

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NASSAU

WILLIAM J. O'REILLY,

Plaintiff,

-against-

MICHAEL J. PANTER,

Defendant.

**SUMMONS WITH NOTICE**

Index No.

Venue is proper in this Court pursuant to  
C.P.L.R. § 503

**TO THE ABOVE-NAMED DEFENDANT:**

**YOU ARE HEREBY SUMMONED** and required to appear in this action by serving a copy of your notice of appearance upon the undersigned within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York).

**YOU ARE HEREBY NOTIFIED THAT** should you fail to answer or appear, a judgment will be entered against you by a default for the relief demanded below.

Dated: October 27, 2017  
New York, New York

Respectfully submitted,

**HOGUET NEWMAN  
REGAL & KENNEY, LLP**

By: Frederic S. Newman  
Fredric S. Newman  
Andrew N. Bourne  
10 East 40<sup>th</sup> Street, 35<sup>th</sup> Floor  
New York, NY 10016  
Phone: 212-689-8808

*Attorneys for Plaintiff*

**To the Defendant: Michael J. Panter  
P.O. Box 8635  
Red Bank, New Jersey 07701**

**NOTICE:** This action seeks redress for Defendant Panter's intentional, malicious, and bad faith actions in making defamatory and false statements in a publicly-available social media post. Plaintiff seeks damages for the public hatred, ridicule, disgrace, and permanent harm to his professional and personal reputations as a result of Defendant Panter's publication of knowingly false defamatory statements about Plaintiff, which were made with actual malice, as well as Defendant Panter's intentional infliction of emotional distress upon Plaintiff.

The relief includes, but is not limited to, reputational damages, monetary damages, special damages, punitive damages, costs, fees, injunctive relief, and such other relief as is just and proper, in an amount not less than \$5 million.

Should Defendant fail to appear herein, judgment will be entered by default for the sum of \$5 million, plus statutory interest, fess, and the costs of this action, as the Court may award.

**VENUE:** Plaintiff designates Nassau County as the place of trial. The basis of this designation is Plaintiff's residence in Nassau County, pursuant to C.P.L.R. § 503.