
Joel Kurtzberg, John MacGregor and Jason Rozbruch Publish “Peephole Cam Case Lowers The Bar On NY Negligence Claims” in Law360

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Under New York law, courts — including the New York Appellate Division, First Judicial Department — have historically required a showing of extreme and outrageous conduct to sustain a cause of action for negligent infliction of emotional distress, or NIED. In this year's *Brown v. New York Design Center Inc.* decision, however, the First Judicial Department reversed itself on this point, holding 6-0 that NIED claims do not require such a showing.

In a new article for *Law360*, partners Joel Kurtzberg and John MacGregor and associate Jason Rozbruch discuss this decision, including the significance and implications now that it is settled law in New York that NIED claimants need not demonstrate extreme and outrageous conduct.

To read the full article, [click here](#).

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