

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

| | | |
|-------------------------------|---|-------------------------|
| RENEE BUTLER, |) | |
| |) | Case No. |
| Plaintiff, |) | |
| |) | Judge |
| v. |) | Magistrate Judge |
| |) | |
| CLOVIS ONCOLOGY, INC., |) | Jury Demand |
| |) | |
| Defendant. |) | |

COMPLAINT

For her Complaint against Defendant Clovis Oncology, Inc. (“Defendant”), Plaintiff Renee Butler (“Ms. Butler”) states:

PARTIES

1. Ms. Butler is a citizen and resident of Franklin, Williamson County, Tennessee, and a former employee of Defendant.
2. Defendant is a Delaware corporation with its principal place of business at 5500 Flatiron Parkway, Unit 100, Boulder, Colorado 80301-2834. Defendant may be served with process through its registered agent, CT Corporation System, 300 Montvue Road, Knoxville, Tennessee 37919-5546.

JURISDICTION AND VENUE

3. This is an action for equitable relief and damages for unlawful employment practices brought under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, *et seq.* (“Title VII”), the Family and Medical Leave Act of 1993, 29 U.S.C. § 2601 *et seq.* (“FMLA”), the Tennessee Human Rights Act, Tenn. Code Ann. § 4-21-101, *et seq.* (“THRA”), and the Tennessee Public Protection Act, Tenn. Code Ann. § 50-1-304 (“TPPA”). The Court has

jurisdiction under 28 U.S.C. §§ 1331, 1332, 1343(a)(4), and 1367(a). Venue is proper under 28 U.S.C. § 1391.

4. Ms. Butler has met all conditions precedent to the filing of this Complaint. She timely filed a Charge of Discrimination with the U.S. Equal Employment Opportunity Commission (“EEOC”) on July 10, 2020. The EEOC mailed her a Notice of Right to Sue on September 17, 2020.

FACTS

5. Ms. Butler worked for Defendant as a Regional Account Director – South from December 3, 2018, until June 17, 2020.

6. Throughout her employment, Ms. Butler was subjected to a sexually hostile and abusive work environment by her supervisor, John Bilger, and by a coworker, Tom Goins, and asked to engage in various activities that she reasonably believed to be illegal and to constitute compliance and/or regulatory violations.

7. Mr. Bilger’s and Mr. Goins’ sex-based discriminatory conduct toward Ms. Butler was severe or pervasive, unwelcome and offensive, altered the conditions of her employment, and made it more difficult for her to perform her job.

8. For example, Mr. Goins obtained a childhood photo of Ms. Butler and repeatedly shared it with others from or about February through December 2019. He referred to the top she was wearing in the photo and called her “a dirty girl.”

9. Mr. Goins repeatedly referred to Ms. Butler as “babe” and “hon,” stated, “open up, babe,” and asked her to be “vulnerable and open with [him],” stated that he “love[d] the hell out of [her]” and that he “c[ould] not wait to give [her] a big hug.”

10. Mr. Goins told multiple male customers and/or employees to “get a selfie” photo with Ms. Butler and to “send it to [him].” Mr. Goins told Ms. Butler to take male customers out to dinner because “they w[ould] respond well to [her] because [she is] a woman.”

11. Mr. Goins regularly made inappropriate comments to and/or about female customers because of sex, about which Ms. Butler was aware. For example, he commented on the tall winter boots that a female oncologist customer had worn in her clinic in an inappropriate manner and stated that he had “asked her for a selfie” with them on.

12. Upon information and belief, other female employees and/or customers of Defendant complained to Defendant about Mr. Goins’ inappropriate behavior and conduct.

13. As to Mr. Bilger, he inappropriately discussed Ms. Butler’s physical appearance at a training session in Boulder, Colorado, in late January 2019. On or about February 19, 2019, Mr. Bilger sent one or more inappropriate text messages stating that Ms. Butler was “twerking.” Mr. Bilger repeatedly referred to places that he wanted to take Ms. Butler; stated that she would have to “get a tattoo” with him; frequently talked about “getting drunk” and about apparent issues with alcohol; and commented to Ms. Butler about a female bartender’s physical appearance and how much he liked it.

14. Mr. Bilger further repeatedly asked Ms. Butler “how [she felt] about [him]” and stated that they “would be married” if they had known each other before or were not already married. He made inappropriate inquiries of Ms. Butler about her husband and marriage.

15. On or about April 23, 2019, Mr. Bilger sent Ms. Butler a “bitmoji” of himself holding one hundred dollar bills, suggesting that he “paid women” because he “need[ed] every bit of help [he could] get,” stated that he “prefers all girls” while referring to Ms. Butler and three female customers.

16. On or about March 26, 2019, at the JW Marriott Hotel in Nashville, Mr. Bilger asked Ms. Butler to have sex with him and inappropriately touched her as he did so.

17. Ms. Butler declined and refused to give in to Mr. Bilger's unwelcome sexual advances toward her.

18. On or about the evening of May 14, 2019, at a Market Access Meeting in Nashville, Mr. Bilger used his middle finger to touch and rub around a hole in a game board while making lewd comments about how Ms. Butler "liked it." He continued to reference this incident after it occurred, including in a text message on August 8, 2019. In mid-November 2019, Mr. Bilger referenced "whacking off" and stated that he could "not help it that [he] revert[ed] back to being twelve years old."

19. In May 2019, Mr. Bilger instructed Ms. Butler to purchase a \$200 gift card for a medical professional customer and to collect cash from members of the Regional Account Team. Ms. Butler told him that she believed this request and activity was illegal. He insisted that she purchase the gift card for the provider/customer anyway.

20. In mid- to late May 2019, Mr. Bilger told Ms. Butler that his supervisor, Jeff Ladwig, was concerned about what Ms. Butler thought about Bilger's behavior and conduct, and that he had told Mr. Ladwig that Ms. Butler was "cool" and "would not say anything." This was one of multiple efforts Mr. Bilger made to intimidate Ms. Butler and prevent her from escalating his behavior and conduct to Human Resources.

21. Throughout 2019, Mr. Bilger frequently became intoxicated at work events and made sex-based discriminatory comments to and about Ms. Butler and other women.

22. For example, on June 1, 2019, Mr. Bilger became intoxicated and told Ms. Butler that she was too "emotional." On June 2, 2019, he became intoxicated and could not attend a

meeting with Ms. Butler as scheduled. Mr. Bilger's supervisor, Jeff Ladwig, was aware of this conduct. Ms. Butler expressed her disapproval of Mr. Bilger's behavior and conduct to Mr. Ladwig on this and other occasions and advised that it made her uncomfortable.

23. On or about November 19, 2019, at a breakfast meeting in Memphis, Tennessee, Mr. Bilger told Ms. Butler that he "need[ed] to fix the problem with Tom Goins" and that Mr. Goins "would not be working [for Defendant] if his sales numbers were not so good."

24. Ms. Butler advised Mr. Bilger that she was tired of Mr. Goins' behavior and that she did not want to meet with Mr. Goins alone. She further advised him that she was going to report Mr. Goins' conduct, among other things (*i.e.*, Mr. Bilger's behavior) to Human Resources because nothing had been done to stop it and to prevent it from continuing.

25. Ms. Butler repeatedly opposed Mr. Bilger's and Mr. Goins' sex-based comments and conduct and refused to give in to Mr. Bilger's direct and indirect requests for sex. She opposed Mr. Bilger's conduct to Mr. Bilger as it occurred. She reported and complained to Mr. Bilger and his supervisor, Mr. Ladwig, about Mr. Goins' conduct.

26. Defendant's response to Ms. Butler's complaints manifested indifference or unreasonableness in light of what it knew or reasonably should have known.

27. Mr. Bilger instructed Ms. Butler not to report his behavior and conduct to upper management or Human Resources. He intimidated and coerced her into not reporting it to Human Resources. He told her that he and Defendant's Vice President of Human Resources, Ann Bozeman, were "friends" and suggested that Ms. Butler would no longer have a job if she complained to Human Resources. Consequently, Ms. Butler feared retaliation if she reported sexual harassment, retaliation, and compliance and regulatory violations to Human Resources.

28. After Ms. Butler opposed and reported Mr. Bilger's and Mr. Goins' discriminatory and illegal conduct to management, Defendant retaliated against her.

29. Ms. Butler was passed over for a promotion to an available Group Purchasing Organization (GPO) lead position in the summer of 2019, which was given to a less qualified male; given a "field coaching report," which was atypical for Directors as opposed to sales representatives, and negative ratings on MBO Assessment/Scorecard Reviews; downgraded from finishing "number one" in the nation to "number two" so that a male colleague would finish "number one"; had her MBO project omitted from a list and her 2020 strategic accounts changed to "low performing" in early January 2020; stripped of and/or no longer provided preferred accounts, which were more lucrative and given to males; had expense reports declined and returned to her; and was subjected to retaliatory harassment and disparate treatment as compared to male colleagues and colleagues who had not engaged in protected activities.

30. On December 20, 2019, Mr. Bilger advised Ms. Butler in a text message or email that "maybe [she] wasn't a fit for the company culture."

31. On January 9, 2020, Ms. Butler reported the sexual harassment, retaliation, and compliance and regulatory violations to Defendant's Executive Vice President of Human Resources, Ann Bozeman.

32. Ms. Bozeman advised Ms. Butler that she "knew too much" and, as a result, Human Resources representative Jillian Williams would investigate her sexual harassment and retaliation complaints, and Senior Director of Legal Compliance Greg Lindquist would investigate her compliance and regulatory violation complaints.

33. Upon information and belief, Ms. Williams was engaged in a personal dating relationship with Mr. Ladwig when Ms. Bozeman assigned her to investigate Ms. Butler's complaints.

34. Ms. Bozeman and/or Mr. Lindquist were aware of Ms. Williams' and Mr. Ladwig's personal relationship.

35. Defendant did not disclose Ms. Williams' relationship with Mr. Ladwig, which presented a conflict of interest and tainted Defendant's investigation of Ms. Butler's complaints.

36. Ms. Bozeman further stated to Ms. Butler on January 9, 2020, "You're going to have to continue to work with these two [Bilger and Goins], investigation or not, [and] there is obviously going to be friction, and [the sexual harassment] doesn't just stop with an apology."

37. On January 10, 2020, Ms. Williams advised Ms. Butler that her complaint would remain confidential.

38. Ms. Bozeman promptly informed Mr. Bilger, however, that Ms. Butler had made a formal complaint against him.

39. Ms. Bozeman's informing Mr. Bilger that Ms. Butler had made a complaint against him led to further harassment of and retaliation against Ms. Butler.

40. Ms. Butler provided more detailed reports about the sexual harassment, retaliation, and compliance/regulatory violations to Ms. Williams and Mr. Lindquist in an in-person interview on January 15, 2020, that lasted several hours; in a call with Mr. Lindquist on January 28, 2020; and in written submissions on February 3, 13, and 26, 2020.

41. During the January 15, 2020, interview in a glass conference room at Defendant's headquarters in Boulder, Colorado, Ms. Williams asked Ms. Butler if she was "sure [she]

want[ed] to do this,” referring directly to her complaints, and that Defendant was “a small company and it w[ould] be difficult to maintain confidentiality” with respect to her complaints.

42. In addition to the sexual harassment and retaliation, Ms. Butler reported to Ms. Williams and Mr. Lindquist what she reasonably believed to be illegal activities, including but not limited to Mr. Bilger’s and Mr. Ladwig’s entertaining customers and executives by, among other things, taking them on a duck hunting trip and discussing Rubraca, Defendant’s product, with them prior to its being approved by the Food and Drug Administration (FDA); and Mr. Goins’ contracting/reimbursement discussions with and instructions to healthcare provider customers to find patients and pull patient charts prior to prescriptions being written by their providers, among other activities for financial gain.

43. Defendant never suspended Mr. Bilger or Mr. Goins pending any investigation of Ms. Butler’s complaints.

44. Defendant failed and refused to take prompt and appropriate corrective and preventative action in response to Ms. Butler’s complaints to Mr. Bilger, Mr. Ladwig, Ms. Bozeman, Ms. Williams, and Mr. Lindquist.

45. Instead, Defendant forced Ms. Butler to continue working with Mr. Goins and Mr. Bilger, enabling the sexual and retaliatory harassment to continue.

46. Defendant altered Ms. Butler’s fourth quarter 2019 account numbers, destroyed or altered a Market Access Dashboard, and took other actions that directly and adversely affected her compensation.

47. As a result of Defendant’s continued harassment of and retaliation against Ms. Butler, her physician placed her on FMLA leave from February 28, 2020, through April 8, 2020, and recommended that she not be required to work with her harassers.

48. Defendant is a covered employer under the FMLA and Ms. Butler was eligible for and entitled to the benefits and protections of the FMLA during her employment and pursuant to its policies, procedures and practices.

49. Ms. Butler had FMLA-qualifying serious health conditions in 2020, including severe anxiety, which necessitated periods of medical leave in 2020.

50. Defendant refused to pay Ms. Butler while she was on medical leave pursuant to its short term disability and leave policies, which was to run concurrently with FMLA leave.

51. When Ms. Butler returned to work from leave on April 9, 2020, Ms. Williams informed her that the investigation of her complaints had been closed while she was on leave.

52. On April 15 or 16, 2020, Ms. Williams advised Ms. Butler that nothing in Defendant's investigation findings implied that the sexual harassment and retaliation she experienced and reported had not occurred.

53. Ms. Williams further advised Ms. Butler that she and Defendant understood that what Mr. Goins and Mr. Bilger had done to her was inappropriate.

54. Ms. Williams advised Ms. Butler that she understood her serious concerns about having to continue reporting to Mr. Bilger, but that she would nevertheless have to continue reporting to him, despite his behavior and conduct toward her.

55. On April 15, 2020, Ms. Williams and Mr. Lindquist stated that Ms. Butler had allegedly engaged in "unprofessional behavior" but refused to tell her what that behavior consisted of, despite her requests.

56. On April 16, 2020, Ms. Butler requested a follow up meeting with Ms. Williams and again asked her what she meant when she stated that Ms. Butler had engaged in "unprofessional behavior" and how she had done so.

57. Ms. Williams responded that Ms. Butler had been “unprofessional” in her responses to Mr. Bilger’s and Mr. Goins’ sexual harassment of her.

58. Defendant further required Ms. Butler to complete “harassment avoidance” training.

59. Ms. Butler inquired with Defendant about a transfer to another position so that she would not have to work with Mr. Bilger and Mr. Goins. Defendant provided her no other options than to remain in her position reporting to Mr. Bilger and working with Mr. Goins.

60. Ms. Butler’s physician again placed her on FMLA leave from April 23, 2020, to June 4, 2020.

61. Mr. Ladwig resigned his employment with Defendant or was terminated while Ms. Butler was on medical leave from April 23, 2020, to June 4, 2020.

62. When Ms. Butler returned to work on June 4, 2020, Defendant again required her to report to Mr. Bilger and work with Mr. Goins.

63. Ms. Butler learned that, while she was on FMLA leave, Defendant had taken three major accounts away from her, using her FMLA leave against her and adversely affecting the terms and conditions of her employment and her compensation.

64. On June 16, 2020, Ms. Butler received an email from Mr. Bilger discussing “changes” to her job description, “additional work responsibilities” for her, the “timing of a mid-year review for [her] and [her] territories’ performance to date,” and an invitation to attend “a Happy Hour” and dinner on June 18, 2020, with, among others, Mr. Goins.

65. As a result of all of the foregoing, Ms. Butler was deliberately subjected to intolerable working conditions and constructively discharged by Defendant on June 17, 2020.

66. As described above, Defendant discriminated against Ms. Butler in the terms, conditions, and privileges of employment because of sex and subjected her to a sexually hostile work environment that altered the conditions of her employment, in violation of Title VII and the THRA.

67. As described above, Defendant retaliated against Ms. Butler for opposing and reporting Mr. Bilger's and Mr. Goins' sex-based discriminatory conduct and/or for participating in Defendant's investigations of her sex discrimination complaints, in violation of Title VII and the THRA.

68. As described above, Defendant discriminated and retaliated against Ms. Butler for requesting and exercising periods of medical leave, in violation of the FMLA.

69. As described above, Defendant retaliated against Ms. Butler for refusing to remain silent about and/or refusing to participate in activities that she reasonably believed to be illegal, in violation of the TPPA.

70. Defendant's conduct as described in this Complaint was willful, intentional, malicious, fraudulent, and/or recklessly indifferent to Ms. Butler's protected rights, entitling her to punitive and liquidated damages.

71. As a direct result of Defendant's discriminatory and retaliatory conduct, Ms. Butler has lost income and other privileges and benefits of employment and sustained economic losses she would not have otherwise incurred; suffered embarrassment, humiliation, emotional distress and mental anguish, undue stress and anxiety, inconvenience, and loss of enjoyment of life; and incurred attorneys' fees, costs and litigation expenses.

RELIEF REQUESTED

Ms. Butler respectfully requests:

1. A jury trial;
2. Back pay and damages for lost benefits;
3. Compensatory damages for embarrassment, humiliation, emotional distress and mental anguish, undue stress and anxiety, inconvenience, and loss of enjoyment of life;
4. Front pay and damages for lost benefits;
5. Punitive damages;
6. Liquidated damages;
7. Attorneys' fees, costs and litigation expenses;
8. Prejudgment interest and, if applicable, post-judgment interest; and
9. Such other and further legal or equitable relief to which she may be entitled.

Respectfully submitted,

s/Douglas B. Janney III
Douglas B. Janney III (BPR No. 19112)
Law Office of Douglas B. Janney III
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Nashville, Tennessee 37215
(615) 742-5900
doug@janneylaw.com

Attorney for Plaintiff

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Renee Butler

(b) County of Residence of First Listed Plaintiff _____

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Douglas B. Janney III, 2021 Richard Jones Road, Suite 310A, Nashville, TN 37215 (615) 742-5900

DEFENDANTS

Clovis Oncology, Inc.

County of Residence of First Listed Defendant **Boulder**

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

| | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

| CONTRACT | TORTS | | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTES |
|---|--|--|---|---|---|
| <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise | PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice | PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) | <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes |
| REAL PROPERTY | CIVIL RIGHTS | PRISONER PETITIONS | | FEDERAL TAX SUITS | |
| <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education | Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | | <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | |

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from Another District (specify)
- 6 Multidistrict Litigation - Transfer
- 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 U.S.C. 2000e

Brief description of cause:
Employment discrimination

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

12/16/2020

SIGNATURE OF ATTORNEY OF RECORD

s/Douglas B. Janney III

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

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