

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

JANE DOE,**Plaintiff,****-against-****DEFENDANT'S
DEMAND FOR CHANGE
OF VENUE****Index No. 161704/2026****CORNELL UNIVERSITY, INC., CHI PHI
CHAPTER HOUSE ASSOCIATION, CHI
PHI FRATERNITY, INC., CHI PHI
EDUCATIONAL TRUST, ALPHA BETA
HOUSE CORPORATION OF DELTA
DELTA DELTA, DELTA DELTA DELTA
SORORITY, ZAREEN ENTERPRISE,
LLC, d/b/a MOONIES BAR AND
NIGHTCLUB, MATTHEW INGALLS,
JOHNATHAN NEWELL, WINSTON
LEE, GILLIO LOPES, DIETO SARABIA,
SCOTT NORRIS, SCOTT
KRETZSCHMAR, JOHN DOE
(FACULTY), JOHN DOE (ALUMNI),
JOHN DOES (EXECUTIVE BOARD), and
ORAZIO PETITO,
Defendants.**

S I R S :

PLEASE TAKE NOTICE, that Defendant ZAREEN ENTERPRISE, LLC, d/b/a MOONIES BAR AND NIGHTCLUB (hereinafter, "Zareen") hereby demands, pursuant to Section 503, Section 510, and Rule 511 of the New York Civil Practice Law and Rules (CPLR), that the place of trial of this action be changed from the County of New York to the County of Tompkins.

The grounds for this Demand are that the County of New York designated by Plaintiff is an improper county for the place of trial, and that the County of Tompkins is the proper county because:

1. Upon information and belief, none of the parties resided in New York County at the time of the commencement of this action pursuant to CPLR § 503(a).
2. The targets of Plaintiff's claims, including defendants CORNELL UNIVERSITY, INC., CHI PHI CHAPTER HOUSE ASSOCIATION, CHI PHI FRATERNITY, INC., CHI PHI EDUCATIONAL TRUST, ALPHA BETA HOUSE CORPORATION OF DELTA DELTA DELTA, DELTA DELTA DELTA SORORITY, and ZAREEN ENTERPRISE, LLC, d/b/a MOONIES BAR AND NIGHTCLUB, are all located, domiciled, or maintain their principal places of business and operations within the County of Tompkins.
3. All of the alleged occurrences, incidents, transactions, and acts complained of in Plaintiff's Second Amended Verified Complaint took place entirely within the City of Ithaca, New York, which is located within the County of Tompkins.
4. Virtually all material non-party witnesses, local law enforcement personnel, medical responders, and business records associated with the claims reside or are located in Tompkins County, meaning the convenience of material witnesses and the ends of justice will be promoted by changing the venue to Tompkins County pursuant to CPLR § 510(3).

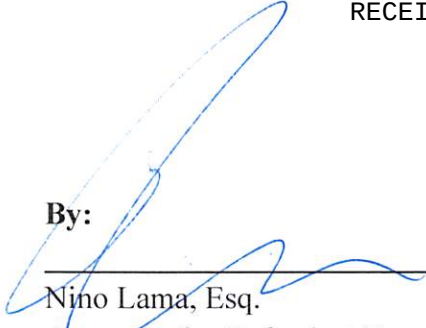
PLEASE TAKE FURTHER NOTICE, that pursuant to CPLR Rule 511(b), you are required to serve your written consent to the change of venue within five (5) days after service of this Demand upon you. In the event that you fail to serve such consent, a motion will be made to the Court to change the place of trial as demanded herein, and Defendant will seek costs and disbursements associated with the motion.

Dated: October 5, 2026
Ithaca, New York

Yours, etc.,

THE LAMA LAW FIRM, LLP

By:



Nino Lama, Esq.

Attorneys for Defendant Zareen Enterprise,
LLC,

d/b/a Moonies Bar and Nightclub

2343 N. Triphammer Rd.

Ithaca, New York 14850

(607) 275-3425

nino@lamalaw.com

TO: Thomas P. Giuffra, Esq.

VIA NYSCEF