



*Vela*, 172 AD3d 1042, 1046 [2d Dept 2019]; see *Brinkley v Casablanacas*, 80 AD2d 428, 435 [1st Dept 1981]).

However, it would be improper to include defendant's conduct during the proceedings as well as legal fees incurred by plaintiff in the reasonable compensation analysis (see *Chiavarelli v Williams*, 281 AD2d 255, 256 [1st Dept 2001]). Plaintiff's testimony failed to substantiate an award of punitive damages (see *Couteller*, 244 AD3d at 558).

Furthermore, defendant failed to proffer any evidence to justify reducing the award during the inquest, and his arguments on appeal are unavailing.

THIS CONSTITUTES THE DECISION AND ORDER  
OF THE SUPREME COURT, APPELLATE DIVISION, FIRST DEPARTMENT.

ENTERED: May 21, 2026



Susanna Molina Rojas  
Clerk of the Court