Case 1:25-cv-20132-CMA Document 1 Entered on FLSD Docket 01/09/2025 Page 1 of 17

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF FLORIDA

ANTHONY WILLIAMS and

KATSIARYNA SHASHOLKA,

Plaintiffs,

v. AMERICAN AIRLINES GROUP, INC. d/b/a AMERICAN AIRLINES, PETER SALLES, MICHAEL WILFONG, American Airlines employee, ANGEL RODRIGUEZ, JOHN DOE I Captain/Pilot; and, JOHN DOES II-X, Unknown Persons,

Complaint

Civil Action No.: 1:25-cv-2013

Defendants.

COMPLAINT

COMES NOW, Plaintiffs ANTHONY WILLIAMS (hereinafter ANTHONY) and KATSIARYNA SHASHOLKA (hereinafter KATSIARYNA), by and through their undersigned attorneys, and sues Defendant AMERICAN AIRLINES GROUP, INC. d/b/a AMERICAN AIRLINES (hereinafter AMERICAN), PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons, and in support of such states as follows:

PARTIES, JURISDICTION, AND VENUE

1. This Court has Federal question and supplemental subject matter jurisdiction over this action pursuant to pursuant to 28 USC Section 1332, based upon diversity of citizenship; 42 U.S.C. §1981, and §1988, pursuant to the laws of the State of Florida, and the doctrine of supplemental jurisdiction to obtain compensatory and punitive damages.

2. Venue is proper in this District because Defendants is a foreign for-profit corporation operating its business in the State of Florida. Venue is also proper in this District because the complained of acts herein, which give rise to these causes of action, occurred within the geographical boundaries of this District.

3. At all times material hereto, Plaintiffs were and remain residents of Arizona. Plaintiff ANTHONY is an African American man, and Plaintiff is a KATSIARYNA is a White woman and a Russian national.

4. Defendant AMERICAN, owns and operates its business in the state of Florida, including regularly operating flights out of the Miami International Airport located at 2100 NW 42nd Ave., Miami, Florida 33142. Defendant JOHN DOE I is a pilot/captain employed by AMERICAN who was responsible for the subject flight. JOHN DOES II-X, are unknown AMERICAN employees involved in unlawfully using law enforcement to detain and falsely imprison Plaintiffs after the flight, racial discrimination, and otherwise violating Plaintiffs rights.

5. Defendant PETER SALLES, was a passenger of American Airlines who wrongfully and falsely accused Plaintiff Anthony of human trafficking his own wife.

6. Defendants MICHAEL WILFONG and ANGEL RODRIGUEZ are American Airlines employees who were in the course and scope of his employment at the time of the incident and in furtherance of the business interests of American Airlines.

7. Defendant JOHN DOE I, Captain/Pilot was an employee of American Airlines and in

the course and scope of his employment at the time of the incident and in furtherance of the business interests of American Airlines.

8. Defendants JOHN DOES II-VIII, Unknown Persons, were employees of American Airlines and in the course and scope of their employment at the time of the incident and in furtherance of the business interests of American Airlines.

9. Defendants JOHN DOES IX-X, were employees of American Airlines that made false and racist statements to American Airlines employees reporting that Anthony was human trafficking his own wife.

10. The subject matter of the incident occurred in Miami, Florida.

11. Jurisdiction is proper as the amount in controversy exceeds \$75,000.00 exclusive of costs, interest and attorney fees. This Court has supplemental jurisdiction under 28 U.S.C. § 1367 to adjudicate all state-law claims pendent to the federal claims that are the thrust and gravamen of this action. This Court also has independent jurisdiction over the state-law claims under 28 U.S.C. § 1332(a)(1), predicated on diversity of citizenship. These claims are brought by individual residents of Arizona against a corporation domiciled in Fort Worth, Texas, seeking damages in excess of \$75,000, exclusive of interest and costs.

12. Venue is proper and this Court has jurisdiction over this matter pursuant to 42 U.S.C. § 1981 in the United States District Court for the Southern District of Florida, within the territorial boundaries of which occurred all or the substantial part of the acts, events, or omissions pertinent and giving rise to this action.

FACTUAL ALLEGATIONS

13. On or about September 13, 2022, Mr. Anthony Williams, an African American and retired police officer, was falsely accused of human trafficking his own wife Katsiaryna Shasholka,

a White woman, by American Airlines. Anthony and Katsiaryna were on flight number AA2408 with service from Phoenix, Arizona to Miami, Florida, to go on their honeymoon when they were racially profiled, and discriminated against based on their race by employees and/or agents of American Airlines, at Miami International Airport. To wit, an American Airlines passenger named Peter Salles falsely accused our client Mr. Anthony Williams, an African American, of human trafficking his own wife Katsiaryna Shasholka, a White woman, and reported same to American Airlines employees Defendants MICHAEL WILFONG and ANGEL RODRIGUEZ. Defendants MICHAEL WILFONG and ANGEL RODRIGUEZ. Defendants MICHAEL WILFONG and ANGEL RODRIGUEZ did not question our clients or conduct any kind of investigation but instead falsely reported to law enforcement that Plaintiff ANTHONY was human trafficking his own wife. Upon landing, our clients were falsely imprisoned by American Airlines employees whom escorted them off of the plane, they were made to wait confused and embarrassed as the other passengers deplaned and walked by them, and then they were questioned by by police officers who worked for the Miami-Dade Police Department, and were detained, falsely imprisoned, questioned, and humiliated. The incident was captured on camera.

14. Defendants had no reason to believe Plaintiff Katsiaryna Shasholka was in any danger; in fact, this is how the married couple appeared on the flight:



- 15. At all times material hereto, Defendant American owned and/or operated the subject airline flights conducting business at: Miami International Airport located at 2100 NW 42nd Ave., Miami, Florida 33142. Plaintiffs purchased two seats on AMERICAN Flight Number AA2408.
- 16. At all times material hereto, AMERICAN employed flight attendants and employees acted on behalf of AMERICAN, in furtherance of their duties and obligations to Defendant AMERICAN and for the benefit of Defendant AMERICAN. All of AMERICAN's employees' actions and inactions described *infra*, were performed within the scope of their respective employments with AMERICAN, and as actual and/or apparent agents of AMERICAN. AMERICAN is therefore vicariously liable for any and all tortious injury resulting from the actions of its employees and/or agents.
- 17. AMERICAN has a pattern and practice and/or custom and policy of racially profiling racial minorities.
- 18. On September 15, 2023, after flying from Atlanta to Los Angeles, a musician named David Ryan Harris stated that he was accused of trafficking his own children. Harris

played guitar in John Mayer's band for 20 years and collaborated with Dave Matthews stated that he and two of his sons, Truman and Hendrix, were met at the top of the jetway by an American Airlines employee and four police officers after disembarking the plane. A flight attendant had called ahead with some sort of concern that his biracial children were not his children, because they were unresponsive during an interaction with her.

- 19. On January 5, 2024 Alvin Jackson, Emmanuel Jean Joseph, and Xavier Veal were traveling from Phoenix to New York's John F. Kennedy International Airport, when they were allegedly kicked off Flight 832 without any valid reason, based solely on their race, and filed a lawsuit against Defendant American. The case is particularly damaging since they didn't know each other and were not sitting near each other, and were all African Americans removed from the plane.
- 20. Then on February 10, 2024, Pamela Hill Veal, a 70-year-old retired African American Judge Then on February 10, 2024, Pamela Hill Veal, a 70-year-old retired African American Judge was travelling with her husband and her elderly mother who needed assistance on the plane. At the beginning of the flight, Mrs. Hill Veal's husband was asked to give up his seat by a flight attendant at the request of a White male passenger. He declined to give up his seat. Pamela Hill Veal used the restroom during the flight. During the flight a flight attendant falsely accused her of slamming the door on the first-class bathroom and instructed her to use the restroom in the back of the plane. The flight attendants' demand was clearly for a malicious purpose and was racial discrimination, as three White male passengers had also used the first-class lavatory

and the door closed similarly but were not instructed to use the bathroom in the back of the plane. Approximately thirty minutes prior to landing, Ms. Hill Veal used the first-class restroom a final time; and, as she was leaving the restroom the same flight attendant followed her to her seat. After she sat down, he proceeded to point his finger at her, physically touched her left shoulder; and threatened that she was going to be arrested when the plane landed. Upon landing she was escorted off of the plane and met by police who declined to arrest her.

- 21. As flight operator American and its employees had a duty to protect Plaintiffs from false accusations of criminal misconduct and/or of misconduct that could lead passengers to being removed from the aircraft, threatened with arrest, subjected to racial profiling, harassment, discrimination, false imprisonment, and intentional infliction of emotional distress, and race discrimination in contract and in public transportation as prohibited by Federal law.
- 22. American's actions actually and proximately caused Plaintiffs to experience mental pain and suffering, sleeplessness, paranoia, panic attacks, fear, anxiety, embarrassment, humiliation, and has suffered monetary damages. Plaintiffs suffered humiliation and anxiety as a result of the incident.
- 23. Plaintiffs have suffered economic and emotional damages and physical injury in an amount to be proven at trial, but which is alleged to be in excess of \$75,000.00 including interest, together with costs and reasonable attorney fees incurred herein, and such other relief as the Court deems just and equitable and file the instant action to demand an award for injuries and damages against same.

COUNT I: VIOLATION OF 42 U.S.C. § 1981, RACE DISCRIMINATION,

AGAINST AMERICAN AIRLINES

- 24. Plaintiffs incorporates paragraphs 1 through 23, as if fully stated herein.
- 25. Mr. Anthony Williams, an African American and is a protected class/race pursuant to 42 U.S.C.A. § 1981. At all times relevant, Plaintiffs were in a contractual relationship with AMERICAN for purchase of a flight from Miami, Florida to Phoenix Arizona within the meaning of 42 U.S.C. § 1981, as amended.

26. Plaintiffs purchased two seats on an AMERICAN flight in consideration of being transported by plane from Miami, Florida to Phoenix, Arizona on September 13, 2022. Plaintiffs were removed from the flight by employees and falsely reported to police as engaging in human trafficking, and deprived of the right to enforce and/or receive benefits from the contract with AMERICAN for the said flight due to their race. Namely, the right not to be falsely accused of committing a crime and subjected to false imprisonment and unlawful detention. The right to contracts for flights with AMERICAN based upon the circumstances described above was not denied to White customers. As such, AMERICAN violated 42 U.S.C.A. § 1981(b), as amended.

27. AMERICAN's treatment, practices, and policies directed toward Plaintiffs denied them full and equal benefits of all laws and proceedings for the security of persons and property as is enjoyed by non-Black citizens, in violation of 42 U.S.C.A. § 1981, as amended.

28. Defendant AMERICAN's treatment, practices and policies directed toward Plaintiffs denied them the right to enforce contracts as enjoyed by AMERICAN's non-Black passengers, in violation of 42 U.S.C.A. § 1981, as amended. 29. Defendant UNITED did not subject its passengers who are not Black citizens to a hostile environment while on flights, unlawfully remove them from an aircraft and have them threatened with arrest, and did subject Caucasian passengers to false imprisonment, embarrassment and humiliation. AMERICAN's disparate treatment of Plaintiffs created a hostile environment, on the basis of Plaintiffs' race under 42 USC § 1981, actions and treatment of Plaintiffs indicated that Defendant UNITED intended to discriminate against Plaintiffs on the basis of race/

30. Defendant AMERICAN had knowledge that its employees had a history of the discriminatory acts directed at Black passengers. Despite knowing about the unlawful actions perpetuated against Plaintiffs, AMERICAN did not take any action to prevent the discriminatory acts directed at Black customers, failed to offer training or supervision to prevent violations of 42 U.S.C. § 1981.

31. The discriminatory environment was so pervasive that it interfered with Plaintiffs' ability to enforce a contract with AMERICAN.

32. As a direct, legal, and proximate and/or "but for" cause of Defendant AMERICAN's discrimination in violation of Section 1981, Plaintiffs suffered embarrassment, humiliation, emotional distress, pain and mental anguish, and other forms of damage; and loss of enjoyment of life, thereby entitling Plaintiffs to damages in an amount to be proven at trial. In its discriminatory actions as alleged above, Defendant AMERICAN acted with malice or reckless indifference to the rights of Plaintiffs, thereby entitling Plaintiffs to an award of punitive damages.

33. WHEREFORE, Plaintiffs demand judgment against Defendant AMERICAN, as follows: enter judgment in Plaintiffs' favor for its violations of 42

9

U.S.C.A. § 1981, as amended; Award Plaintiffs actual damages suffered; Award Plaintiffs compensatory damages under 42 U.S.C.A. § 1981 for the embarrassment, anxiety, humiliation and emotional distress, pain and mental anguish and physical injury Plaintiffs have suffered; Award Plaintiffs punitive damages; Award Plaintiffs prejudgment interest on their damages award; Award Plaintiffs reasonable costs and attorney's fees; and Grant Plaintiffs such other and further relief, as this Court deems equitable and just.

<u>COUNT II: FALSE IMPRISONMENTAGAINST AMERICAN AIRLINES,</u> <u>PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL</u> <u>RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and,</u> <u>JOHN DOES II-X, Unknown Persons</u>

34. Plaintiffs incorporate paragraphs 1 through 23, as if fully stated herein.

35. As described above, AMERICAN and/or PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons, directed and otherwise caused Plaintiffs' physical movements to be kept in custody and/or control of law enforcement, and/or an AMERICAN employee while Plaintiffs were removed from the plane and into the airport and questioned by police officers. At no point did Plaintiffs consent, expressly or effectively, to being publicly detained and/or removed from the plane. AMERICAN AIRLINES, PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons, thus caused Plaintiffs to be confined, detained, and restrained against their will.

36. By causing Plaintiffs' confinement, detention, and restraint, AMERICAN AIRLINES, PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and,

JOHN DOES II-X, Unknown Persons, compelled Plaintiffs to be removed from the plane and did not allow them to control their own movements, stay on the plane and/or leave at their own discretion and without being physically controlled and monitored by third persons, or at least go to a less conspicuous manner so as not to suffer humiliation and embarrassment.

37. AMERICAN AIRLINES, PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons, acted intentionally, recklessly, and maliciously. The conduct was sufficiently egregious to entitle Plaintiffs to an award of punitive damages.

38. WHEREFORE, Plaintiffs demand judgment against Defendant AMERICAN AIRLINES, PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons, as follows: enter judgment in Plaintiffs' favor for its violations including: Award Plaintiffs actual damages suffered; Award Plaintiffs compensatory damages for the embarrassment, anxiety, humiliation and emotional distress and physical injury, Award pain and mental anguish Plaintiffs have suffered; Award Plaintiffs punitive damages; Award Plaintiffs prejudgment interest on their damages award; Award Plaintiffs reasonable costs and attorney's fees; and Grant Plaintiffs such other and further relief, as this Court deems equitable and just.

COUNT III: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AT COMMON LAW AGAINST AMERICAN AIRLINES, PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons

39. Plaintiff incorporates paragraphs 1 through 23, as if fully stated herein.

40. Defendant AMERICAN AIRLINES, PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons, acted intentionally, recklessly, or both when they accused Plaintiffs of a crime, misconduct and caused them to be subjected to conduct described above.

41. Particularly given the total dearth of reasonable cause to suspect that Plaintiffs had not committed any crime and/or engaged in misconduct, Plaintiffs mistreatment by Defendant AMERICAN AIRLINES, PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons, was so outrageously atrocious as to be utterly intolerable in civilized society.

42. The extreme, outrageous conduct by Defendant AMERICAN AIRLINES, PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons, toward Plaintiffs was the sort of conduct capable of causing a reasonable person, normally constituted, to experience extreme and severe emotional distress.

43. Plaintiffs did in fact experience extreme and severe emotional distress as a result of Defendant AMERICAN AIRLINES, PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons', misconduct directed toward them and Plaintiffs are entitled to recover just compensation.

12

44. Furthermore, in so acting, Defendant AMERICAN AIRLINES, PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons acted intentionally, recklessly, and maliciously. Their conduct was sufficiently egregious to entitle Plaintiffs to an award of punitive damages.

45. WHEREFORE, Plaintiffs demand judgment against Defendant AMERICAN AIRLINES, PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons, as follows: enter judgment in Plaintiffs' favor for its violations including: Award Plaintiffs actual damages suffered; Award Plaintiffs compensatory damages for the embarrassment, anxiety, humiliation and emotional distress and physical injury, Award pain and mental anguish Plaintiffs have suffered; Award Plaintiffs punitive damages; Award Plaintiffs prejudgment interest on their damages award; Award Plaintiffs reasonable costs and attorney's fees; and Grant Plaintiffs such other and further relief, as this Court deems equitable and just.

<u>COUNT IV: GENERAL NEGLIGENCE, COMMON CARRIER AT COMMON</u> <u>LAW AGAINST AMERICAN AIRLINES, MICHAEL WILFONG, American</u> <u>Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN</u> <u>DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons</u>

46. Plaintiff incorporates paragraphs 1 through 23, as if fully stated herein.

47. AMERICAN AIRLINES is considered a common carrier in Florida, as it is an airline that transport passengers. As a common carrier, AMERICAN had a duty to use the utmost caution to protect its passengers, or the caution that would be used by a very careful and prudent person. AMERICAN's employees also owe an obligation as common carriers to Plaintiffs. 48. Defendant AMERICAN AIRLINES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons, breached the duty owed to Plaintiffs as its passengers, and failed to properly investigate the incident prior to removing Plaintiffs from the plane and falsely accusing Anthony of human trafficking and removing Plaintiffs under threat of arrest, subjecting Plaintiffs to racial profiling, false imprisonment, emotional distress, and humiliation. AMERICAN's policies and practices, which AMERICAN'S employees and agents whose conduct is described above were adhering to and implementing at all pertinent times, directly, legally, and proximately caused Plaintiffs to experience unlawful denial of services and/or transportation; markedly hostile conduct; racial profiling; unwanted, offensive and unlawful false imprisonment or confinement against one's will; malicious harassment; and intentionally, recklessly, or negligently caused extreme and severe emotional distress.

49. Due to multiple prior incidents of racial discrimination on AMERICAN's flights, AMERICAN knew that its policies and practices in place at the time of the incident, created a substantial and unjustifiable risk that non-White customers would be subject to unlawful denial of services; markedly hostile conduct; racial profiling; unwanted, offensive and unlawful false imprisonment or confinement against one's will; malicious harassment; and intentionally, recklessly, or negligently caused extreme and severe emotional distress. It had failed to correct these conditions, as evidenced by what Plaintiffs experienced.

50. As the owner and the operator of AMERICAN flight, AMERICAN had a duty to take the utmost caution to protect its business invitees in that establishment, including Plaintiffs, as well as other persons, against unlawful denial of services; markedly

hostile conduct; racial profiling; unwanted, offensive and unlawful false imprisonment or confinement against one's will; yet negligently caused extreme and severe emotional distress. AMERICAN failed to take such precautions on the date of the incident, as evidenced by what Plaintiffs experienced.

51. The above-described conditions, which Defendant AMERICAN AIRLINES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons, either created or failed to remedy or mitigate, caused Plaintiffs to experience extreme and severe anxiety, embarrassment, fright, humiliation, shame, and other mental distress.

52. WHEREFORE, Plaintiffs demand judgment against Defendant AMERICAN AIRLINES, PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons, as follows: enter judgment in Plaintiffs' favor for its violations including: Award Plaintiffs actual damages suffered; Award Plaintiffs compensatory damages for the embarrassment, anxiety, humiliation and emotional distress and physical injury, Award pain and mental anguish Plaintiffs have suffered; Award Plaintiffs prejudgment interest on their damages award; Award Plaintiffs reasonable costs and attorney's fees; and Grant Plaintiffs such other and further relief, as this Court deems equitable and just.

COUNT V: NEGLIGENT HIRING, TRAINING, SUPERVISION, AND RETENTION AT COMMON LAW AGAINST AMERICAN AIRLINES

53. Plaintiff incorporates paragraphs 1 through 23, as if fully stated herein.

54. As employer, principal, and supervisor of the employees and agents whose actions are described above, AMERICAN had a duty exercise reasonable care in the hiring and makeup of its workforce to protect its business invitees, including Plaintiffs, and other persons, against unlawful denial of services; markedly hostile conduct; racial profiling; unlawful false imprisonment or confinement against one's will; malicious harassment; and intentionally, recklessly, or negligently caused extreme and severe emotional distress.

55. Prior to September 13, 2022, AMERICAN failed to exercise such care with respect to its employees and agents whose conduct is described above. Had AMERICAN exercised appropriate care over its workforce, Plaintiffs would not have been dealing with the AMERICAN employees and agents whose conduct is described above, and thus would not have been subjected to such markedly hostile, highly offensive conduct.

56. The markedly hostile, highly offensive conduct to which AMERICAN's employees and agents subjected Plaintiffs to caused them to experience extreme and severe anxiety, embarrassment, fright, humiliation, shame, and other mental distress.

57. WHEREFORE, Plaintiffs demand judgment against Defendant AMERICAN as follows: enter judgment in Plaintiffs' favor for its violations including: Award Plaintiffs actual damages suffered; Award Plaintiffs compensatory damages for the embarrassment, anxiety, humiliation and emotional distress and physical injury, Award pain and mental anguish Plaintiffs have suffered; Award Plaintiffs prejudgment interest on their damages award; Award Plaintiffs reasonable costs and attorney's fees; and Grant Plaintiffs such other and further relief, as this Court deems equitable and just.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs ANTHONY WILLIAMS (hereinafter ANTHONY) and

KATSIARYNA SHASHOLKA (hereinafter KATSIARYNA), by and through their undersigned attorneys, and sues Defendant AMERICAN AIRLINES GROUP, INC. d/b/a AMERICAN AIRLINES (hereinafter AMERICAN), PETER SALLES, MICHAEL WILFONG, American Airlines employee; ANGEL RODRIGUEZ, American Airlines employee, JOHN DOE I, Captain/Pilot; and, JOHN DOES II-X, Unknown Persons, for damages as set forth herein in an amount in excess of SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00), together with post judgment interest and costs.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury on all issues so triable.

DATED this <u>9th</u> day of January, 2025.

Respectfully submitted,

<u>/s/Jasmine Rand</u> Jasmine Rand, Esquire FBN: 0077047 RAND LAW, L.L.C. 2525 Ponce de Leon Blvd., Ste. 300 Miami, Florida 33134 (305) 906-6400 Telephone (305) 503-9235 Facsimile Attorney for Plaintiffs

JS 44 (Rev. Grasser 1:25-CM2/02/2022 Page 1 of 1

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)* **NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.**

I. (a) PLAINTIFFS

DEFENDANTS

| (b) | County of Residence of First Listed Plaintiff | County of Resider | County of Residence of First Listed Defendant | |
|-----|--|--------------------|---|--|
| | (EXCEPT IN U.S. PLAINTIFF CASES) | | (IN U.S. PLAINTIFF CASES ONLY) | |
| | | NOTE: | IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. | |
| (c) | Attorneys (Firm Name, Address, and Telephone Number) | Attorneys (If Know | <i>m</i>) | |

(d) Check County Where Action Arose: 🗆 MIAMI- DADE 📄 MONROE 📄 BROWARD 🗆 PALM BEACH 🗋 MARTIN 🗋 ST. LUCIE 📄 INDIAN RIVER 🗖 OKEECHOBEE 🗖 HIGHLANDS

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| 133 Recovery of Overpayment 345 Marine Product 138 Telephone Consumer Product Liability 138 Telephone Consumer Product Liability 139 Overpayment 138 Telephone Consumer Product Liability 139 Overpayment 130 Overpayment 130 Overpayment 130 | 150 Recovery of Overpayment & Enforcement of Judgment 151 Medicare Act 152 Recovery of Defaulted Student Loans | 320 Assault, Libel & Slander 330 Federal Employers' Liability | Pharmaceutical Personal Injury Product Liability 368 Asbestos Person | al | RIGHTS 820 Copyrights 830 Patent 835 Patent – Abbreviated New Drug Application 840 Trademark 880 Defend Trade Secrets | Y □ 430 Banks and Banking □ 450 Commerce □ 460 Deportation □ 470 Racketeer Influenced and Corrupt Organizations □ 480 Consumer Credit |
| 199 Other Contract □ 375 Motor Vehicle □ 371 Truth in Lending □ 740 Railway Labor Act ■ 683 DIWC/DIŴV (405(g)) Exchange 199 Contract Product Liability □ 360 Other Personal □ 71 Family and Medical ■ 683 SID Tite XVI ■ 90 Other Statusty Action 199 Contract Product Liability □ 360 Other Personal □ 71 Family and Medical ■ 685 SID Tite XVI ■ 90 Other Statusty Action 190 Char Contract □ 800 Other Personal □ 70 Other Labor Linging ■ 865 RSI (405(g)) ■ 891 Agricultural Acts 190 Char Contact □ 800 Other Personal □ 700 Other Labor Linging ■ 865 RSI (405(g)) ■ 895 Procetron 01 Romation 120 Land Condermation □ 40 Other Cvill Rights ■ 186 Determent ■ 800 Cher Proceed ■ 895 Procetron 01 Romation ■ 800 Romation 01 Romation | | | PERSONAL PROPERTY | | SOCIAL SECURITY | □ Protection Act (TCPA) □ 490 Cable/Sat TV |
| REAL PROPERTY CIVIL Rights PRISONER PETITIONS FEDERAL TAX SUITS 989 Administrative Proceed of Agency Decision 210 Land Condemnation 440 Other Civil Rights Habeas Corpus: 0 |] 190 Other Contract] 195 Contract Product Liability | 355 Motor Vehicle Product Liability 360 Other Personal Injury 362 Personal Injury - | 50 Motor Vehicle 370 Other Fraud 55 Motor Vehicle 371 Truth in Lending Product Liability 380 Other Personal 60 Other Personal Property Damage Injury 385 Property Damage 62 Personal Injury - Product Liability | | □ 863 DIWC/DIWW (405(g)) □ 864 SSID Title XVI | 890 Other Statutory Actions 891 Agricultural Acts 893 Environmental Matters 895 Freedom of Information A |
| 12 20 Foreclosure 440 Voting Hardea Corpus. Befendant) Agency Decision ² . 12 20 Foreclosure 441 Voting 463 Alien Detainee 570 Constitutionality of State Statutes 12 20 Foreclosure 441 Voting 463 Alien Detainee 570 Constitutionality of State Statutes 12 20 Foreclosure 441 Voting 463 Alien Detainee 570 Constitutionality of State Statutes 12 20 Foreclosure 443 Housing/ 530 General 535 Death Penalty Befendanty 12 240 Tors to Land 433 Housing/ 535 Death Penalty HMIGRATION House Constrained Actions 12 240 Tors to Land 443 Housing/ 535 Death Penalty House Constrained Actions HMIGRATION 12 24 Tors to Land 445 Annew, WDisabilities - 530 Civil Rights 550 Civil Rights Actions 12 0 riginal 22 Removed 3 Re-filed 4 Reinstated 5 Transferred from Confinement Actions 11 0 original 2 Removed 3 Re-filed Case YES NO NO NO 11 0 original 2 Removed 3 Re-filed Case YES NO NO NO 11 0 original 2 Removed 3 Re-filed Cas | REAL PROPERTY | • | PRISONER PETITIONS | Income security Act | FEDERAL TAX SUITS | |
| 220 Foreclosure 441 Voting 463 Alien Detaince \$71 IRS_Third Party 26 USC 950 Constitutionality of State Statutes 230 Rent Lease & Ejectment 442 Employment 510 Motions to Vacate State Statutes \$310 Motions to Vacate State Statutes \$310 Motions to Vacate Statutes </td <td>210 Land Condemnation</td> <td>□ 440 Other Civil Rights</td> <td>Habeas Corpus:</td> <td></td> <td></td> <td></td> | 210 Land Condemnation | □ 440 Other Civil Rights | Habeas Corpus: | | | |
| 1 Original Proceeding 2 Removed from State Court 3 Re-filed (See VI below) 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation Transfer 7 Appeal to District Judge from Magistrate Judgment 8 Multidistrict Litigation - Direct File 9 Remanded fro Appellate Court 1. RELATED/ (See instructions): a) Re-filed Case YES NO b) Related Cases YES NO 2. FILED CASE(S) JUDGE: DOCKET NUMBER: Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity): TI. CAUSE OF ACTION LENGTH OF TRIAL via days estimated (for both sides to try entire case) CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No | 230 Rent Lease & Ejectment 240 Torts to Land 245 Tort Product Liability 290 All Other Real Property | 442 Employment 443 Housing/ Accommodations 445 Amer. w/Disabilities - Employment 446 Amer. w/Disabilities - Other 448 Education | 510 Motions to Vaca Sentence 530 General 535 Death Penalty Other: 540 Mandamus & Other 550 Civil Rights 555 Prison Condition 560 Civil Detaince – Conditions of | IMMIGRATION 462 Naturalization Applicati 465 Other Immigration | □ 871 IRS—Third Party 26 US 7609 | SC 950 Constitutionality of |
| E-FILED CASE(S) JUDGE: DOCKET NUMBER: I. CAUSE OF ACTION Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity): III. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No BOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE DEMAND \$ DEMAND \$ DEMAND \$ No | 1 Original Proceeding □ 2 Remov from S | red \square 3 Re-filed \square 4 (See VI \square 4 | or anothe | r district Litigation | District Judge | – Direct |
| /II. CAUSE OF ACTION LENGTH OF TRIAL via days estimated (for both sides to try entire case) /III. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: BOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE | | | | b) Related Cases | | R: |
| TII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: CHECK YES only if demanded in complaint: BOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE DEMAND \$ Output Yes No | II. CAUSE OF ACTION | | , i i i i i i i i i i i i i i i i i i i | C | | ctional statutes unless diversity): |
| | | □ CHECK IF THIS | IS A CLASS ACTION | | CHECK YES only | I. |
| | | RUE & CORRECT TO | | | | |

Case 1:25-cv-20132-CMA Document 1-2 Entered on FLSD Docket 01/09/2025 Page 1 of 2

AO 440 (Rev. 06/12) Summons in a Civil Action

| UNITED STATES DISTRICT COURT | | |
|------------------------------------|---|--|
| | _ District of | |
| Plaintiff(s) V. Defendant(s) |))))) Civil Action No.)))) | |
| Defendum(s) |) | |

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

| | This summons for (name | e of individual and title, if any) | | | | | |
|--------|--|---|---|----------|--|--|--|
| was re | ceived by me on (date) | | | | | | |
| | I personally served the summons on the individual at (place) on (date) ; or | | | | | | |
| | | | | | | | |
| | □ I left the summons at the individual's residence or usual place of abode with (name) | | | | | | |
| | , a person of suitable age and discretion who resides there, | | | | | | |
| | | | o the individual's last known address; or | | | | |
| | \Box I served the summor | ns on (name of individual) | | , who is | | | |
| | designated by law to a | designated by law to accept service of process on behalf of <i>(name of organization)</i> | | | | | |
| | | | on (date) | ; or | | | |
| | \Box I returned the summ | ons unexecuted because | | ; or | | | |
| | □ Other (<i>specify</i>): | | | | | | |
| | My fees are \$ | for travel and \$ | for services, for a total of \$ | | | | |
| | I declare under penalty of perjury that this information is true. | | | | | | |
| Date: | | | | | | | |
| Date. | | | Server's signature | | | | |
| | | | Printed name and title | | | | |
| | | | | | | | |

Server's address

Additional information regarding attempted service, etc:

Case 1:25-cv-20132-CMA Document 1-3 Entered on FLSD Docket 01/09/2025 Page 1 of 2

AO 440 (Rev. 06/12) Summons in a Civil Action

| UNITED STATES DISTRICT COURT | | |
|------------------------------------|--|--|
| | District of | |
| Plaintiff(s) V. Defendant(s) |)))))))))))))) | |

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

| | This summons for (nar | ne of individual and title, if any, |) | | | | |
|--------|---|-------------------------------------|---------------------------------|------|--|--|--|
| was re | ceived by me on (date) | | | | | | |
| | □ I personally served the summons on the individual at (<i>place</i>) on (<i>date</i>); or | | | | | | |
| | | | | | | | |
| | □ I left the summons at the individual's residence or usual place of abode with <i>(name)</i> , a person of suitable age and discretion who resides there on <i>(date)</i> , and mailed a copy to the individual's last known address; or | | | | | | |
| | | | | | | | |
| | \Box I served the summer | on behalf of (name of organization) | , who is | | | | |
| | | on (date) | | ; or | | | |
| | \Box I returned the summ | nons unexecuted because | | | | | |
| | □ Other <i>(specify)</i> : | | | | | | |
| | My fees are \$ | for travel and \$ | for services, for a total of \$ | · | | | |
| | I declare under penalty of perjury that this information is true. | | | | | | |
| Date: | | | | | | | |
| | | | Server's signature | | | | |
| | | | Printed name and title | | | | |
| | | | | | | | |

Server's address

Additional information regarding attempted service, etc: