

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

JANE DOE,

Plaintiff,

-against-

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 &
NIGHTCLUB, MATTHEW INGALLS, JOHNATHAN
NEWELL, WINSTON LEE, GILLIO LOPES, DIEGO
SARABIA, SCOTT NORRIS, SCOTT KRETZSCHMAR,
JOHN DOE (FACULTY), JOHN DOE (ALUMNI), JOHN
DOES (EXECUTIVE BOARD), and ORAZIO PETITO,
Defendant.

Index No.:

PLAINTIFF'S AFFIRMATION

Plaintiff [REDACTED] as JANE DOE, being duly sworn, affirms the contents of the following to be true under penalty of perjury:

1. I am the Plaintiff JANE DOE in this action. I am a victim of sexual abuse, sexual assault, and rape.

2. I submit this Affirmation in support of Plaintiff's Order to Show Cause to Proceed via Pseudonym pursuant to Civil Rights Law 50-b and other supporting authority and case law. I respectfully request that I be permitted to proceed anonymously using the pseudonym in the above-captioned matter and in all publicly filed documents, as well as to enjoin the Defendants and their agents from disclosing my name and/or identity to anyone other than their attorneys.

3. I am seeking to proceed anonymously because I was drugged, sexually assault, and raped by Defendants MATTHEW INGALLS, JOHNATHAN NEWELL, WINSTON LEE, GILLIO LOPES, DIEGO SARABIA, SCOTT NORRIS, and SCOTT KRETZSCHMAR, in October 2024 within the Xi Chapter of Chi Phi Fraternity's house located on Cornell University's campus.

4. I am seeking compensation from the individual defendants for the heinous sexual abuse I suffered, as well as against the institutional defendants for allowing, enabling, encouraging, aiding, and abetting said abuses to occur.

5. I am seeking to shield my identity from the stigma associated with the sexual assault and rape that I suffered. I strongly believe that proceeding in this matter henceforth via a pseudonym is in my best interests.

6. The risk of exposing my identity is particularly acute here as I was raped by multiple defendants while attending Cornell University as a full-time undergraduate student. I have since stopped attending Cornell University because of the subject incident.

7. What happened to me was devastating and humiliating. I fear that such details of the subject assaults being made public would bring further shame to not only myself, but to my family as well.

8. I fear that being identified by name in this lawsuit will hinder my social life and career. Exposing my identity will negatively affect my relationships, as these people will view me differently after discovering such personal information about me through a public filing. Attaching my name to this lawsuit may permanently tarnish my reputation, one that I have

worked so hard to rebuild.

9. I truly fear retribution and retaliation resulting from filing this lawsuit. Defendants have no regard for my health or safety. My assailants threatened my safety and wellbeing on numerous occasions, especially in plying me with copious amounts of drugs without any regard for the consequences.

10. Not only am I seeking to proceed anonymously as "JANE DOE", but I am also kindly requesting a partial Attorneys' Eyes Only (AEO) designation as to my sensitive personal information including my date of birth, SSN, residential address, phone number, and email address.

11. The worry of my identity being revealed in this lawsuit has caused me extreme anxiety, depression, and many sleepless nights.

12. I do not believe that Defendants will be negatively affected and/or prejudiced by allowing me to use a pseudonym in legal proceedings or by granting any of the requested relief. Defendants and their attorneys will be made aware of my true identity upon the filing of this lawsuit.

13. I believe that proceeding anonymously is within my best interests and will allow me to remain safe and maintain a sound sense of mind.

I affirm this 14 day of September 2026, under the penalties of perjury under the law of New York which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

Dated: New York, New York

September 14, 2026

By: [Signature]
[Redacted] as JANE DOE