrogatories, specifically identify:

- a. The nature of the asset;
- b. The date of the transfer;
- c. Name and address of the Person or Entity to whom the asset was transferred;
- d. The consideration paid for the asset and the form in which it was paid, e.g., check, cash; and
- e. Explain in detail what happened to the consideration paid for the asset.

15. Set forth any and all judgments that have been entered against the Defendant(s) and include the following for each:

- a. Creditor's name;
- b. Creditor's attorney;
- c. Amount due;
- d. Name of Court; and
- e. Docket number.

McOMBER McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Maria Hadley

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: January 09, 2026

CERTIFICATION

I hereby certify (or aver) that I have reviewed the document production request and that I have made or caused to be made a good faith search for documents responsive to the request. I further certify (or aver) that as of this date, to the best of my knowledge and information, the production is complete and accurate based on () my personal knowledge and/or () information provided by others. I acknowledge my continuing obligation to make a good faith effort to identify additional documents that are responsive to the request and to promptly serve a supplemental written response and production of such documents, as appropriate, as I become aware of them. The following is a list of the identity and source of knowledge of those who provided information to me:

- 1.
- 2.
- 3.
- 4.
- 5.

Dated: _____

By: _____

CERTIFICATION

I certify that the foregoing answers to the Interrogatories made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: _____

By: _____

Christian V. McOmber, Esq. - NJ ID # 012292010

cvm@njlegal.com

Peter D. Valenzano, Esq. - NJ ID # 037892010

pdv@njlegal.com

Jennifer C. Iodice, Esq. – NJ ID #478512024

jci@njlegal.com

McOMBER McOMBER & LUBER, P.C.

54 Shrewsbury Avenue

Red Bank, NJ 07701

(732) 842-6500 Phone

Attorneys for Plaintiff Maria Hadley

MARIA HADLEY

Plaintiff,

vs.

LAMINGTON FARM CLUB, LLC d/b/a
TRUMP NATIONAL GOLF CLUB,
BEDMINSTER; PATRICO NEIRA;
POTHULA RAJESHWARA; ROBIN
GUBANTES; DAVID SCHUTZENHOFER;
ABC CORPORATIONS 1-5 (fictitious names
describing presently unidentified business
entities); and JOHN DOES 1-5 (fictitious names
describing presently unidentified individuals),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MORRIS COUNTY

DOCKET NO.:

Civil Action

**NOTICE OF R. 4: 14-2 (c) VIDEO
DEPOSITION OF CORPORATE
DEFENDANT(S)**

PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiff Maria Hadley, through her undersigned counsel, will take the deposition upon oral examination of the representative of Corporate Defendants **commencing on May 25, 2026, at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C.

PLEASE TAKE FURTHER NOTICE that the foregoing deposition shall be conducted before a notary public or other duly authorized officer and will be recorded stenographically and/or

by videotape in accordance with Rules of Court. The deposition shall continue from day to day, weekends and holidays excepted, until completed, unless otherwise agreed by the parties.

McOMBER, McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Maria Hadley

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: January 12, 2026

Christian V. McOmber, Esq. - NJ ID # 012292010

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Peter D. Valenzano, Esq. - NJ ID # 037892010

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Jennifer C. Iodice, Esq. – NJ ID #478512024

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54 Shrewsbury Avenue

Red Bank, NJ 07701

(732) 842-6500 Phone

Attorneys for Plaintiff Maria Hadley

<p>MARIA HADLEY</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>LAMINGTON FARM CLUB, LLC d/b/a TRUMP NATIONAL GOLF CLUB, BEDMINSTER; PATRICO NEIRA; POTHULA RAJESHWARA; ROBIN GUBANTES; DAVID SCHUTZENHOFER; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals),</p> <p style="text-align: right;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MORRIS COUNTY</p> <p>DOCKET NO.:</p> <p style="text-align: center;"><u>Civil Action</u></p> <p style="text-align: center;">NOTICE OF <u>R. 4:14-2</u> AND <u>R. 4:14-9</u> VIDEO DEPOSITION OF DEFENDANT PATRICO NEIRA</p>
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PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiff Maria Hadley, through her undersigned counsel, will take the deposition upon oral examination of Defendant Neira **commencing on May 26, 2026, at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C.

PLEASE TAKE FURTHER NOTICE that the foregoing deposition shall be conducted before a notary public or other duly authorized officer and will be recorded stenographically and/or

by videotape in accordance with Rules of Court. The deposition shall continue from day to day, weekends and holidays excepted, until completed, unless otherwise agreed by the parties.

McOMBER, McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Maria Hadley

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: January 12, 2026

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Attorneys for Plaintiff Maria Hadley

<p>MARIA HADLEY</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>LAMINGTON FARM CLUB, LLC d/b/a TRUMP NATIONAL GOLF CLUB, BEDMINSTER; PATRICO NEIRA; POTHULA RAJESHWARA; ROBIN GUBANTES; DAVID SCHUTZENHOFER; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals),</p> <p style="text-align: right;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MORRIS COUNTY</p> <p>DOCKET NO.:</p> <p style="text-align: center;"><u>Civil Action</u></p> <p style="text-align: center;">NOTICE OF <u>R. 4:14-2</u> AND <u>R. 4:14-9</u> VIDEO DEPOSITION OF DEFENDANT POTHULA RAJESHWARA</p>
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PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiff Maria Hadley, through her undersigned counsel, will take the deposition upon oral examination of Defendant Rajeshwara **commencing on May 27, 2026, at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C.

PLEASE TAKE FURTHER NOTICE that the foregoing deposition shall be conducted before a notary public or other duly authorized officer and will be recorded stenographically and/or

by videotape in accordance with Rules of Court. The deposition shall continue from day to day, weekends and holidays excepted, until completed, unless otherwise agreed by the parties.

McOMBER, McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Maria Hadley

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: January 12, 2026

Christian V. McOmber, Esq. - NJ ID # 012292010
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 Peter D. Valenzano, Esq. - NJ ID # 037892010
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Attorneys for Plaintiff Maria Hadley

<p>MARIA HADLEY</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>LAMINGTON FARM CLUB, LLC d/b/a TRUMP NATIONAL GOLF CLUB, BEDMINSTER; PATRICO NEIRA; POTHULA RAJESHWARA; ROBIN GUBANTES; DAVID SCHUTZENHOFER; ABC CORPORATIONS 1-5 (fictitious names describing presently unidentified business entities); and JOHN DOES 1-5 (fictitious names describing presently unidentified individuals),</p> <p style="text-align: right;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MORRIS COUNTY</p> <p>DOCKET NO.:</p> <p style="text-align: center;"><u>Civil Action</u></p> <p style="text-align: center;">NOTICE OF <u>R. 4:14-2</u> AND <u>R. 4:14-9</u> VIDEO DEPOSITION OF DEFENDANT ROBIN GUBANTES</p>
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PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiff Maria Hadley, through her undersigned counsel, will take the deposition upon oral examination of Defendant Gubantes **commencing on May 28, 2026, at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C.

PLEASE TAKE FURTHER NOTICE that the foregoing deposition shall be conducted before a notary public or other duly authorized officer and will be recorded stenographically and/or

by videotape in accordance with Rules of Court. The deposition shall continue from day to day, weekends and holidays excepted, until completed, unless otherwise agreed by the parties.

McOMBER, McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Maria Hadley

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: January 12, 2026

Christian V. McOmber, Esq. - NJ ID # 012292010

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Peter D. Valenzano, Esq. - NJ ID # 037892010

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Jennifer C. Iodice, Esq. – NJ ID #478512024

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54 Shrewsbury Avenue

Red Bank, NJ 07701

(732) 842-6500 Phone

Attorneys for Plaintiff Maria Hadley

MARIA HADLEY

Plaintiff,

vs.

LAMINGTON FARM CLUB, LLC d/b/a
TRUMP NATIONAL GOLF CLUB,
BEDMINSTER; PATRICO NEIRA;
POTHULA RAJESHWARA; ROBIN
GUBANTES; DAVID SCHUTZENHOFER;
ABC CORPORATIONS 1-5 (fictitious names
describing presently unidentified business
entities); and JOHN DOES 1-5 (fictitious names
describing presently unidentified individuals),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MORRIS COUNTY

DOCKET NO.:

Civil Action

**NOTICE OF R. 4:14-2 AND R. 4:14-9
VIDEO DEPOSITION OF DEFENDANT
DAVID SCHUTZENHOFER**

PLEASE TAKE NOTICE that pursuant to the New Jersey Rules of Court, Plaintiff Maria Hadley, through her undersigned counsel, will take the deposition upon oral examination of Defendant Schutzenhofer **commencing on May 29, 2026, at 10:00 AM**, at the law offices of McOmber McOmber & Luber, P.C.

PLEASE TAKE FURTHER NOTICE that the foregoing deposition shall be conducted before a notary public or other duly authorized officer and will be recorded stenographically and/or

by videotape in accordance with Rules of Court. The deposition shall continue from day to day, weekends and holidays excepted, until completed, unless otherwise agreed by the parties.

McOMBER, McOMBER & LUBER, P.C.
Attorneys for Plaintiff, Maria Hadley

By: /s/ Peter D. Valenzano
PETER D. VALENZANO, ESQ.

Dated: January 12, 2026

Civil Case Information Statement

Case Details: MORRIS | Civil Part Docket# L-000072-26

Case Caption: HADLEY MARIA VS LAMINGTON FARM CLUB, LLC

Case Initiation Date: 01/12/2026

Attorney Name: PETER DOUGLAS VALENZANO

Firm Name: MCOMBER MCOMBER & LUBER, PC

Address: 54 SHREWSBURY AVE

RED BANK NJ 07701

Phone: 7328426500

Name of Party: PLAINTIFF : MARIA HADLEY

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: LAW AGAINST DISCRIMINATION (LAD) CASES

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: MARIA HADLEY? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? YES

If yes, is that relationship: Employer/Employee

Does the statute governing this case provide for payment of fees by the losing party? YES

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO Medical Debt Claim? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

01/12/2026
Dated

/s/ PETER DOUGLAS VALENZANO
Signed

