

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STELLA CRISTINA GOMES DE SOUZA,

Plaintiff,

-against-

WATCHTOWER BIBLE AND TRACT SOCIETY
OF PENNSYLVANIA, INC.;
WATCHTOWER BIBLE AND TRACT SOCIETY
OF NEW YORK, INC.; and
THE GOVERNING BODY OF JEHOVAH'S
WITNESSES,

Defendants.

Case No.: 7-25-cv-09458-NSR

**NOTICE OF PLAINTIFF'S MOTION FOR LEAVE TO FILE AMEND THE
COMPLAINT AND STAY BRIEFING ON
DEFENDANTS' PENDING MOTIONS TO DISMISS**

PLEASE TAKE NOTICE that upon the Declaration of Jason S. Giaimo dated February 23, 2026, together with the exhibits annexed thereto; and the accompanying Memorandum of Law, Plaintiff, by and through her undersigned counsel, shall move this Court, Honorable Nelson Stephen Román, United States District Judge, 300 Quarropas Street, White Plains, New York 10601, on a date to be determined by the Court, for an Order as follows: (i) permitting Plaintiff to file a First Amended Complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure; (ii) staying briefing on the pending motions to dismiss of Defendants; and (iii) together with such other and further relief as the Court deems just and proper.

Dated: New York, New York
February 23, 2026

McLAUGHLIN & STERN, LLP

By: 
Brett R. Gallaway
Jason S. Giaimo

260 Madison Avenue
New York, New York 10016
Tel.: (212) 448-1100
bgallaway@mclaughlinstern.com
jgiaimo@mclaughlinstern.com
Attorneys for Plaintiff