FILED: QUEENS COUNTY CLERK 02/09/2024 04:58 PM

NYSCEF DOC. NO. 1

INDEX NO. 703640/2024

RECEIVED NYSCEF: 02/16/2024

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF QUEENS

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EMMANUEL PAISIOS LOULOURGAS aka The METROPOLITAN PAISIOS,

Plaintiffs,

-against-

SACRED PATRIARCHAL AND STAVROPEGIAL ORTHODOX MONASTERY OF ST. IRENE CHRYSOVALANTOU, INC., IOANNIS IEROTHEOS ZHACHARIS, BISHOP IEROTHEOS OF EFKARPIAS ABBOT as the Trustee of the SACRED PATRIARCHAL AND STAVROPEGIAL ORTHODOX MONASTERY OF ST. IRENE CHRYSOVALANTOU, INC., THEOLOGITIS NIKITAS as the Trustee of the SACRED PATRIARCHAL AND STAVROPEGIAL ORTHODOX MONASTERY OF ST. IRENE CHRYSOVALANTOU, INC., ARCHBISOP LOULIAS NIKITAS as the Chairman of the SACRED PATRIARCHAL AND STAVROPEGIAL ORTHODOX MONASTERY OF ST. IRENE CHRYSOVALANTOU, INC.,ST. NECTARIOS GREEK ORTHODOX CHURCH, BROOKLYN, NY. ST. NICHOLAS GREEK ORTHODOX CHURCH, BROOKLYN, NY, ST. ATHANASIOS AND JOHN GREEK ORTHODOX CHURCH, CHICAGO, IL. HOLY ASCENSION GREEK ORTHODOX CHURCH, CLEARWATER, FL, STS. ANARGYROI, TAXIARCHIS AND GERASIMOS GREEK ORTHODOX CHURCH, GREENPORT, NY. Defendants.

Index No.
Date Filed:
Date Purchased:
Plaintiff designates
QUEENS COUNTY
as the place of
trial

The basis of venue is Plaintiff's place of Business:

SUMMONS WITH NOTICE

To the above-named Defendants:

YOU ARE HEREBY SUMMONED, to answer the Summons with Notice in this action and to serve a copy of your Answer, or, if the Complaint is not served with this Summons, to serve a Notice of Appearance, on the Plaintiff's Attorney(s) within twenty (20) days after the service of this Summons, exclusive of the day of service (or within thirty (30) days after the service is completed if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New York, New York February 9, 2024

NOS AISIDIS Egg

KONSTANTINOS GAISIDIS, Esq, LAW OFFICES OF KONSTANTINOS GAISIDIS

43W 43RD STREET. STE.240 NEW YORK, NEW YORK 10036

(212) 859-5056

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NOTICE:

The nature of this action is for deceptive religious business practices (including but not limited to, breach of contract, fraud, unpaid wages, constructive trust, defamation, intentional infliction of emotional distress, negligent infliction of emotional distress.

Providing the following consumer goods and/or services: Clergy/Priest and Religious Worship Services.

The date range of the complained of conduct is as follows: Year 1972 (or prior) to Year 2023 (and continuing).

The relief sought is compensatory and punitive damages in excess of the monetary jurisdiction of all lower courts for the Plaintiff, an individual New York State resident and professional.

It is anticipated this action will additionally seek injunctive relief to protect the public from the Defendants' activities and to ensure compliance with all applicable laws.

Should defendant(s) fail to appear, judgment will be entered by default for the sum of Twenty-Five Million Dollars \$25.000,000.00 together with interest and the costs of this action.

Parties to be served:

SACRED PATRIARCHAL AND STAVROPEGIAL ORTHODOX MONASTERY OF ST. IRENE CHRYSOVALANTOU, INC., IOANNIS IEROTHEOS ZHACHARIS, BISHOP IEROTHEOS OF EFKARPIAS ABBOT as the Trustee of the SACRED PATRIARCHAL AND STAVROPEGIAL ORTHODOX MONASTERY OF ST. IRENE CHRYSOVALANTOU, INC., THEOLOGITIS NIKITAS as the Trustee of the SACRED PATRIARCHAL AND STAVROPEGIAL ORTHODOX MONASTERY OF ST. IRENE CHRYSOVALANTOU, INC., ARCHBISOP LOULIAS NIKITAS as the Chairman of the SACRED PATRIARCHAL AND STAVROPEGIAL ORTHODOX MONASTERY OF ST. IRENE CHRYSOVALANTOU, INC.,

ST. NECTARIOS GREEK ORTHODOX CHURCH, BROOKLYN, NY. ST. NICHOLAS GREEK ORTHODOX CHURCH, BROOKLYN, NY, ST. ATHANASIOS AND JOHN GREEK ORTHODOX CHURCH, CHICAGO, IL. HOLY ASCENSION GREEK ORTHODOX CHURCH, CLEARWATER, FL, STS. ANARGYROI, TAXIARCHIS AND GERASIMOS GREEK ORTHODOX CHURCH, GREENPORT, NY.

SACRED PATRIARCHAL AND STAVROPEGIAL ORTHODOX MONASTERY OF ST. IRENE CHRYSOVALANTOU, INC 36-07 23rd Avenue Astoria, NY, New York 11105-1916 (718) 626-6225

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SUMMONS WITH NOTICE

LAW OFFICES OF KONSTANTINOS GAISIDIS 43W 43RD STREET. STE.240 NEW YORK, NEW YORK 10036 (212) 859-5056 By: KONSTANTINOS GAISIDIS,ESQ.