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

Index No.:

Date Summons Filed: 07-13-2021

DAMON DASH, individually, and on behalf of ROC-A-FELLA RECORDS, INC.

Plaintiffs,

-against-

SHAWN "JAY-Z" CARTER

Plaintiff designates New York County as place of trial. The basis of venue is: CPLR § 509

SUMMONS WITH NOTICE

Defendant.

<u>Plaintiff's Address</u> 13547 Ventura Blvd, Ste 199, Sherman Oaks, CA 91423

To the above-named Defendant:

YOU ARE HEREBY SUMMONED to serve a notice of appearance on the *Plaintiff's Attorney* within twenty (20) days after the service of this summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York).

Take notice that the object of this action, and the relief sought, is to recover monetary damages available under applicable law and to be proven at trial for causes of action including but not limited to:

 Unjust Enrichment, (2) Breach of Fiduciary Duty, (3) Replevin and (4) Conversion: each claim is in connection with the unauthorized theft of Roc-A-Fella Records, Inc.'s streaming rights (i.e., Spotify, Apple Music, Tidal, etc.) in the *Reasonable Doubt* album by Defendant's transferring of these rights, without authorization, to S. Carter Enterprises LLC, which is solely owned by Defendant.

In case of your failure to appear, judgment will be sought and taken against you, by default, as follows:

 (i) For each of the following claims, the damages sought are in an amount greater than the threshold of the lower court, but estimated to be no less than One Million Dollars (\$1,000,000.00).

This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been 1 of 2 accepted for filing by the County Clerk.

NYSCEF DOC. NO. 1

Dated: July 14, 2021 Brooklyn, New York

TURTURRO LAW, P.C.

BY:/s/ Natraj S. Bhushan 1602 McDonald Avenue Brooklyn, NY 11230 Tel.:718-384-2323 Email: natraj@turturrolawpc.com

-and-

THE HOWARD LAW FIRM, P.C.

BY<u>:/s/Eric Howard</u> 244 5th Avenue, New York, NY 10001 Tel: 646-820-5291 Email: Eric@erichowardlaw.com

Attorneys for Plaintiffs

To Defendant:

540 W 26th St, New York, NY 10001

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