

# **Exhibit A**

First Amended Complaint

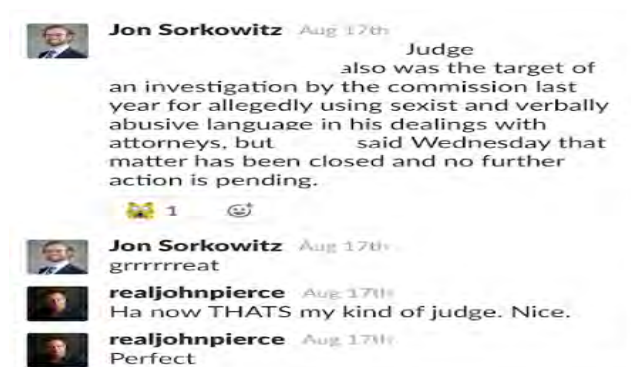
Index No. 155686/2019

## **Misogynistic Statements by Pierce Bainbridge Managing Partner John Pierce**

## Documented Misogynistic Comments of Managing Partner John Pierce

The following is a *representative sample* of allegations in *paragraph 178* of the Lewis Complaint.

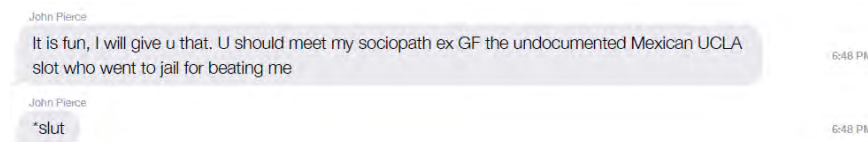
- Upon receiving a report from Sorkowitz about the investigation of a male judge for using “sexist and verbally abusive language in his dealings with attorneys,” Pierce posted firm-wide: “Ha Now THAT’s my kind of judge.”



- Pierce sends a message to Beck about LSG after a temporary falling out: “make sure Lauren knows that I will be thrilled to prosecute her for dozens of counts of extortion if she f\*cks with me. I am done being abused and blackmailed by psycho females. Done.” (Lauren is Pierce’s 24/7 assistant for 5 years. They have a volatile relationship)



- Pierce pens a message about his dalliances with a relative of El Chapo, the Narcotics Kingpin: “U should meet my sociopath ex GF the undocumented Mexican UCLA slut who went to jail for beating me. . .Last name Guzman. Of the El Chapo family. Good in bed though”




John Pierce  
Last name Guzman. Of the El Chapo family. 6:49 PM

John Pierce  
Good in bed though 6:50 PM

John Pierce  
Love her!!! 6:51 PM

John Pierce  
Yes the drug kingpin 6:51 PM

- Pierce on whether his ex-wife should be kept off of all communications: “For now yes. She is being a bitch again about the amendments I am insisting on in our divorce agreements...But she will break and I will get her back involved within a couple of days. She can actually be a big asset on the newsletter, collections, biz dev and other stuff.”

 **realjohnpierce** 6:53 PM  
For now yes. She is being a bitch again about the amendments I am insisting on in our divorce judgment ( ^ . But she will break and I will get her back involved within a couple days. She can actually be a big asset on the newsletter, collections, biz dev and other stuff

- Pierce opines on Chang who is likely at least 15 years younger during the Boston Trial: “Grace is crushing on me and she is jealous lol. . . So God damn funny I can barely contain myself. Fuc\*ing chicks. Whack jobs. So hot. And so sweet.” (Documented)

John Pierce  
Grace is crushing on me and she is jealous lol 7:18 PM

John Pierce  
So God damm funny I can barely contain myself 7:20 PM

John Pierce  
Fucking chicks. Whack jobs 7:20 PM

John Pierce  
So hot 7:20 PM

John Pierce  
And so sweet 7:20 PM

- Pierce continues: “[Grace] is all plump and cuddly lol. Well just compared to what I am what I am used to that’s all. She is perfect. Lauren is a fuc\*ing psycho. I’m a magnet for them. U will see. MAGNET. Wait til u meet our classmate my ex-wife. Jesus Mary and joseph. #oneofakind #theybrokehemold. Problem is normal chicks like Grace are scared of me. The psychos are drawn to me. Great.”

John Pierce  
All plump and cuddly lol 7:22 PM

John Pierce  
Well just compared to what I am used to that's all. She is perfect 7:23 PM

John Pierce  
Lauren is a fucking psycho. I'm a magnet for them. U will see. 7:30 PM

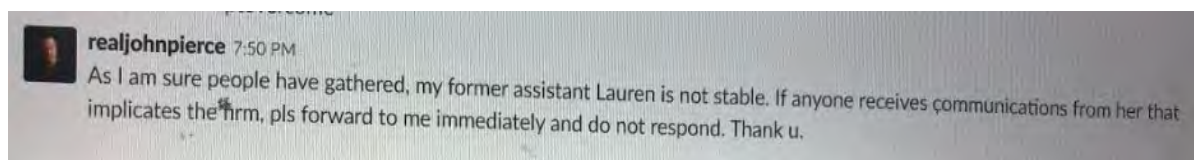
John Pierce  
MAGNET 7:30 PM

John Pierce  
Wait til u meet our classmate my ex wife. Jesus Mary and joseph 7:31 PM

John Pierce  
#oneofakind #theybrokethemold 7:32 PM

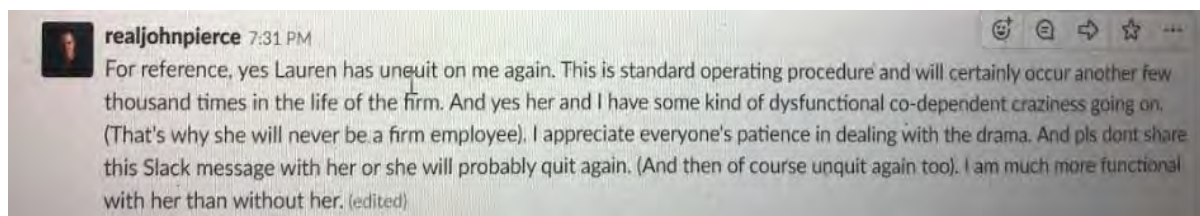
John Pierce  
Problem is normal chicks like Grace are scared of me. The psychos are drawn to me. Great 7:34 PM

- Pierce posts to the entire firm: “As I am sure people have gathered, my former assistant Lauren is not stable. If anyone receives communications from her implicating the firm, please forward immediately to me and do not respond.”



realjohnpierce 7:50 PM  
As I am sure people have gathered, my former assistant Lauren is not stable. If anyone receives communications from her that implicates the firm, pls forward to me immediately and do not respond. Thank u.

- Pierce posts to firm: “For reference, yes, Lauren has unquit on me again. This is standard operating procedure and will certainly occur another thousand times in the history of the firm. And yes, her and I have some kind of dysfunctional co-dependent craziness going on.”



realjohnpierce 7:31 PM  
For reference, yes Lauren has unquit on me again. This is standard operating procedure and will certainly occur another few thousand times in the life of the firm. And yes her and I have some kind of dysfunctional co-dependent craziness going on. (That's why she will never be a firm employee). I appreciate everyone's patience in dealing with the drama. And pls dont share this Slack message with her or she will probably quit again. (And then of course unquit again too). I am much more functional with her than without her. (edited)

John asking, I will tell him only. 4:53 PM

Me  
Call me. 4:54 PM

Me  
Handled. 5:05 PM

Thank you. I appreciate it. 5:36 PM

The guy makes my skin crawl. 5:37 PM

Me  
You weren't named. 5:40 PM

- Pierce expounds on why he thinks a female employee should come to meeting: “And bring [female employee] since all males will salivate over her.”

John Pierce  
And we should invite [redacted] since the [redacted] provides yet more collateral for funding. And [redacted], since all males will salivate over her 3:31 PM

- LSG on Pierce and a female employee: “the only reason he wants to keep [same “salivating” female employee] is, they have some deep, trashy slack situation happening and he can get SUEDE for all his inappropriateness. SUEDE. so, he’s treading lightly and making us all squirm.”

Lauren PB  
and his whole “she’s jealous!!” and that “Grace has a crush on me!”... she’s actually repulsed by him and he HATES that i don’t want to be with him cause i have someone i’ve been with for a while and am in love with.  
he’s a piece of work. there’s NO loyalty and all’s fair in love and war. he’d just assume toss me off a bridge if i no longer served a purpose. 12:49 AM  
and the only reason he wants to keep [redacted] is, they has some deep, trashy slack situation happening and he can get SUEDE for all his inappropriateness. SUEDE. so he’s treading lightly and making us all squirm cause he’s fucking burying his own hole.

Lauren PB  
i’ve watched him do this at THREE firms in 5 years. hold onto your hat... it’s gonna get fun. and i want zero affiliation. 12:50 AM