

CV 14-1611

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

Marie LAVENTURE, Maggie LAVENTURE,
Sane LAVENTURE, Carmen LAVENTURE
each individually and on behalf of the Estate
of Cherylusse LAVENTURE, and the Estate
of Marie Thérèse Fleuriciane DELINAIS,
and the additional persons and their
representatives listed on Exhibit
1, and on behalf of all others similarly situated,

Plaintiffs,

v.

United Nations; United Nations
Stabilization Mission in Haiti; Ban Ki
Moon, Secretary-General of the United
Nations; Edmond Mulet, former Under
Secretary-General for the United Nations
Stabilization Mission in Haiti; Chandra
Srivastava former Chief Engineer for the
United Nations Mission to Haiti; Paul
Aghadjanian, Chief of Mission Support for the
United Nations Mission to Haiti; Pedro
Medrano, Assistant United Nations Secretary
General; Miguel de Serpa, Under Secretary for
Legal Affairs,

Defendants.

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

TOWNES, J.

MANN, M.J.

COMPLAINT

Plaintiffs Marie LAVENTURE, Maggie LAVENTURE, Sane LAVENTURE, Carmen
LAVENTURE, each individually and on behalf of the Estate of Cherylusse LAVENTURE, and
the Estate of Marie Thérèse Fleuriciane DELINAIS, and those additional 1,479 plaintiffs or
deceased parties whose representatives are plaintiffs, listed on Exhibit 1, on behalf of themselves

