

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

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BRIA S. FELIU,

Plaintiffs,

-against-

NATIONAL BASKETBALL ASSOCIATION, NATIONAL
BASKETBALL ASSOCIATION LEAGUE, NBA PROPERTIES,
INC., TODD JACOBSON, EVELYN STONE, ERIC
DIMICELI, KATHLEEN BEHRENS, BARBARA BUSH, and
PENELOPE JONES

Defendants
-----X

Summons

Index No.

Jury Demand

To the Defendant named above:

You are hereby summoned and required to serve a written answer to the attached Verified Complaint upon the Plaintiff's attorney at the address below.

If this Summons is personally delivered to you within the State of New York, you must serve your answer within twenty (20) days after such service, exclusive of the service date.

If this Summons is served upon you in any other manner authorized by law, you must serve your answer within thirty (30) days after service is complete, as provided by the New York Civil Practice Law and Rules.

Should you fail to appear or answer within the applicable period stated above, judgment may be entered against you by default for the relief demanded in the Verified Complaint, without further notice.

This action is venued in the Supreme Court of the State of New York County of the Bronx 851 Grand Concourse Bronx, New York 10451.

Dated: February 25, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders _____
Eric Sanders

Eric Sanders, Esq.
THE SANDERS FIRM, P.C.
30 Wall Street, 8th Floor
New York, NY 10005
(212) 652-2782 (Business Telephone)
(212) 652-2783 (Facsimile)

Website: <http://www.thesandersfirm.com>

DEFENDANT ADDRESSES

CORPORATE DEFENDANTS

Defendant NATIONAL BASKETBALL ASSOCIATION
(Employer-of-Record / EIN: 13-5582586)
100 Plaza Drive, Suite 3, Secaucus, NJ 07094

Defendant NATIONAL BASKETBALL ASSOCIATION LEAGUE
(Employer-of-Record / EIN: 13-5582586)
100 Plaza Drive, Suite 3, Secaucus, NJ 07094

Defendant NBA PROPERTIES, INC. (DOS ID: 213747)
645 Fifth Avenue, New York, NY 10022

INDIVIDUAL DEFENDANTS

(All individual defendants are sued in their individual and professional capacities at the following business address):

c/o National Basketball Association 645 Fifth Avenue New York, NY 10022

- TODD JACOBSON (Senior Vice President, Head of Social Responsibility)
- EVELYN STONE (Senior Employee Relations Partner)
- ERIC DIMICELI (Vice President of Social Responsibility)
- KATHLEEN BEHRENS (President of Social Responsibility and Player Programs)
- BARBARA BUSH (Head of Social Responsibility)
- PENELOPE JONES (Vice President and Global Head of Employee Relations)

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BRIA S. FELIU,

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NATIONAL BASKETBALL ASSOCIATION, NATIONAL
BASKETBALL ASSOCIATION LEAGUE, NBA PROPERTIES,
INC., TODD JACOBSON, EVELYN STONE, ERIC
DIMICELI, KATHLEEN BEHRENS, BARBARA BUSH, and
PENELOPE JONES

Defendants
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Verified Complaint

Index No.

Jury Demand

The Plaintiff BRIA S. FELIU, through her attorney, THE SANDERS FIRM, P.C., files this Verified Complaint against Defendants’ NATIONAL BASKETBALL ASSOCIATION, NATIONAL BASKETBALL ASSOCIATION LEAGUE, NBA PROPERTIES, INC., TODD JACOBSON, EVELYN STONE, ERIC DIMICELI, KATHLEEN BEHRENS, BARBARA BUSH, and PENELOPE JONES.

SUMMARY OF THE ALLEGATIONS

This case arises from race- and gender-based discrimination, a hostile work environment, and retaliation imposed on Plaintiff BRIA S. FELIU, a highly qualified, Emmy-award-winning marketing and production professional with a graduate degree, during her employment with the NATIONAL BASKETBALL ASSOCIATION, NATIONAL BASKETBALL ASSOCIATION LEAGUE, and NBA PROPERTIES, INC. (collectively, the “NBA”).

Plaintiff BRIA S. FELIU holds a B.A. in Public Relations/Image Management and an M.S. in Management with a specialization in Marketing, and in April 2021 she received an Emmy Award for Outstanding Interactive Experience – Event Coverage for her work producing

influencer streams during the NBA’s bubble season. Despite credentials and experience that the NBA relied upon in a storytelling/brand/social-impact environment—and despite Plaintiff’s allegation that Black women in the group were, as a class, more highly educated and more experienced in sports marketing than other racial and gender groups. Plaintiff BRIA S. FELIU alleges she was treated less well because of race and gender, channeled into subordinate “assistant” labor, denied advancement, and punished for opposing discriminatory conduct.

Plaintiff BRIA S. FELIU entered the NBA Social Responsibility Department from a unionized project-employee role (NABET) in the New Jersey office after being recruited through internal introductions and interviews in late May and early June 2021, and she began in the role on July 12, 2021. From the outset, she alleges she was overworked amid persistent turnover, subjected to “cultural fit” messaging applied disparately to employees of color, and undermined by management, setting a race- and gender-coded framework in which her competence, demeanor, and “fit” were judged more harshly than others.

The discrimination escalated into explicit race-based misconduct in April 2022 when Ben Alon refused to perform a core work task tied to an HBCU initiative because he was not Black and did not attend an HBCU. Plaintiff BRIA S. FELIU reported this conduct to her manager Defendant TODD JACOBSON, and the matter was escalated to Employee Relations through Defendant EVELYN STONE; however, Plaintiff BRIA S. FELIU alleges senior management—particularly Defendant ERIC DIMICELI—dismissed and minimized the incident, effectively ratifying discriminatory conduct and signaling that complaints about race-based mistreatment would be neutralized rather than remedied.

Thereafter, Plaintiff BRIA S. FELIU alleges the NBA treated her less well because of race and gender by repeatedly relegating her to “assistant” and “catch-all” functions inconsistent

with her credentials and proven performance, denying her clarity and advancement, and maintaining inequitable compensation dynamics—including after she received praise and an 11% raise to \$74,500 while comparable roles were posted at similar pay requiring far less experience. She further alleges that when she raised concerns about workload, role clarity, and compensation, Defendant TODD JACOBSON responded in a manner that discouraged escalation and reinforced that she would bear consequences for pushing back, and that management and HR processes functioned as deterrents rather than protections.

Following the July 2023 layoffs and leadership departures, Plaintiff BRIA S. FELIU alleges Defendant ERIC DIMICELI intensified race- and gender-linked targeting through micromanagement, disparagement, and the construction of a negative narrative about her performance and professionalism. Plaintiff BRIA S. FELIU further alleges that departmental leadership—including Defendant KATHLEEN BEHRENS—failed to intervene, and that Defendant BARBARA BUSH later operated within and reinforced the same environment of marginalization and devaluation, including after Plaintiff returned from medical leave taken for work-related stress.

On April 11, 2024, after Plaintiff BRIA S. FELIU reported that Defendant ERIC DIMICELI was creating a hostile work environment and treating women of color differently—including in comparison to Black men and white colleagues—Employee Relations head Defendant PENELOPE JONES opened an investigation. Soon thereafter, Plaintiff received a sharply negative mid-year review she alleges contradicted her actual performance and previously approved goals, and she alleges that throughout summer and early fall 2024 the NBA escalated hostility and retaliation through sabotage of projects, berating and punitive scrutiny, and unreasonable demands during serious illness.

On November 4, 2024, the NBA terminated Plaintiff BRIA S. FELIU effective immediately. Plaintiff alleges the termination was expedited to block an internal transfer and was carried out without a performance improvement plan or coherent explanation at the time of discharge, including through the involvement of Employee Relations personnel such as Defendant EVELYN STONE, and that the discharge was the culmination of a race- and gender-driven course of conduct designed to devalue, marginalize, and ultimately remove a highly qualified woman of color who opposed discriminatory treatment and invoked internal complaint mechanisms.

These facts support the following claims, asserted in this Complaint in the sequence pled:

- a) N.Y. Exec. Law § 296 (NYSHRL) — Race and Gender Discrimination (including intersectional discrimination against a woman of color).
- b) N.Y. Exec. Law § 296 (NYSHRL) — Hostile Work Environment based on Race and Gender (including intersectional hostility toward a woman of color).
- c) N.Y. Exec. Law § 296 (NYSHRL) — Retaliation for opposing and reporting discrimination and hostile conduct based on Race and Gender.
- d) N.Y.C. Admin. Code § 8-107 (NYCHRL) — Race and Gender Discrimination (treated less well because of race and gender, including intersectional discrimination).
- e) N.Y.C. Admin. Code § 8-107 (NYCHRL) — Hostile Work Environment based on Race and Gender (treated less well, including intersectional hostility).
- f) N.Y.C. Admin. Code § 8-107 (NYCHRL) — Retaliation (conduct reasonably likely to deter protected activity opposing discrimination based on Race and Gender).

Plaintiff BRIA S. FELIU seeks compensatory damages, emotional distress damages, punitive damages where permitted, injunctive and declaratory relief, and attorneys' fees and costs as authorized by law.

JURISDICTION AND VENUE

1. The jurisdiction of this Court is invoked under the laws of the State of New York to secure protection of and to redress the deprivation of rights secured by state and local law, including:

- a) N.Y. Exec. Law § 296 (NYSHRL) — employment discrimination based on race and gender, hostile work environment, and retaliation; and
- b) N.Y.C. Admin. Code § 8-107 (NYCHRL) — employment discrimination based on race and gender, hostile work environment, and retaliation.

2. This Court has subject matter jurisdiction over these claims pursuant to the New York State Constitution and applicable statutes, including CPLR § 301, because this is an action for legal and equitable relief arising under the NYSHRL and NYCHRL.

3. This Court has personal jurisdiction over Defendants pursuant to CPLR §§ 301 and 302, because, upon information and belief, Defendants transact business in New York, maintain offices and operations in New York, employ personnel in New York, and committed and/or directed the discriminatory, retaliatory, and hostile acts complained of within the State of New York, including at NBA offices located at or associated with 645 Fifth Avenue, New York, N.Y. 10022.

4. Venue is proper in Bronx County pursuant to CPLR § 503(a) because Plaintiff BRIA S. FELIU resides in Bronx County, and the economic, professional, and emotional harms caused by Defendants' unlawful conduct were sustained by Plaintiff in Bronx County. Venue is

independently proper based on Plaintiff's residence.

5. Plaintiff BRIA S. FELIU further alleges, in anticipation of any potential motion to change venue under CPLR § 510, that Bronx County remains an appropriate, convenient, and equitable forum for this action. Plaintiff's residence in Bronx County places the locus of continuing harm within this County, including the ongoing impact on Plaintiff's health, livelihood, and professional standing. Defendants are sophisticated entities and individuals with the capacity to litigate in Bronx County, and any relocation would unduly burden Plaintiff while providing no material increase in convenience to witnesses or furtherance of justice.

6. Upon information and belief, Defendants challenged employment practices and decision-making are part of interstate operations and involve conduct affecting employees and business activities throughout the United States; however, Plaintiff BRIA S. FELIU alleges the discriminatory and retaliatory conduct at issue was implemented, directed, and/or felt in New York, and Plaintiff has at all relevant times been a resident of Bronx County, N.Y.

PROCEDURAL REQUIREMENTS

7. Plaintiffs Plaintiff BRIA S. FELIU, has filed suit with this Court within the applicable statute of limitations period.

PLAINTIFF BRIA S. FELIU

8. PLAINTIFF BRIA S. FELIU is a Black woman and a citizen of the State of New York, over eighteen (18) years of age. She resides in Bronx County, New York. At all relevant times, BRIA S. FELIU was employed by Defendants in the NBA's Social Responsibility Department and was subjected to the discriminatory, hostile, and retaliatory conduct alleged herein.

DEFENDANTS'

9. Defendant NATIONAL BASKETBALL ASSOCIATION, is a business entity and/or trade name of the National Basketball Association, identified on Plaintiff BRIA S. FELIU'S wage and tax records as a purported employer, utilizing Employer Identification Number (EIN) 13-5582586, with a primary service and payroll address located at 100 Plaza Drive, Suite 3, Secaucus, New Jersey 07094.

10. Defendant NATIONAL BASKETBALL ASSOCIATION LEAGUE, is a business entity and/or trade name of the National Basketball Association, identified on Plaintiff BRIA S. FELIU'S wage and tax records as a purported employer, utilizing Employer Identification Number (EIN) 13-5582586, with a primary service and payroll address located at 100 Plaza Drive, Suite 3, Secaucus, New Jersey 07094.

11. Defendant NBA PROPERTIES, INC., is a domestic business corporation duly organized and existing under the laws of the State of New York (DOS ID: 213747), with a designated address for service of process at 645 Fifth Avenue, New York, New York 10022. Defendant NBA Properties, Inc. serves as the commercial and operational arm of the National Basketball Association.¹

¹ **The Single Integrated Enterprise:** At all times relevant to this action, Defendants National Basketball Association, National Basketball Association League, and NBA Properties, Inc. (collectively, "the NBA Defendants") have operated as a single integrated enterprise. The NBA Defendants share common management, centralized control of labor relations, interrelated operations, and common ownership or financial control.

Joint Employer Status: Upon information and belief, the NBA Defendants acted as joint employers of the Plaintiff BRIA S. FELIU. Each entity exercised significant and substantial control over the essential terms and conditions of Plaintiff's employment, including but not limited to:

The authority to hire and terminate employment;

The supervision and control of Plaintiff's daily work schedules and assignments;

12. Defendant TODD JACOBSON, is an individual who, at all times relevant, served as the Senior Vice President and Head of Social Responsibility for the National Basketball Association. Defendant JACOBSON is sued in his individual and professional capacities as a primary decision-maker who received reports of discriminatory conduct and subsequently engaged in role/compensation conflicts and HR-deterrence messaging against the Plaintiff.

13. Defendant EVELYN STONE, is an individual who, at all times relevant, served as a Senior Employee Relations Partner for the National Basketball Association. Defendant STONE is sued in her individual and professional capacities as the Employee Relations recipient

The determination of the rate and method of payment; and

The maintenance of Plaintiff's employment and personnel records.

Inconsistency in Records: While Plaintiff BRIA S. FELIU performed her professional duties at the NBA offices located at 645 Fifth Avenue, New York, New York 10022, her 2023 and 2024 wage and tax records inconsistently identified her employer as "National Basketball Association" and/or "National Basketball Association League" at the Secaucus, New Jersey address.

Reservation of Rights: Plaintiff BRIA S. FELIU names these entities in an abundance of caution to ensure all proper parties are before the Court. Plaintiff expressly reserves the right to amend or conform these pleadings to the proof as discovery clarifies the precise "employer-of-record" structure, specifically regarding the intermingling of payroll, benefits, and the decision-making chain of command within the various NBA affiliates.

Liability: Upon information and belief, each individual defendant exercised supervisory authority and control over plaintiff's terms and conditions of employment and/or acted as an agent of the employer.

To the extent any individual defendant qualifies as an employer within the meaning of the NYSHRL and/or NYCHRL, that individual is directly liable for the discriminatory and retaliatory conduct alleged herein; in all events, each individual defendant is liable for aiding and abetting such unlawful conduct.

of the April 2022 escalation involving the HBCU-related race-based refusal and as a participant in the subsequent termination of Plaintiff's employment.

14. Defendant ERIC DIMICELI, is an individual who, at all times relevant, served as the Vice President of Social Responsibility for the National Basketball Association. Defendant DIMICELI is sued in his individual and professional capacities as a dominant actor in the post-2022 and post-layoff narrative, who allegedly engaged in the minimization of Plaintiff's complaints, undermining, and disparagement of Plaintiff's professional performance. Furthermore, Defendant DIMICELI exercised supervisory authority over Plaintiff's performance reviews and played a direct role in the decision-making process resulting in the termination of Plaintiff's employment.

15. Defendant KATHLEEN BEHRENS, is an individual who, at all times relevant, served as the President of Social Responsibility and Player Programs for the National Basketball Association. Defendant BEHRENS is sued in her individual and professional capacities as the department head who exercised ultimate supervisory authority over the Plaintiff's division. She is alleged to have participated in the narrative regarding Plaintiff's medical leave and health-related matters and further engaged in the support and ratification of the discriminatory and retaliatory acts committed by subordinate managers.

16. Defendant BARBARA BUSH, is an individual who, at all times relevant, served as the Head of Social Responsibility (and/or Senior Vice President of Social Impact) for the National Basketball Association. Defendant BUSH is sued in her individual and professional capacities as a senior executive who joined the organization in or around late 2022. She is alleged to have had knowledge of, or remained indifferent to, the discriminatory environment reported by the Plaintiff. Furthermore, Defendant BUSH is alleged to have supervised the

Plaintiff's return-from-leave dynamic and aligned herself with the adverse employment actions that culminated in the termination of Plaintiff's employment.

17. Defendant PENELOPE JONES, is an individual who, at all times relevant, served as the Vice President and Global Head of Employee Relations for the National Basketball Association. Defendant JONES is sued in her individual and professional capacities as a high-level executive who oversaw the April 2024 investigation, conducted the June 2024 meeting, and presided over the August 2024 closure of Plaintiff's internal complaints. She is alleged to have orchestrated the Employee Relations and Human Resources processes in a manner that linked directly to the adverse employment actions and the ultimate termination of Plaintiff's employment.

BACKGROUND

18. Prior to joining the Social Responsibility Department, Plaintiff BRIA S. FELIU was a project employee in a unionized contract role under NABET and worked in the NBA's New Jersey office as a Production Assistant.

19. Plaintiff BRIA S. FELIU did not apply for the Social Responsibility position before it was offered to her; instead, she was introduced by John Hareas (White, Male), Vice President, Editorial and Daily Content Management, to Tara Schwartz (White, Female), who advised her in a conversation on May 28, 2021, that there were two openings.

20. On June 1, 2021, Plaintiff BRIA S. FELIU was contacted via Slack about the position and her availability to interview.

21. On June 4, 2021, at approximately 2:30 p.m., Plaintiff BRIA S. FELIU met with Daniel Feinberg (White, Male), who stated that he started out in the role and that, if he "could go back in time, he wouldn't take the job."

22. Later that day at approximately 3:30 p.m., Plaintiff BRIA S. FELIU interviewed with Defendant TODD JACOBSON (White, Male), whose only question to her was, “what did you hear about me because I’ve heard nothing but great things about you.”

23. The following week, Nick Bishop (Black, Male), a Talent Acquisitioner, contacted Plaintiff BRIA S. FELIU and informed her that he was on vacation but that Defendant TODD JACOBSON wanted to hire her.

24. Bishop instructed Plaintiff BRIA S. FELIU to tell her then-manager to avoid any “bad blood” between departments and stated that he would post the job so she could apply as soon as possible.

25. Upon her hiring, Plaintiff BRIA S. FELIU was warned by Hareas and Cheryl Stallings (Black, Female), Vice President, International Content and Programming, that Social Responsibility was a tight-knit group and that they were “like a family,” and to be mindful of that.

26. On July 12, 2021, Plaintiff BRIA S. FELIU joined the NBA Social Responsibility Department, a subgroup of Social Responsibility & Player Programs led by Defendant KATHLEEN BEHRENS (White, Female).

27. Plaintiff BRIA S. FELIU was assigned to work under the direction of Defendant TODD JACOBSON, the head of Social Responsibility and plaintiff’s manager.

28. The job title at issue during the relevant period was SOCIAL RESPONSIBILITY PROGRAM COORDINATOR.

29. The position summary for SOCIAL RESPONSIBILITY PROGRAM COORDINATOR states that the role assists in the planning, coordination, and promotion of the NBA’s social impact efforts, supports the successful execution and promotion of NBA Cares

tentpole activations, helps ensure the smooth functioning of the Employee Volunteer Program (“EVP”), and manages both the administrative needs of the department and the Head of Social Responsibility.

30. The major responsibilities of the role include: (a) coordinating organizational logistics for the Social Responsibility department; (b) tracking programs and events; (c) maintaining the social responsibility calendar; (d) managing department orders and storage of supplies; (e) coordinating donations and tracking expenses; (f) supporting the Head of Social Responsibility by managing calendar, travel, meetings, speaking engagements, and expenses; (g) assisting on planning, communication, and implementation of NBA/WNBA/G League social impact programming, including drafting planning materials, organizing meetings, managing events, and tracking follow-up tasks; (h) helping lead EVP communications, activities, and events; (i) serving as a liaison across departments in a cross-functional environment; (j) managing community partner relationships; (k) coordinating approvals and stakeholder input; and (l) communicating key issues internally through status updates while proactively recommending solutions.

31. The required skills and knowledge for the role include, among other things, project and partnership management, cross-functional stakeholder engagement, strong attention to detail and process, the ability to work under pressure in a fast-paced environment with minimal direction, strong written and verbal communication, and the ability to manage multiple projects and priorities with flexibility.

32. Plaintiff BRIA S. FELIU alleges that, from the outset of her tenure through termination, she performed the job as designed—i.e., she was required to function simultaneously as operational coordinator, program logistics driver, EVP support lead, and

administrative support for the Head of Social Responsibility—often absorbing additional duties triggered by turnover, vacancies, and shifting leadership demands.

33. Plaintiff BRIA S. FELIU further alleges that, notwithstanding the formal description that frames these responsibilities as professional program coordination and cross-functional delivery, defendants repeatedly treated and described her labor as “assistant” work and “support” work in a manner that minimized her role, discounted her contributions, and reinforced a subordinate status consistent with race- and gender-coded workplace expectations applied to Black women.

34. Plaintiff BRIA S. FELIU alleges that defendants’ recurring use of subjective “culture,” “fit,” and demeanor narratives—along with public undermining, minimization of complaints, and hostility when she sought clarity, workload relief, and equitable compensation—operated as a mechanism to extract the full scope of the coordinator role while denying plaintiff the professional standing, advancement pathway, and equal treatment that the job design itself contemplates.

35. Plaintiff BRIA S. FELIU further alleges that, when she opposed discriminatory treatment and raised concerns about being overqualified, underpaid, and treated as an assistant, defendants responded not by aligning her role to the job’s professional scope, but by escalating scrutiny, generating negative narratives, and ultimately citing subjective “culture” and “difficulty working with her” as purported justification for termination.

36. Plaintiff BRIA S. FELIU alleges that, during her employment in the NBA’s Social Responsibility Department, department leaders including Defendants TODD JACOBSON and ERIC DIMICELI and colleagues routinely invoked race, national origin, and related identity categories as decision-making criteria in the department’s external-facing work, including how

the department approached community engagement, programming, and stakeholder-facing matters involving players and franchises.

37. Plaintiff BRIA S. FELIU alleges that she rejected and objected to the use of race and national origin as impermissible factors in departmental decision-making, and that she expressed concern that identity-based prioritization was being applied inconsistently across groups.

38. Plaintiff BRIA S. FELIU alleges that, in that context, she raised the concern that the department's posture toward the Jewish community reflected a heightened institutional sensitivity and protection when compared to how other communities were treated, and that she questioned whether the department's identity-based framing and allocation choices were being applied in a principled, evenhanded, and non-discriminatory manner.

39. Plaintiff BRIA S. FELIU alleges that after she made these objections and raised these concerns, she was shunned and marginalized within the group, including being treated as outside the "family" culture, excluded from workplace communications and opportunities, and subjected to increasing hostility and "culture" policing.

40. Plaintiff BRIA S. FELIU alleges that this shunning and marginalization constituted retaliatory conduct—reasonably likely to deter protected activity—because it followed her opposition to what she reasonably believed were discriminatory or impermissible identity-based practices and messaging within the department.

41. During Plaintiff BRIA S. FELIU'S first year and a half in the department, there was substantial turnover, and the recurring directive communicated within the group was that "we all need to step up and do more."

42. Throughout this period, Plaintiff BRIA S. FELIU did not receive negative performance reviews and was told that she was managing faster than others who previously held her role.

43. Notwithstanding that performance, Plaintiff BRIA S. FELIU alleges she was routinely overworked and pressured to exceed normal expectations in a department culture that treated excessive workload as a baseline requirement.

44. Plaintiff BRIA S. FELIU further alleges that the department's internal culture used "cultural fit" language as a proxy for exclusion, particularly regarding employees of color, particularly Black women.

45. Plaintiff BRIA S. FELIU overheard comments within the group about the prior employee in her role, Carlos Martinez (Latinx, Male), including that he was "lazy" and "not a cultural fit for the group." These remarks reinforced a workplace environment in which employees of color; particularly Black women were evaluated through stigmatizing stereotypes and subjective "fit" narratives rather than objective performance.

46. In or about this same period, Plaintiff BRIA S. FELIU placed a hold on the department calendar to organize the storage closet as part of workplace organization and operational support.

47. In response, Defendant TODD JACOBSON instructed Plaintiff BRIA S. FELIU to join a meeting concerning the calendar hold.

48. During that meeting, Daniel Feinberg (White, Male) made a disparaging comment implying that Plaintiff BRIA S. FELIU was "not doing anything" and that she "should be present," undermining her credibility and contributions in front of others.

49. Following the meeting, Micah Tannenbaum (White, Male) and Amber Scott (Black, Female) offered Plaintiff BRIA S. FELIU encouraging and supportive remarks.

50. In contrast, Defendant ERIC DIMICELI (White, Male) responded by minimizing the incident, telling Plaintiff BRIA S. FELIU that Feinberg “did not mean that in a negative way” and that she should not let it bother her.

51. Plaintiff BRIA S. FELIU alleges that this minimization reflected a broader management practice within the department of dismissing and neutralizing concerns raised by women of color, particularly Black women rather than addressing the conduct or correcting the workplace environment.

52. From July 12, 2021 through April 27, 2022, Plaintiff BRIA S. FELIU was subjected to the same demeaning and undermining behaviors in the workplace, including public disparagement, minimization of her concerns, and workplace dynamics that treated excessive workload as a baseline expectation.

53. During this period, Plaintiff BRIA S. FELIU did not make a formal complaint because she feared losing her employment.

54. During the same timeframe, Plaintiff BRIA S. FELIU was routinely overworked and pressured to exceed normal expectations in a department culture that treated chronic overwork as a default requirement rather than an exception.

55. Plaintiff BRIA S. FELIU alleges this structure disproportionately burdened her and reinforced the subordinate role she was expected to play, despite her strong performance.

56. Plaintiff BRIA S. FELIU further alleges that remarks and conduct within the department reinforced a workplace environment in which employees of color, particularly Black

Women were evaluated through stigmatizing stereotypes and subjective “cultural fit” narratives rather than objective performance.

57. Plaintiff BRIA S. FELIU alleges this environment contributed to the normalization of disrespectful treatment toward employees of color, particularly Black women and shaped how her work was perceived and discussed.

58. On or about April 27, 2022, Plaintiff BRIA S. FELIU oversaw social responsibility efforts connected to the 2K League and worked with Ben Alon (White, Male), who was assigned to lead social responsibility efforts for the 2K League, including a panel discussion at an HBCU.

59. Plaintiff BRIA S. FELIU added Scott, and Kamelah Muhammad (Black, Female), Social Responsibility Program Manager, to the working communications because they oversaw the initiative.

60. On April 26, 2022, due to scheduling conflicts with Plaintiff BRIA S. FELIU and Muhammed, Scott took a conference call alone with Alon regarding the HBCU panel and related deliverables.

61. During that conference call and/or in communications surrounding it, Alon refused to create a document necessary for the event and stated words to the effect that he would not do so because he was not Black and did not attend an HBCU.

62. Plaintiff BRIA S. FELIU reported Alon’s statement and refusal as racial discrimination to Defendant TODD JACOBSON, Head of Social Responsibility and plaintiff’s manager.

63. Defendant TODD JACOBSON confirmed to Plaintiff BRIA S. FELIU that Alon’s statement was inappropriate.

64. Defendant TODD JACOBSON and Schwartz, escalated the incident to Employee Relations through Defendant EVELYN STONE.

65. Notwithstanding the escalation to Employee Relations, Plaintiff BRIA S. FELIU alleges that senior management failed to take appropriate corrective action.

66. Defendant ERIC DIMICELI, Senior Director, dismissed Alon's comment and refusal, suggesting that Scott had taken it out of context and that Alon "meant nothing by it."

67. Plaintiff BRIA S. FELIU alleges this dismissal minimized race-based misconduct, signaled tolerance of discriminatory behavior, and contributed to a hostile work environment by discouraging reporting and insulating the wrongdoer from accountability.

68. Plaintiff BRIA S. FELIU further alleges that Defendant ERIC DIMICELI'S minimization and dismissal functioned as retaliatory discouragement—conduct intended and reasonably likely to deter FELIU and others from opposing discrimination or pursuing internal complaint mechanisms going forward.

69. Between April 27, 2022 and early November 2022, Plaintiff BRIA S. FELIU was subjected to the same types of demeaning, undermining, and dismissive workplace conduct described above, including being overworked, publicly undermined, and treated in a manner that reinforced "cultural fit" policing and subjective narratives rather than objective performance.

70. Plaintiff BRIA S. FELIU continued to experience a workplace environment in which race- and gender-coded dynamics shaped how her work, demeanor, and role were evaluated, and in which internal reporting mechanisms did not result in meaningful remediation.

71. In or about November 2022, during the "Season of Giving" project, Plaintiff BRIA S. FELIU received conflicting instructions from Defendant ERIC DIMICELI regarding project ownership and responsibilities.

72. Plaintiff BRIA S. FELIU'S colleague Muhammad likewise received conflicting direction, and the lack of clarity was compounded by Muhammad's manager, Schwartz.

73. As a result of this mismanagement and conflicting direction, Plaintiff BRIA S. FELIU was forced to assume a significant workload, including managing both internal and external initiatives to keep the project moving.

74. During this same period, Plaintiff BRIA S. FELIU declined an invitation from Defendant TODD JACOBSON and Feinberg to watch a World Cup game during the workday because she was overwhelmed by workload and competing deadlines.

75. Afterward, Defendant TODD JACOBSON requested to speak with Plaintiff BRIA S. FELIU.

76. Plaintiff BRIA S. FELIU explained that she was overwhelmed and struggling to manage Defendant TODD JACOBSON'S requests, the "Season of Giving" project, and additional requests from colleagues.

77. Defendant TODD JACOBSON told plaintiff BRIA S. FELIU to focus on internal matters and to seek clarification if she was confused.

78. When Plaintiff BRIA S. FELIU raised that she was receiving conflicting instructions from Defendant ERIC DIMICELI and Schwartz, defendant TODD JACOBSON directed her to speak with them.

79. Defendant ERIC DIMICELI represented that he would address the issue with Schwartz; however, he failed to do so, and Plaintiff BRIA S. FELIU was left to resolve the confusion and complete the work herself.

80. Plaintiff BRIA S. FELIU questioned her role and responsibilities, explaining that she did not know whether she was being treated as a coordinator, an executive assistant, or a

department assistant, and she raised concerns about her compensation in light of the scope of work being imposed on her.

81. Defendant TODD JACOBSON responded by yelling at Plaintiff BRIA S. FELIU and stating words to the effect that she was the “coordinator who assisted him,” and that if others continued “dumping” work on her, she needed to make him aware.

82. Plaintiff BRIA S. FELIU and Defendant TODD JACOBSON discussed compensation, delegation, and plaintiff’s lack of growth opportunities due to chronic confusion and expansion of her “supporting” responsibilities.

83. Defendant TODD JACOBSON advised Plaintiff BRIA S. FELIU to leave if she was unhappy, but also stated words to the effect that she “would be wrong to leave over money.”

84. A few weeks later, Plaintiff BRIA S. FELIU received her end-of-year review.

85. Defendant TODD JACOBSON praised Plaintiff BRIA S. FELIU’S work and awarded her an 11% increase, bringing her salary to \$74,500.

86. Approximately one week later, a job posting for Sheley Riester’s role appeared with the same salary but fewer stated experience requirements (0–2 years).

87. Plaintiff BRIA S. FELIU alleges this reflected discriminatory compensation and devaluation of her labor, including because she was expected to perform expanded, high-output work without corresponding title and pay progression.

88. Plaintiff BRIA S. FELIU further alleges that she believed she was hired in part because of her race and gender in the context of the NBA’s social justice push in 2021.

89. Plaintiff BRIA S. FELIU did not raise that belief directly with Defendant TODD JACOBSON, but did raise it in communications with Annie Horn and Defendant ERIC DIMICELI.

90. At this point, Plaintiff BRIA S. FELIU became further dismayed because she saw no pathway to growth within the NBA.

91. Plaintiff BRIA S. FELIU alleges that, despite her demonstrated performance and increasing workload, she was being held in a stagnant, subordinate role without meaningful advancement opportunities and that this lack of mobility was tied to race and gender, including her status as a Black woman.

92. From early December 2022 through February 2023, Plaintiff BRIA S. FELIU was subjected to the same types of treatment described above, including being overworked, assigned unclear and shifting responsibilities, and treated as a catch-all resource without a corresponding title, compensation, or advancement pathway.

93. Plaintiff BRIA S. FELIU further alleges that the pattern of undermining conduct, dismissive management responses, and race- and gender-linked devaluation continued during this period.

94. In or about February 2023, Plaintiff BRIA S. FELIU was assigned to the All-Star Day of Service and worked with Lindsay Gilder (White, Female), a Social Responsibility Program Manager.

95. Plaintiff BRIA S. FELIU alleges that Gilder was not collaborative and treated her as though she were an assistant, despite plaintiff's existing responsibilities, including managing Defendant TODD JACOBSON'S schedule and preparing for other All-Star events that she was leading.

96. Plaintiff BRIA S. FELIU further alleges that Gilder created a hostile work environment by being uncooperative and leaving her to handle tasks alone.

97. As an example, Gilder directed Plaintiff BRIA S. FELIU to drop several boxes off at five hotels, despite knowing plaintiff's logistical limitations, including that she does not drive.

98. On February 17, 2023, while Plaintiff BRIA S. FELIU was waiting for Gilder outside a Starbucks, plaintiff was threatened with a knife.

99. Plaintiff BRIA S. FELIU alleges that Gilder showed a complete lack of concern and responded by asking words to the effect of whether plaintiff "seriously" did not drive, rather than addressing her safety and wellbeing.

100. Plaintiff BRIA S. FELIU reported the incident to her manager, Defendant TODD JACOBSON, and also notified security.

101. Plaintiff BRIA S. FELIU alleges that Employee Relations contacted her the following day while she was working at an activation to ask what occurred.

102. Plaintiff BRIA S. FELIU was told that Employee Relations had resources and would follow up; however, she alleges that no meaningful follow-up occurred.

103. Plaintiff BRIA S. FELIU alleges that, despite reporting the incident and raising concerns about Gilder's conduct and lack of concern for her safety, the NBA did not take meaningful corrective action.

104. Upon information and belief, Gilder was not disciplined, counseled, or otherwise held accountable for her conduct in connection with the February 17, 2023 incident or for how she managed Plaintiff BRIA S. FELIU'S safety-related situation.

105. In or about March 2023, Plaintiff BRIA S. FELIU continued conversations with Defendant TODD JACOBSON regarding her role, workload, and lack of clarity in responsibilities.

106. Plaintiff BRIA S. FELIU followed up directly with Defendant TODD JACOBSON because he had told her multiple times that if there were issues, she should come to him and not HR, and that matters could be handled within his office.

107. During these conversations, Defendant TODD JACOBSON acknowledged that Plaintiff BRIA S. FELIU'S role had "always been a pain point for others," but suggested that she consider other areas such as team services or partnerships within the department.

108. Defendant TODD JACOBSON also stated words to the effect of, "let me be careful what I say to you because I know you'll bring it up and remind me months later," which Plaintiff BRIA S. FELIU understood as a warning and as discouragement from documenting or escalating concerns.

109. Defendant TODD JACOBSON further advised Plaintiff BRIA S. FELIU to work more closely with him and with Schwartz, and stated that Defendant ERIC DIMICELI, Senior Director, was not a "good manager" due to his micromanagement style.

110. Plaintiff BRIA S. FELIU alleges this placed her in a difficult position because both Defendant TODD JACOBSON and Schwartz frequently canceled or rescheduled their weekly one-on-one meetings with her, leaving plaintiff without consistent supervision, support, or a reliable forum to address workload, role clarity, or discriminatory and hostile conduct.

111. In or about April 2023, Plaintiff BRIA S. FELIU met with Zoraida Colon (Latinx, Female), a Senior HR Generalist, to inquire about the resignation process.

112. Plaintiff BRIA S. FELIU and Colon had previously been in the same Career Development course when plaintiff moved to the Social Responsibility department.

113. During this meeting, Plaintiff BRIA S. FELIU asked that their conversation remain between the two of them when Colon inquired about her interest in resigning.

114. The following day, Colon contacted Plaintiff BRIA S. FELIU via Slack and asked to speak in person.

115. Colon told Plaintiff BRIA S. FELIU that she had to raise the issues discussed to her HR Business Partner, David Flam (White, Male), because what plaintiff had shared was “extremely concerning” regarding her treatment.

116. Plaintiff BRIA S. FELIU was disappointed that her request for discretion was not honored, but she expected that HR would now address the concerns she had raised.

117. Despite that escalation, Plaintiff BRIA S. FELIU alleges she did not hear from Flam for months and did not receive meaningful HR outreach or intervention.

118. Plaintiff BRIA S. FELIU alleges she only heard from Flam later, after she independently reached out in or about fall 2023 prior to going on leave.

119. Instead of receiving support, Plaintiff BRIA S. FELIU alleges that information about her HR contact was used to monitor and pressure her.

120. In or about this same period, Defendant TODD JACOBSON stated words to the effect of, “I know where your head is at, I know you went to HR,” which Plaintiff BRIA S. FELIU understood as confirmation that her communications with HR were known to management and were being tracked and held against her.

121. From mid-April 2023 through September 21, 2023, Plaintiff BRIA S. FELIU was subjected to the same types of treatment described above, including being overworked, assigned unclear and shifting responsibilities, and treated as a catch-all resource without a corresponding title, compensation, or advancement pathway. Plaintiff BRIA S. FELIU further alleges that the pattern of undermining conduct, dismissive management responses, and race- and gender-linked devaluation continued during this period.

122. Plaintiff BRIA S. FELIU alleges that after the July 2023 layoffs and leadership departures, the department did not receive clarity on its new reporting structure until September 21, 2023.

123. Prior to that clarification, Defendant ERIC DIMICELI asked Plaintiff BRIA S. FELIU to prepare an updated list of her responsibilities, stating it was intended to provide more structure and to offload some of her duties to the intern and to Hannah Hooper (White, Female).

124. Plaintiff BRIA S. FELIU alleges that this promised redistribution of duties and clarity never occurred.

125. Instead, Plaintiff BRIA S. FELIU alleges that over the next month or two Defendant ERIC DIMICELI began conflating her responsibilities, particularly with respect to finances, and used that “confusion” to portray her as incapable.

126. Initially, Plaintiff BRIA S. FELIU managed one P-Card and assisted Defendant TODD JACOBSON with expenses.

127. As personnel departed, Plaintiff BRIA S. FELIU was assigned additional duties, including management of the department’s Meeting Card.

128. Defendant ERIC DIMICELI then tasked Plaintiff BRIA S. FELIU with additional finance-related functions while plaintiff lacked the seniority, access, and systems permissions to perform them.

129. In particular, Plaintiff BRIA S. FELIU did not have access to manage the Charitable Contributions account, which was managed by Defendants ERIC DIMICELI, KATHLEEN BEHRENS, and BEHRENS’ assistant, Emma Zingone.

130. Plaintiff BRIA S. FELIU alleges that Defendant ERIC DIMICELI nonetheless attempted to hold her responsible for finance-related outcomes and repeatedly sought to portray

her as unable to handle financial responsibilities, even where the tasks were not assigned to her and she lacked the access required to complete them.

131. Plaintiff BRIA S. FELIU further alleges that documentary evidence exists reflecting these dynamics, including communications where Defendant ERIC DIMICELI accidentally forwarded his response to plaintiff, communications showing plaintiff being denied access to process a request, and communications showing plaintiff being looped into payment processing beyond her level without the permissions necessary to complete the tasks.

132. On September 21, 2023, during Defendant TODD JACOBSON and Schwartz's going-away party, Horn, a director, delegated responsibilities to Plaintiff BRIA S. FELIU without checking her availability, and competing deadlines that afternoon.

133. On the way to the event, Plaintiff BRIA S. FELIU received an email regarding new staffing that showed her administrative responsibilities remained in place, with no new opportunities for advancement pathways, despite prior representations that her role would evolve. Plaintiff BRIA S. FELIU emailed Defendant ERIC DIMICELI to discuss this.

134. At the party, a colleague, Candace Haynes (Black, Female), Director of Youth Basketball, joked that Defendant TODD JACOBSON was leaving plaintiff in "limbo" and that she had become a catch-all as many people had left.

135. Defendant TODD JACOBSON responded with statements including, "Bria doesn't know what she wants to do," and then, in substance, that plaintiff should continue "until you can no longer tolerate it."

136. The following day, Plaintiff BRIA S. FELIU spoke with Defendant ERIC DIMICELI. Defendant ERIC DIMICELI stated words to the effect that "things change" and that the group was "short staffed."

137. Plaintiff BRIA S. FELIU expressed frustration that her workload continued to increase without a corresponding change in title or compensation.

138. Defendant ERIC DIMICELI had to leave the conversation and later emailed Plaintiff BRIA S. FELIU to follow up, but plaintiff alleges no meaningful corrective action resulted.

139. Around this time, Plaintiff BRIA S. FELIU alleges that Defendant ERIC DIMICELI engaged in retaliatory conduct by speaking negatively about her to other leaders in the department, including David Krichavsky (White, Male), Head of Youth Basketball. Defendant ERIC DIMICELI stated words to the effect that plaintiff “didn’t want to do [her] job but wanted to do everything else,” which plaintiff alleges was false and damaging and was intended to undermine plaintiff’s standing within the organization.

140. Plaintiff BRIA S. FELIU further alleges that defendant ERIC DIMICELI engaged in disparaging and inappropriate communications toward plaintiff, including sending an email forwarding plaintiff’s response accompanied only by “...,” and then denying that he had sent it when plaintiff raised the issue.

141. Plaintiff BRIA S. FELIU alleges that when she later confronted Defendant ERIC DIMICELI with evidence of his disparaging remarks and conduct, he feigned surprise and attempted to deflect rather than address the substance of her concerns.

142. In one-on-one meetings, Defendant ERIC DIMICELI also made inappropriate and demeaning comments to Plaintiff BRIA S. FELIU, including telling plaintiff she was no longer smiling and that it was impacting her job, telling her that if she was unhappy, she should leave.

143. Defendant ERIC DIMICELI also required Plaintiff BRIA S. FELIU to instruct other departments, including HR, “how to do their job” because the department was allegedly the

“leaders within this space,” and accused plaintiff of being unprofessional and harmful to the department’s culture.

144. Plaintiff BRIA S. FELIU alleges that Defendant ERIC DIMICELI’s criticism of her demeanor, the rewriting of her legitimate concerns into purported “culture” and “professionalism” deficiencies, and the disparagement of her to other leaders were part of a broader pattern of hostile and retaliatory conduct.

145. Plaintiff BRIA S. FELIU further alleges that when she attempted to address these issues directly and explained that she had raised concerns about being treated unfairly and being subjected to “tit for tat” treatment within the department, Defendant ERIC DIMICELI did not respond substantively and took no corrective action.

146. In or about October and November 2023, Plaintiff BRIA S. FELIU began therapy due to work-related stress.

147. In or about November and December 2023, due to work-related stress and anxiety, Plaintiff BRIA S. FELIU was encouraged to take FMLA leave.

148. Plaintiff BRIA S. FELIU spoke with Michael Lanzo (White, Male), a former Benefits Manager, and raised concerns to Flam, a Human Resources Business Partner.

149. Flam told Plaintiff BRIA S. FELIU that he would connect her to Defendant PENELOPE JONES (Black, Female), Vice President and Global Head of Employee Relations.

150. Before speaking with Defendant PENELOPE JONES, Plaintiff BRIA S. FELIU spoke with Lesley Slaton Brown (Black, Female), then the Chief DEI Officer.

151. Brown advised Plaintiff BRIA S. FELIU not to share her documents and not to “show [her] cards,” and instead to focus on transition documents and remain positive about returning.

152. Plaintiff BRIA S. FELIU alleges that at the time Brown was hosting listening sessions for Black female employees because there had been an influx of resignations from the League Office, which plaintiff understood as demonstrating that Black women were experiencing workplace conditions that were driving them out of the organization.

153. Around this time, Plaintiff BRIA S. FELIU confronted Defendant ERIC DIMICELI regarding his treatment of her and his portrayal of her competence.

154. Plaintiff BRIA S. FELIU stated words to the effect that she did not understand why he (DIMICELI) viewed her as “incompetent” when other organizations with which the NBA worked had attempted to recruit her.

155. Defendant ERIC DIMICELI responded by asking why Plaintiff BRIA S. FELIU was still there if she was unhappy.

156. Plaintiff BRIA S. FELIU explained that she had been excited about the work she was promised the opportunity to do, but that she was instead doing everyone else’s job in addition to her own, with no clarity and no upward progression.

157. Following this conversation, Plaintiff BRIA S. FELIU submitted her FMLA request to take medical leave.

158. Plaintiff BRIA S. FELIU advised Defendant BARBARA BUSH (White, Female) that she would be taking medical leave before informing Defendant ERIC DIMICELI.

159. When Plaintiff BRIA S. FELIU informed Defendant ERIC DIMICELI, he immediately informed Defendant KATHLEEN BEHRENS before plaintiff had an opportunity to speak with her directly.

160. When Plaintiff BRIA S. FELIU later met with Defendant KATHLEEN BEHRENS, BEHRENS stated words to the effect of, “I already know you’re going on leave so there isn’t much to talk about.”

161. Plaintiff BRIA S. FELIU alleges this reflected indifference and a lack of professional courtesy in response to an employee taking leave for work-related stress and anxiety.

162. Plaintiff BRIA S. FELIU further alleges that Defendant ERIC DIMICELI forwarded a Benefits email related to plaintiff’s leave to Defendant BARBARA BUSH and included plaintiff on that communication, which plaintiff experienced as inappropriate and humiliating.

163. Plaintiff BRIA S. FELIU prepared transition documentation in connection with her medical leave.

164. Plaintiff BRIA S. FELIU’S leave began on or about December 4, 2023 and concluded on or about January 22, 2024.

165. On or about January 22, 2024, Plaintiff BRIA S. FELIU returned from medical leave of approximately seven weeks.

166. On the morning of her first day back, Plaintiff BRIA S. FELIU experienced an anxiety attack, and her Apple Watch reflected a heart rate of approximately 157 beats per minute.

167. Plaintiff BRIA S. FELIU alleges that during this period anxiety attacks became frequent and that she began experiencing increased migraines, a condition she had been diagnosed with in or about early 2021.

168. Upon returning, Plaintiff BRIA S. FELIU alleges she faced a reduction in workload that functioned as marginalization rather than support.

169. On her first day back, Plaintiff BRIA S. FELIU met with Defendants ERIC DIMICELI and BARBARA BUSH.

170. During that meeting, Defendant BARBARA BUSH asked Plaintiff BRIA S. FELIU whether she did anything “fun” during her time off.

171. Plaintiff BRIA S. FELIU alleges this response reflected a lack of seriousness and empathy regarding a medical leave taken due to work-related stress and anxiety.

172. Prior to All-Star, Defendant PENELOPE JONES met with Plaintiff BRIA S. FELIU to ask how things were going.

173. Plaintiff BRIA S. FELIU stated that her return had been an adjustment and that she felt she was being taken off projects, and that she was asking more questions to ensure everything was to Defendant ERIC DIMICELI’S liking.

174. Plaintiff BRIA S. FELIU further told Defendant PENELOPE JONES that, despite plaintiff not feeling good about the change in treatment, Defendant ERIC DIMICELI had stated to her that this was the best work she had done in a while, which defendant PENELOPE JONES stated was “interesting.”

175. On or about March 11, 2024, Plaintiff BRIA S. FELIU took a sick day and notified Defendants ERIC DIMICELI and BARBARA BUSH after having received medical treatment at Barclays Center the night before.

176. Plaintiff BRIA S. FELIU then went to her doctor and was advised to begin taking medication to manage her anxiety.

177. On or about April 11, 2024, Plaintiff BRIA S. FELIU reported that Defendant ERIC DIMICELI was speaking negatively about her and creating a hostile work environment.

178. Plaintiff BRIA S. FELIU also reported that Tannenbaum, a Social Responsibility Program Manager, had stated that Defendant ERIC DIMICELI treats women of color differently.

179. On that same date, Defendant PENELOPE JONES began an Employee Relations investigation.

180. Defendant PENELOPE JONES asked Plaintiff BRIA S. FELIU whether she was treated differently, and plaintiff responded yes, explaining that the way Defendant ERIC DIMICELI treated her and the other Black women, Muhammad was vastly different from how he treated Black men and white colleagues.

181. On or about April 11, 2024, Defendant PENELOPE JONES informed Plaintiff BRIA S. FELIU that someone had provided a negative description of her during the investigation.

182. Plaintiff BRIA S. FELIU alleges she was upset because she had experienced the most discomfort interacting with defendant ERIC DIMICELI and Horn,

183. Plaintiff BRIA S. FELIU alleges that her career coach stated that it appeared that Defendant ERIC DIMICELI was creating a case against her.

184. Plaintiff BRIA S. FELIU further alleges that she was confused because, at that time, she worked most closely with Defendant ERIC DIMICELI and Horn on projects, and she reasonably believed the negative description came from them and potentially from Defendant BARBARA BUSH, who plaintiff alleges became colder toward her as Defendant ERIC DIMICELI's negative narrative escalated.

185. Plaintiff BRIA S. FELIU further alleges that Gilder made comments to others about the investigation when plaintiff was not present and made remarks about the “future of the group,” reinforcing the atmosphere of isolation and instability surrounding plaintiff.

186. In or about April 2024, Hooper resigned.

187. In or about April and May 2024, Tannenbaum went on sabbatical.

188. On or about May 9, 2024, while on a work trip in Chicago, Plaintiff BRIA S. FELIU received a negative mid-year review and was surprised because she had not previously received such negative feedback.

189. Plaintiff BRIA S. FELIU spoke to Gilder during the trip, and Gilder also referenced difficulties working with Defendant ERIC DIMICELI.

190. Plaintiff immediately requested a meeting with Employee Relations.

191. In a meeting with Defendants ERIC DIMICELI and PENELOPE JONES, Plaintiff BRIA S. FELIU stated that the review did not accurately reflect her work or performance.

192. Defendant PENELOPE JONES stated that the contents of the review reflected Defendant ERIC DIMICELI’S “goals” for plaintiff.

193. Plaintiff BRIA S. FELIU responded that such goals should have been shared beforehand because Defendant ERIC DIMICELI had approved the goals plaintiff entered into the system and the review feedback did not align with those approved goals.

194. On or about May 25, 2024, while on a work trip, Plaintiff BRIA S. FELIU’S foot was run over by a coworker’s SUV.

195. Plaintiff BRIA S. FELIU alleges Defendant ERIC DIMICELI insisted she call the police, but plaintiff declined because it was an accident and she had just completed a 14-hour workday.

196. Plaintiff BRIA S. FELIU alleges that days later Defendant ERIC DIMICELI reported the incident to Defendant PENELOPE JONES without plaintiff's knowledge, even though plaintiff was already in the process of reporting it to Risk Analysis.

197. Plaintiff BRIA S. FELIU further alleges that she was not provided meaningful accommodations and struggled to navigate the workplace while injured.

198. In or about May 2024, Lindsay Halpin moved to a different department, and Plaintiff BRIA S. FELIU was tasked with planning a "goodbye" outing in addition to her existing workload.

199. In or about June 2024, Plaintiff BRIA S. FELIU alleges Defendant ERIC DIMICELI intentionally undermined and sabotaged the annual intern volunteer project.

200. Plaintiff BRIA S. FELIU had secured a local partnership for the project, but Defendant ERIC DIMICELI insisted on canceling it, resulting in a rushed replacement plan and logistical failures.

201. When Plaintiff BRIA S. FELIU returned from vacation, Defendant ERIC DIMICELI berated plaintiff and the summer intern, Devin Carr (Black, Female), for the failures, despite plaintiff's allegation that defendant ERIC DIMICELI caused the disruption and was aware that necessary documents had been provided.

202. Plaintiff BRIA S. FELIU further alleges that when she attempted to provide constructive feedback to Defendant ERIC DIMICELI about his unprofessional behavior toward

Carr, Defendant ERIC DIMICELI stated words to the effect that he would “do as he pleases” and walked out of the meeting.

203. Plaintiff BRIA S. FELIU alleges this reflected hostility, disregard for feedback, and a willingness to subject a Black junior female employee to mistreatment without accountability.

204. On or about June 20, 2024, Plaintiff BRIA S. FELIU took a sick day due to food poisoning.

205. When Plaintiff BRIA S. FELIU returned on or about June 25, 2024, Defendant ERIC DIMICELI insisted on meeting with her immediately.

206. Plaintiff BRIA S. FELIU requested that Defendant PENELOPE JONES join the meeting because Defendant ERIC DIMICELI’S tone in email communications was concerning, and Defendant PENELOPE JONES agreed.

207. In that meeting, Plaintiff BRIA S. FELIU stated that she felt she was being treated as an assistant and that she was overqualified for many of the tasks she was being required to perform.

208. Defendant ERIC DIMICELI responded, “the job is the job,” and stated that it did not matter if Plaintiff BRIA S. FELIU was overqualified.

209. Plaintiff BRIA S. FELIU raised that two Social Responsibility Program Coordinator roles had been posted with higher salaries and far less experience requirements (0–2 years).

210. Defendant PENELOPE JONES asked whether this was true, and Defendant ERIC DIMICELI made excuses.

211. Defendant ERIC DIMICELI also accused Plaintiff BRIA S. FELIU of failing to communicate while sick, notwithstanding that he had approved plaintiff's sick day.

212. Defendant PENELOPE JONES told Plaintiff BRIA S. FELIU to take the rest of the day off, but plaintiff stated she felt she could not do so because taking time off had become a source of conflict and scrutiny.

213. In or about June 2024, Lauren Clayborne resigned.

214. In or about July 2024, Olivia Fenwick (Black, Female) was hired, and plaintiff BRIA S. FELIU was tasked with onboarding her.

215. In or about August 2024, Defendant BARBARA BUSH went on maternity leave.

216. Plaintiff BRIA S. FELIU was tasked with organizing a "baby sprinkle" ahead of Defendant BARBARA BUSH'S leave in addition to plaintiff's existing workload.

217. In or about August 2024, Madison Kane (White, Female) was hired, and plaintiff BRIA S. FELIU was tasked with onboarding her.

218. In or about August 2024, Gilder went on sabbatical.

219. On or about August 20, 2024, Plaintiff BRIA S. FELIU received a note from Defendant PENELOPE JONES regarding closure of the Employee Relations case.

220. Plaintiff BRIA S. FELIU alleges that a security investigation found nothing, and that defendant PENELOPE JONES' comments regarding compensation were false based on information plaintiff learned from other colleagues.

221. Plaintiff BRIA S. FELIU alleges this closure reinforced that internal reporting would not yield corrective action and instead left plaintiff exposed to continued hostility and retaliation.

222. In or about September 2024, after Defendant TODD JACOBSON and Schwartz departed, Defendant ERIC DIMICELI tasked plaintiff BRIA S. FELIU with reimagining the Employee Volunteer Program.

223. Plaintiff BRIA S. FELIU alleges Horn was supposed to work with plaintiff but did not meaningfully participate, instead making cosmetic edits and shutting down opportunities aligned with community needs and employee interests.

224. Plaintiff BRIA S. FELIU alleges the program was redesigned so that employee resource groups would run projects while plaintiff would manage the operational steps.

225. The project was scheduled for or about September 10, 2024.

226. When Plaintiff BRIA S. FELIU attempted to identify a project for the Veterans group, plaintiff proposed options; Horn told plaintiff to defer to co-chairs, while Defendant ERIC DIMICELI stated words to the effect of, "I don't care, just get it done."

227. Plaintiff BRIA S. FELIU provided transportation and sign-up updates in the days leading up.

228. On the morning of the event, Defendant ERIC DIMICELI emailed co-chairs suggesting cancellation, which Plaintiff BRIA S. FELIU alleges showed disregard for commitments already made to the school and participants.

229. Plaintiff BRIA S. FELIU also alleges Defendant ERIC DIMICELI sent messages about rescheduling a staff meeting claiming no one could join, even though plaintiff was informed that participants were present both in-person and on Zoom.

230. On or about September 20, 2024, Plaintiff BRIA S. FELIU produced an event on behalf of two colleagues, and after Horn's direct report quit, plaintiff alleges she was assigned a significant portion of that person's work, including responsibility for a bi-weekly check-in email.

231. Plaintiff BRIA S. FELIU created a form for colleagues to input updates so she could efficiently compile and send them; however, plaintiff alleges Horn and defendant ERIC DIMICELI repeatedly failed to use the system, forcing plaintiff to chase them for updates via email, Slack, and in person.

232. Plaintiff BRIA S. FELIU alleges that during this period Horn engaged in a pattern of delegating menial, time-consuming tasks to plaintiff and younger employees while reserving higher-profile tasks for senior executives.

233. Plaintiff BRIA S. FELIU alleges a specific example was a last-minute smoothie “toast” Horn wanted to organize for a direct report who had already transferred departments.

234. Horn sent the request while Plaintiff BRIA S. FELIU was in back-to-back meetings, and when plaintiff stated she would need support, Defendant ERIC DIMICELI did nothing to assist or manage the situation despite plaintiff requesting time to address the confusion and the ongoing pattern of how she was being treated.

235. Between September 24 and September 27, 2024, while sick with pneumonia, Plaintiff BRIA S. FELIU was directed by Defendant ERIC DIMICELI to update an All-Star deck, even though plaintiff alleges she was not assigned to that working group in a recently shared staffing document.

236. Defendant ERIC DIMICELI accused Plaintiff BRIA S. FELIU of failing to update all parts of the deck despite plaintiff following his initial instructions and lacking the information and assets needed to complete additional demands.

237. Plaintiff BRIA S. FELIU alleges Defendant ERIC DIMICELI did not ensure she received what she needed and instead instructed her to locate passwords, search Getty for

images, and update information for a program she had no insight into because she had never worked on it.

238. Plaintiff BRIA S. FELIU alleges this conduct occurred while she was seriously ill, and that she expressed confusion about her responsibilities because this vertical was not within the scope of work she had been given, yet defendant ERIC DIMICELI continued to assign urgent tasks exceeding her bandwidth.

239. Between September 26 and September 27, 2024, Plaintiff BRIA S. FELIU updated Defendant KATHLEEN BEHRENS and Defendant ERIC DIMICELI about her health.

240. Plaintiff BRIA S. FELIU alleges defendant ERIC DIMICELI minimized the severity of her illness and continued issuing demands by email and Slack, including on email threads where Defendant KATHLEEN BEHRENS was included, despite also telling plaintiff to take the day off.

241. Plaintiff BRIA S. FELIU alleges this pattern reflected hostility, retaliation, and indifference to her health and wellbeing, and further exacerbated the hostile work environment.

242. On or about October 29, 2024, Defendant ERIC DIMICELI placed a meeting request on Plaintiff BRIA S. FELIU'S calendar.

243. Plaintiff BRIA S. FELIU appeared for the meeting as scheduled, but Defendant ERIC DIMICELI abruptly canceled the meeting without providing an explanation.

244. Plaintiff BRIA S. FELIU alleges that this conduct was part of the ongoing pattern of destabilization, intimidation, and retaliatory management tactics directed at her in the weeks leading up to her termination.

245. On or about November 4, 2024, Defendant ERIC DIMICELI placed a meeting request on Plaintiff BRIA S. FELIU'S calendar to occur in his office on the 17th Floor.

246. Plaintiff BRIA S. FELIU appeared as scheduled.

247. Upon arrival, Plaintiff BRIA S. FELIU observed Defendant EVELYN STONE present for the meeting.

248. The meeting was led by Defendant ERIC DIMICELI.

249. Defendant ERIC DIMICELI notified Plaintiff BRIA S. FELIU that she was terminated effective immediately.

250. Defendant ERIC DIMICELI stated words to the effect that plaintiff's "work [was] not up to par," that he had "difficulty working with" her, and that plaintiff was negatively impacting the "culture" of the group.

251. Plaintiff BRIA S. FELIU alleges these stated reasons were pretextual and were consistent with the same subjective and stigmatizing themes that had been used against her throughout her employment, including "cultural fit" policing, demeanor-based criticism, and management narratives that treated a Black woman raising concerns as the problem rather than addressing discrimination and hostile conduct.

252. Plaintiff BRIA S. FELIU further alleges that prior to her informal and formal complaints regarding discrimination and hostile treatment in the workplace, she had not been subjected to disciplinary write-ups, performance counseling, or progressive discipline of the type consistent with the asserted rationale for an immediate termination.

253. Plaintiff BRIA S. FELIU also alleges that she was not placed on a performance improvement plan or provided a meaningful opportunity to address alleged deficiencies before being discharged.

COMPARATORS AND DISPARATE TREATMENT

(July 12, 2021 through termination November 4, 2024)

254. From approximately July 12, 2021 through Plaintiff BRIA S. FELIU'S termination on November 4, 2024, plaintiff alleges that the department repeatedly referenced mandatory "trainings" and the need to work from home to complete them, and that these trainings were treated as routine professional-development opportunities for white employees, including newly hired coordinators Madison Kane and Hooper, while plaintiff and other employees of color—particularly Black women—were not afforded the same notice, access, or support to complete them.

255. Plaintiff BRIA S. FELIU further alleges that, when high-visibility travel and event opportunities were planned, plaintiff was treated as the person expected to manage and execute the "work," while white employees were selected for the visibility and advancement opportunities tied to travel.

256. Plaintiff BRIA S. FELIU alleges she was not considered for travel for the Global Games in Mexico City (October 2024) despite managing that phase's substantive "work;" she was not selected for travel connected to the phase in Paris (September 2024) while Kane, a white coordinator (newly hired), was assigned to travel.

257. Plaintiff BRIA S. FELIU further alleges that, from the beginning of her tenure as the office returned to in-person work, she was assigned "routine" administrative and personal-assistant tasks that were not imposed comparably on white employees, and that these tasks were "normalized" as part of plaintiff's role because she is a Black woman.

258. Plaintiff BRIA S. FELIU alleges she was "expected" to send virtual cards and gifts, curate birthday breakfasts, and ship items to managers' homes (Defendants TODD JACOBSON and ERIC DIMICELI), and that she was repeatedly "required" to handle "personal

matters” for Defendants TODD JACOBSON and ERIC DIMICELI, including mailing passports, visa materials and shipping personal items.

259. Plaintiff BRIA S. FELIU further alleges that Defendant ERIC DIMICELI enforced in-office and work-from-home tracking in a manner that favored white employees and subjected plaintiff, and other persons of color to heightened scrutiny.

260. Plaintiff BRIA S. FELIU alleges that Defendant ERIC DIMICELI required her, without additional compensation and outside the scope of her role, to administer an employee in-office/work-from-home tracking system, including maintaining a calendar and coordinating availability updates through WhatsApp on plaintiff’s personal mobile device, while Horn was permitted to work remotely more days than any other employee.

261. Plaintiff BRIA S. FELIU further alleges that the department “culture” was shaped by identity-coded gossip and disparagement led primarily by Defendant ERIC DIMICELI, Horn, Gilder and Feinberg, and that the negative stereotyping disproportionately targeted employees of color.

262. Plaintiff BRIA S. FELIU alleges that Defendant ERIC DIMICELI, Horn, Gilder, and Feinberg disparaged Tatia Williams, a Black woman and senior vice president, as “not easy to work with” and “not fit to lead” an event, reflecting racial tropes applied to Black women in the workplace.

263. Plaintiff BRIA S. FELIU further alleges that her leadership, contributions, and Black employee initiatives were “minimized,” while comparable involvement by white employees was highlighted and rewarded, particularly by Defendant ERIC DIMICELI.

264. Plaintiff BRIA S. FELIU alleges she served on the executive board of DREAM IN COLOR, the NBA’s Black Employee Resource Group, and worked on the Black Leadership

Forum in 2023 and 2024, yet in 2024 Defendant ERIC DIMICELI did not attend or support plaintiff's involvement, while Gilder, a white employee, was publicly highlighted for her involvement in the Women's Network and the Women's Leadership Forum.

**CONDUCT THAT PLAUSIBLY FALLS OUTSIDE
(OR MATERIALLY BEYOND) THE JOB SPECIFICATION**

Personal errands and personal logistics for a supervisor

265. Plaintiff BRIA S. FELIU alleges that she was repeatedly required to handle personal errands and personal logistics for Defendants TODD JACOBSON and ERIC DIMICELI that were not part of plaintiff's professional role, including mailing Defendant ERIC DIMICELI's passport and visa materials, shipping personal items, etc.

266. Plaintiff BRIA S. FELIU alleges that these tasks materially exceeded the job specification's contemplated support functions because they were private-personal courier duties rather than administrative support tied to organizational business operations.

Using plaintiff's personal mobile device as a management-mandated tracking platform

267. Plaintiff BRIA S. FELIU alleges that Defendant ERIC DIMICELI required plaintiff, without additional compensation and outside the scope of her role, to administer an in-office/work-from-home tracking system using plaintiff's personal mobile device, including maintaining a calendar and coordinating availability updates through a WhatsApp chat.

268. Plaintiff BRIA S. FELIU further alleges that employees were required to update availability and communicate changes through this system, and that plaintiff was held responsible for coordinating changes and enforcing compliance.

269. Plaintiff BRIA S. FELIU alleges that this constituted a management-mandated employee tracking platform imposed on plaintiff personally, rather than ordinary calendar maintenance within the job specification.

“Virtual cards / gifts / birthday breakfasts” as routine duties

270. Plaintiff BRIA S. FELIU alleges that, beginning as the office returned to in-person work, she was assigned routine social and courtesy obligations that became normalized as continuing duties, including sending virtual cards, sending gifts, and curating birthday breakfasts.

271. Plaintiff BRIA S. FELIU alleges that these tasks were not professional program coordination duties and were imposed as routine labor that materially exceeded the substantive job functions described for a Social Responsibility Program Coordinator.

Being forced into a de facto executive-assistant role for multiple people

272. Plaintiff BRIA S. FELIU alleges that she was repeatedly treated as a departmental “catch-all,” a “department assistant,” and a de facto executive assistant for multiple people beyond the head of Social Responsibility, including being assigned menial and time-consuming tasks by Horn without checking plaintiff’s availability and without regard to plaintiff’s competing deadlines.

273. Plaintiff BRIA S. FELIU further alleges that she was forced to chase senior staff for bi-weekly check-in updates because those leaders failed to use a form plaintiff created to streamline the process, requiring plaintiff to pursue updates by email, Slack, and in person.

274. Plaintiff BRIA S. FELIU further alleges that Gilder treated plaintiff as though plaintiff were Gilder’s assistant, including imposing unreasonable logistics and tasks despite knowing plaintiff’s limitations, including that plaintiff does not drive.

275. Plaintiff BRIA S. FELIU alleges that this pattern converted plaintiff’s role into generalized administrative labor for multiple managers, materially beyond the job specification’s

contemplated support for the head of Social Responsibility plus program coordination responsibilities.

**Assignments that exceed access and seniority by design,
then used to portray incompetence**

276. Plaintiff BRIA S. FELIU alleges that Defendant ERIC DIMICELI repeatedly looped plaintiff into finance-related tasks and workflows for which plaintiff lacked the necessary systems permissions and access, while the Charitable Contributions account was controlled by Defendants ERIC DIMICELI and KATHLEEN BEHRENS, and Zingone.

277. Plaintiff BRIA S. FELIU further alleges that Defendant ERIC DIMICELI nonetheless treated plaintiff as responsible for outcomes on tasks plaintiff could not complete due to denied access, and attempted to portray plaintiff as incapable based on predictable obstacles created by the absence of permissions and authority.

278. Plaintiff BRIA S. FELIU alleges that this exceeded ordinary “tracking expenses” duties because plaintiff was assigned work beyond her access and seniority and then evaluated through a competency narrative based on the resulting barriers.

VIOLATIONS AND CLAIMS ALLEGED

FIRST CAUSE OF ACTION

NYSHRL – Race and Gender Discrimination (Unequal terms and conditions)

N.Y. Exec. Law § 296, against all defendants

279. Plaintiff BRIA S. FELIU repeats and realleges the allegations above as if fully set forth herein.

280. Plaintiff BRIA S. FELIU is Black and a woman.

281. NATIONAL BASKETBALL ASSOCIATION employed plaintiff BRIA S. FELIU and controlled the terms and conditions of her employment.

282. NATIONAL BASKETBALL ASSOCIATION discriminated against plaintiff BRIA S. FELIU because of race and gender by subjecting her to unequal terms, conditions, and privileges of employment, including the discriminatory conduct alleged above.

283. Each individual defendant, acting within the scope of their authority and/or in concert with others, directly participated in, implemented, escalated, approved, ratified, and/or facilitated the discriminatory acts and unequal employment conditions alleged herein, and is liable for such conduct at minimum pursuant to N.Y. Exec. Law § 296(6).

284. As a direct and proximate result, plaintiff BRIA S. FELIU suffered damages.

SECOND CAUSE OF ACTION

**NYSHRL – Hostile Work Environment (Race and Gender)
N.Y. Exec. Law § 296, against all defendants**

285. Plaintiff BRIA S. FELIU repeats and realleges the allegations above as if fully set forth herein.

286. NATIONAL BASKETBALL ASSOCIATION subjected plaintiff BRIA S. FELIU to a hostile work environment because of race and gender by permitting, tolerating, ratifying, and/or failing to correct hostile and demeaning conduct, and by taking no effective remedial action after notice.

287. Each individual defendant directly engaged in hostile conduct and/or aided, abetted, incited, compelled, or coerced the hostile work environment by participating in it, minimizing it, discouraging reporting, escalating negative narratives, and/or facilitating adverse actions following complaints, and is liable at minimum pursuant to N.Y. Exec. Law § 296(6).

288. As a direct and proximate result, plaintiff BRIA S. FELIU suffered damages.

THIRD CAUSE OF ACTION

**NYSHRL – Retaliation
N.Y. Exec. Law § 296(7), against all defendants**

289. Plaintiff BRIA S. FELIU repeats and realleges the allegations above as if fully set forth herein.

290. Plaintiff BRIA S. FELIU engaged in protected activity, including opposing and reporting race- and gender-based discrimination and hostile treatment, making internal complaints, and participating in employee relations/human resources processes.

291. NATIONAL BASKETBALL ASSOCIATION knew of plaintiff's protected activity.

292. After and because of plaintiff's protected activity, NATIONAL BASKETBALL ASSOCIATION took adverse action(s) and/or subjected plaintiff to retaliatory conduct, including escalating scrutiny and negative narratives, marginalization and reduction of duties/opportunities, adverse evaluation activity, and termination.

293. Each individual defendant knew of plaintiff's protected activity and directly participated in, implemented, approved, and/or facilitated the retaliation alleged herein, and is liable at minimum pursuant to N.Y. Exec. Law § 296(6).

294. As a direct and proximate result, plaintiff BRIA S. FELIU suffered damages.

FOURTH CAUSE OF ACTION

**NYCHRL – Race and Gender Discrimination (Treated less well)
N.Y.C. Admin. Code § 8-107(1)(a), against all defendants**

295. Plaintiff BRIA S. FELIU repeats and realleges the allegations above as if fully set forth herein.

296. NATIONAL BASKETBALL ASSOCIATION and the individual defendants treated plaintiff BRIA S. FELIU less well than other employees, at least in part because of race and gender, through the acts and omissions alleged above.

297. Each individual defendant directly participated in the discriminatory treatment and/or aided and abetted it within the meaning of N.Y.C. Admin. Code § 8-107(6).

298. Plaintiff BRIA S. FELIU suffered damages as a direct and proximate result.

FIFTH CAUSE OF ACTION

**NYCHRL – Hostile Work Environment (Race and Gender)
N.Y.C. Admin. Code § 8-107(1)(a), against all defendants**

299. Plaintiff BRIA S. FELIU repeats and realleges the allegations above as if fully set forth herein.

300. NATIONAL BASKETBALL ASSOCIATION and the individual defendants subjected plaintiff BRIA S. FELIU to a hostile work environment and treated her less well, at least in part because of race and gender, through the conduct alleged above, including demeaning, humiliating, exclusionary, and retaliatory workplace treatment.

301. Each individual defendant directly participated in the hostile conduct and/or aided and abetted it within the meaning of N.Y.C. Admin. Code § 8-107(6).

302. Plaintiff BRIA S. FELIU suffered damages as a direct and proximate result.

SIXTH CAUSE OF ACTION

**NYCHRL – Retaliation
N.Y.C. Admin. Code § 8-107(7), against all defendants**

303. Plaintiff BRIA S. FELIU repeats and realleges the allegations above as if fully set forth herein.

304. Plaintiff BRIA S. FELIU engaged in protected activity by opposing discrimination and hostile treatment and by making internal complaints and participating in employee relations processes.

305. NATIONAL BASKETBALL ASSOCIATION and the individual defendants knew of plaintiff's protected activity.

306. NATIONAL BASKETBALL ASSOCIATION and the individual defendants retaliated by taking actions reasonably likely to deter protected activity, including heightened scrutiny, adverse narratives, marginalization/reduction of duties and opportunities, adverse evaluation activity, and termination.

307. Each individual defendant directly participated in the retaliation and/or aided and abetted it within the meaning of N.Y.C. Admin. Code § 8-107(6).

308. Plaintiff BRIA S. FELIU suffered damages as a direct and proximate result.

JURY TRIAL

309. Plaintiff BRIA S. FELIU hereby demand a trial by jury on all issues so triable as of right pursuant to CPLR 4101.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff BRIA S. FELIU respectfully requests that this Court enter judgment in her favor and against Defendants NATIONAL BASKETBALL ASSOCIATION, NBA PROPERTIES, INC., TODD JACOBSON, EVELYN STONE, ERIC DIMICELI, KATHLEEN BEHRENS, BARBARA BUSH, and PENELOPE JONES, jointly and severally, and award the following relief:

- a. A declaration that defendants' acts, policies, practices, and omissions described herein violated the New York State Human Rights Law and the New York City Human Rights Law;
- b. An award of compensatory damages in an amount to be determined at trial, including back pay, lost wages, lost benefits, and other economic losses resulting from defendants' unlawful conduct;
- c. An award of front pay in lieu of reinstatement, or in the alternative reinstatement to plaintiff's former position or an equivalent position, with restoration of seniority, compensation, benefits, and other terms and conditions of employment;
- d. An award of compensatory damages for emotional distress, pain and suffering, humiliation, and loss of enjoyment of life in an amount to be determined at trial;
- e. An award of punitive damages in an amount sufficient to punish defendants and deter similar misconduct, including punitive damages as authorized under the New York State Human Rights Law and New York City Human Rights Law;
- f. An award of reasonable attorneys' fees, expert fees, and costs and disbursements as authorized by the New York City Human Rights Law and, to the extent applicable, the New York State Human Rights Law;
- g. Pre-judgment and post-judgment interest, including interest on back pay and other economic damages, at the maximum lawful rate, including pursuant to CPLR §§ 5001 and 5004;
- h. Injunctive relief requiring defendants to cease and desist from discrimination, hostile work environment practices, and retaliation; and requiring implementation of effective anti-discrimination, anti-harassment, and anti-retaliation measures,

including training for managers and employee relations personnel, complaint-handling protocols, and monitoring sufficient to prevent recurrence; and

- i. Such other and further relief as the Court deems just and proper.

Dated: February 25, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders _____
Eric Sanders

Eric Sanders, Esq.
THE SANDERS FIRM, P.C.
30 Wall Street, 8th Floor
New York, NY 10005
(212) 652-2782 (Business Telephone)
(212) 652-2783 (Facsimile)

Website: <http://www.thesandersfirmpc.com>

ATTORNEY VERIFICATION

STATE OF NEW YORK

ss:

COUNTY OF WESTCHESTER

ERIC SANDERS, ESQ., affirms as follows:

I am an attorney admitted to practice in the State of New York courts. As the attorney for the plaintiff in the action, I am familiar with all the facts and circumstances.

The Verified Complaint is true to the knowledge of the affirmant, except for those matters stated to be alleged upon information and belief, and he believes those matters to be factual.

The affirmant further states that this verification is made by the affirmant and not by the Plaintiff because the Plaintiff is not within the county of Westchester, where the affirmant maintains his office.

The undersigned attorney affirms that the previous statements are true under the penalties of perjury and Rule 2106 CPLR.

Dated: February 25, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders _____
Eric Sanders

Eric Sanders, Esq.
THE SANDERS FIRM, P.C.
30 Wall Street, 8th Floor
New York, NY 10005
(212) 652-2782 (Business Telephone)
(212) 652-2783 (Facsimile)

Website: <http://www.thesandersfirmpc.com>

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

INDEX NO.:

BRIA S. FELIU,

Plaintiffs,

-against-

NATIONAL BASKETBALL ASSOCIATION, NATIONAL
BASKETBALL ASSOCIATION LEAGUE, NBA PROPERTIES,
INC., TODD JACOBSON, EVELYN STONE, ERIC
DIMICELI, KATHLEEN BEHRENS, BARBARA BUSH, and
PENELOPE JONES

Defendants

SUMMONS WITH VERIFIED COMPLAINT

Duly submitted by:

Eric Sanders, Esq.
THE SANDERS FIRM, P.C.
30 Wall Street, 8th Floor
New York, NY 10005
(212) 652-2782 (Business Telephone)
(212) 652-2783 (Facsimile)

Website: <http://www.thesandersfirmpc.com>
