

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

LILLIAN BERNIER,

Plaintiff,

v.

TURBOCAM, INC.,

Defendant.

ORAL ARGUMENT REQUESTED

Civil Action No. 1:23-cv-00523-LM-AJ

PLAINTIFF LILLIAN BERNIER’S MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56(a), Plaintiff Lillian Bernier respectfully requests summary judgment in her favor as to Defendant Turbocam, Inc. (“Turbocam”) with respect to her claims of discrimination on the basis of sex under Title VII (Count I) and the Americans with Disabilities Act (ADA) (Count IV).¹

A memorandum of law in support of Lillian’s Motion for Summary Judgment is attached to this motion. She has separately filed the statement of undisputed material facts required by Local Rule 56.1. Pursuant to the protective order issued in this case, Doc. No. 61, certain documents have been filed under seal in compliance with L.R. 83.12 and AP 3.3.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Lillian requests oral argument. Lillian believes that oral argument will assist the court in understanding the relevant legal issues and the focus of her claims.

WHEREFORE, Plaintiff Lillian Bernier respectfully requests that this Court

¹ Plaintiff does not intend to pursue her state law claims (Counts II, III, and V) and is prepared to enter into a stipulation of dismissal as to those counts.

A. Grant Plaintiff's Motion for Summary Judgment and enter summary judgment in her favor as to Counts I and IV; and

B. Grant such further relief as this Court deems just or equitable.

Respectfully submitted,
Lillian Bernier

By her attorneys,

Date: July 31, 2025

/s/ Chris Erchull
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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing document using CM/ECF system, which will send notification of such filing(s) to all those registered with the ECF system.

/s/ Chris Erchull

Date: July 31, 2025

Chris Erchull