

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

**CHRISTA RITTER,**  
formerly known as  
**CHRISTA KLISIVITICH,**

Plaintiff,

-against-

**WILLIAM KLISIVITCH, COLETTE  
PANEBIANCO (now known as COLETTE  
KLISIVITCH), ZVI GRINBAUM, FRANCES  
TROTTO, ITM WORLD GROUP, LLC, 142456  
CANADA, INC., 127630 CANADA, INC.,  
WVDAC HOLDINGS INC., a/k/a GESTIONS  
WVDAC, INC., INTERNATIONAL TEXTILE  
MACHINES CANADA LTD., a/k/a LES  
MACHINES TEXTILES INTERNATIONALES  
DU CANADA LTÉE, trading as ITM World  
Group/Group Mondial ITM, JOHN DOE 1-5 and  
JANE DOE 1-5, (being and intended to be persons  
whose identity are unknown who have joined with  
one or more named defendants in a conspiracy to  
deprive plaintiff of her rights),**

Defendants.

Docket No. **06-CV-5511-DRH-WDW**

**UPDATED PROPOSED  
SECOND  
AMENDED  
COMPLAINT**

**JURY DEMAND**

Pursuant to FRCP Fed. R. Civ. Pro. 38,  
plaintiff demands a trial by jury of all  
issues of fact in this action.

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\*The above Table of Contents is not intended to limit or define any of the substantive paragraphs of the within Updated Proposed Second Amended Complaint. It is respectfully intended solely as an aid to the Court and Counsel.