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**MARISA WATLEY,
Plaintiff,**

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IN THE DISTRICT COURT

V.

____ JUDICIAL DISTRICT

**JUSTICE ARMANI BLACKBURN,
JAMES HARDEN, JOHN DOE
SECURITY GUARDS 1-10, and
DOE CORPORATE EMPLOYER OF
JOHN DOE SECURITY GUARDS 1-10
Defendants.**

OF HARRIS COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Marisa Watley ("Ms. Watley" or "Plaintiff"), complaining of and about Justice Armani Blackburn ("Mr. Blackburn"), James Harden ("Mr. Harden"), John Doe Security Guards 1-10, and Doe Corporate Employer of John Doe Security Guards 1-10 (collectively, "Defendants"), for cause of action shows unto the Court the following:

PRELIMINARY STATEMENT

1. Plaintiff Marisa Watley was brutally raped by Defendant Justice Armani Blackburn following a New Years Eve party at Defendant James Harden's mansion home. Before this horrific assault occurred, Ms. Watley's friends alerted Mr. Harden's security team that they were concerned that Ms. Watley appeared to be missing somewhere in the house, and Mr. Harden's security team was aware that women were passed out from intoxication throughout the house, was aware that Ms. Watley was present in the house with Mr. Blackburn, was aware that Ms. Watley was in a vulnerable condition in which she lacked the ability to consent, and was aware that Mr. Blackburn had engaged in criminal conduct towards others. Nonetheless, Mr.

Harden's security team recklessly failed to protect Ms. Watley on Mr. Harden's property—and the result was a sexual assault from which she will suffer indefinitely.

PARTIES AND SERVICE

2. Plaintiff Marisa Watley is a resident of the State of Texas.

3. Defendant Justice Armani Blackburn is, upon information and belief, a resident of the State of Texas. Defendant Blackburn may be served with process at 302 Glenwood Drive, Houston, Texas 77007, or wherever Defendant Blackburn may be found. Plaintiff requests a citation.

4. Defendant James Harden is, upon information and belief, a resident of the State of Texas. Defendant Harden may be served with process at 3 W. Rivercrest Drive, Houston, Texas 77042, or wherever Defendant Harden may be found. Plaintiff requests a citation.

5. Defendants John Doe Security Guards 1-10 are certain unknown security guards whose actions are described below.

6. Defendant Doe Corporate Employer of John Doe Security Guards 1-10 is the unknown corporate entity that administers the employment of John Doe Security Guards 1-10.

DISCOVERY CONTROL PLAN LEVEL

7. Plaintiff intends that discovery be conducted under Discovery Level 3 of Texas Rule of Civil Procedure 190.4 and affirmatively pleads that this suit is not governed by the expedited-actions process in Texas Rule of Civil Procedure 169, because Plaintiff requests injunctive relief and Plaintiff seeks monetary relief over \$100,000.

JURISDICTION AND VENUE

8. This Court has jurisdiction over this matter, and venue in this Court is appropriate, because the action involves unlawful conduct that was committed by Defendants in Harris County.

9. Venue is proper in Harris County, Texas pursuant to Section 15.002(a)(1) of the Texas Civil Practices and Remedies Code because all or a substantial part of the events or omissions giving rise to the claims occurred in Harris County, Texas. The Court has subject matter jurisdiction because the amount in controversy is within the jurisdictional limits of this Court. Moreover, all of the incidents in question occurred in Harris County.

FACTS

I. Ms. Watley is Raped by Defendant Blackburn

10. Ms. Watley, 40 years old, is a Real Estate agent in Texas and New Jersey. She lives in Houston, Texas.

11. Around 10:45 p.m. on New Year's Eve, December 31, 2024, she arrived at a restaurant where she met her two friends, referred to hereinafter pseudonymously as "Jane" and "Emily."

12. Ms. Watley had driven and parked her car at the restaurant, while Jane and Emily had taken a car service.

13. Eventually, Jane reached out to a friend and learned there was a party happening at a club called Polekatz.

14. Ms. Watley drove Jane and Emily back to Jane's apartment to change, and Ms. Watley also changed into some clothing she had with her in her car.

15. The three of them took an Uber to Polekatz, which was near Jane's apartment.

16. Jane's friend came to the door and brought the three of them into the club and then led them to what appeared to be the VIP section of the club (it was on an upper level).

17. In the VIP section, Jane asked whether Ms. Watley knew the basketball player James Harden and pointed out that Harden was there in the VIP section. This was around 3:30 a.m.

18. Soon after, Jane learned (likely through her friend) that there would be an after party at Mr. Harden's home.

19. Ms. Watley got into an Uber with Jane and Emily, thinking they were headed back to Jane's apartment.

20. Instead, without Ms. Watley knowing the destination, the Uber took them to the after party at Mr. Harden's home.

21. There was at least one security guard at the gate, and a guard was reviewing guest identification (i.e. driver's licenses, etc.) and instructing the guests to leave their phones in their cars. Of course, Ms. Watley could not do this because she had come in an Uber.

22. The guard was armed with a firearm and checked Ms. Watley and her friends' identification. A guard directed the guests to go to the "studio" in Mr. Harden's home.

23. When Ms. Watley arrived at the studio, she noted that it appeared to be a recording studio. Ms. Watley saw that Mr. Harden was there.

24. At some point in the early morning, Justice Armani Blackburn—Mr. Harden's nephew, though Ms. Watley did not know this at the time—approached the three women.

25. Ms. Watley recalls a simple introductory conversation with Mr. Blackburn, where she and Mr. Blackburn asked each other where they came from.

26. Mr. Blackburn offered Ms. Watley, Jane, and Emily, a drink from the bottle of liquor he was holding.

27. The three of them each took a small drink from the bottle. Around this time Ms. Watley noticed there was a woman asleep on a couch in the studio.

28. From the moment Ms. Watley drank from Mr. Blackburn's bottle, her memory becomes extremely hazy.

29. She can recall trying to speak to Jane about a woman who was dancing, but she was fading in and out and felt as though she could not speak.

30. She also recalls Mr. Blackburn saying "come on, come on" to her repeatedly and tapping her on the chest, as though he wanted her to join him somewhere urgently.

31. Mr. Blackburn knew he was running out of time before Ms. Watley passed out.

32. The next thing Ms. Watley recalls is being shocked into consciousness while lying face down on a bed with a man behind her having aggressive sex with her. For the first few moments that she can recall of the assault, she was in a dream-like state and was not fully awake. During those first few seconds, Ms. Watley likely reacted in a way that indicated she was no longer unconscious, even if she was still only semi-conscious. Mr. Blackburn continued his sexual assault and apparently nearing an orgasm, demanded for Ms. Watley to tell him if she was on birth control, stating (as best as Ms. Watley can recall): "Are you on birth control? I want to cum inside of you! Tell me!"¹

33. Ms. Watley recalls saying only "no, no, no" repeatedly. She then realized that the person using her as a sex instrument was Mr. Blackburn, whom she had met the first time in the studio shortly after she had arrived at the house (though she did not at this time know his name).

¹ As shown by public filings, Mr. Blackburn has been involved in paternity/child-support proceedings, which would explain why he would be concerned enough to ask this question in the midst of a rape.

34. At some point, Mr. Blackburn stopped raping Ms. Watley.
35. Ms. Watley recalls seeing her pants inside out on the floor and him picking them up and putting them on.
36. Ms. Watley began frantically looking for her phone and asking Mr. Blackburn where it was. Mr. Blackburn indicated that he did not know where it was.
37. Throughout this experience, Ms. Watley had only barely regained consciousness and was struggling to understand what was happening around her.
38. At some point a security guard in Mr. Harden's employ entered the room and ordered Ms. Watley to leave the mansion. Ms. Watley cannot recall seeing Mr. Blackburn after this time.
39. Ms. Watley told the security guard that she had lost her phone and begged the guard to take her to look in the studio. He let her do this but followed closely behind her.
40. Ms. Watley passed through the studio and saw the same woman was still passed out on the couch. Ms. Watley worried that this woman may have been drugged.
41. The guard then proceeded to cruelly kick Ms. Watley out of the mansion.
42. As he brought her out of the house, Ms. Watley tried to explain that she had no way of traveling without her phone.
43. The guard told her that "Elaina" (which is Ms. Watley's sister's name) was coming to pick her up, though she did not understand how that had been arranged or if he was even referring to her sister. He walked her to the front gates and then closed the gates behind her.

44. Once outside the gate, confused and disoriented, Ms. Watley stopped a woman who was walking her dog and asked for help. The woman offered to call her father and explained that they lived across the street from Mr. Harden.

45. This woman's father arrived with a phone, offering to let Ms. Watley call someone, but Ms. Watley did not have any useful phone numbers memorized. She wished to call her sister, Elaina, but could not.

46. She asked Mr. Harden's neighbor to find her sister on Instagram. When he did, he sent Ms. Watley's sister an Instagram message at around 2:17 p.m.

47. Shortly after, however, Jane and Emily pulled up in a car and Ms. Watley quickly got in. Jane and Emily looked visibly frightened. They had her phone and Ms. Watley was finally able to call her sister, at around 2:30 p.m.

48. Later, she would notice numerous missed calls from a California phone number beginning at 1:35 p.m.

49. She learned that this number was Mr. Blackburn's (though she does not recall sharing her number with him).²

50. Ms. Watley went to an emergency room the same day as the assault. She has been struggling to recover mentally from what occurred.

51. Since the event, she speaks with a heavy stutter—a symptom of severe trauma. With the help of her sister, she is seeking therapy and psychiatric help. She will be suffering from the fallout of this event her entire life.

² Likely trying to take her temperature, Mr. Blackburn also texted "Yo" to Ms. Watley the next day, on January 2, 2025.

II. Mr. Harden's Security Personnel Deliberately Delay and Prevent the Rescue of Ms. Watley

52. It was not a coincidence that Jane and Emily pulled up in a car at the moment they did.

53. As Ms. Watley would learn later, the two had been frantically engaged for several hours in efforts to find and rescue Ms. Watley.

54. Ms. Watley's sister, Elaina, had led those efforts.

55. At around a little before 10:00 a.m.—approximately only hours before Ms. Watley recalls being raped—Jane and Emily regained consciousness. They too had passed out and lost consciousness shortly after drinking from Mr. Blackburn's bottle.

56. Like Ms. Watley when she woke up, Jane and Emily found themselves in front of security guards who were demanding that they immediately leave Mr. Harden's home.

57. And again, like Ms. Watley later on, they were missing personal items, including their phones, purses and keys.

58. They also realized that Ms. Watley was missing and demanded that the security guards let them look for her. A guard refused, said that "there were no more women in the house" and instead insisted that the two leave immediately.

59. Jane and Emily were, of course, outraged. They were disoriented, missing a friend, and could not find their personal possessions, and yet were being hustled out the door by guards who understood all of these facts but apparently did not care.

60. Before they were escorted out, however, Jane found Ms. Watley's iPhone and took it with her.

61. The guards forced Jane and Emily outside of the gates (as they would later do to Ms. Watley) and locked them out. Jane and Emily began arguing with the guards, telling them their friend and possessions were inside and that they wanted to be let back in.

62. While this was all occurring, one of the guards indicated he knew that Jane or Emily had Ms. Watley's phone, and they tried to take it away.

63. The guards told Jane and Emily that they would bring them their possessions to the security building at the front gate, but that the two had to leave.

64. Though Ms. Watley's phone was locked, Jane was able to access Ms. Watley's emergency contacts and found Ms. Watley's sister, Elaina.

65. Jane called Elaina at 10:44 a.m. and began explaining that she and Emily had Ms. Watley's phone but could not find Ms. Watley, and that they themselves had lost their phones, purses and keys.

66. Jane explained that she believed Ms. Watley remained inside the mansion, because her car was parked at Jane's apartment and they had her phone. However, as Jane explained, the guards told them that "there were no more women in the house."

67. As an initial matter, the guards knew this statement to be incorrect given that there was a woman passed out on the couch in the studio. Moreover, upon information and belief, the guards also knew that Ms. Watley remained in the house and that there was physical evidence—namely, her phone—indicating that she was still there.

68. Shocked, Elaina got off the phone and tried to get in touch with Ms. Watley's neighbor, to see if he might have seen Ms. Watley or knew anything about her whereabouts. She failed to reach him.

69. Around 10 minutes after their first call, Elaina called back her sister's phone and reached Jane. As Elaina did not have any prior relationship with Jane, and was by this point concerned about her sister's whereabouts, asked Jane for some identifying information.

70. She then asked for further details about what was happening, and Jane explained that they had been at a party at Mr. Harden's house with Ms. Watley. Jane explained that they were at that moment standing outside the mansion where the party had occurred, that they had Ms. Watley's phone, and they therefore suspected that Ms. Watley must still be inside the mansion.

71. She also explained that they had passed out and lost their memory at some point in the night and were trying to get back in to look for Ms. Watley and find their possessions. Jane said in sum and substance that she suspected they had been drugged. Jane also told Elaina that they had been arguing with the security guards at the gate to Mr. Harden's home and asking about Ms. Watley, but the guards were stonewalling them.

72. Around this time, Jane told Elaina that she had seen other women leaving the mansion, which provided only further proof that the guards had been lying to them about other women remaining on the property.

73. Jane also told Elaina that she suspected that Ms. Watley must be inside the mansion because her car was parked at Jane's apartment, and she could not have gotten to the car on her own and without her phone.

74. Jane then told Elaina that Mr. Harden himself was driving through the front gates, and while the gates were open to let him out, she was going to get off the phone to run through the gates while they were still open.

75. To summarize, shortly before Mr. Harden's exit, there were at least three women (Jane, Emily and the woman on the couch) passed out in plain sight in his home. Ms. Watley was passed out in a bedroom. And, around the time Mr. Harden drove away from his home, an additional group of women was being ejected by his guards.

76. To appearances, his guards had a modus operandi for quickly ejecting passed-out women from Mr. Harden's mansion as soon as they woke up—but not before. For instance, they did not kick the women out at a certain time, and they did not kick the women out systematically.

77. After this call, Elaina once again tried to contact Ms. Watley's neighbor. She was once again unsuccessful.

78. Realizing at this point (approximately 11:13 a.m.) that based on what Jane was telling her there was likely a serious problem, Elaina once more called Ms. Watley's phone and reached Jane.

79. In this third call, Jane explained that they had found their things in the mansion and were leaving. They had a more comprehensive conversation where Jane confirmed what had occurred and what had happened the night before and that morning.

80. In the midst of these calls with Jane or shortly after, Elaina called her youngest sister, who had access to Ms. Watley's phone location and sent Elaina a screenshot showing that Ms. Watley's phone was indeed outside of 3 West Rivercrest Drive in Houston, a home known to belong to Mr. Harden.



81. At around 11:30 a.m., Jane called Elaina back from Ms. Watley’s phone, saying they had made it back to Jane’s apartment and Ms. Watley’s car was still there, and Ms. Watley must therefore be inside Mr. Harden’s home.

82. Based on what she had heard from Jane, Elaina agreed that Ms. Watley must indeed still be inside Mr. Harden’s home.

83. Elaina thought to use her personal network—Elaina works in the entertainment sector—to reach out to a friend associated with Mr. Harden, to see if that friend had any ideas for how they might get in touch with someone within the mansion.

84. Elaina began texting the friend at 12:04 p.m.,³ and the two started speaking about the situation five minutes later.

³ Elaina was in a time zone two hours ahead of Texas. The times here are all expressed as Central time.

85. Elaina's friend was able to get in touch with someone with access to the mansion, Mr. Harden's sister Arnique Jelks. Ms. Jelks is Mr. Blackburn's mother, the man who raped Ms. Watley.

86. At the urging of Ms. Watley's friend, Ms. Jelks—who, to all appearances, was unaware of what was happening between her son and Ms. Watley—was able to contact someone within Mr. Harden's home.

87. While Elaina and her friend remained on the phone, the security guards claimed to “sweep” the mansion. They then informed Ms. Jelks that there was a “girl in Justice's room” but they had no way of knowing who it was. They requested a picture of Ms. Watley to verify.

88. Elaina's friend transmitted all of this information to Elaina, who sent a picture of her sister. The security guards within Mr. Harden's home, photo in hand, lied to Ms. Jelks that the girl with Mr. Blackburn was not Ms. Watley.

89. Since they saw her in the room, the security guards would also have realized that she was unconscious and in a vulnerable state.

90. It was now around 12:50 p.m. Elaina, growing increasingly frightened, told her friend to have Ms. Jelks check instruct someone to check the security cameras.⁴ Either Ms. Jelks or Mr. Harden's security claimed to be checking the cameras, though it is not clear they did.

91. As the security guards appeared to drag their feet, at 1:24 p.m., Elaina told her friend that Ms. Watley's friends were “calling the police.”

92. This was a “white lie” so that she would not seem overly aggressive towards two women who were doing her a helpful favor. In fact, Elaina herself was already on the phone with the police, waiting for someone to pick up.

⁴ Ms. Jelks was not apparently within Mr. Harden's house.

93. This threat finally forced Mr. Harden's security personnel to respond truthfully. While Elaina remained on hold with the police, Elaina's friend finally heard back from Ms. Jelks that Ms. Watley was in Mr. Blackburn's room.

94. Elaina found this out at 1:29 p.m. Ms. Jelks, seemingly confused by the whole situation, exclaimed to Elaina's friend, "Why is your friend in that room with a 27-year-old loser?"

95. It was during this exchange that Elaina learned that Mr. Blackburn was Mr. Harden's nephew.

96. Elaina hung up the call with the police and called Jane to let her know to pick up Ms. Watley.

97. Mr. Harden's security personnel, having identified Ms. Watley, did not inform her right away that her friends and family were looking for her.

98. Instead, and based on the timeline of events, it was likely around this time that Mr. Blackburn had just raped Ms. Watley, and it was only immediately after he finished raping Ms. Watley that security took any action.

99. Upon information and belief, Mr. Harden and/or his security personnel had familiarity with Mr. Blackburn and knew that he had a history of engaging in threatening, violent and abusive conduct, particularly when he drinks alcohol.

100. For example, Mr. Blackburn has been convicted of criminal trespassing which included allegations of threatening conduct towards a woman when he was intoxicated.

101. Had the security guards acted sooner, had they listened to a single one of the concerns raised to them in the hours before Ms. Watley was raped, Mr. Harden's security could have prevented this nightmare from occurring.

**PLAINTIFF'S CLAIM OF SEXUAL ASSAULT AGAINST
DEFENDANT JUSTICE ARMANI BLACKBURN**

102. Defendant Justice Armani Blackburn committed sexual assault against Ms. Watley.
103. Defendant Blackburn intentionally or knowingly made offensive physical contact with Ms. Watley.
104. Defendant Blackburn knew or should reasonably have believed that Ms. Watley would regard the contact as offensive or harmful.
105. Plaintiff is therefore entitled to economic, compensatory, and punitive damages against Mr. Blackburn.

**PLAINTIFF'S CLAIM OF NEGLIGENCE
AGAINST DEFENDANTS JAMES HARDEN, JOHN DOE SECURITY GUARDS 1-10,
DOE CORPORATE EMPLOYER OF JOHN DOE SECURITY GUARDS 1-10**

106. The security guards employed by Mr. Harden had a duty of care towards the guests in Mr. Harden's home, in light of the foreseeability of the conduct that occurred, the low social utility of having a house party, and the minimal burden that would be imposed by taking care, and all other factors set forth in Bird v. W.C.W., 868 S.W.2d 767, 769 (Tex. 1994).
107. The guards also had a special relationship with guests of Mr. Harden. Specifically, those guards took Mr. Harden's house guests into their custody, care, and control by confiscating their belongings and locking Mr. Harden's mansion's outer front gate.
108. On the morning and afternoon of January 1, the security guards were on notice of a danger, as Ms. Watley's friends were looking for her, and as there were several women passed out in Mr. Harden's home.

109. By the actions and omissions described above, the security guards employed by Mr. Harden failed to exercise reasonable care in protecting Ms. Watley from a foreseeable danger of rape by Mr. Blackburn.

110. Their policy of letting drugged women lie unprotected also led to a foreseeable risk of rape.

111. Mr. Harden is vicariously liable for the actions of his guards and their corporate employer.

112. Plaintiff is therefore entitled to economic, compensatory, and punitive damages against Defendants James Harden, John Doe Security Guards 1-10, and Doe Corporate Employer of John Doe Security Guards 1-10, in an amount to be determined at trial.

PLAINTIFF'S CLAIM OF NEGLIGENT RESCUE AGAINST DEFENDANTS JAMES HARDEN, JOHN DOE SECURITY GUARDS 1-10, DOE CORPORATE EMPLOYER OF JOHN DOE SECURITY GUARDS 1-10

113. The security guards also undertook to find Ms. Watley and either negligently or knowingly refused to bring her to safety.

114. On information and belief, their actions alerted Defendant Blackburn that a rescue was underway which prompted him to hurry to rape and/or finish raping Ms. Watley.

115. Their purposeful delays and lies about Ms. Watley's presence also caused others to delay calling the police, who could have arrived in time to prevent Ms. Watley's rape.

116. Mr. Harden is vicariously liable for the conduct of the security guards in his employ.

117. Plaintiff is therefore entitled to economic, compensatory, and punitive damages against Defendants James Harden, John Doe Security Guards 1-10, and Doe Corporate Employer of John Doe Security Guards 1-10.

**PLAINTIFF'S CLAIM OF NEGLIGENT SUPERVISION AGAINST DEFENDANTS
JAMES HARDEN AND DOE CORPORATE EMPLOYER OF JOHN DOE SECURITY
GUARDS 1-10**

118. Defendants James Harden and Doe Corporate Employer of John Doe Security Guards had a duty to exercise reasonable care in supervising John Doe Security Guards 1-10.

119. By instructing them to let drugged women lie unprotected, they created a foreseeable risk of sexual assault, ultimately causing Ms. Watley's rape.

120. Defendants Harden and Doe Corporate Employer also failed to provide instructions on how to deal with the threat of rape, when such a threat was foreseeable at Mr. Harden's mansion.

121. Plaintiff is therefore entitled to economic, compensatory, and punitive damages against Defendants James Harden, John Doe Security Guards 1-10, and Doe Corporate Employer of John Doe Security Guards 1-10.

JURY DEMAND

122. Plaintiff demands a jury trial and tenders the appropriate fee with this petition.

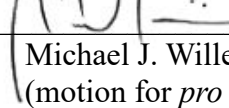
PRAYER

WHEREFORE PREMISES CONSIDERED, Plaintiff respectfully prays that the Defendants be cited to appear and answer herein, and that a final hearing of the cause, judgment be entered for the Plaintiff against Defendants for damages in an amount within the jurisdictional limits of the Court including appropriate compensatory and punitive damages; together with judgment interest (from the date of injury through the date of judgment) at the maximum, allowed by law; post-judgment interest at the legal rate, costs of court; and such other and further relief to which the Plaintiff may be entitled at law or in equity.

Dated: June 23, 2025
New York, New York


Respectfully submitted,

WIGDOR LLP

By: 
Michael J. Willemin
(motion for *pro hac vice* forthcoming)
John S. Crain
(motion for *pro hac vice* forthcoming)

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