#### IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

| BAKER & MCKENZIE LLP   |
|------------------------|
| 815 Connecticut Ave NW |
| Washington, DC 20006   |

MAURICE BELLAN 815 Connecticut Ave NW Washington, DC 20006

and

DOE PLAINTIFFS 1-5 815 Connecticut Ave NW Washington, DC 20006

Plaintiffs,

v.

BROOKE RADFORD 10401 Motor City Drive, Apartment 503 Bethesda, MD 20817,

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|----|------|---|-----|---|
| ., |      |   | 411 |   |

Case No.

## COMPLAINT AND APPLICATION FOR CIVILE PROTECTIVE ORDER

Plaintiffs Baker & McKenzie LLP ("Baker" or "Firm"), Maurice Bellan, and Doe Plaintiffs

1 through 5 (collectively "Plaintiffs"), by and through undersigned counsel, hereby file this

Complaint and Application for Civil Protective Order against Defendant Brooke Radford ("Ms.

Radford" or "Defendant"). In support thereof, Plaintiffs state as follows:

## **Introduction**

Defendant Brooke Radford is a former associate attorney at Baker. Baker terminated Ms. Radford's employment during June 2025 because she: (1) made multiple unauthorized personal purchases on her Firm-issued credit card, including clothing at high-end clothing stores, first-class airplane tickets, and many personal food delivery and Lyft transportation charges; (2) violated

other Firm policies; and (3) refused to cooperate with a Firm investigation into the unauthorized charges and other violations. Following her termination, Ms. Radford has committed the following tortious conduct against Plaintiffs:

- (1) Repeatedly sent threatening messages to Mr. Bellan, other Baker attorneys, and other Firm managers and personnel;
- (2) Repeatedly defamed Baker by "trolling" Baker on LinkedIn and Reddit with at last count over 80 false, defamatory, and malicious public statements that Mr. Bellan sexually assaulted her and other employees and that the Firm covered this up—all of which statements are entirely false; and
- (3) Refused to return Baker's property, including a laptop computer and related equipment.

This lawsuit seeks injunctive relief and monetary damages for Ms. Radford's tortious conduct.

### **Parties**

- 1. Plaintiff Baker is a national law firm with various offices, including an office in the District of Columbia ("DC").
- 2. Plaintiff Maurice Bellan is the Managing Partner of Baker's DC office, who works in DC.
- 3. Doe Plaintiffs are current Baker employees to and about whom Ms. Radford has made threatening and harassing comments, and who fear for their safety.
- 4. Defendant Brooke Radford is a former associate attorney in Baker's DC office. Her last known address is in Bethesda, Maryland. Ms. Radford was hired by Baker as an associate attorney in September 2022. Her employment at Baker was terminated during June 2025, effective

in July 2025.

## **Jurisdiction and Venue**

- 5. This Court has jurisdiction over this action pursuant to D.C. Code § 13-423(a).
- 6. Ms. Radford caused tortious injury to Plaintiffs in DC via her acts described in this Complaint. Ms. Radford engaged in a persistent course of conduct of defaming Mr. Bellan and Baker, threatening Mr. Bellan and other Baker attorneys and employees, converting Baker's property, and otherwise harming Plaintiffs in DC.
  - 7. Venue is appropriate in this Court, pursuant to D.C. Code § 11-921.

# <u>During June 2025, Ms. Radford's Employment With Baker Was Terminated Because She Made Unauthorized Personal Purchases On Her Firm Credit Card, Which She Refused To Discuss With Baker.</u>

- 8. Baker provided Ms. Radford with a Firm-issued credit card to use for appropriate work-related expenses.
- 9. Baker has established policies regarding which expenses are considered work-related and authorized for associate attorneys to charge to Firm credit cards.
- 10. During the spring of 2025, Baker discovered that Ms. Radford had charged more than 100 transactions on her Firm-issued credit card that appeared to be unauthorized non-work-related expenses and/or which required receipts to verify the purchases as authorized business expenses.
- 11. Ms. Radford's many suspect credit card charges included, among other dubious charges:
  - \$712.85 purchase of clothing at Lululemon in Beverly Hills, California;
  - \$233.62 of purchases at clothing retailer H&M;
  - Amazon purchases of women's tights, AirPods, and a phone case, among other

## Amazon purchases;

- Numerous food deliveries to Ms. Radford's home;
- Numerous Lyft transportation charges that did not appear to be work-related; and
- Unauthorized first-class airplane tickets.
- 12. During April and May 2025, Baker investigated Ms. Radford's charges on her Firm-issued credit card.
  - 13. Baker also investigated other violations of Firm policy committed by Ms. Radford.
  - 14. As part of the investigation, multiple Baker managers interviewed Ms. Radford.
- 15. Baker managers also requested that Ms. Radford provide receipts for suspect charges to demonstrate the business purposes of the charges.
  - 16. Ms. Radford was uncooperative and combative during the interviews.
- 17. Ms. Radford refused to provide information that Baker requested regarding the credit card charges.
- 18. During late May and early June 2025, Baker followed up with Ms. Radford multiple times to discuss the investigation.
- 19. Ms. Radford refused to participate in requested meetings to discuss the credit card charges.
- 20. Ms. Baker also refused to provide her availability for a meeting to discuss the issues being investigated.
- 21. On June 4, 2025, Baker notified Ms. Radford in writing that the Firm was terminating her employment for the foregoing reasons, effective July 7, 2025.
- 22. The termination letter informed Ms. Radford that she was prohibited from performing any further Firm-related work.

# <u>During June and July 2025, Following Her Termination, Ms. Radford Texted Accusatory,</u> <u>Threatening, And Odd Messages To Baker Associate Attorneys.</u>

- 23. After Ms. Radford received her termination letter, she began making accusatory, threatening, and otherwise odd comments in a group text chat of Baker tax associates.
- 24. During June and July 2025, both after Baker had informed Ms. Radford that it was terminating her employment and after her employment officially ended, Ms. Radford texted messages to a Baker associates' group text chat that included, among other messages:
  - Accusing her former colleagues of "oppression";
  - Accusing a former colleague of "mov[ing] [her] things during a meeting";
  - Singling out the same former colleague and asking whether she "would like to apologize for anything you've done to me";
  - Saying that she "wanted to air some things out";
  - Oddly posting multiple news articles about heat waves and other weather news; and
  - Posting rap song "5 AM in Philly," in which rapper Meek Mill calls out and threatens revenge against people who betrayed him. The song features many lyrics about gun violence and revenge, including:
    - o "How you think I'm supposed to live when only thing I see is war?"
    - o "I change my drawers, then put on my Glock when I wake up"
    - o "And the only thing you own is a .40 and a little nine"
  - Posting rap album "AI Youngboy 2," which includes multiple songs about revenge, retaliation, and gun violence, as well as racist and profane lyrics. Below are merely a few examples:

- "Make No Sense" "I flash and beat a nigga ass with this fifty ball"; "Northside, bullets flying, back to back, bitch, when we ride"; "Die today, bitch, they say four pussy niggas died 'fore I died, slime."
- "Self Control" "I'ma finish him off with a four nickel"; "Play, I put you to sleep before you could see (bitch)"; "You niggas know we quick to let it blow for any reason"; Kick down your door, post up on your front porch, and we ain't leavin'."
- 25. Ms. Radford did not reference in her messages any allegations about sexual assault or harassment committed by anyone at Baker.
  - 26. The following are screenshots of those messages in the group chat:<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> The names of Baker attorneys and other employees, other than Mr. Bellan and Human Resources Manager Marisha Lewis, are redacted from the messages and communications included in this Complaint to protect their privacy and safety. *See Doe v. Cabrera*, 307 F.R.D. 1, 5 (D.D.C. 2014) (recognizing courts' authority to allow anonymity or redaction when necessary to safeguard victims of harassment or retaliation). Disclosure of these individuals' identities is unnecessary to the resolution of the legal issues in this matter and could expose them to further harm or unwanted attention, as a result of Ms. Radford's harmful and tortious conduct.











Brooke Radford



BR This he

# This heat is also relentless

Tue, Jun 24 at 8:03 PM

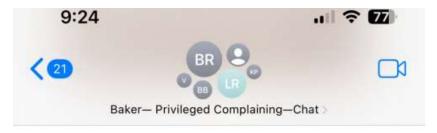
Brooke Radford





iMessage





Sun, Jul 6 at 9:57 AM

Brooke Radford





### Blair and Brooke Harber

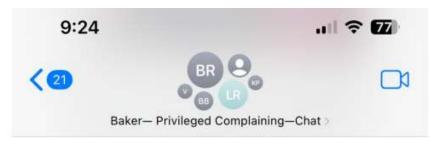
Eighth-grader Blair Harber and her sixthgrade sister Brooke were staying with their grandparents in a cabin near the Guadalupe when the flooding took place, according to a letter sent out by St. Rita Catholic School in Dallas. Their grandparents are still missing; however, their parents, who were staying in a separate cabin, survived. The girls' father told CNN that Blair had "a generous, kind heart," and that Brooke was "like a light in any room, people gravitated to her and she made them laugh and enjoy the moment."





Fri, Jul 25 at 6:45 AM

Brooke Radford iMessage



Fri, Jul 25 at 6:45 AM

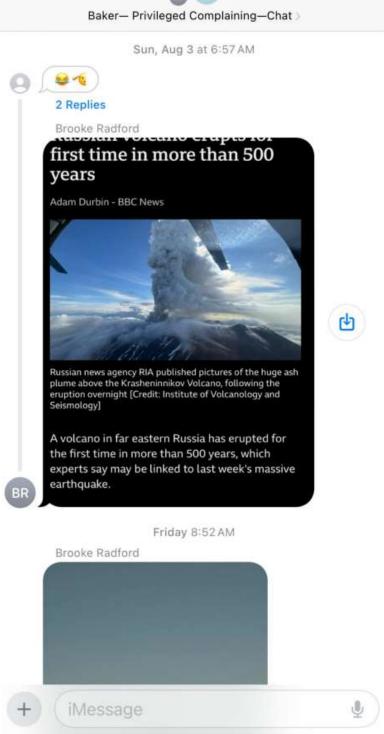
Brooke Radford

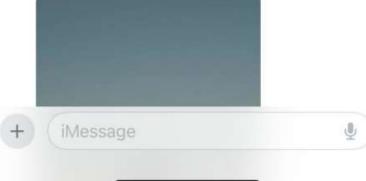




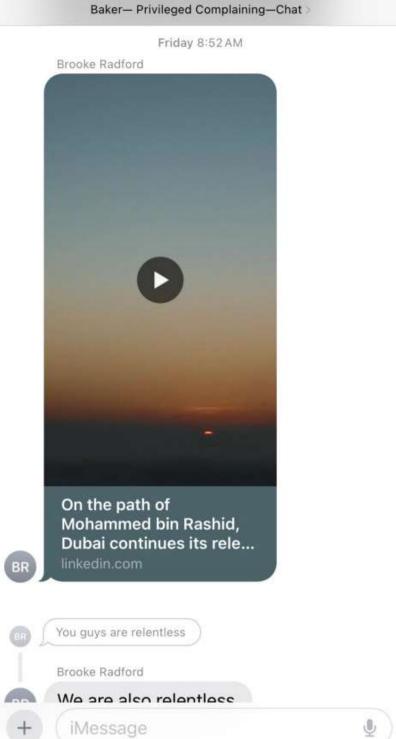














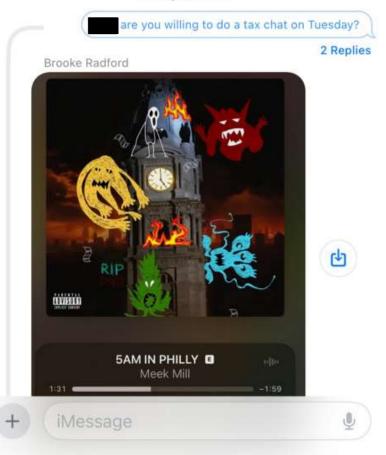


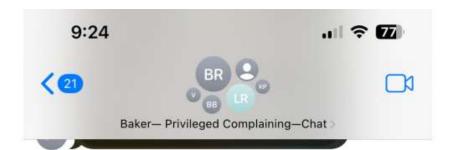


Brooke Radford

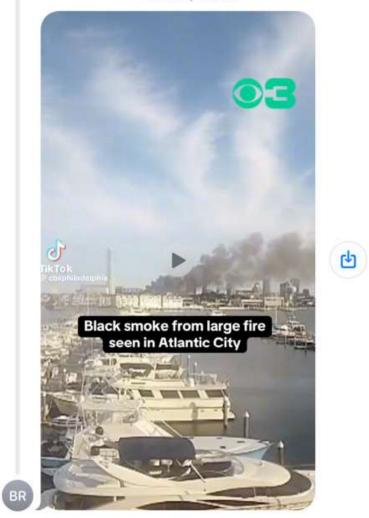
It's no fun if you guys don't play

Friday 5:48 PM

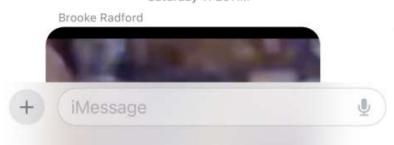




Saturday 9:17 AM

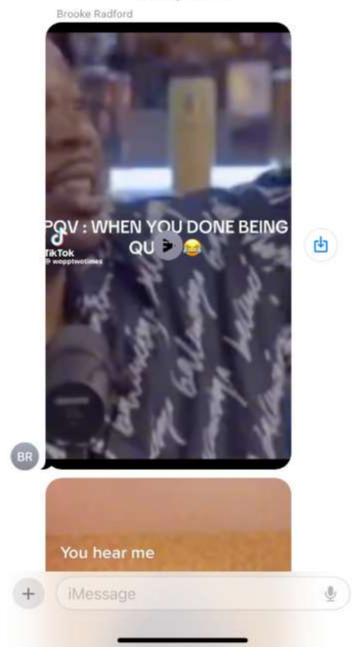


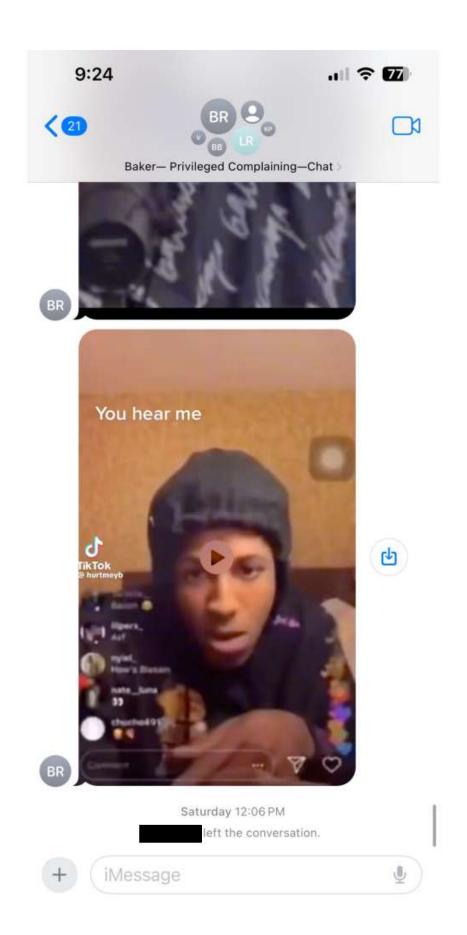
Saturday 11:29 AM





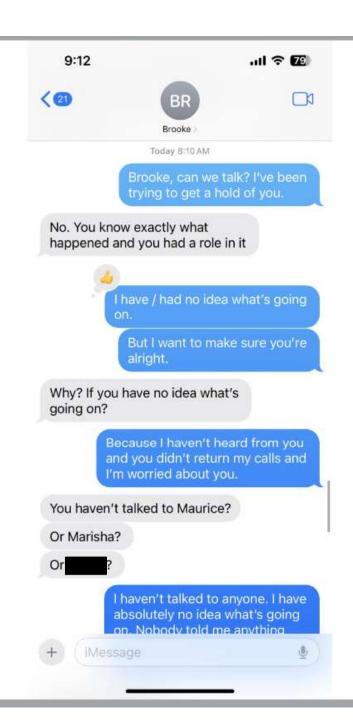
Saturday 11:29 AM

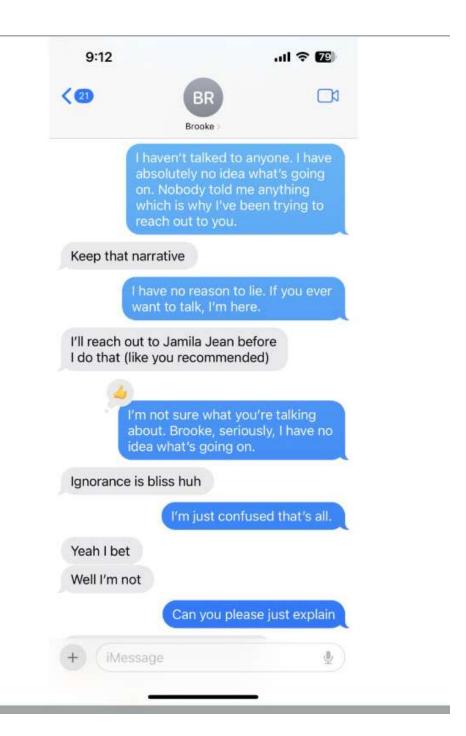


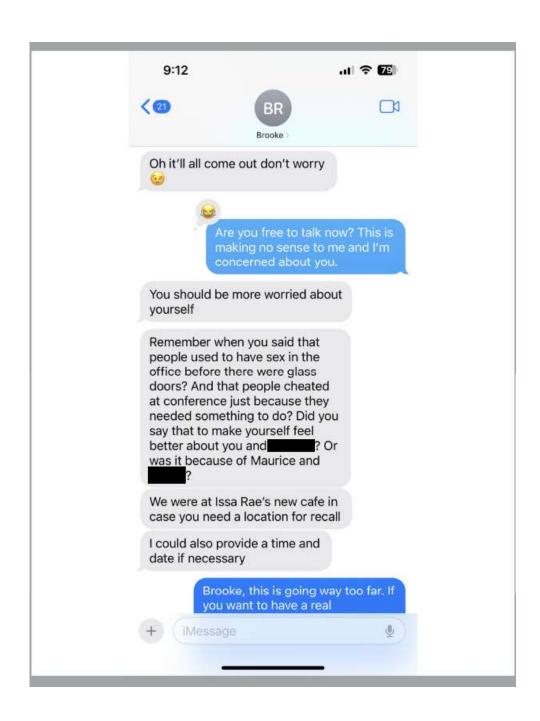


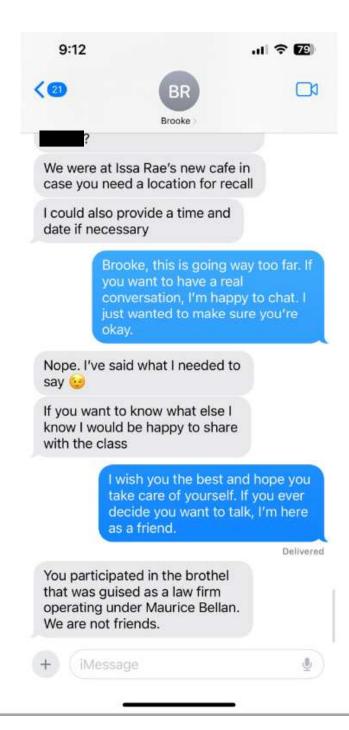
- 27. Ms. Radford also texted strange messages to another former colleague attorney.
- 28. That attorney told Ms. Radford that he did not know what was going on with her and expressed concern for her well-being, in light of her strange messages. Ms. Radford responded with even more strange messages.
  - 29. The following are screenshots of Ms. Radford's messages:











# <u>During July and August 2025, Ms. Radford Sent Threatening And Bizarre Messages to Mr.</u> Bellan and Other Baker Attorneys And Employees.

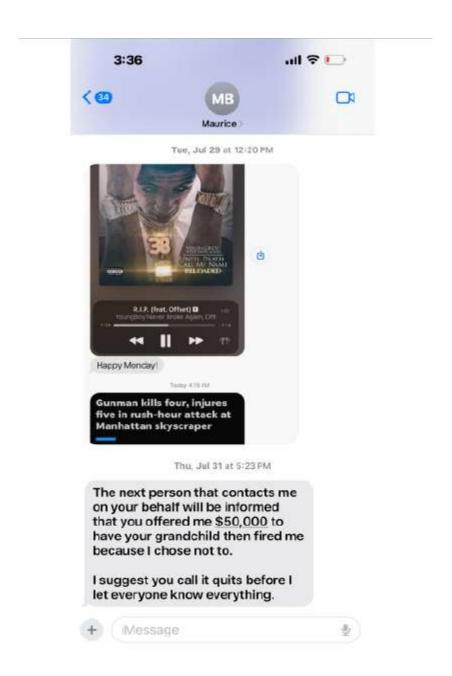
30. During the weekend of July 5-6, 2025, Ms. Radford emailed Maurice Bellan, Human Resources Manager Marisha Lewis, and others links to a Dallas news article about flooding in Texas, and a New York Times article also about how the flooding in Texas killed at least 24

people and rescuers were searching for as many as 25 missing girls, noting "I find this fascinating." Ex. 1.

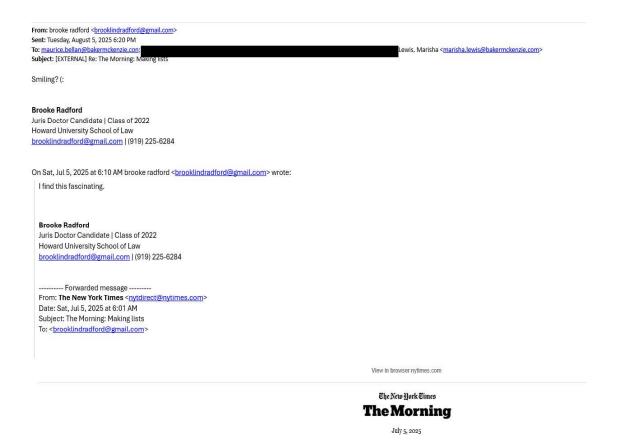
- 31. On July 11, 2025, in response to Ms. Lewis's emails attaching Ms. Radford's final pay statement and requesting that Ms. Radford return the Firm's equipment (laptop, power cord, mobile device, etc.), Ms. Radford stated only, "You can expect a lawsuit." Ex. 2.
  - 32. To date, Ms. Radford still has not returned the Firm's equipment.
- 33. A few minutes later, Ms. Radford responded again to Ms. Lewis's email, "Any other question?" Ex. 3.
- 34. On July 29 and 30, 2025, Ms. Radford sent threatening text messages to Mr. Bellan. The text messages included:
  - "The next person that contacts me on your behalf will be informed that you offered me \$50,000 to have your grandchild then fired me because I chose not to. I suggest you call it quits before I let everyone know everything."
  - Sharing a violent rap song "R.I.P" by Youngboy, which is laced with violent and racist lyrics such as:

Mothafuck them niggas and what they say about me (said 'bout me) You do too much talkin', you a fed, prolly (fed, prolly) Drive-by in my pocket, got them dead bodies (dead bodies) My Goyard look like morgues, that's them dead bodies (dead bodies)

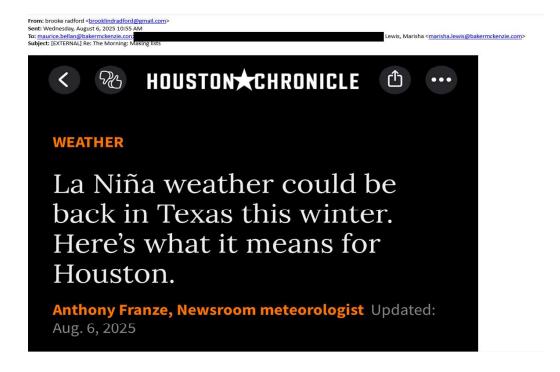
- "Gunman kills four, injures five in rush-hour attack at Manhattan skyscraper."
- 35. Screenshots of those text messages are below:



36. On August 5, 2025, Ms. Radford forwarded to Mr. Bellan, Ms. Lewis, and others her earlier email from July 5 about the Texas flood and wrote, "Smiling? (:."

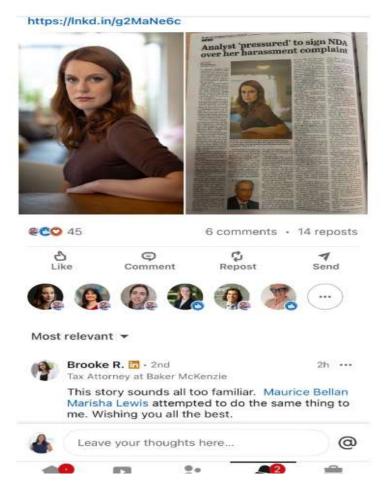


37. The next day, August 6, 2025, Ms. Radford followed up with another weather-related article to Mr. Bellan, Ms. Lewis, and others:



# <u>During August 2025, Ms. Radford Continuously Posted False And Defamatory Messages About Baker on LinkedIn, While Misrepresenting Herself As A Current Baker Attorney.</u>

- 38. In her LinkedIn profile, Ms. Baker continues to misrepresent herself as a "Tax Attorney at Baker McKenzie," despite no longer working at the Firm.
- 39. On or about August 12, 2025, Ms. Radford posted on LinkedIn a comment on a story about a woman who was asked to sign an NDA over a harassment complaint. In her comment, Ms. Radford specifically named Maurice Bellan and Marisha Lewis, accusing them of "attempt[ing] to do the same thing to me." Ms. Radford "tagged" Mr. Bellan and Ms. Lewis in her comment.



40. Following her comment on August 12, 2025, Ms. Radford messaged Ms. Lewis on LinkedIn: "My turn":

From: "Brooke R. via LinkedIn" <messages-noreply@linkedin.com>

Date: August 12, 2025 at 11:01:38 AM EDT

To: Marisha Lewis

Subject: Brooke just messaged you



- 41. Neither Mr. Bellan nor Ms. Lewis (or anyone else at Baker) ever attempted to have Ms. Radford sign an NDA.
- 42. On August 13, 2025, Ms. Radford sent a LinkedIn message to another Baker business professional: "How can you be a DEI employee and act the way you do? As ignorant as you are, you would struggle to find your way out of a brown paper bag."





# Your InMail from Brooke is awaiting response

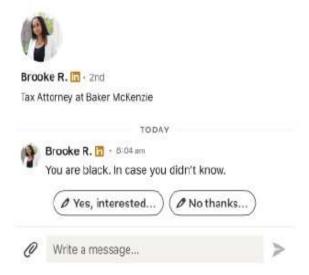


**Brooke R.**Tax Attorney at Baker McKenzie

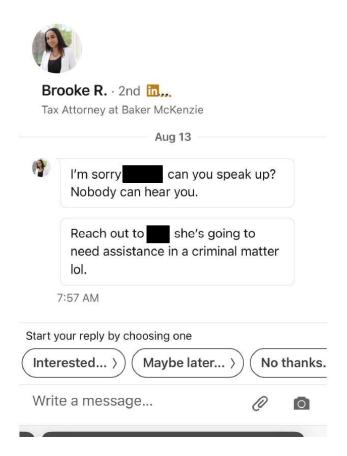
How can you claim to be a DEI employee and act the way you do? As ignorant as you are, you would struggle to find your way out of a brown paper bag



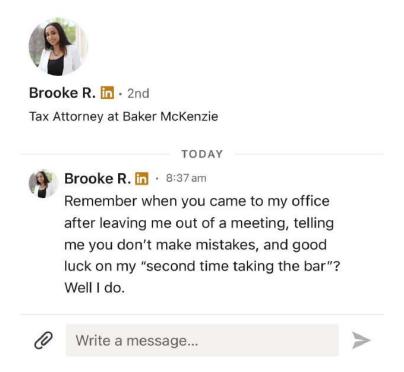
43. Also on August 13, 2025, Ms. Radford sent a LinkedIn message to a Baker partner, stating "You are black, in case you didn't know":



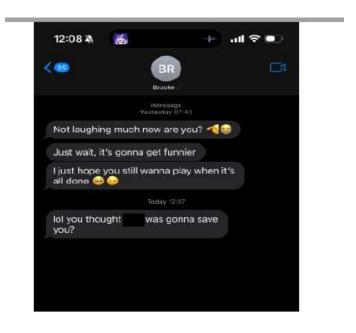
44. Also on August 13, 2025, Ms. Radford sent a LinkedIn message to another Baker attorney, stating "I'm sorry [name redacted], can you speak up? Nobody can hear you. Reach out to [name redacted], she's going to need assistance in a criminal matter":



45. Also on August 13, 2025, Ms. Radford sent a text message to a Baker business professional stating, "Remember when you came to my office after leaving me out of a meeting, telling me you don't make mistakes, and good luck on my 'second time taking the bar'? Well I do." A screenshot of that message is below:



- 46. The Baker professional whom Ms. Radford messaged understood the message to be a personal threat against her.
- 47. On August 13 and 14, 2025, Ms. Radford sent threatening text messages to a Baker associate attorney. The associate was visibly shaken when she reported the messages to Mr. Bellan. Screenshots of the messages are below:



# <u>During August 2025, Ms. Radford Rebuffed Communications From Baker's Outside</u> <u>Counsel Asking Her To Cease Her Inappropriate Behavior.</u>

- 48. On August 15, 2025, Baker McKenzie's outside counsel sent Ms. Radford a letter, which requested that she refrain from sending harassing and threatening messages to Firm employees. Ex. 4.
- 49. Ms. Radford's response to the Firm's outside counsel did not address the substance of the letter, but instead remained cryptic, and included a TikTok video regarding Hurricane Erin. Ex. 5).
- 50. Ms. Radford did not raise or describe any allegations of any improper conduct on the part of Baker in her communications to Baker's outside counsel.

# Ms. Radford Continued To Text Threatening Messages To Baker Associates.

- 51. During August and September 2025, Ms. Radford texted threatening text messages to a group text chat of Baker associate attorneys.
- 52. On August 17, 2025, Ms. Radford posted in this group chat a rap song "Back in Blood" by rappers Pooh Shiesty and Lil Durk.
- 53. The song "Back in Blood" contains lyrics about violence and revenge, as well as frequent profanity and racist words, including as examples:

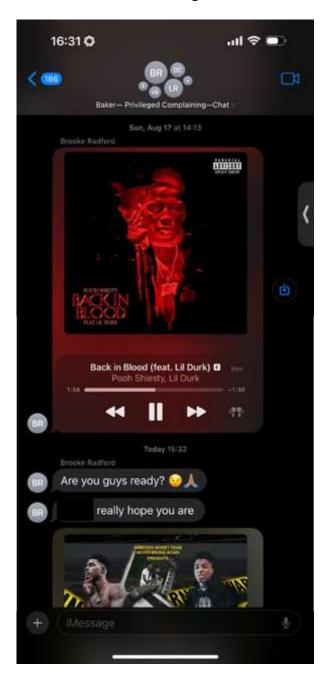
I ain't got nowhere to go, I shot up everywhere they was (blrrrd) Yeah, you know who took that shit from you blrrrd Come get it back in blood (blrrrd, blrrrd)
Bitch, come get it back in blood (big blrrrd)

If your nigga killer ain't dead, you shouldn't wear no R.I.P shirt (nope) We had 300 shots up in the car before we picked up Durk (3Hunna) You niggas who? Ain't got shit goin', go grab a glizzy, get alert (alert) Shiesty G post "R.I.P." and reason he in the dirt (on slime, blrrrd, blrrrd)

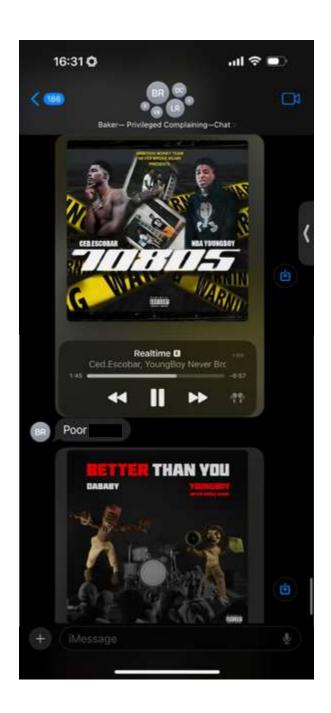
54. On September 14, 2025, Ms. Radford texted the group: "Are you guys ready?" Ms. Radford then singled out a particular Baker associate in a threatening text message: "[name

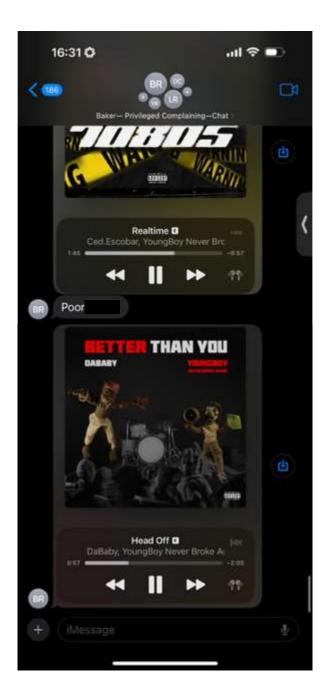
redacted], really hope you are."

55. Below are screenshots of those messages:



56. On September 14, 2025, Ms. Radford posted additional threatening messages to the group chat, including posting rap songs "Realtime" and "Head Off," both of which include explicit lyrics about violence and murder. Screenshots of the messages are below:



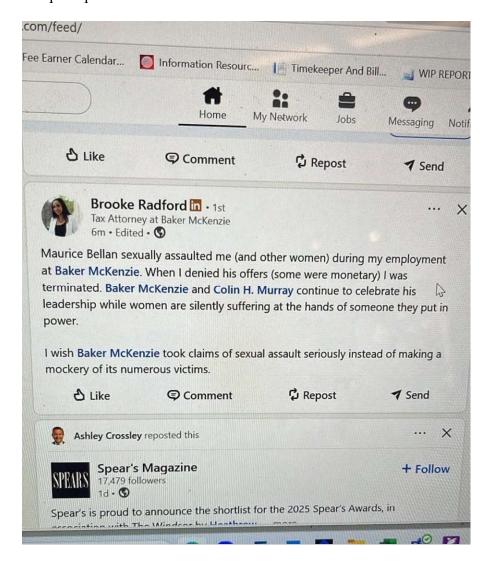


# <u>During September 2025, Ms. Baker Repeatedly Trolled Baker On LinkedIn With</u> <u>Defamatory Comments Falsely Accusing Baker Of Committing Sexual Assault</u>

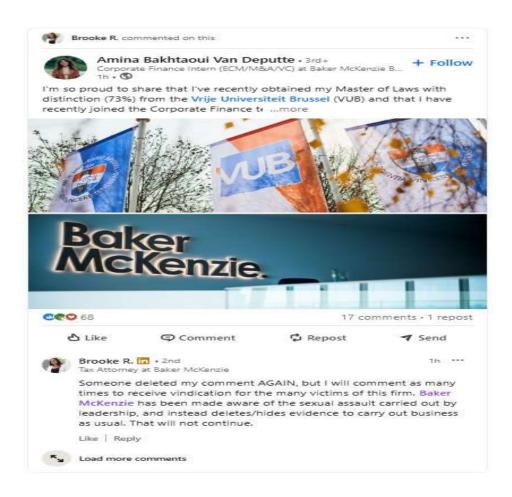
- 57. During her employment, Ms. Radford never reported to any Baker manager or Human Resources employee any accusations that anyone at Baker had sexually assaulted her or otherwise harassed her in any way.
  - 58. Beginning on September 16, 2025, Ms. Radford has continually posted comments

on LinkedIn posts of Baker attorneys and other LinkedIn posts referencing Baker, accusing Mr. Bellan of sexual assault, and generally accusing Baker's "leadership" of "sexual assault" and a cover-up. As of September 19, 2025, there were at least 83 such posts.

59. On September 16, 2025, Ms. Radford posted the following LinkedIn post falsely stating in the public forum of LinkedIn: "Maurice Bellan sexually assaulted me (and other women) during my employment at Baker McKenzie. When I denied his offers (some were monetary) I was terminated. Baker McKenzie and Colin H. Murray continue to celebrate his leadership while women are silently suffering at the hands of someone they put in power." A screenshot of the complete post is below:



60. Ms. Radford also posted comments on LinkedIn posts of Baker attorneys and posts that generally tagged Baker stating: "Baker McKenzie has been made aware of the sexual assault carried out by leadership, and instead deletes/hides evidence to carry out business as usual." One example is in the following screenshot:



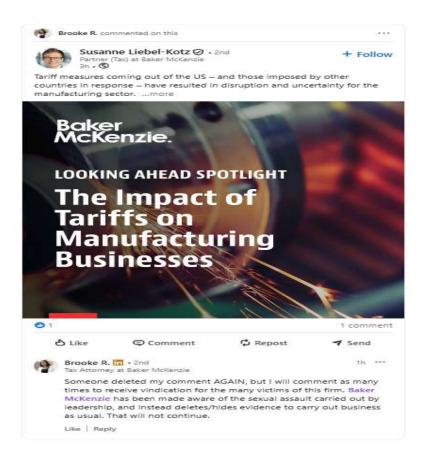
61. Ms. Radford posted numerous other identical or similar comments on numerous LinkedIn posts of both Baker attorneys and posts from other LinkedIn accounts referencing Baker, screenshots of which are in Exhibit 6. Ms. Radford also tagged her original post to over 80 other posts. Ex. 7.

# Baker's Outside Counsel Invited Ms. Radford To Discuss Her Allegations, But Ms. Radford Refused.

- 62. On September 17, 2025, Baker's outside counsel emailed Ms. Radford to inquire about her claim that she had privately communicated to the Firm her allegation of sexual assault. *See* Ex. 8.
- 63. The Firm's outside counsel communicated that he was "reaching out with the hopes of opening a dialog with you" and suggested that Ms. Radford could speak with someone at Baker or Baker's outside counsel. *Id*.
  - 64. Ms. Radford responded that she was not interested in speaking with anyone. *Id.*
- 65. Baker's outside counsel urged Ms. Radford "to stop sending people, including former colleagues, threatening messages, and, further, to stop making false and defamatory posts. *Id.*

# Thereafter, Ms. Radford Continued To Post A Barrage Of False And Defamatory Comments About Baker and Mr. Bellan On LinkedIn and Reddit.

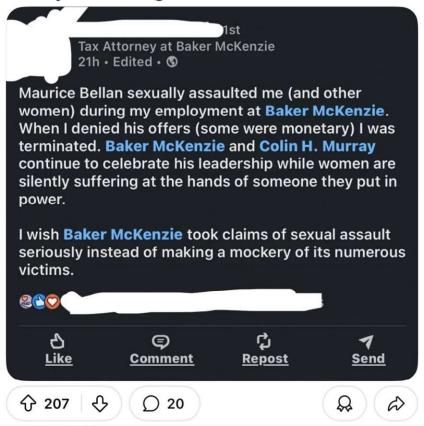
66. Following the September 17, 2025 communications between Baker's outside counsel and Ms. Radford, she continued to post the same or similar comments on LinkedIn posts involving Baker. One example is below, but as noted above, there are dozens more.



- 67. On September 18, 2025, a screenshot of Ms. Radford's LinkedIn post containing her false accusations about Mr. Bellan and Baker was posted on Reddit, stating: "Maurice Bellan sexually assaulted me (and other women) during my employment at Baker McKenzie. When I denied his offers (some were monetary) I was terminated. Baker McKenzie and Colin H. Murray continue to celebrate his leadership while women are silently suffering at the hands of someone they put in power."
- 68. A screenshot of that Reddit post is below, and the version with comments is attached at Exhibit 9:



baker mckenzie partner accused of sexually assaulting female attorneys; allegedly offered money in exchange for sex acts



- 69. Mr. Bellan never sexually assaulted Ms. Radford or any other women.
- 70. Mr. Bellan never made any offers to Ms. Radford to silence any allegations of sexual assault.
- 71. Ms. Radford never communicated to any Baker manager or HR employee, prior to her termination, any allegations that Mr. Bellan had sexually assaulted her.
- 72. Ms. Radford's LinkedIn and Reddit posts included knowingly false statements that: (1) Mr. Bellan sexually assaulted her and other women; (2) Mr. Bellan offered Ms. Radford money

to silence her allegations of sexual assault; and (3) Baker failed to address allegations raised of sexual assault.

# COUNT I Defamation Per Se (On Behalf of Bellan)

- 73. The allegations contained in the preceding paragraphs are re-alleged and incorporated by reference as though fully set forth herein.
  - 74. Defendant knowingly and falsely accused Plaintiff Bellan of sexual assault.
  - 75. Defendant's accusation of sexual assault is a provably false statement of fact.
  - 76. Plaintiff Bellan did not sexually assault Defendant.
- 77. Defendant knowingly and falsely accused Plaintiff Bellan of trying to pay her off to cover up the falsely alleged sexual assault.
- 78. Defendant's accusation of trying to pay her off to cover up the falsely alleged sexual assault is a provably false statement of fact.
- 79. Plaintiff Bellan did not try to pay Defendant off to cover up the falsely alleged sexual assault. Defendant's accusation is provably false.
- 80. Defendant repeatedly published her false accusation of sexual assault on, at least, LinkedIn and Reddit, both of which are public forums.
- 81. Defendant's publications of her knowingly false accusations against Plaintiff Bellan were made with actual malice as evidenced by the frequency and targeting of publication, as well as her refusal to discuss any facts to back up her accusations.
- 82. Likewise, Defendant published her false accusation that Plaintiff Bellan tried to pay her off to cover up the falsely alleged sexual assault on, at least, LinkedIn and Reddit, both of which are public forums.

- 83. Defendant's false accusation of sexual assault is, per se, harmful to Plaintiff Bellan's reputation, as managing partner of Plaintiff Baker's Washington, D.C. office, in that it makes him appear odious and/or infamous.
- 84. Similarly, Defendant's false accusation that Plaintiff Bellan, managing partner of Plaintiff Baker's Washington, D.C. office, tried to pay her off to cover up the falsely alleged sexual assault is, per se, harmful to his reputation in that it makes him appear odious and/or infamous.
- 85. Likewise, Plaintiff Bellan has suffered actual reputational harm as a result of Defendant publishing knowingly false accusations because the accusations have been made in a public forum, before peers, colleagues, and colleagues, amongst others.
- 86. Defendant's publications of her knowingly false accusations against Plaintiff Bellan were made with actual malice as evidenced by the frequency and targeting of publication, as well as her refusal to discuss any facts to back up her accusations.

#### COUNT II Defamation Per Se (On Behalf of Baker)

- 87. The allegations contained in the preceding paragraphs are re-alleged and incorporated by reference as though fully set forth herein.
- 88. Defendant knowingly and falsely accused Plaintiff Baker of covering up and ignoring a sexual assault of Defendant.
- 89. Defendant's accusation of covering up and ignoring a sexual assault of Defendant is a provably false statement of fact.
  - 90. Plaintiff Baker did not cover up or ignore any alleged sexual assault of Defendant.
- 91. Defendant published her false accusation that Plaintiff Baker covered up and ignored her alleged sexual assault on, at least, LinkedIn and Reddit, both of which are public forums.

- 92. Defendant's publications of her knowingly false accusations against Plaintiff
  Baker were made with actual malice as evidenced by the frequency and targeting of publication,
  as well as her refusal to discuss any facts to back up her accusations.
- 93. Defendant's false accusation that Plaintiff Baker covered up and ignored sexual assault is, per se, harmful to Plaintiff Baker's reputation, as a prominent national law firm.
- 94. Plaintiff Baker has also suffered actual reputational harm as a result of Defendant publishing knowingly false accusations because the accusations have been made in a public forum, before business partners, clients, and competitors, amongst others.

# COUNT III APPLICATION FOR CIVIL PROTECTIVE ORDER (On behalf of Mr. Bellan and Doe Plaintiffs)

- 95. The allegations contained in the preceding paragraphs are re-alleged and incorporated by reference as though fully set forth herein.
- 96. Ms. Radford has and continues to engage in a course of conduct towards current Baker employees that has caused those employees to fear for their safety, be seriously alarmed, disturbed and frightened, and suffer emotional distress.
- 97. Ms. Radford knew and knows that her conduct would cause Mr. Bellan and the Doe Plaintiffs to fear for their safety and the safety of other persons associated with Mr. Bellan and the Doe Plaintiffs, be seriously alarmed, disturbed and frightened, and suffer emotional distress.
- 98. Ms. Radford knew or should have known that her conduct would cause a reasonable person in Mr. Bellan's and the Doe Plaintiffs' circumstances to fear for their safety or the safety of another person, feel seriously alarmed, disturbed or frightened, or suffer emotional distress.
- 99. Ms. Radford has intended and continues to intend that her conduct cause such fear and emotional distress in Mr. Bellan and the Doe Plaintiffs.

#### **COUNT IV**

#### **Intentional Infliction of Emotional Distress (On Behalf of Mr. Bellan)**

- 100. The allegations contained in the preceding paragraphs are re-alleged and incorporated by reference as though fully set forth herein.
- 101. Mr. Radford's false accusations towards Mr. Bellan and the means by which she distributed and continues to distribute those allegations constitutes extreme and outrageous conduct.
  - 102. Ms. Radford engaged in the aforementioned conduct intentionally and recklessly.
- 103. Ms. Radford's conduct has caused Mr. Bellan to fear for his safety and the safety of his family members and has caused him and his family severe emotional distress.

#### PRAYER FOR RELIEF

WHEREFORE, Plaintiffs prays that this Court:

- 1. Grant judgment for Plaintiffs on all of their claims against Defendant;
- 2. Award immediate, preliminary and permanent injunctive relief to Plaintiffs ordering Defendant to:
  - a. Immediately cease posting on social media or other places false and defamatory statements about Mr. Bellan, Baker, or other individuals associated with Baker;
  - b. Remove all such false and defamatory statements from all social media sites on which she posted them;
  - c. Permanently cease and desist from harassing Mr. Bellan, Baker, and all others associated with Baker, online or otherwise;
  - 3. Issue an Anti-Stalking Civil Protection Order prohibiting Defendant from:
    - a. Having any direct or indirect contact with Mr. Bellan or Doe Plaintiffs;

- b. Sending electronic messages, including but not limited to emails, text messages, and social media messages, to Mr. Bellan or Doe Plaintiffs;
- c. Stalking, following, surveilling, harassing, or threatening Mr. Bellan or Doe Plaintiffs;
- d. Using third parties to contact or harass Mr. Bellan or Doe Plaintiffs;
- 4. Award money damages to Plaintiffs in amounts to be determined by the Court;
- 5. Award Plaintiffs pre-judgment and post-judgment interest, as permitted by law; and
- 6. Award Plaintiffs any other and further relief that the Court deems just and proper.

#### Respectfully submitted,

/s/ Nigel L. Wilkinson

Nigel L. Wilkinson (DC Bar No. 466221)
Teresa Burke Wright (DC bar No. 429196)
Eric P. Burns (DC Bar No. 1015999)
Jackson Lewis P.C.
11790 Sunrise Valley Drive, Suite 400
Reston, VA 20191
(703) 483-8300
Nigel.wilkinson@jacksonlewis.com
Teresa.wright@jacksonlewis.com
Eric.burns@jacksonlewis.com

Counsel for Plaintiffs Baker & McKenzie LLP, Maurice Bellan, and Doe Plaintiff 1 through 5

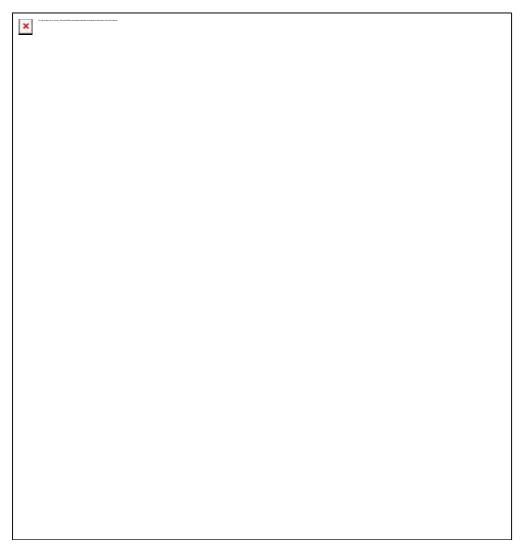
| From:<br>Sent:<br>To:  | brooke radford <brooklindradford@gmail.com> Sunday, July 6, 2025 10:48 AM maurice.bellan@bakermckenzie.con; Lewis, Marisha</brooklindradford@gmail.com> |  |  |  |  |
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| On Sat, Jul 5, 2025 at 6:10 AM<br>I find this fascinating.   | brooke radford < brooklindradford@gmail.com > wrote:  |  |  |  |  |
| Brooke Radford  Juris Doctor Candidate   Cla- Howard University School of brooklindradford@gmail.com   | Law   |  |  |  |  |
| Forwarded message From: <b>The New York Times</b> < <u>nytdirect@nytimes.com</u> > Date: Sat, Jul 5, 2025 at 6:01 AM Subject: The Morning: Making lists To: < <u>brooklindradford@gmail.com</u> >  |   |  |  |  |  |
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July 5, 2025



Good morning. We've been marinating in lists of the best movies of the 21st century. What purpose does a list serve, anyway?



María Jesús Contreras

# Hit list



By Melissa Kirsch

What did you rank as your <u>top movies of the 21st century</u>? Did you include "La La Land," which landed at No. 16 on <u>our list of readers' picks</u>, despite not appearing at all on the list by actors and directors? I struggled to determine how I would rank a movie as one of "the best." Was it one that left me astonished when I saw it? One that stayed with me long after

watching? Or should I choose films that somehow felt important in the history of cinema? And what does "important" mean anyway? In 2000, I loved "High Fidelity" and "Best in Show" — but of course I hadn't seen "Moonlight" or "The Royal Tenenbaums" or "Tár" yet. What did it mean if my list diverged wildly from The Times's lists? From those of my friends? I found myself inanely worrying that my picks weren't serious enough, that they didn't adequately convey my tastes or aesthetic.

What is the purpose of a list ranking "the best" of something, anyway? Is it to establish a canon, a definitive record, etched in stone? Is it to inspire questions and conversations and arguments about what makes something good? The very fact that we are stopping to consider the movies we love and debating their relative merits, interrogating what our picks say about us and the culture, is glorious. If we bemoan how the majesty of moviegoing has been diminished and replaced by slack-jawed streaming of algorithm-designed "content," then a project that lifts us out of the endless scroll and helps us remember why we love movies in the first place is a welcome tonic.

I love the way a big list forces me to question and define my tastes, to consider what I like and don't and why, to sharpen my critical takes against those of others. But the best part of engaging with the films of the 21st century is how the list prompted a cascade of memories of the past 25 years. I remember the exact theater in which I saw "Y Tu Mamá También" in 2002, the friends I was with, where we ate afterward. That restaurant is definitely not there anymore. I remember seeing "Melancholia" in 2011, talking about it over drinks in a weird bar in Midtown. What was my drink order in those days?

The objective quality of a film is fun to debate, but it's a lovely sort of ecstasy to think back over one's quarter-century of movie-watching experiences, to use those movies to populate a memory palace. The film is just the catalyst for a million other reminiscences.

Making a list of the movies you loved over the past 25 years is a way of organizing those years, a kind of post-factum diary. If you were to riff on each of your top 10 movies, what long-forgotten details from your history might be dislodged? You might remember how "The Hurt Locker" floored you in 2009, but you might also remember the rainy day on which you saw it, your raincoat — what happened to that raincoat? — the car you drove to the theater, the job you had then or the person you were dating. We're forever cramming our brains with more information. Take these 10 movies and use them to sift through some of the accumulated sediment, to make order out of the chaos.

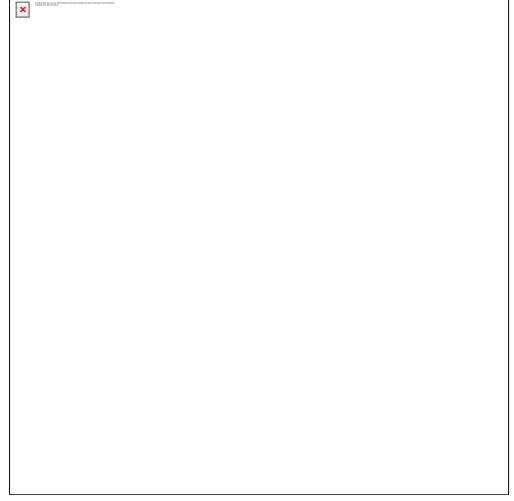
If I can rouse myself from reverie, I'll commit myself this weekend to some of the 11 movies on the main list that I haven't seen and want to. (How is it possible that I've never seen

"Spirited Away"?) Or maybe not - "F1" and "Sorry, Baby" are in theaters, and it might be more satisfying to get a jump on 2050's list.

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#### THE LATEST NEWS

Flooding in Texas

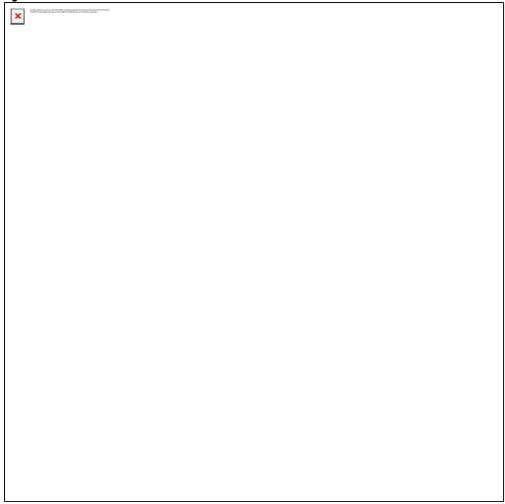


The flooded Guadalupe River in Kerrville, Texas. Carter Johnston for The New York Times

• In central Texas, sudden floods swept through a summer camp and homes, killing at least 24. Rescuers are frantically searching for as many as 25 missing girls. Read more here.

- Rain led to a rapid rise of the Guadalupe River, which accelerated to over 29 feet before sunrise on Friday.
- Camp Mystic, a Christian camp, said that it did not have power, water or Wi-Fi and was <u>struggling to get more help</u> because a nearby highway had washed away.

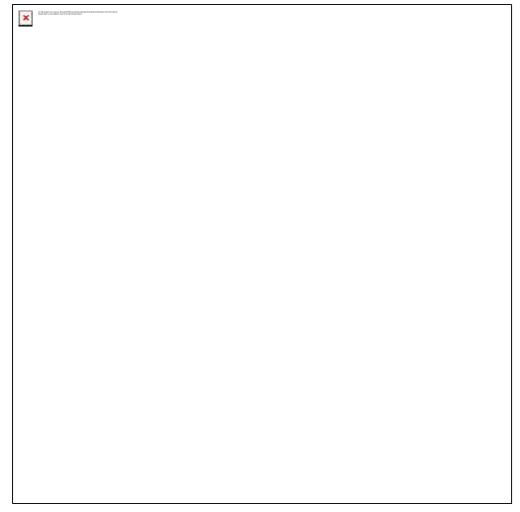
**Trump's Policy Bill** 



In Washington D.C. Tierney L. Cross/The New York Times

- President Trump signed his sweeping policy bill into law in a Fourth of July ceremony.
- The American tax code now blends traditional supply-side economics with President Trump's populist 2024 campaign promises. See how the legislation could affect you.

## **Other Big Stories**

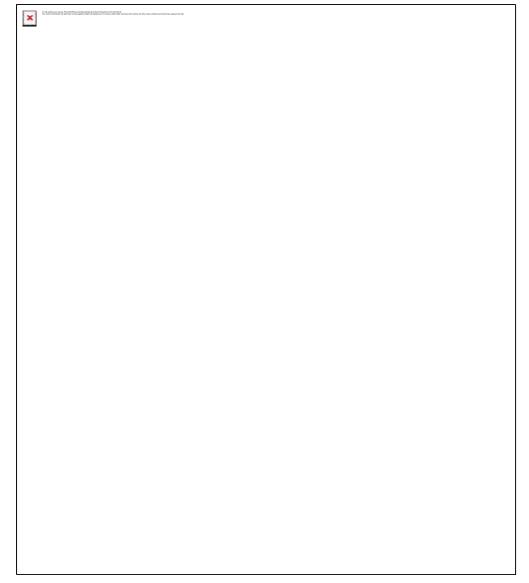


In Sierra Madre, Calif. Mario Tama/Getty Images

- America celebrated the Fourth of July, and you can <u>see photos here</u>. The Times asked people to <u>share what they love about the country</u>.
- Hamas said it was <u>ready to negotiate a truce proposal</u>.
- Russia <u>attacked Kyiv and other Ukrainian cities</u> with the largest number of drones and missiles launched in a single barrage so far in the war, Ukraine said.
- The United Nations' nuclear watchdog said that <u>its inspectors have left Iran</u>, which had stopped cooperating with the agency.

#### THE WEEK IN CULTURE

#### Film and TV

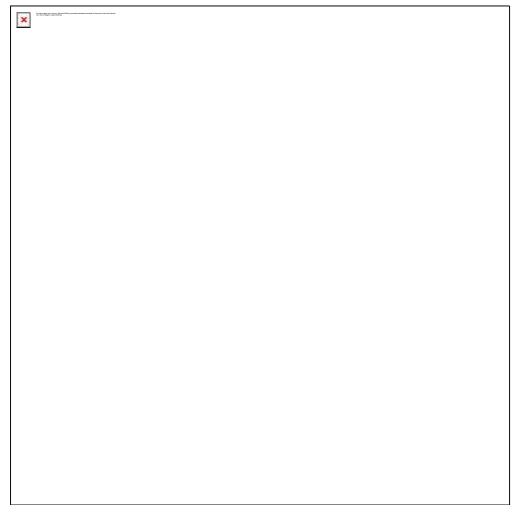


Uma Thurman, left, with Charlize Theron. Thea Traff for The New York Times

- Uma Thurman returns to action movies with "The Old Guard 2," which pits her against Charlize Theron. The two of them spoke with The Times about women in action.
- "Jurassic World Rebirth" is in theaters this weekend. Listen to its director, Gareth Edwards, narrate a <u>T. rex escape scene from the film</u>. (You can also <u>read our review here</u>.)
- The teaser for "The Odyssey," Christopher Nolan's next film, is playing in theaters before "Jurassic World Rebirth." Here's what it reveals.

• In "Heads of State," Idris Elba plays the British prime minister and John Cena plays the U.S. president, both of whom fend off assassination attempts. Our reviewer calls it loud and harmless japery.

#### Music



Liam Gallagher, left, and Noel Gallagher from the band Oasis. Scott a Garfitt/Invision, via Associated Press

- Oasis is back. In the 16 years they were away, the Gallagher brothers kept their names in the news by <u>mastering the art of the troll</u>.
- Sean Combs was acquitted of the most serious charges against him. His successful defense hinged on the argument that he might be abusive, <u>but he wasn't a racketeer</u>.
- Ozzy Osbourne appears in his last-ever concert today. Five musicians, including Tommy Lee of Mötley Crüe, <u>reflected on Osbourne's career</u>.

#### **Fashion**

- A skinny little mustache is the facial hair style of the moment, GQ reports.
- Some athletes' wives and girlfriends are more famous than the players themselves. Fashion brands have noticed.
- Marc Jacobs showed off his latest collection at the New York Public Library. The looks were dreamy and <u>wide open to interpretation</u>, our Styles editor wrote.

#### **More Culture**

- Some say there is no longer a place for the straight white male novelist. The Times's Marc Tracy asks: Should we care?
- Some people are injecting themselves with Botox. The Cut is encouraging them to stop.

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#### **CULTURE CALENDAR**



**Sent:** Friday, July 11, 2025 4:41 PM

To: Lewis, Marisha

**Subject:** [EXTERNAL] Re: Pay Statement

You can expect a lawsuit.

#### **Brooke Radford**

Juris Doctor Candidate | Class of 2022 Howard University School of Law brooklindradford@gmail.com | (919) 225-6284

On Fri, Jul 11, 2025 at 4:22 PM Lewis, Marisha < Marisha.Lewis@bakermckenzie.com > wrote:

Dear Brooke,

Attached please find the pay statement for July 8, 2025. The document is password protected (last four of your SSN).

Also, to date we have not received the firm's equipment (laptop, power cord, mobile device, etc.). Can you please advise of when we can expect its return? If you need another prepaid label we can provide one.

Kind regards,

#### **Marisha Lewis**

Human Resources Manager

Baker & McKenzie LLP 815 Connecticut Avenue, N.W. Washington, DC 20006-4078 United States Tel: +1 202 452 7000

Tel: +1 202 452 7000 Direct: +1 202 452 7023

marisha.lewis@bakermckenzie.com



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**From:** brooke radford <br/>brooklindradford@gmail.com>

**Sent:** Friday, July 11, 2025 4:57 PM

To: Lewis, Marisha

**Subject:** [EXTERNAL] Re: Pay Statement

Any other question?

#### **Brooke Radford**

Juris Doctor Candidate | Class of 2022 Howard University School of Law brooklindradford@gmail.com | (919) 225-6284

On Fri, Jul 11, 2025 at 4:22 PM Lewis, Marisha < Marisha.Lewis@bakermckenzie.com > wrote:

Dear Brooke,

Attached please find the pay statement for July 8, 2025. The document is password protected (last four of your SSN).

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Kind regards,

#### **Marisha Lewis**

Human Resources Manager

Baker & McKenzie LLP 815 Connecticut Avenue, N.W. Washington, DC 20006-4078 United States Tel: +1 202 452 7000

Tel: +1 202 452 7000 Direct: +1 202 452 7023

marisha.lewis@bakermckenzie.com



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## **JacksonLewis**

Jackson Lewis P.C. 11790 Sunrise Valley Drive Suite 400 Reston, VA 20191 (703) 483-8300 Main (703) 483-8301 Fax jacksonlewis.com

August 15, 2025

#### Via Electronic Mail

Brooke Radford 10401 Motor City Drive Apartment 503 Bethesda, MD 20817

brooklindradford@gmail.com

Re: Baker & McKenzie

Dear Ms. Radford:

My firm is outside counsel to your former employer, Baker & McKenzie LLP (the "Firm").

Since the Firm terminated your employment on June 4, 2025, the termination taking effect on July 7, 2025, you have sent several emails, text messages, and LinkedIn messages to various current Firm employees that have raised serious concerns. Some of these messages contain statements by you that are threatening (both veiled and explicit), and others are just confusing as they have no bearing on your former position at the Firm. You have also made defamatory comments on LinkedIn and in text messages about Firm employees.

While it is unclear what your motivations are for sending such messages, we ask that you refrain from contacting any person at Baker & McKenzie going forward. Should you continue to reach out to people at the Firm, or continue to make defamatory comments, we will take all appropriate legal action to protect Firm employees. We truly hope that such action will not be necessary.

Finally, I understand that the Firm has asked you several times to return the Firm's computer, mobile device, key fobs, etc., but you have not done so. I can arrange to have prepaid mailing materials sent to you so that you can return that equipment if you do not already have those mailing materials – just let me know if you'd like me to do that. If you do not return that equipment, then the Firm may take legal action to retrieve it. Here too we hope such action is unnecessary.

If you have any questions about any of this, please feel free to contact me rather than anyone at the Firm.

Very truly yours,

Nigel L. Wilkinson Jackson Lewis P.C.

#### Wilkinson, Nigel L. (DC)

**From:** brooke radford <brooklindradford@gmail.com>

Sent: Saturday, August 16, 2025 5:23 PM

**To:** Wilkinson, Nigel L. (DC) **Subject:** Re: Baker & McKenzie

**Attachments:** v12025gd0000d2gasvvog65uiuaab3n0.mp4

#### **Brooke Radford**

Juris Doctor Candidate | Class of 2022 Howard University School of Law brooklindradford@gmail.com | (919) 225-6284

On Fri, Aug 15, 2025 at 10:00 AM Wilkinson, Nigel L. (DC) < Nigel. Wilkinson@jacksonlewis.com > wrote:

I just wanted to know whether you planned to return the Firm's equipment as I can help facilitate that. Your responses don't answer that question. Will you please just let me know one way or the other?

Thanks,

Nigel



## Nigel L. Wilkinson

Attorney at Law

Jackson Lewis P.C.

11790 Sunrise Valley Drive Suite 400

Reston, VA 20191

Direct: (703) 483-8327 | Main: (703) 483-8300

Nigel.Wilkinson@jacksonlewis.com | www.jacksonlewis.com

Sent: Friday, August 15, 2025 9:56 AM

To: Wilkinson, Nigel L. (DC) < Nigel. Wilkinson@jacksonlewis.com >

Subject: Re: Baker & McKenzie

If we go to court you will.

#### **Brooke Radford**

Juris Doctor Candidate | Class of 2022

Howard University School of Law

brooklindradford@gmail.com | (919) 225-6284

On Fri, Aug 15, 2025 at 9:54 AM Wilkinson, Nigel L. (DC) < <u>Nigel.Wilkinson@jacksonlewis.com</u> > wrote:

Unfortunately, I don't know what that means.



#### Nigel L. Wilkinson

Attorney at Law

Jackson Lewis P.C.

<u>11790</u> <u>Sunrise</u> <u>Valley</u> <u>Drive</u> Suite 400

Reston, VA 20191

Direct: (703) 483-8327 | Main: (703) 483-8300

Nigel.Wilkinson@jacksonlewis.com | www.jacksonlewis.com

From: brooke radford < brooklindradford@gmail.com >

**Sent:** Friday, August 15, 2025 9:49 AM

To: Wilkinson, Nigel L. (DC) < Nigel. Wilkinson@jacksonlewis.com >

Subject: Re: Baker & McKenzie

(:

#### **Brooke Radford**

Juris Doctor Candidate | Class of 2022

Howard University School of Law

brooklindradford@gmail.com | (919) 225-6284

On Fri, Aug 15, 2025 at 9:47 AM Wilkinson, Nigel L. (DC) < Nigel. Wilkinson@jacksonlewis.com > wrote:

Hi Ms. Radford, do you plan to return the Firm's equipment and other property you still have? And would you like me to have the prepaid mailing materials sent to you?

Thanks,

Nigel



Nigel L. Wilkinson

Attorney at Law

Jackson Lewis P.C.

11790 Sunrise Valley Drive Suite 400

Reston, VA 20191

Direct: (703) 483-8327 | Main: (703) 483-8300

Nigel.Wilkinson@jacksonlewis.com | www.jacksonlewis.com

**From:** brooke radford < brooklindradford@gmail.com >

Sent: Friday, August 15, 2025 9:18 AM

To: Wilkinson, Nigel L. (DC) < Nigel. Wilkinson@jacksonlewis.com >

**Subject:** Re: Baker & McKenzie

I am begging you to take legal action. I would love everything to come out in court.

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#### **Brooke Radford**

Juris Doctor Candidate | Class of 2022

Howard University School of Law

brooklindradford@gmail.com | (919) 225-6284

On Fri, Aug 15, 2025 at 9:13 AM Wilkinson, Nigel L. (DC) < Nigel. Wilkinson@jacksonlewis.com > wrote:

Dear Ms. Radford, please see the attached letter.

Best regards,

Nigel Wilkinson



## Nigel L. Wilkinson

Attorney at Law

Jackson Lewis P.C.

<u>11790 Sunrise Valley Drive</u> <u>Suite 400</u>

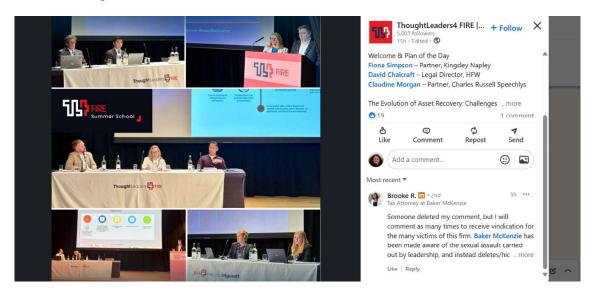
Reston, VA 20191

Direct: (703) 483-8327 | Main: (703) 483-8300

Nigel.Wilkinson@jacksonlewis.com | www.jacksonlewis.com

#### **Comments:**

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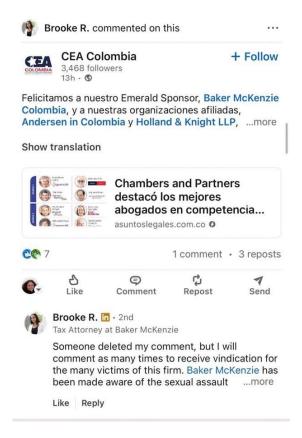
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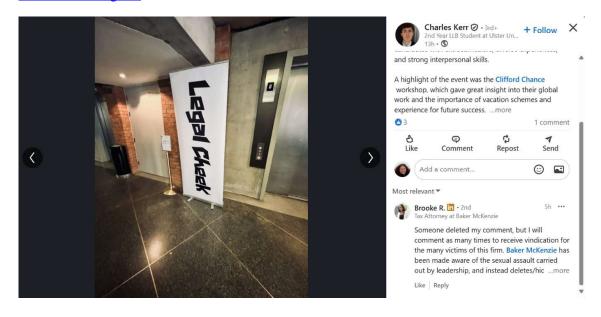
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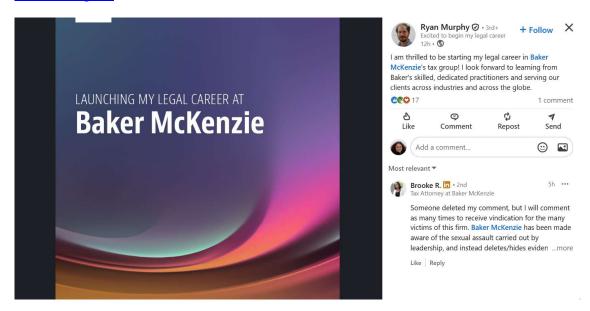
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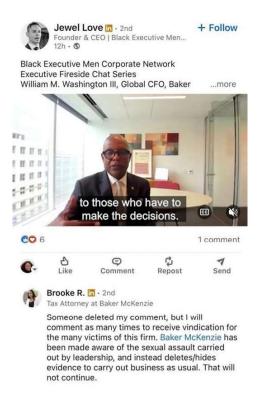


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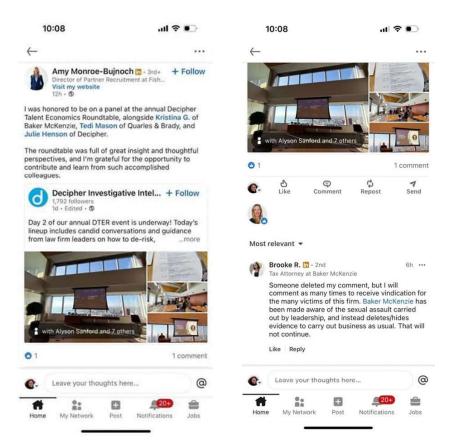


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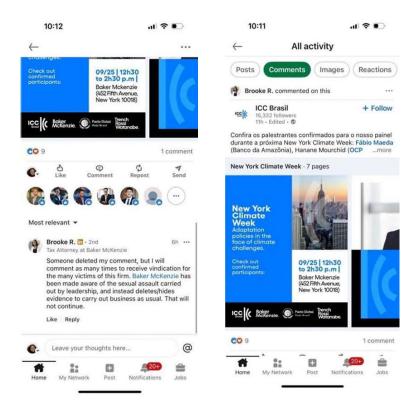
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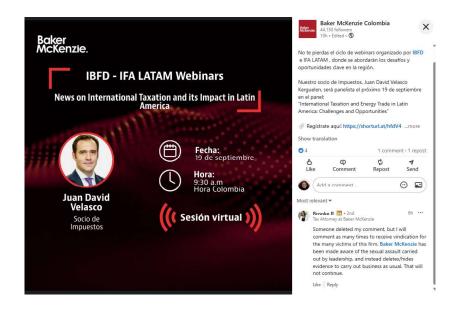
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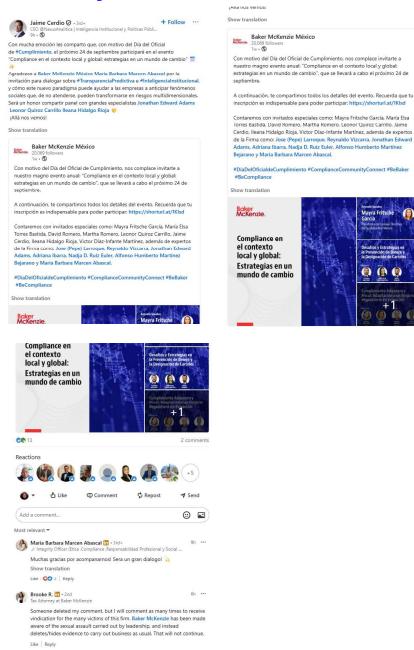


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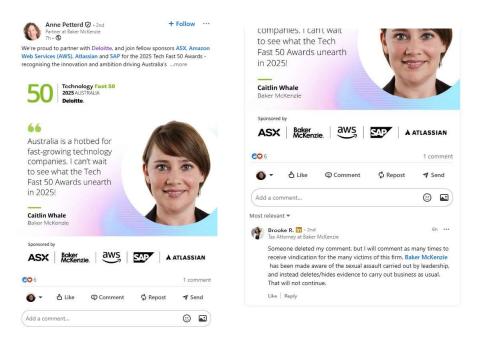


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**CSO** 73

Reactions



I couldn't, in good conscience, sign an NDA and as a result, I've lost my job and become the target of retaliation from my employer.

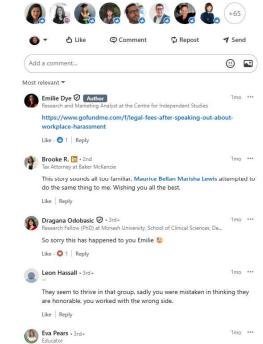
I've lodged several claims with the Fair Work Commission, including for sexual harassment, retaliation, and unfair dismissal.

Legal fees have already reached \$17.936 and continue to climb. I'm sharing my GoFundMe link below to help cover the cost of standing up (not just for myself, but for others who've been silenced).

If you're able to contribute or share, thank you. It means more than you know.

#### https://lnkd.in/g2MaNe6c

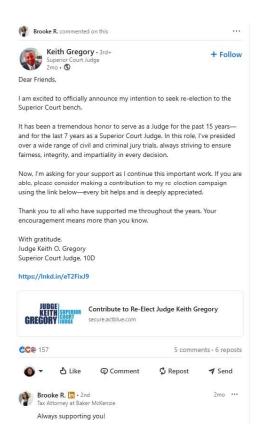




7 comments - 19 reposts

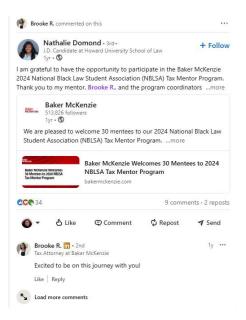
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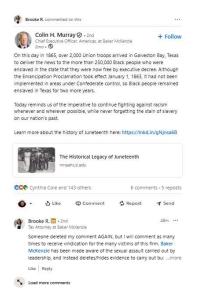


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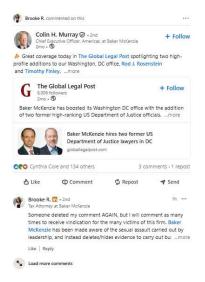
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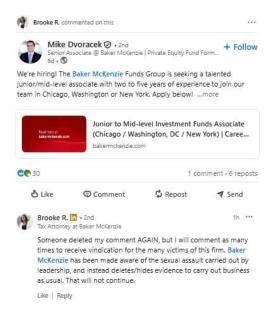
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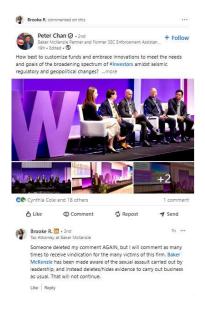
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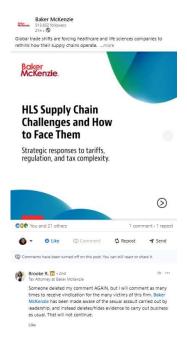




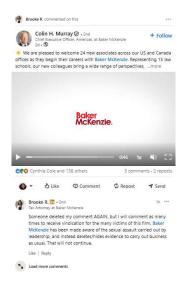








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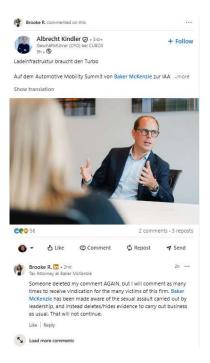
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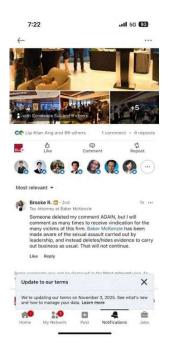
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#### **BMWL**



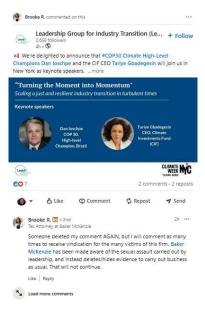
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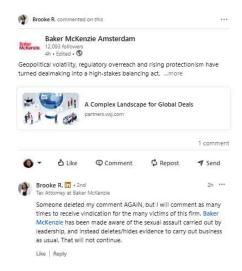
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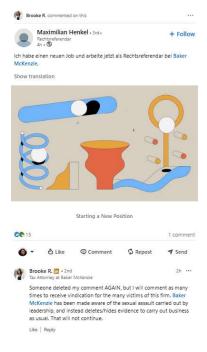
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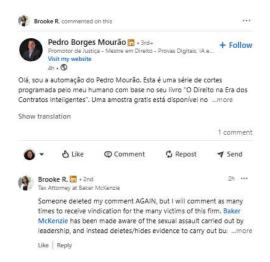
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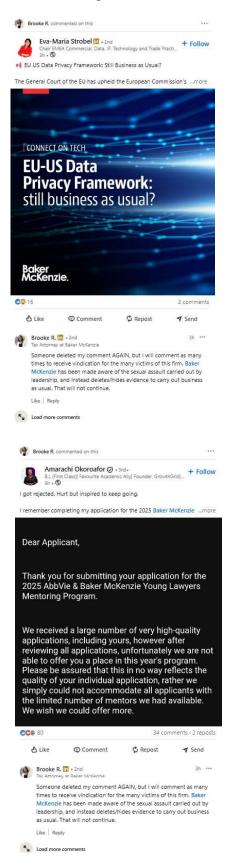
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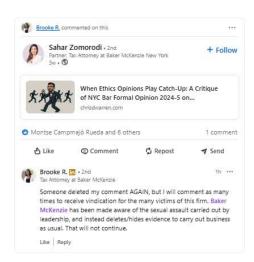
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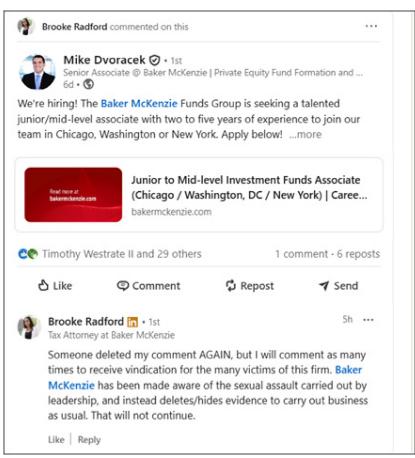
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https://www.linkedin.com/posts/mouniabenabdallah\_on-5-november-baker-mckenzie-invites-you-activity-7372465788240396288-

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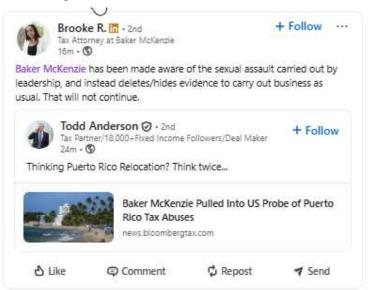




#### **Reshares with Comments:**

https://www.linkedin.com/posts/brooke-r-12a404141\_baker-mckenzie-pulled-into-us-probe-of-puerto-activity-7374513906632925184-

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https://www.linkedin.com/posts/brooke-r-12a404141\_baker-mckenzie-pulled-into-us-probe-of-puerto-activity-7374510373263151104-

<u>1Pug?utm\_source=share&utm\_medium=member\_desktop&rcm=ACoAAAFRsAcBJzXHKxHBSLcO8vx8u8-0gGJvRPo</u>



https://www.linkedin.com/posts/brooke-r-12a404141\_sumate-a-baker-mckenzie-argentina-activity-7374510275082997760-

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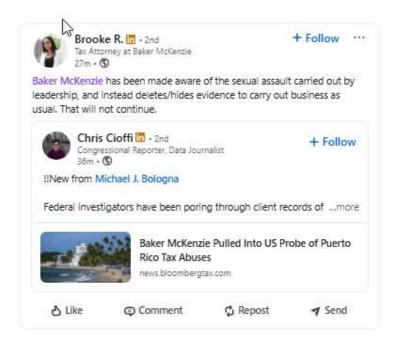
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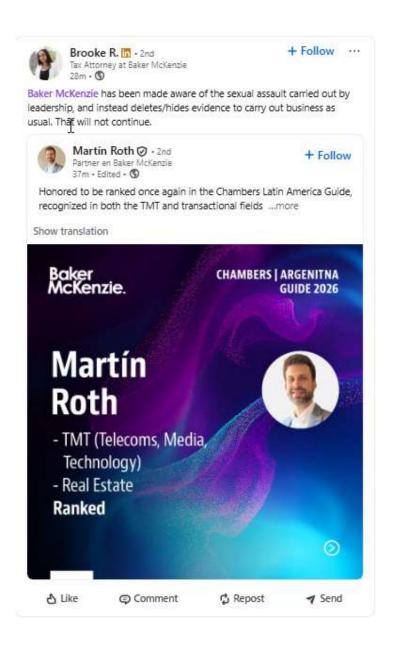
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https://www.linkedin.com/posts/brooke-r-12a404141\_bakermckenzie-luxembourg-anniversary-activity-7374501847065333760-

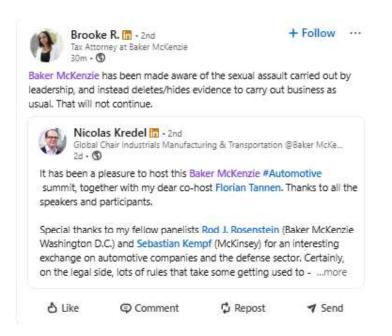
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#### https://www.linkedin.com/posts/brooke-r-

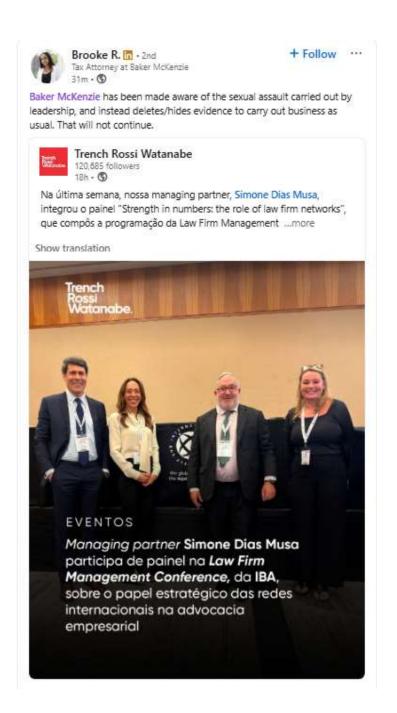
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https://www.linkedin.com/posts/brooke-r-12a404141\_gestern-%C3%B6ffneten-sich-f%C3%BCrzwei-tage-die-t%C3%BCren-activity-7374488419768475648-9NPG?utm\_source=share&utm\_medium=member\_desktop&rcm=ACoAAAFRsAcBJzXHKxHBSLcO8vx8u8-0gGJvRPo



Baker McKenzie has been made aware of the sexual assault carried out by leadership, and instead deletes/hides evidence to carry out business as usual. That will not continue.



https://www.linkedin.com/posts/brooke-r-12a404141\_herzliche-einladung-zum-buj-summit-energy-activity-7374477586187362304-e-

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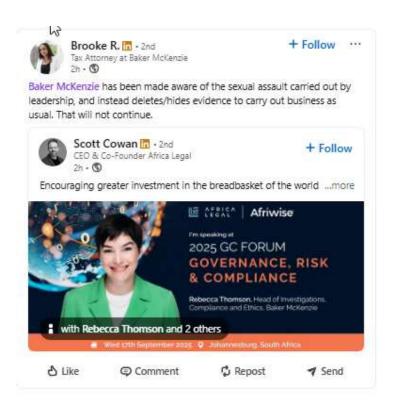
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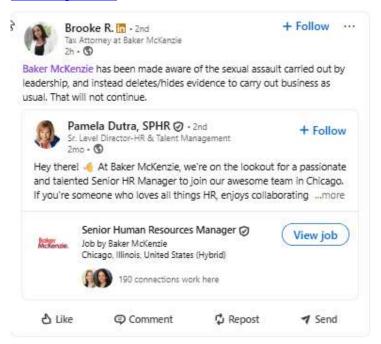
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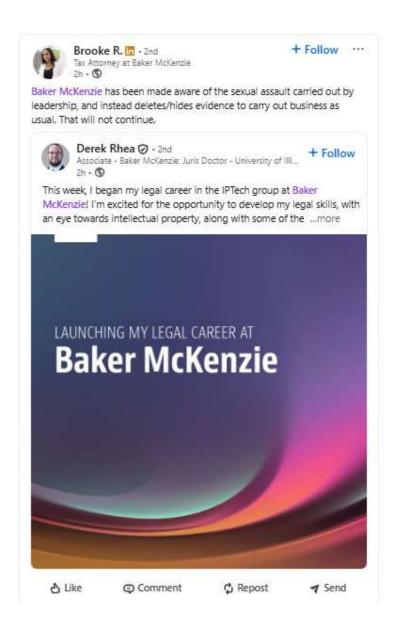
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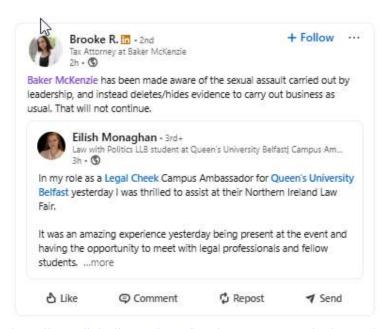
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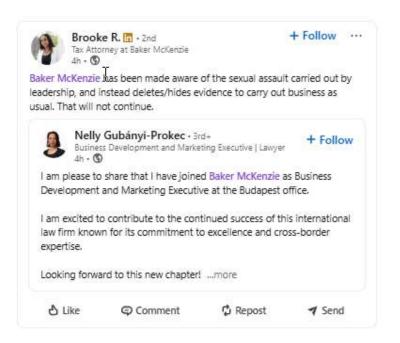
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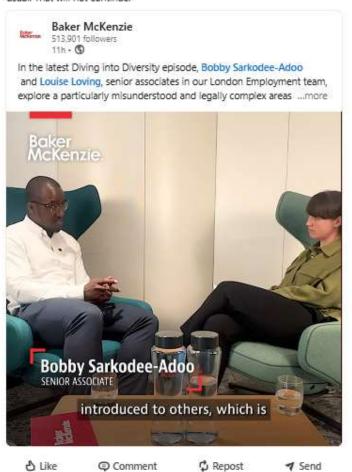


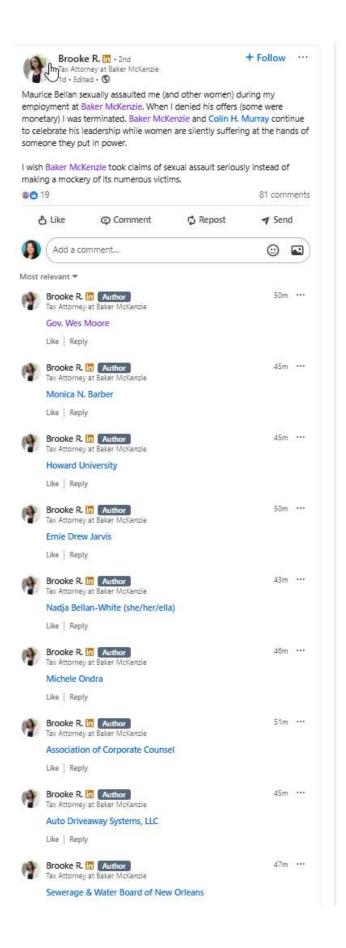
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Baker McKenzie has been made aware of the sexual assault carried out by leadership, and instead deletes/hides evidence to carry out business as usual. That will not continue.





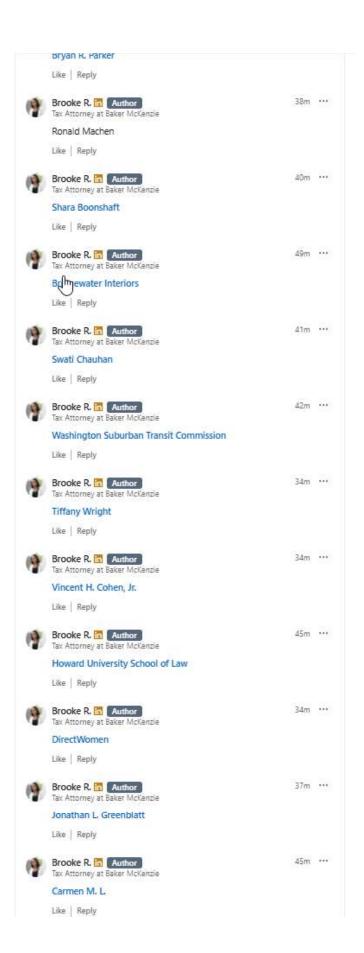
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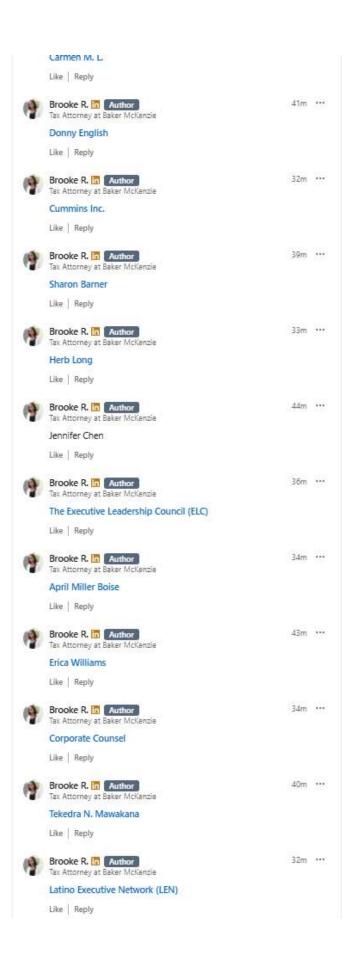
### Brooke R. in Author Tax Attorney at Baker McKenzie 38m \*\*\* Spencer Overton Like | Reply 38m \*\*\* Brooke R. In Author Tax Attorney at Baker McKenzie Alex Rene Like Reply Brooke R. in Author Tax Attilmey at Baker McKenzie Jeanne M. Gills 39m \*\*\* Like | Reply 45m \*\*\* Brooke R. Tale Author Tax Attorney at Baker McKenzie SAVOY Like | Reply Brooke R. Author Tax Attorney at Baker McKenzie 38m \*\*\* Lisa LeCointe-Cephas Like | Reply Brooke R. In Author 38m \*\*\* Tax Attorney at Baker McKenzie Janine Carlan Like | Reply Brooke R. in Author Tax Attorney at Baker McKenzie 42m \*\*\* Kristen Clarke Like | Reply Brooke R. in Author 41m ... Tax Attorney at Baker McKenzie Tamika Tremaglio Like Reply Brooke R. M Author Tax Attorney at Baker McKenzie 48m \*\*\* Women's Bar Association of the District of Columbia Like | Reply Brooke R. Author Tax Attorney at Baker McKenzie 40m \*\*\* Robert H. Edwards Jr. Like Reply 37m \*\*\* Brooke R. [7] Author Tax Attorney at Baker McKenzie Bryan R. Parker

Sewerage & Water Board of New Orleans

Like Reply

Like | Reply



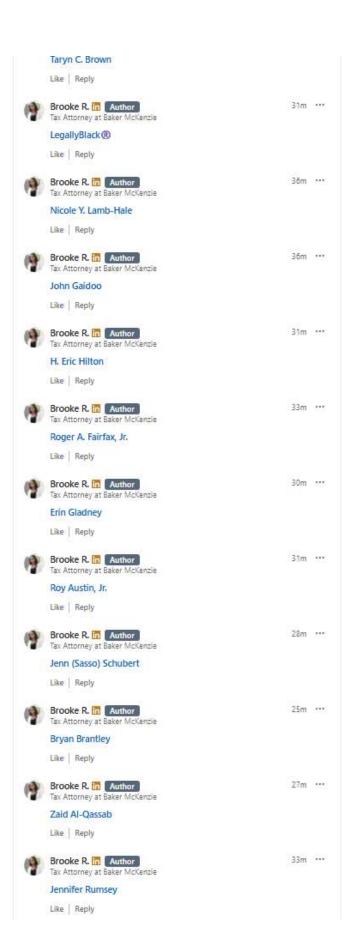


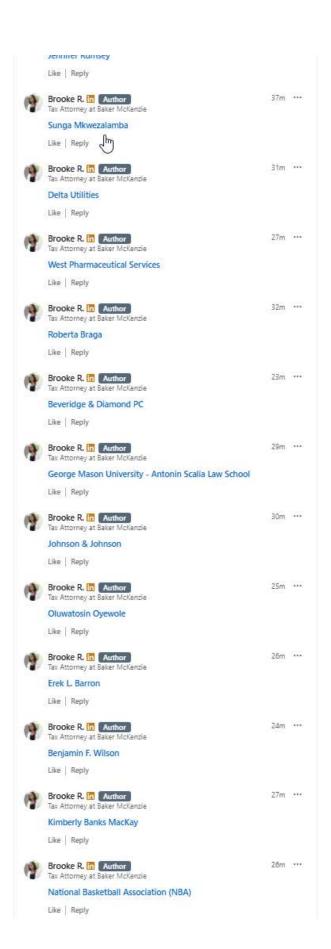
## Brooke R. To Author Tax Attorney at Baker McKenzie Nicole Stovall Like Reply Brooke R. . Author Tax Attorney at Baker McKenzie 40m ... Bryan Brantley Like Reply 32m ... Brooke R. In Author Tax Attorney at Baker McKenzie Rob Green Like Reply Brooke R. The Author 44m ... Tax Attorney at Baker McKenzie Zimmer Biomet Like Reply Brooke R. In Author Tax Attorney at Baker McKenzie 35m ··· Reem Sadik Like Reply Brooke R. Author Tax Attorney at Baker McKenzie 44m ... National Bar Association Like Reply Brooke R. . Author Tax Attorney at Baker McKenzie 39m ··· Anthony Pierce Like Reply Brooke R. In Author Tax Attorney at Baker McKenzie 33m ... Ken L. Harris, Ph.D. Like Reply Brooke R. In Author Tax Attorney at Baker McKenzie 41m ... Gerard Bullock Like Reply Brooke R. [n Author Tax Attorney at Baker McKenzie 31m ... Kevin Armstrong Like Reply Brooke R. M. Author 38m ··· Tax Attorney at Baker McKenzie Taryn C. Brown Like | Reply

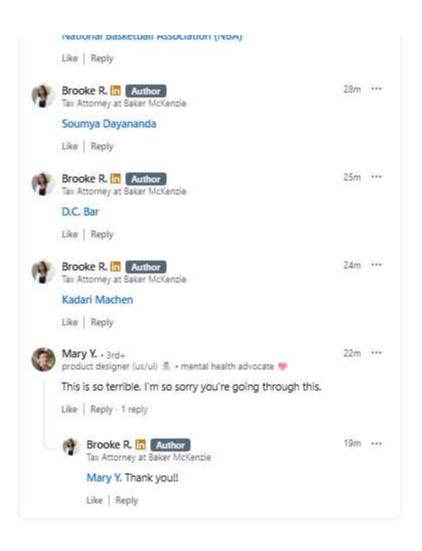
EQUITO EXCEDITAC LACTACOLY (PETA)

35m ...

Like Reply







From: brooke radford <brooklindradford@gmail.com>
Sent: brooke radford <brooklindradford@gmail.com>
Thursday, September 18, 2025 11:44 AM

**To:** Burns, Eric P. (DC Region)

Cc: Wilkinson, Nigel L. (DC); Wright, Teresa Burke (DC)

**Subject:** Re: Baker & McKenzie

Any other questions?

#### **Brooke Radford**

Juris Doctor Candidate | Class of 2022 Howard University School of Law <u>brooklindradford@gmail.com</u> | (919) 225-6284

On Thu, Sep 18, 2025 at 10:15 AM brooke radford < <a href="mailto:brooklindradford@gmail.com">brooklindradford@gmail.com</a>> wrote:

I gave the firm multiple times to address my sexual assault, I told Marisha Lewis and was fired, so now my goal is to assure there are no further victims.

**Thanks** 

#### **Brooke Radford**

Juris Doctor Candidate | Class of 2022 Howard University School of Law brooklindradford@gmail.com | (919) 225-6284

On Thu, Sep 18, 2025 at 10:13 AM Burns, Eric P. (DC Region) < <a href="mailto:Eric.Burns@jacksonlewis.com">Eric.Burns@jacksonlewis.com</a>> wrote:

Ms. Radford,

The purpose of reaching out to you was to open a dialog and obtain from you the alleged factual basis for your claims. The Firm does not know what you allege happened, when, where or with whom. The Firm has none of this information, and you seem to not want to provide it. This does not make sense, if your goal is to bring legitimate concerns to the Firm and get them addressed. Also, if you reported this to someone at the Firm who did not act, Firm leadership wants to know those details. The Firm is not aware of anyone in firm leadership was told about these claims before Tuesday. You make these allegations, yet you refuse to assist the Firm in addressing them.

Moreover, I've urged you to stop sending threatening and harassing text messages and to stop making false and defamatory posts, yet you have offered no facts to show that your posts are anything other than false and defamatory. Finally, you say that you "will continue business as usual," with a winking emoji. This is not a winking or

joking matter. You have made extremely serious allegations but refuse to even discuss them or otherwise back them up. The Firm takes this all very seriously, and reserves all of its available legal rights and remedies.

I look forward to hearing soon from whatever attorney you retain.

Thank you,

Eric



11790 Sunrise Valley Drive Suite 400

Reston, VA 20191

Direct: (703) 483-8317 | Main: (703) 483-8300

Eric.Burns@jacksonlewis.com | www.jacksonlewis.com

From: brooke radford < <a href="mailto:brooklindradford@gmail.com">brooke radford < <a href="mailto:brooklindradford@gmail.com">brooke radford < <a href="mailto:brooklindradford@gmail.com">brooke radford < <a href="mailto:brooklindradford@gmail.com">brooklindradford@gmail.com</a>>
<a href="mailto:brooklindradford@gmail.com">Sent: Wednesday, September 17, 2025 5:28 PM</a>

To: Burns, Eric P. (DC Region) < <a href="mailto:Eric.Burns@jacksonlewis.com">Eric.Burns@jacksonlewis.com</a>>

Cc: Wilkinson, Nigel L. (DC) <Nigel.Wilkinson@jacksonlewis.com>; Wright, Teresa Burke (DC)

<<u>Teresa.Wright@jacksonlewis.com</u>> **Subject:** Re: Baker & McKenzie

And since you called my claims false, consider the dialogue closed between me and any other proxy. I will continue business as usual ②

#### **Brooke Radford**

Juris Doctor Candidate | Class of 2022

Howard University School of Law

brooklindradford@gmail.com | (919) 225-6284

On Wed, Sep 17, 2025 at 5:25 PM brooke radford < <a href="mailto:brooklindradford@gmail.com">brooklindradford@gmail.com</a>> wrote:

| Anything else you would like to demand from a victim of sexual assault?  |  |  |  |  |
|--|--|--|--|--|
|  |  |  |  |  |
| Brooke Radford   |  |  |  |  |
| Juris Doctor Candidate   Class of 2022   |  |  |  |  |
| Howard University School of Law  |  |  |  |  |
| brooklindradford@gmail.com   (919) 225-6284  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| On Wed, Sep 17, 2025 at 5:24 PM brooke radford < <u>brooklindradford@gmail.com</u> > wrote:  |  |  |  |  |
| Baker McKenzie has silenced enough women. It will not silence me.  |  |  |  |  |
|  |  |  |  |  |
| Brooke Radford   |  |  |  |  |
|  |  |  |  |  |
| Juris Doctor Candidate   Class of 2022   |  |  |  |  |
| Howard University School of Law  |  |  |  |  |
| brooklindradford@gmail.com   (919) 225-6284  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| On Wed, Sep 17, 2025 at 5:22 PM brooke radford < <u>brooklindradford@gmail.com</u> > wrote:  |  |  |  |  |
| This is exactly where the confusion is. I do not wish to have an open dialogue when you are telling me my claims and false and defamatory. I will continue business as usual just as the firm tried to do. |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| Brooke Radford   |  |  |  |  |

Juris Doctor Candidate | Class of 2022

Howard University School of Law

brooklindradford@gmail.com | (919) 225-6284

On Wed, Sep 17, 2025 at 5:21 PM Burns, Eric P. (DC Region) < Eric.Burns@jacksonlewis.com > wrote:

Ms. Radford,

Understood. Please have your attorney reach out to me at their earliest convenience.

In the meantime, I urge you to stop sending people, including former colleagues, threatening messages, and, further, to stop making false and defamatory posts.

Please provide my contact information to your attorney as soon as possible, and I look forward to hearing from them.

Thank you,

Eric



**Eric P. Burns** Attorney at Law

Jackson Lewis P.C.

<u>11790 Sunrise Valley Drive</u> <u>Suite 400</u>

Reston, VA 20191

Direct: (703) 483-8317 | Main: (703) 483-8300

Eric.Burns@jacksonlewis.com | www.jacksonlewis.com

**From:** brooke radford < <u>brooklindradford@gmail.com</u>>

Sent: Wednesday, September 17, 2025 5:03 PM

To: Burns, Eric P. (DC Region) < <a href="mailto:Eric.Burns@jacksonlewis.com">Eric.Burns@jacksonlewis.com</a>>

Cc: Wilkinson, Nigel L. (DC) < Nigel. Wilkinson@jacksonlewis.com >; Wright, Teresa Burke (DC)

<<u>Teresa.Wright@jacksonlewis.com</u>> **Subject:** Re: Baker & McKenzie

I am actually in the process of hiring and employment attorney and would prefer you speak to him.

#### **Brooke Radford**

Juris Doctor Candidate | Class of 2022

Howard University School of Law

brooklindradford@gmail.com | (919) 225-6284

On Wed, Sep 17, 2025 at 5:01 PM Burns, Eric P. (DC Region) < <a href="mailto:Eric.Burns@jacksonlewis.com">Eric.Burns@jacksonlewis.com</a> wrote:

Ms. Radford,

Thank you. When are you available for a phone call to discuss?



Eric P. Burns

Attorney at Law

Jackson Lewis P.C.

11790 Sunrise Valley Drive Suite 400

Reston, VA 20191

Direct: (703) 483-8317 | Main: (703) 483-8300

<u>Eric.Burns@jacksonlewis.com</u> | <u>www.jacksonlewis.com</u>

**From:** brooke radford < <u>brooklindradford@gmail.com</u>>

Sent: Wednesday, September 17, 2025 4:47 PM

To: Burns, Eric P. (DC Region) < <a href="mailto:Eric.Burns@jacksonlewis.com">Eric.Burns@jacksonlewis.com</a>>

Cc: Wilkinson, Nigel L. (DC) < Nigel. Wilkinson@jacksonlewis.com>; Wright, Teresa Burke (DC)

<Teresa.Wright@jacksonlewis.com>

Subject: Re: Baker & McKenzie

I have messaged almost all of leadership. They have ignored it but I have proof. But I first reported to Marisha Lewis and I was fired.

#### **Brooke Radford**

Juris Doctor Candidate | Class of 2022

Howard University School of Law

brooklindradford@gmail.com | (919) 225-6284

On Wed, Sep 17, 2025 at 4:45 PM Burns, Eric P. (DC Region) < <a href="mailto:Eric.Burns@jacksonlewis.com">Eric.Burns@jacksonlewis.com</a>> wrote:

Ms. Radford,

The Firm is willing to discuss your claims, but at present nobody seems to know what you are referring to. Who in the firm have you reported it to?

Eric



Eric P. Burns

Attorney at Law

Jackson Lewis P.C.

11790 Sunrise Valley Drive Suite 400

Reston, VA 20191

Direct: (703) 483-8317 | Main: (703) 483-8300

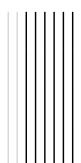
Eric.Burns@jacksonlewis.com | www.jacksonlewis.com

Sent: Wednesday, September 17, 2025 4:27 PM To: Burns, Eric P. (DC Region) < <a href="mailto:Eric.Burns@jacksonlewis.com">Eric.Burns@jacksonlewis.com</a>> Cc: Wilkinson, Nigel L. (DC) < Nigel. Wilkinson@jacksonlewis.com >; Wright, Teresa Burke (DC) <Teresa.Wright@jacksonlewis.com> Subject: Re: Baker & McKenzie If they planned on addressing my sexual assault then I wouldn't have to go to these measures. **Brooke Radford** Juris Doctor Candidate | Class of 2022 Howard University School of Law brooklindradford@gmail.com | (919) 225-6284 On Wed, Sep 17, 2025 at 4:25 PM Burns, Eric P. (DC Region) < Eric.Burns@jacksonlewis.com > wrote: Ms. Radford, You've previously corresponded with my colleague Nigel Wilkinson. As a reminder, Jackson Lewis is outside counsel to your former employer, Baker & McKenzie LLP (the "Firm"). We have recently been made aware of your social media posts alleging claims against the Firm, and, particularly, your claim that you have tagged and "reached out privately" to the Firm, which outreach we are not aware of.

Thank you,

Firm or with Jackson Lewis. Please let us know and we will set up a time.

We are reaching out with the hopes of opening a dialog with you. You can either speak with someone from the



Eric



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Reston, VA 20191

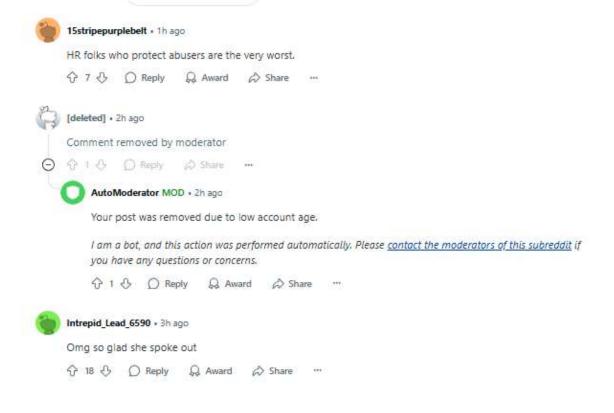
Direct: (703) 483-8317 | Main: (703) 483-8300

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<u>Post in r/biglaw:</u> baker mckenzie partner accused of sexually assaulting female attorneys; allegedly offered money in exchange for sex acts: r/biglaw

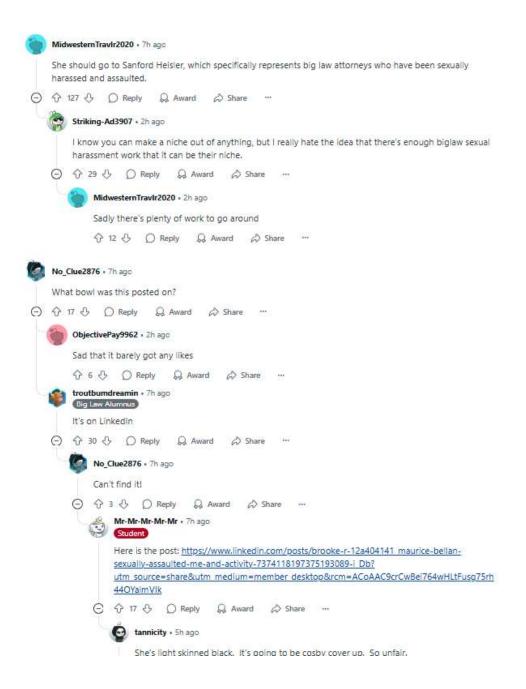
Screenshots from 18 Sept 2025 ~4:30 pm CT:

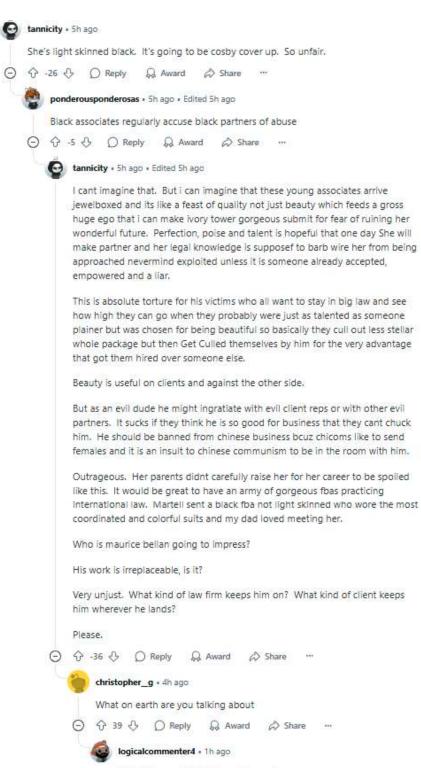




|         | exual assault or "offers" that could be denied? I believe women first but people throw around terms too  |
|---------|--|
| 0.200 0 | posely and it waters it down for the real victims  |
| Θ 4     | } -29 ♦  |
|         | JoeDangit • 4h ago • Edited 3h ago   |
|         | Neither of those are okay at the workplace and both are reprehensible. I think trying to make a distinction to diminish the person in the post is just wild and perpetuates the problem.         |
| e       | ○ ☆ 33 ↔ ○ Reply ♀ Award ⇔ Share …   |
|         | KissingBear • 2h ago   |
|         | Plus, this reads to me like she was sexually assaulted and then offered some remediation, no? I mean, who knows, but that's how I understood it, and also how I have experienced it. First comes |
|         | the transgression, then comes the offer of (trips, gifts, cash, career advancement) to legitimize or remedy the assault.   |
|         | ♦ 9 ♦ ♠ Reply A Award ♦ Share ···  |
| t t     | rustme_ima_lawyer + 6h ago   |
| S       | he should tag Maurice's clients in the LinkedIn post.  |
| 4       | } 41 ♦ ○ Reply Q Award ⇔ Share …   |
| -3 s    | pirited-Session-786 • 6h ago   |
| 4 10    |  |

| 9 | zulu                        | down8                   | 88 • 7h | ago        |          |         |       |          |      |                       |       |
|---|-----------------------------|-------------------------|---------|------------|----------|---------|-------|----------|------|-----------------------|-------|
| Ī | Wov                         | w a ske                 | ezy ol  | d white o  | lude at  | Putin's | Ame   | erican c | ouns | el is a sex pest? Who | knew? |
| Θ | Ŷ                           | -72 🖑                   | , Ω     | Reply      | Q A      | ward    | ۵     | Share    |      |                       |       |
| 9 | Goingbacktoboston • 2h ago  |                         |         |            |          |         |       |          |      |                       |       |
|   |                             | Can                     | we not  | automat    | ically a | ssume   | a rac | e? Jesu  | s,   |                       |       |
|   |                             |                         | 0       | O Repl     | , £      | Award   | 1     | A Shar   | 6    | ***                   |       |
|   | 0                           | AdroitPreamble • 4h ago |         |            |          |         |       |          |      |                       |       |
|   |                             | Your                    | bias is | showing    | . Might  | want t  | o tuc | k that I | back | in.                   |       |
|   |                             | Ŷ 1                     | 6 B     | ∩ Rep      | ty &     | ) Awan  | d     | Sha      | re   | ***                   |       |
| - | KissingBear • 7h ago        |                         |         |            |          |         |       |          |      |                       |       |
|   |                             | Maur                    | rice Be | llan is no | t white  |         |       |          |      |                       |       |
|   | Θ                           | Ŷ 8                     | 7 🖰     | ○ Rep      | ly (     | Awar    | d     | Sha      | are  |                       |       |
|   | Striking-Walk-8243 • 5h ago |                         |         |            |          |         |       |          |      |                       |       |
|   |                             | Doh 😄!                  |         |            |          |         |       |          |      |                       |       |
|   |                             |                         |         | 0 O        | Reply    | Q       | Award | 1 2      | Sha  | re                    |       |
|   | inhocfaf • 7h ago           |                         |         |            |          |         |       |          |      |                       |       |
|   |                             | Swing and a miss!       |         |            |          |         |       |          |      |                       |       |
|   |                             |                         | \$2 44  | B (        | ) Reply  | Ω       | Awa   | rd a     | Ď Sh | are ***               |       |





Yeah this was difficult to get through.

|   | logicalcommenter4 • 1h ago   |
|---|--|
|   | Yeah this was difficult to get through.  |
|   | ♦ 3 ♦ ♠ Reply ♠ Award ♠ Share …  |
| [deleted] • 7h ago  |  |
| Comment removed by moderator  |  |
| O O 1 O O Reply △ Share ••  | •  |
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