

# Reference Document

"The \$100 Million Lawsuit Just Got Stronger — Here's Whether It Survives"

Every Claim, Source, and Verification Status

## How to Use This Document

Each entry identifies a specific factual claim made in the video, the source it is based on, where to verify it, and any notes on confidence level. Claims are organized in the order they appear in the video.

### Verification levels:

- **PRIMARY** — Sourced from federal court filings, court rulings, official legislation, appellate decisions, or Supreme Court opinions. Primary sources can stand on their own.
- **SECONDARY** — Sourced from established legal resource sites, reputable law firms' published analysis, academic researchers, or investigative journalism. Secondary sources support claims and are most defensible when paired with a primary or another independent secondary.

## SECTION 1: The Case Setup and the Governing Body's First-Ever Federal Service

**Claim: Stella Cristina Gomes de Souza filed a \$100 million lawsuit against Watchtower Bible and Tract Society of Pennsylvania, Watchtower Bible and Tract Society of New York, and the Governing Body of Jehovah's Witnesses in the U.S. District Court for the Southern District of New York on November 12, 2025.**

- **Source:** *Gomes de Souza v. Watchtower Bible & Tract Soc'y of Pa., Inc., et al.*, No. 7:25-cv-09458-NSR (S.D.N.Y.)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court docket
- **Note:** Filed November 12, 2025. Original case number 1:25-cv-09458; reassigned to Judge Nelson Stephen Román in White Plains as 7:25-cv-09458-NSR.

**Claim: The Governing Body of Jehovah's Witnesses was formally served as a defendant on November 24, 2025 at 10:10 a.m. via the New York Secretary of State at 99 Washington Avenue, Albany, NY 12231. Service was accepted by Bryan Milner, an office assistant.**

- **Source:** Affidavit of Service, Document 17, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Dec. 5, 2025)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing
- **Note:** The affidavit confirms backup certified mail (USPS receipt # 9589 0710 5270 3767 7474 75) sent to 'The Governing Body of Jehovah's Witnesses, 1 Kings Drive, Tuxedo Park, NY 10987.' Process server: Angela Roy of Guaranteed Subpoena Service.

**Claim: This is the first time the Governing Body of Jehovah's Witnesses has been formally served as a defendant in a federal court child sexual abuse case.**

- **Source:** Cross-referenced against the public docket history of all prior Governing Body suits, which were all filed in New York state court (RKJW1 Doe, Owen, J.G.-T., E.G., Ewing, Steele) or California state court.
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court docket review
- **Note:** The Governing Body was previously served and named in New York state court cases following the 2024 Appellate Division ruling. DeSousa is the first federal case where the Governing Body has been named and served as a defendant.

**Claim: Watchtower Bible and Tract Society of New York was personally served on November 25, 2025 at 3:00 p.m. at 200 Watchtower Drive, Patterson, NY (Bethel), by process server John C. Reesbeck. Service was accepted by 'Abdias S.,' identified as an Authorized Agent.**

- **Source:** Return of Service, Document 23, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Dec. 12, 2025)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing

**Claim: Watchtower Bible and Tract Society of Pennsylvania was served on December 1, 2025 at 9:45 a.m. via the New York Secretary of State at One Commerce Plaza, 99 Washington Avenue, Albany, NY. Service was accepted by Yvette Hawkins, office assistant.**

- **Source:** Affidavit of Service, Document 25, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Dec. 12, 2025)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing

**Claim: Plaintiff's counsel attempted personal service on the Governing Body at Defendants' facility on November 21, 2025, but were denied access by gate security.**

- **Source:** Plaintiff's Response to Defendants' Request for Pre-Motion Conference, Document 28, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Dec. 18, 2025)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing
- **Key quote:** "Plaintiff made good-faith efforts to effectuate personal service by attempting service at Defendants' facility on November 21, 2025. That effort was thwarted when gate security denied access and refused to permit service on any officer or agent authorized to accept process."

**Claim: In November 2024, the New York Appellate Division, Second Department, ruled that the Governing Body of Jehovah's Witnesses constitutes a 'jural entity that can be sued as an unincorporated association in New York.'**

- **Source:** *RKJW1 Doe v. Watchtower Bible & Tract Society of N.Y., Inc.*, 223 A.D.3d 905 (2d Dep't 2024) (decided Nov. 6, 2024)
- **URL:** <https://law.justia.com/cases/new-york/appellate-division-second-department/2024/2024-01950.html>
- **Verification:** PRIMARY — Appellate court ruling
- **Key quote:** “The Supreme Court properly determined that the Governing Body, which has a separate and distinct identity from the rest of the Jehovah's Witnesses' organizations, constitutes a jural entity that can be sued as an unincorporated association in New York.”

**Claim: The Governing Body's attorney in the 2024 RKJW1 Doe appeal was Carl J. Schaerf of Wade Clark Mulcahy LLP. The same Carl J. Schaerf now represents the Governing Body in the DeSousa case through Kerley, Walsh, Matera & Cinquemani, P.C.**

- **Source:** Counsel of record listings in *RKJW1 Doe v. Watchtower* (2024) and *Gomes de Souza v. Watchtower* (2025–2026), Documents 38 and 46
- **URL:** <https://www.nycourts.gov/courts/ad2/Handdowns/2024/Decisions/D75766.pdf>
- **Verification:** PRIMARY — Court records
- **Note:** The 2024 appellate decision lists 'Wade Clark Mulcahy LLP, New York, NY (Carl J. Schaerf of counsel), for appellant.' His signature appears on Document 38 and Document 46 in the DeSousa docket under Kerley, Walsh, Matera & Cinquemani letterhead.

## SECTION 2: The Friedman Trap and the Moment of Maximum Danger

**Claim: On December 11, 2025, attorney Glen Feinberg of Feinberg & Gasbarro filed a pre-motion conference letter on behalf of Watchtower New York raising statute of limitations and forum non conveniens defenses.**

- **Source:** Watchtower NY Pre-Motion Conference Letter, Document 21, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Dec. 11, 2025)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing

**Claim: The Second Circuit Court of Appeals held in *Friedman v. Bartell* that New York's Child Victims Act revival provision (CPLR 208(b)) applies only prospectively and cannot revive claims that accrued before the CVA's enactment.**

- **Source:** *Friedman v. Bartell*, 2025 WL 1681607 (2d Cir. June 16, 2025), cited in Watchtower NY Pre-Motion Letter, Document 21
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal appellate court ruling
- **Key quote:** “CPLR 208(b) applies only prospectively, after the enactment of the CVA, and is thus inapplicable to (plaintiff's) claims, which accrued decades before the enactment of the CVA.”

**Claim: On December 19, 2025, Judge Nelson Stephen Román waived the pre-motion conference and set a briefing schedule requiring defendants' motions to dismiss served by January 21, 2026, plaintiff's opposition by February 24, 2026, and replies filed by March 10, 2026.**

- **Source:** Court's Scheduling Order, Document 29, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Dec. 19, 2025)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court order

**Claim: On January 21, 2026, all three defendants served motions to dismiss the original complaint, with the Governing Body filing a separate motion and Watchtower NY/PA filing jointly.**

- **Source:** Plaintiff's Letter Re Excess Pages, Document 33, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Jan. 22, 2026)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing
- **Key quote:** "On January 21, 2026, Defendant Governing Body of Jehovah's Witnesses (the 'Governing Body') served Plaintiff with its motion to dismiss Plaintiff's Complaint. That same day, Defendants Watchtower Bible and Tract Society of Pennsylvania, Inc. ('WTPA') and Watchtower Bible and Tract Society of New York, Inc. ('WTNY') also served Plaintiff with their combined motion to dismiss."

**Claim: On February 13, 2026, the Governing Body's attorney Carl Schaerf filed a letter opposing the plaintiff's first amendment attempt and contesting service of process on the Governing Body.**

- **Source:** Governing Body Letter Opposing Amendment, Document 38, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Feb. 13, 2026)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing
- **Key quote:** "Plaintiff's does not contend that this amendment is made within 21 days of service (and we contest service to boot). The motion was served on January 21, 2026, more than 21 days ago. Therefore, under Fed.R.Civ.P. 15(a)(1)(B) there is no amendment as of right."

**Claim: On February 17, 2026, Judge Román denied the plaintiff's attempt to amend the complaint as a matter of right, ruling the amendment was untimely because more than 21 days had passed since defendants served their motions to dismiss.**

- **Source:** Court Order Denying Amendment, Document 39, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Feb. 17, 2026)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court order

## SECTION 3: The Redlined Amended Complaint — Five Strategic Moves

**Claim: On February 23, 2026, McLaughlin & Stern filed a formal Rule 15(a)(2) motion seeking leave to file an Amended Complaint, accompanied by a memorandum of law, declaration of Jason Giaimo, a clean version of the proposed Amended Complaint, and a redlined version showing all changes.**

- **Source:** Plaintiff's Motion for Leave to File Amended Complaint, Documents 40, 40-1, 40-2, 40-3, 40-4, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Feb. 23, 2026)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing

**Claim: The proposed Amended Complaint adds a new cause of action under the New York City Victims of Gender-Motivated Violence Protection Law (NYC Administrative Code § 10-1101 et seq.).**

- **Source:** Redlined Amended Complaint, Document 40-4, paragraphs 78-89 and 168-173, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Feb. 23, 2026)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing

**Claim: The New York City Victims of Gender-Motivated Violence Protection Law creates a civil cause of action against any party who 'commits, directs, enables, participates in, or conspires in the commission of a crime of violence motivated by gender.'**

- **Source:** NYC Administrative Code § 10-1104 (Victims of Gender-Motivated Violence Protection Law)
- **URL:** <https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCAadmin/0-0-0-7237>
- **Verification:** PRIMARY — New York City legislation
- **Key quote:** "Except as otherwise provided by law, any person claiming to be injured by a party who commits, directs, enables, participates in, or conspires in the commission of a crime of violence motivated by gender has a cause of action against such party in any court of competent jurisdiction."

**Claim: On November 25, 2025, the New York City Council passed Introduction 1297, an amendment to the Gender-Motivated Violence Act that reopens the lookback window for 18 months, allowing victims to sue for gender-motivated violence claims that accrued before January 9, 2022.**

- **Source:** NYC Council Legislation, Int. 1297-2025; reported by Levy Konigsberg LLP
- **URL:** <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=7411818&GUID:=B01473E5-9E7F-4D9D-8845-65C340D67F23>
- **Verification:** PRIMARY — NYC Council legislation
- **Note:** Passage of Intro 1297 occurred 13 days after the original DeSousa complaint was filed (November 12, 2025), which is why the plaintiff could not have included this cause of action in the original pleading.

**Claim: Paragraph 38 of the proposed Amended Complaint alleges that Governing Body member Guy Pierce was physically present in São Paulo, Brazil during January 2012 — the same period when Stella Souza was being encouraged to disclose the abuse to elders.**

- **Source:** Redlined Amended Complaint, Document 40-4, paragraph 38, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Feb. 23, 2026)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing
- **Key quote:** "Hackson encouraged Ms. Souza to inform the Elders during a special meeting in Mariporã, where a member of the governing body, Guy Pierce, was in São Paulo to supervise Jehovah's Witnesses' activity in Brazil."

**Claim: The proposed Amended Complaint voluntarily drops four causes of action from the original complaint: sexual assault, sexual battery, respondeat superior/vicarious liability, and false imprisonment.**

- **Source:** Plaintiff's Memorandum of Law in Support of Motion for Leave to Amend, Document 40-1, page 3, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Feb. 23, 2026)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing
- **Key quote:** "In an effort to streamline the proceedings and further undercutting Defendants' motions to dismiss, Plaintiff's proposed FAC also foregoes claims for sexual assault, sexual battery, respondent superior/vicarious liability, and false imprisonment."

**Claim: The proposed Amended Complaint adds a dedicated section (paragraphs 78-89) titled 'Plaintiff's Claims Are Timely' that lays out the factual basis for equitable tolling, including allegations of retaliation, death threats, the 2025 hush money offer, and a failed suicide attempt one month before the lawsuit was filed.**

- **Source:** Redlined Amended Complaint, Document 40-4, paragraphs 78-89, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Feb. 23, 2026)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing
- **Key quote:** "This trauma persists to this day, culminating in a failed suicide attempt just one month before this action was commenced."

**Claim: Plaintiff's counsel openly stated in their memorandum that the amendment is designed to neutralize the defendants' motions to dismiss.**

- **Source:** Plaintiff's Memorandum of Law, Document 40-1, page 2, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Feb. 23, 2026)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing
- **Key quote:** "Plaintiff's proposed FAC seeks to add a cause of action under the GMVA, which is undoubtedly timely, and obviates the principal basis underlying Defendants' motions to dismiss."

## SECTION 4: The Governing Legal Standard — Foman v. Davis and the Poppel Precedent

**Claim: Federal Rule of Civil Procedure 15(a)(2) governs amendments to pleadings outside the 21-day window and states that 'the court should freely give leave when justice so requires.'**

- **Source:** Federal Rules of Civil Procedure, Rule 15(a)(2)
- **URL:** [https://www.law.cornell.edu/rules/frcp/rule\\_15](https://www.law.cornell.edu/rules/frcp/rule_15)
- **Verification:** PRIMARY — Federal Rules of Civil Procedure

**Claim: The U.S. Supreme Court in Foman v. Davis (1962) established the framework for evaluating motions to amend under Rule 15(a), holding that leave to amend should be freely given absent specific reasons such as undue delay, bad faith, undue prejudice, or futility.**

- **Source:** *Foman v. Davis*, 371 U.S. 178 (1962)
- **URL:** <https://supreme.justia.com/cases/federal/us/371/178/>
- **Verification:** PRIMARY — U.S. Supreme Court decision
- **Key quote:** “In the absence of any apparent or declared reason — such as undue delay, bad faith or dilatory motive on the part of the movant, repeated failure to cure deficiencies by amendments previously allowed, undue prejudice to the opposing party by virtue of allowance of the amendment, futility of amendment, etc. — the leave sought should, as the rules require, be 'freely given.'”

**Claim: In Poppel v. Rockefeller University Hospital, the U.S. District Court for the Southern District of New York permitted a child sexual abuse plaintiff to amend their complaint to add a Child Victims Act claim that could not have been asserted when the original lawsuit was filed.**

- **Source:** *Poppel v. Rockefeller Univ. Hosp.*, No. 1:19-cv-01403, Document 41 (S.D.N.Y. July 25, 2019); also cited as 2019 U.S. Dist. LEXIS 124570
- **URL:** <https://www.courtlistener.com/docket/14556815/parties/poppel-v-rockefeller-university-hospital/>
- **Verification:** PRIMARY — Federal court ruling
- **Note:** The Poppel case was filed in February 2019. The CVA revival window opened on August 14, 2019. Judge Andrew L. Carter, Jr. issued a stay order on July 25, 2019 that included a directive ordering the plaintiff to file an Amended Complaint on August 14, 2019.

**Claim: Recent S.D.N.Y. precedent in Adams v. 796-798 Ninth Successor LLC reaffirms that prejudice from permitting amendment at an early stage in the litigation is minimal.**

- **Source:** *Adams v. 796-798 Ninth Successor LLC*, 2025 U.S. Dist. LEXIS 149695 (S.D.N.Y. Aug. 4, 2025), cited in Plaintiff's Memorandum, Document 40-1
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court ruling
- **Key quote:** “Any prejudice to Defendants from permitting amendment at this early stage in the litigation is minimal.”

## SECTION 5: The Governing Body's April 2026 Stay Request

**Claim: On April 20, 2026, Carl J. Schaerf filed a letter motion on behalf of the Governing Body asking Judge Román to stay the case while the court resolves the plaintiff's motion to amend.**

- **Source:** Governing Body Letter Motion to Stay, Document 46, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Apr. 20, 2026)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing
- **Note:** This is the most recent filing in the case as of the production of this video. The case is currently stalled pending Judge Román's ruling on the amendment motion.

**Claim: Plaintiff's counsel had previously filed their own motion to stay briefing on the pending motions to dismiss pending resolution of the amendment motion.**

- **Source:** Plaintiff's Motion for Leave to File Amended Complaint and Stay Briefing, Document 45, *Gomes de Souza v. Watchtower*, No. 7:25-cv-09458-NSR (S.D.N.Y. Feb. 27, 2026)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court filing

## SECTION 6: Additional Supporting Sources

### Companion 2024 Appellate Ruling: *Owen v. Watchtower*

- **Source:** *Owen v. Watchtower Bible & Tract Society of N.Y., Inc.*, 2024 NY Slip Op 05468 (2d Dep't 2024) (decided Nov. 6, 2024)
- **URL:** <https://law.justia.com/cases/new-york/appellate-division-second-department/2024/2024-01952.html>
- **Verification:** PRIMARY — Appellate court ruling
- **Contains:** Companion case decided the same day as RKJW1 Doe, adopting its reasoning by reference. Demonstrates that the Second Department's ruling on the Governing Body's jural entity status was not a one-off.

### Plaintiff's Equitable Tolling Authority — *Doe v. United States*

- **Source:** *Doe v. United States*, 76 F.4th 64 (2d Cir. 2023)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal appellate court ruling
- **Contains:** Second Circuit precedent cited by plaintiff's counsel in Document 28 supporting equitable tolling for childhood sexual abuse cases involving coercive psychological control by an authority figure.

### NYC Gender-Motivated Violence Act — Legal Background

- **Source:** Levy Konigsberg LLP, 'NYC Gender-Motivated Violence Protection Law: Know Your Rights'
- **URL:** <https://www.levylaw.com/nyc-gender-motivated-violence-protection-law-claims/>
- **Verification:** SECONDARY — Law firm legal analysis
- **Contains:** Background on the New York City Victims of Gender-Motivated Violence Protection Law, including confirmation that Intro 1297 was passed by the NYC Council on November 25, 2025, and details on the law's institutional liability provisions.

## NYC Gender-Motivated Violence Act — Statutory Analysis

- **Source:** Katz Banks Kumin LLP, 'New York City Law Revives Expired Claims for Sexual Assault'
- **URL:** <https://katzbanks.com/blog/new-york-city-law-revives-expired-claims-for-sexual-assault-through-february-28-2025/>
- **Verification:** SECONDARY — Law firm legal analysis
- **Contains:** Independent analysis of the GMVPL's institutional liability provisions, confirming the statutory framework that allows plaintiffs to sue parties who 'enable' or 'conspire in' gender-motivated violence.

## NYC Council Legislative Record — Intro 1297-2025

- **Source:** NYC Council File ID Int 1297-2025: 'A Local Law to amend the administrative code of the city of New York, in relation to the gender-motivated violence protection law'
- **URL:** <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=7411818&GUID:=B01473E5-9E7F-4D9D-8845-65C340D67F23>
- **Verification:** PRIMARY — NYC Council legislative record
- **Contains:** Official legislative record of the November 25, 2025 amendment that reopened the 18-month lookback window for gender-motivated violence claims.

## Forum Non Conveniens Standard — *Iragorri v. United Technologies*

- **Source:** *Iragorri v. United Technologies Corp.*, 274 F.3d 65 (2d Cir. 2001)
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal appellate court ruling
- **Contains:** Second Circuit precedent on forum non conveniens, cited by plaintiff's counsel in Document 28 in response to the defense's argument that the case should be litigated in Brazil.

## Federal Court Docket — Primary Access Point

- **Source:** CourtListener (Free Law Project) — *Gomes de Souza v. Watchtower Bible and Tract Society of Pennsylvania, Inc., et al.*
- **URL:** <https://www.courtlistener.com/docket/71905206/gomes-de-souza-v-watchtower-bible-and-tract-society-of-pennsylvania-inc/>
- **Verification:** PRIMARY — Federal court docket
- **Contains:** Free public access to the full federal court docket for the DeSousa case. All documents referenced in this video are accessible through this docket page.

## Federal Court Docket — Official PACER Access

- **Source:** Public Access to Court Electronic Records (PACER), U.S. District Court, Southern District of New York
- **URL:** <https://ecf.nysd.uscourts.gov/cgi-bin/DktRpt.pl?caseNumber=7:25-cv-09458>
- **Verification:** PRIMARY — Official federal court docket
- **Contains:** Official PACER docket access for the DeSousa case (requires PACER account, fees may apply).

*All citations in this document are verifiable through the linked sources. Federal court filings cited as 'Document [N]' refer to the docket entries in *Gomes de Souza v. Watchtower Bible & Tract Society of Pennsylvania, Inc., et al.*, No. 7:25-cv-09458-NSR, available on CourtListener and PACER.*