SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JANE DOE,	:	
	:	
Plaintiff,	:	Index No.
	:	
v.	:	
	:	**SUMMONS**
CALEB T. SUH,	:	
	:	
Defendant.	:	**Basis for Venue:**
	:	**Defendant's Residence in New York**
	:	**County**
	:	

To the above-named Defendant:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to serve a notice of appearance or demand for a complaint on counsel for Plaintiff within twenty (20) days after service of this summons, exclusive of the day of service; or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York.

The nature of this action is Plaintiff asserts claims pursuant to New York common law for assault and battery. Plaintiff is seeking damages to redress the injuries Plaintiff has suffered as a result of being forcibly drugged, sexually assaulted, and subjected to batteries in or around February 4, 2022.

The relief sought is an amount to be determined at trial for, *inter alia*, physical injury, compensatory damages, punitive damages, attorneys' fees and costs, and other such and further relief as this Court deems just and proper.

Venue is proper as Defendant is a resident of New York County. Plaintiff designates **NEW YORK COUNTY** as the place of trial.

YOU ARE HEREBY NOTIFIED THAT, should Defendant fail to appear herein or demand a complaint, judgment will be entered by default for the relief demanded above.

Dated: October 28, 2026
New York, New York

Respectfully submitted,

WIGDOR LLP

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Counsel for Plaintiff Jane Doe

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JANE DOE,	:	
	:	Index No.:
Plaintiff,	:	
v.	:	**COMPLAINT**
	:	
CALEB T. SUH,	:	**Jury Trial Demanded**
Defendant.	:	
	:	

Plaintiff Jane Doe ("Plaintiff" or "Ms. Doe") in her Complaint against Defendant Caleb T. Suh ("Defendant" or "Defendant Suh"), hereby alleges as follows:

PRELIMINARY STATEMENT

1. This is a case about a life-altering act of sexual violence.

2. In 2022, when Ms. Doe was a sophomore Cadet at the United States Military Academy at West Point, she became pregnant by Defendant Suh.

3. Defendant Suh repeatedly pressured Ms. Doe to get an abortion. He even threatened to commit suicide if she did not terminate the pregnancy.

4. Ms. Doe told Defendant Suh that she wanted to keep the baby, and told him, repeatedly, that she would never get an abortion.

5. On February 4, 2022, Defendant Suh coerced Ms. Doe to drink what he told her was a protein drink to help their baby.

6. Ms. Doe became incapacitated. She felt paralyzed and had difficulty moving. Defendant Suh watched her become increasingly ill.

7. While Ms. Doe was in an incapacitated state, Defendant Suh shoved abortion pills into Ms. Doe's vagina and in her mouth.

8. As a result, Ms. Doe miscarried and lost her baby.

9. For years, Ms. Doe has been forced to grapple with her experience. Meanwhile, Defendant Suh matriculated at Cornell University, earned a Bachelor's degree, and is now enrolled at Columbia University.

10. In 2026, Defendant Suh was charged under 18 U.S.C. § 113.[1] On June 30, 2026, Defendant Suh pleaded guilty to assault resulting in substantial bodily injury to a dating partner under 18 U.S.C. § 113(a)(7) and acknowledged the foregoing acts. [2]

11. Ms. Doe now files this action seeking all available civil relief.

PARTIES

12. Plaintiff Jane Doe is a former Cadet at the United States Military Academy at West Point. Plaintiff will move for leave to proceed pseudonymously, because this action concerns sexual assault, reproductive coercion, medical privacy, the United States Military, and deeply personal trauma. Plaintiff also proceeded under a pseudonym in the parallel criminal matter.

13. Defendant Caleb T. Suh is a citizen of New York and, upon information and belief, a resident of New York County, where he is currently enrolled in the Columbia University Mailman School of Public Health.

JURISDICTION AND VENUE

14. The Court has jurisdiction over this matter under CPLR § 301 because Defendant Suh is a resident of New York.

15. Venue is proper under CPLR § 503(a) because, upon information and belief, Defendant Suh resides in New York County.

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1 *United States v. Suh*, 7:26-cr-00283-PMH-1 (S.D.N.Y. 2026).
2 *Id.* at Dkt. No. 7.

16. The acts set forth herein constitute criminal conduct and conviction within the meaning of CPLR §§ 213-b and 213-c.

FACTUAL ALLEGATIONS

I. MS. DOE MATRICULATES AT WEST POINT AND MEETS DEFENDANT SUH

17. Ms. Doe arrived on West Point's campus in August 2020 as a freshman Cadet.

18. West Point assigned Defendant Suh, a sophomore, to be her "Team Leader." He was supposed to mentor her and another freshman.

19. Defendant Suh soon began coming to Ms. Doe's room unannounced under the guise of "checking in."

20. Ms. Doe found this behavior odd because no other Team Leader spent that much time with their freshman counterpart, and Defendant Suh largely neglected the other student assigned to him.

21. She also believed the Academy's strict anti-fraternization policy—expressly prohibiting relationships between freshmen and upperclassmen—protected her from untoward advances.

22. Defendant Suh nonetheless pursued a romantic relationship with Ms. Doe, and the two began dating around October 2020.

II. MS. DOE BECOMES PREGNANT AND DEFENDANT SUH FORCIBLY TERMINATES THE PREGNANCY

23. Around January 21, 2022, Ms. Doe learned she was pregnant with Defendant Suh's child.

24. Ms. Doe had repeatedly told Defendant Suh that if she ever became pregnant, she would not have an abortion.

25. Despite knowing Ms. Doe's desire to keep any child she conceived, Defendant Suh repeatedly demanded that Ms. Doe terminate the pregnancy. He even told Ms. Doe that he would commit suicide if she did not get an abortion.

26. Then Defendant Suh changed course. He now purported to be supportive of the pregnancy and of Ms. Doe's decision to keep the child.

27. Unbeknownst to Ms. Doe, Defendant Suh had taken a photo of Ms. Doe's identification. Defendant Suh used that identification to open an account in Ms. Doe's name with an online pharmacy.

28. Defendant Suh continued impersonating Ms. Doe and obtained a prescription for abortion medication. He had the medication shipped to his mailbox at West Point, where he received it.

29. Defendant Suh also impersonated Ms. Doe on the pharmacy's online forum. He asked questions, including, "[w]ill I feel the pills in my vagina," and "I don't want to swallow pills, either. Could I just break them up in my water and drink water?"

30. Around the same time, Defendant Suh obtained Xanax and Promethazine.

31. In early February 2022, Defendant Suh told Ms. Doe that he bought her a special pregnancy protein powder.

32. On February 4, 2022, Defendant Suh came to Ms. Doe's barracks with a bag of protein powder. He opened the protein powder, put some in a water bottle, and then stepped out of the room. He returned with the water bottle filled with liquid. Ms. Doe took a sip and was repulsed by the taste. Ms. Doe told Defendant Suh that she did not want to finish the drink.

33. Defendant Suh became insistent and upset, eventually holding the bottle against her lips and forcing her to drink it.

34. Ms. Doe became sick and fell asleep. For the next few hours, she was in and out of consciousness with severe pain.

35. At one point, Ms. Doe awoke and felt an odd sensation in her gums. She had two pills in her mouth. Ms. Doe immediately spat them out.

36. Defendant Suh grabbed the pills and tried to put them back in her mouth. He told her, "eat this, it's good for you."

37. While Ms. Doe was in and out of consciousness, Defendant Suh moved closer and began touching her vagina.

38. Ms. Doe was unable to move or defend herself while Defendant Suh continued to assault her. She later fell asleep.

39. Around 11 p.m., Defendant Suh left Ms. Doe incapacitated and returned to his barracks room.

40. Ms. Doe woke up several times throughout the night. Around midnight, Ms. Doe awoke again due to the pain. She now vomited and experienced diarrhea.

41. Ms. Doe stumbled to the bathroom where the bright lights showed she was profusely bleeding from her vagina.

42. Unbeknownst to Ms. Doe, the pills lodged in her mouth were the fraudulently acquired abortion medication. Defendant Suh had also lodged a third pill in her vagina.

43. Fearing a miscarriage, Ms. Doe contacted Defendant Suh repeatedly. He did not respond.

44. Ms. Doe called 911 and was taken to the hospital.

45. The doctors at the hospital confirmed that Ms. Doe was suffering a miscarriage.

46. Believing she needed a dilation and curettage, a process by which the cervix is widened so tissue can be removed from the uterus, she was transferred to another hospital.

47. Defendant Suh, while continuing to ignore Ms. Doe's communications, posted on the pharmacy's online forum, "They moved me to another hospital, and I think they are going to do a procedure to get rid of the remains in my uterus. Will they say anything if they see the remaining pills in there? Will I have to tell them that it was self-induced?"

48. A few days after being discharged, Ms. Doe tried to show Defendant Suh the paperwork surrounding her miscarriage. He took the packet and threw it in the trash can.

49. A few weeks later, in March 2022, Defendant Suh broke up with Ms. Doe.

III. MS. DOE SUFFERS IN THE AFTERMATH OF DEFENDANT SUH'S ABUSE AND ASSAULT

50. The remainder of Ms. Doe's time at West Point was shaped by what Defendant Suh did to her.

51. Ms. Doe reported what she had experienced to the Army Criminal Investigation Division at West Point in May 2022. Over the remainder of her time at West Point, she would devote substantial time to the investigation.

52. Ms. Doe lived in fear of Defendant Suh.

53. Ms. Doe's life has been irreparably changed, and she has lost a baby that she intended to keep.

IV. DEFENDANT SUH ATTENDS CORNELL AND COLUMBIA AFTER ASSAULTING PLAINTIFF DOE

54. Defendant Suh, meanwhile, has gone on to attend two Ivy League Universities in New York, positioning himself as a champion of public health.

55. In fall 2024, Cornell University admitted Defendant Suh as an undergraduate student. There, he became involved in numerous societies, received an award and scholarship, and was a member of the Cornell Center for Health Equity, where he claimed to be interested in "emergency medicine" and claimed that his "long-term goal is to become a physician leader committed to advancing both patient care and structural equity."[3] He was also a Clinical Research Coordinator in translational and emergency medicine research at Weill Cornell.

56. Defendant Suh graduated from Cornell in 2026.

57. Defendant Suh then received a scholarship to attend a master's degree program at Columbia University, which he began during the Fall 2026 semester. Defendant Suh is currently enrolled in Columbia University's Mailman School of Public Health.[4]

V. DEFENDANT SUH PLEADS GUILTY TO CRIMINAL CHARGES

58. On June 30, 2026, Defendant Suh pleaded guilty to violating 18 U.S.C. § 113(a)(7). He admitted as follows:

> While I was a cadet at the United States Military Academy at West Point, I was involved in a dating relationship with my then-girlfriend, who was a class below me. In January of 2022, my girlfriend and I learned that she was pregnant. I wanted her to terminate the pregnancy, but she was opposed to this and determined to bring the pregnancy to term.
>
> Upon learning of her pregnancy, I created an account with an online pharmacy using my girlfriend's name, personal information, and identification without her knowledge or consent. Through this account I obtained abortion medications, which I had shipped to West Point. I also obtained Xanax through a friend. My intent was use the Xanax to unwittingly sedate my girlfriend so that I could then administer the abortion pills, which I had obtained via the online pharmacy.

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[3] Caleb Suh, Cornell Center for Health Equity, https://centerforhealthequity.cornell.edu/member-directory/member/5915/ (last accessed Oct. 23, 2026).

[4] *United States v. Suh*, 7:26-cr-00283-PMH-1, Dkt. No. 10 (S.D.N.Y. 2026).

> In order to deceive her, I led her to believe that I had come to support her pregnancy when, in fact, I did not. On the evening of February 4th, 2022, while spending time with my girlfriend in her parents' room -- barracks room, I encouraged her to drink a prenatal protein shake. I then waited for her to fall asleep, at which time I physically administered the abortion pills I had secretly obtained from the online pharmacy by impersonating her.
>
> The next morning I learned that my girlfriend had been taken to the hospital where she, in fact, miscarried as a result of the abortion pills that I had administered without her knowledge and consent.

59. On October 13, 2026, Defendant Suh asked to postpone his sentencing to January 2027, in part to permit him to complete the semester at Columbia University before appearing for sentencing.

FIRST CAUSE OF ACTION
(Assault and Battery)

60. Defendant intentionally caused harmful and offensive contact with Plaintiff's person without her consent, including by drugging her, sexually assaulting her, and administering abortion medication orally and vaginally. Defendant's conduct also created a reasonable apprehension of immediate harmful or offensive contact.

61. As a direct and proximate result of the aforementioned assault and battery, Plaintiff has sustained in the past, and will continue to sustain, *inter alia*, physical injury, monetary damages, pain and suffering, psychological and emotional distress, humiliation, and loss of career fulfillment.

62. Defendant's conduct was wanton, malicious, willful and/or cruel, entitling Plaintiff to an award of punitive damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that the Court issue a judgment in Plaintiff's favor and issue the following additional relief:

A. A declaratory judgment that the actions of Defendant complained of herein constitute assault and battery;

B. An award of damages against Defendant, in an amount to be determined at trial, plus prejudgment interest, to compensate Plaintiff for all monetary and/or compensatory damages;

C. An award of punitive damages, in an amount to be determined at trial;

D. Prejudgment interest on all amounts due;

E. An award of costs that Plaintiff has incurred in this action, including, but not limited to, expert witness fees, as well as Plaintiff's reasonable attorneys' fees and costs to the fullest extent permitted by law; and

F. Such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues of fact and damages stated herein.

Dated: October 28, 2026
New York, New York

Respectfully submitted,

WIGDOR LLP

By: _____
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