

1 Ben Crump (pro hac vice)  
2 Nabeha Shaer (pro hac vice)  
3 BEN CRUMP LAW, PLLC  
4 122 S. Calhoun St.  
5 Tallahassee, FL 32301  
6 Telephone: (800) 713-1222  
7 court@bencrump.com

8 Linda D. Friedman (pro hac vice)  
9 Suzanne E. Bish (pro hac vice)  
10 George Robot (pro hac vice)  
11 Mark S. Current (pro hac vice)  
12 STOWELL & FRIEDMAN LTD.  
13 303 W. Madison St., Suite 2600  
14 Chicago, Illinois 60606  
15 Telephone: (312) 431-0888  
16 sbish@sfltd.com

17 Sam Sani (SBN 2733993)  
18 SANI LAW, APC  
19 595 E. Colorado Blvd., Suite 522  
20 Pasadena, CA 91101  
21 Telephone: (310) 935-0405  
22 ssani@sanilawfirm.com  
23 *Attorneys for Plaintiffs and the Putative Class*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

APRIL CURLEY, DESIREE MAYON,  
RONIKA LEWIS, RAYNA REID, ANIM  
AWEH, and EBONY THOMAS, individually  
and behalf of all others similarly situated,

Plaintiff,

v.

GOOGLE, LLC,

Defendant.

CASE NO: 3:22-cv-01735-AMO

**THIRD AMENDED COMPLAINT**

Class Action

Jury Trial Demanded

**THIRD AMENDED COMPLAINT**

**CLASS ACTION**

**THIRD AMENDED  
COMPLAINT**

1 Plaintiffs April Curley (“Curley”), Desiree Mayon (“Mayon”), Ronika Lewis (“Lewis”),  
2 Rayna Reid (“Reid”), Anim Aweh (“Aweh”), and Ebony Thomas (“Thomas”) (collectively,  
3 “Plaintiffs”), individually and on behalf of all others similarly situated, by and through their  
4 attorneys, Ben Crump Law, PLLC, Stowell & Friedman, Ltd., and Sani Law, APC, hereby file  
5 this Third Amended Complaint against Defendant Google, LLC (“Defendant” or “Google”) and  
6 in support state as follows:  
7

8 **NATURE OF THE ACTION**

9 1. Google famously adopted “don’t be evil” as a core value in its early days. Yet as it  
10 has grown into one of the world’s largest corporate behemoths, Google has practiced one of this  
11 nation’s oldest evils—race discrimination.

12 2. Pursuant to its strong, racially biased corporate culture, Google is engaged in a  
13 pattern and practice of systemic race discrimination against its African American and Black  
14 employees and job applicants. Google’s centralized leadership, which is nearly devoid of Black  
15 representation, holds biased and stereotypical views about the abilities and potential of Black  
16 professionals. As a result, and pursuant to company-wide discriminatory policies and practices,  
17 Google refuses to hire extraordinarily qualified Black job applicants, and subjects the few Black  
18 employees it does hire to wildly differential treatment. Google assigns Black professionals to  
19 lower-level roles, pays them less, unfairly rates their performance, and denies them advancement  
20 and leadership roles because of their race. Black professionals at Google face a racially hostile  
21 work environment and suffer retaliation if they dare to challenge or oppose the company’s  
22 discriminatory practices. As a result, Black employees at Google earn and advance less than non-  
23 Black employees and suffer higher rates of attrition.  
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1           3.       Plaintiffs have been harmed by Google’s racially hostile work environment and  
2 company-wide discriminatory practices. Due to its abysmal representation of Black professionals  
3 since its founding and growing public awareness of its lack of commitment to genuine diversity  
4 and inclusion, Google hired Plaintiff Curley in 2014 to expand its outreach to Black college  
5 students. Like other Black professionals, including Plaintiffs Mayon, Lewis, and Reid, Google  
6 placed Curley in a lower job grade and title than her work and responsibilities warranted and  
7 denied her pay and promotion opportunities because of her race. Plaintiffs Curley, Mayon, Lewis,  
8 Reid and other Black professionals were often pigeon-holed into dead-end jobs—with less  
9 visibility, lower pay, and no advancement opportunities.  
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11           4.       As Curley brought talented, qualified Black candidates to Google, she discovered  
12 Google did not really care about diversity and equal employment opportunities but sought only to  
13 burnish its public image for marketing purposes. Google wanted Curley, as an African American  
14 woman, to quietly put on a good face for the company and toe the company line. But Curley was  
15 unwilling to be used as a mere marketing ploy. Curley was a champion for Black employees and  
16 Black students; she vocally opposed and called for reform of the barriers and double standards  
17 Google imposed on Black employees and applicants. In response to her advocacy for herself and  
18 other Black employees subjected to Google’s discriminatory practices, Google unlawfully  
19 marginalized, undermined, and ultimately terminated Curley because of her race and her  
20 protected activity. Consistent with Google’s retaliation against Curley for speaking out against  
21 the company’s discrimination, Google similarly targeted Plaintiffs Mayon, Lewis and Reid for  
22 reporting their own discriminatory treatment.  
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**PARTIES**

9. Google, LLC is one of the largest companies in the world. Google develops and sells technology products and services. Google services generated over \$257 billion in revenue in 2021.<sup>1</sup> Google was originally incorporated as Google Inc. but in a 2015 corporate restructuring converted to an LLC. Google is now a wholly-owned subsidiary of XXVI Holdings, Inc., which is incorporated in Delaware with a principal place of business in Mountain View, California. Google’s publicly traded ultimate parent company, Alphabet Inc., has a market capitalization of over \$2.25 trillion as of this filing, placing it fourth among the most valuable companies in America as well as fourth globally.

10. Google maintains its corporate headquarters at 1600 Amphitheatre Parkway, Mountain View, California. Google employs over 21,000 employees at its corporate headquarters, and tens of thousands of employees across the United States.

11. Plaintiff April Curley is an African American woman and was employed by Google as a University Programs Specialist in New York City, New York from 2014 until she was unlawfully terminated in September 2020. Throughout her employment, Curley worked diligently and performed at a high level for Google. Nonetheless, pursuant to Defendant’s nationwide pattern or practice of race discrimination and discriminatory employment practices, Google paid Curley lower wages and denied her advancement opportunities because of her race, and subjected her to a hostile work environment and retaliation.

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<sup>1</sup> Alphabet Inc., Form 10-K at 32 (Feb. 2, 2022), <https://www.sec.gov/ix?doc=/Archives/edgar/data/1652044/000165204422000019/goog-20211231.htm>

1           12. Plaintiff Desiree Mayon is an African American woman and was employed by  
2 Google as a Technical Program Manager from August 2019 until she was unlawfully terminated  
3 in September 2021. Throughout her employment, Mayon worked diligently and performed at a  
4 high level for Google. Nonetheless, pursuant to Defendant's nationwide pattern or practice of race  
5 discrimination, Google denied Mayon compensation and advancement opportunities because of  
6 her race, and subjected her to a hostile work environment and retaliation, among other things.  
7 Google also subjected Mayon to discrimination and retaliation due to her sex and disability.

9           13. Plaintiff Ronika Lewis is an African American woman who was employed at  
10 Google as a Senior Program Manager in the Mountain View, California headquarters from  
11 February 2020 until Google terminated her employment in 2023. Throughout her employment,  
12 Lewis worked diligently and performed at a high level for Google. Nonetheless, pursuant to  
13 Defendant's nationwide pattern or practice of race discrimination, Google denied Lewis  
14 compensation and advancement opportunities because of her race, subjected her to a hostile work  
15 environment and retaliation, and unlawfully terminated her employment because of her race and  
16 in retaliation for her protected activity.

18           14. Plaintiff Rayna Reid is an African American woman and was employed by Google  
19 as a Staffing Channel Specialist in Austin, Texas from October 2018, until she was unlawfully  
20 terminated in January 2020. Throughout her employment, Reid worked diligently and performed  
21 at a high level for Google. Nonetheless, pursuant to Defendant's nationwide pattern or practice of  
22 race discrimination, Google denied Reid compensation and advancement opportunities because of  
23 her race, and subjected her to a hostile work environment and retaliation.  
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1           20.     When Google hired Plaintiff Curley in 2014, for instance, only 628 of its over  
2 32,000 employees—1.9%—identified as Black or African American. At that time, Google had  
3 only one Black or African American top-level executive out of 25. Over the next two years  
4 Google added 5 white top-level executives, but the African American count remained at one. By  
5 2020, despite the heroic and uphill efforts of people like Plaintiff Curley, the overall  
6 demographics had scarcely budged. Under intense public scrutiny to address its abysmal  
7 underrepresentation of African Americans in the wake of the murder of George Floyd and  
8 ensuing national racial reckoning, Google made concerted, public-relations–driven efforts to  
9 recruit Black employees. As of 2021, Google’s workforce inched up to a dismal 4.4% “Black+.”<sup>3</sup>  
10 This seeming improvement still pales by comparison to the 2021 U.S. Bureau of Labor Statistics  
11 data, which reflects a 9.1% Black or African American representation within Google’s industry  
12 classification.<sup>4</sup> But Google steers and traps its “Black+” hires into lower-paying and lower-  
13 prestige roles. Google’s awful underrepresentation is even worse in leadership and prestigious  
14 technical roles. For instance, in 2021, Google’s leadership ranks were only 3% Black and its  
15 prestigious tech workforce was only 2.9% Black.

18           21.     Google’s anemic diversity statistics are the result of its discriminatory hiring and  
19 employment policies and practices. Google employs company-wide hiring policies and practices  
20 for the recruitment, screening, interviewing, evaluating, and hiring of candidates that discriminate  
21 against Black applicants at every step of the hiring process. Google disproportionately screens out  
22 and assigns lower scores to Black applicants than similarly qualified and even less qualified non-  
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25 <sup>3</sup> Google’s self-reporting category “Black+” includes employees who identify as more than one race, one  
26 of which is Black.

<sup>4</sup> <https://www.bls.gov/cps/cpsaat18.htm>

1 Black applicants, among other discriminatory practices. Google relies on factors and processes  
2 that individually and collectively discriminate against Black applicants and hold Black applicants  
3 to differential and higher standards than non-Black applicants. Indeed, even when Black  
4 applicants “pass” the initial screens and interviews, Google employs discriminatory “culture-fit”  
5 interviews to assess a candidate’s “Googleness” to deny well reviewed Black applicants  
6 opportunities and positions for which they are otherwise well-qualified, and often the best  
7 candidate.  
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9           22. The Black employees hired by Google must work in an unflinchingly hostile  
10 workplace, in which racial segregation and harassment are commonplace and unabated. Pursuant  
11 to its racially biased corporate culture, Google fosters a racially hostile work environment in its  
12 workplaces across the country, including its Mountain View headquarters. While non-Black  
13 Google employees freely stroll Google’s state-of-the-art workplaces, Black Google employees are  
14 viewed with suspicion and routinely harassed and subjected to invasive security stops and  
15 identification checks. They are treated as unwelcome outsiders or even threats at Google’s  
16 Mountain View headquarters, reminiscent of the over-policing of Black communities that plagues  
17 America. In doing their jobs and pursuing their careers and dreams at Google, Black employees  
18 are openly subjected to striking racist and racialized comments and conduct by their peers and  
19 managers. There is open and offensive talk at Google of slavery and skin color, and racial  
20 caricatures and stereotypes abound. Google personnel falsely assume and openly comment that  
21 Black professionals are unqualified, dumb, and do not belong. For example, Black professionals  
22 are not considered “Googlers” and are often assumed to be “the help” and directed to help with  
23 dishes and told to smile more and ask to be of service to non-Black colleagues and managers.  
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1 Google's racially hostile workplace is so pervasive and notorious that employees of color created  
2 a shared document on the company's intranet to share thousands of examples of acts of  
3 harassment and microaggressions they face on a daily basis at Google offices.

4           23. In addition to being forced to work in a racially hostile work environment, Black  
5 Google employees face company-wide discriminatory pay, level and job assignment,  
6 performance assessment, and advancement and promotion policies and practices that  
7 systematically underpay, diminish, and delay and deny their advancement in a number of ways.

8           24. Google assigns "levels" to all positions across the country. For example, Level 2 is  
9 the lowest level Google assigns to permanent, full-time employees, typically reserved for hires  
10 straight out of college. Level 3 corresponds to entry-level work, typically for recent college  
11 graduates. Google considers all employees at the same level—regardless of location in the United  
12 States—to perform substantially equal or substantially similar work. Each level is to correspond  
13 to a standardized base salary and compensation range, among other things.

14           25. Following its company-wide pattern or practice of discrimination and racially  
15 biased culture, Google places Black hires and employees into lower-levels than their experience  
16 and responsibilities warrant and lower than similarly situated non-Black hires. Google pays Black  
17 employees less compensation and steers them into roles that lack opportunities for advancement  
18 or leadership.

19           26. Google's compensation policies and practices result in racial pay disparities based  
20 on this levelling. For example, Google's pay practices regarding bonuses and stock options harm  
21 Black employees. Among other things, Google awards bonuses and stock options to its  
22 employees with progressively increasing bonus targets depending on level. At Level 3, for  
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1 instance, Google’s centralized, nationwide policy establishes a bonus target of 15% of base  
2 compensation. At Level 4, the bonus target increases to 20% of the already-higher base  
3 compensation. Thus, by steering Black employees into lower levels and paying them less than  
4 non-Black employees within level, Google intentionally uses policies that compound any pay  
5 disparity between Black and non-Black employees throughout their careers. These disparities  
6 only worsen because Google rarely offers its Black employees opportunities for advancement.  
7

8 27. Under Google’s compensation policies and practices, Black professionals  
9 otherwise are paid lower salaries and bonuses and receive less equity than comparable non-Black  
10 employees.

11 28. Further, Google maintains company-wide racially discriminatory performance  
12 assessment, management, and review policies and practices, which result in Black employees  
13 being rated lower than their performance warrants and denied advancement opportunities,  
14 compensation, and other benefits. Indeed, Google’s own internal studies and reports reflect that it  
15 rates Black employees lower than their non-Black colleagues in performance review ratings.  
16 Pursuant to Google’s discriminatory practices, Black employees are more likely than any other  
17 group to receive a job-threatening “Needs Improvement” performance review, which results in  
18 substantial earnings losses, is the death-knell for advancement, and often ends their Google  
19 careers.  
20

21 29. Google also maintains corporate policies and practices that deny Black  
22 professionals advancement and promotions, stunting their careers and depressing their earnings.  
23

24 30. By assigning Black employees to lower-level positions, compensating them less  
25 within levels than similarly situated non-Black employees, unfairly evaluating their performance,  
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1 and denying Black employees advancement opportunities into higher levels, under Google's  
2 centralized, nationwide policies, Black employees are paid substantially less than similarly  
3 situated non-Black employees. Moreover, because of the racially discriminatory and hostile  
4 environment at Google, as well as the underpayment and denial of advancement, Black  
5 employees suffer above-average attrition rates at Google. In fact, Google's most recent data  
6 shows that from 2020 to 2021, a period during which white attrition decreased, the already-high  
7 attrition rate for all Black employees increased, with attrition for Black women in particular  
8 exceeding firmwide attrition by nearly 50%.<sup>5</sup>

10 31. Complicit in Google's pattern or practice of race discrimination and retaliation is  
11 its human resources group, which is ineffective at resolving complaints of discrimination,  
12 harassment, and retaliation. Black employees recognize the futility of lodging internal complaints.  
13 The few brave enough to come forward suffer retaliation. Google's human resources department  
14 and legal department defend discriminators, harassers, and retaliators, and do not take adequate  
15 steps to prevent Google from retaliating against Black employees who lodge complaints.

17 32. Google does not foster an environment where Black employees feel free to  
18 complain of discrimination or harassment. Instead, Black employees often feel intimidated from  
19 coming forward and suffer retaliation.

21 33. Thus, during Plaintiffs' employment, before and afterwards, Google engaged in a  
22 pattern or practice of discriminatory and retaliatory conduct toward its Black employees and  
23 applicants throughout the United States including, but not limited to the following practices:

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25 <sup>5</sup> 2021 *Diversity Annual Report* at 13, GOOGLE,  
26 [https://static.googleusercontent.com/media/diversity.google/en//annual-report/static/pdfs/google\\_2021\\_diversity\\_annual\\_report.pdf](https://static.googleusercontent.com/media/diversity.google/en//annual-report/static/pdfs/google_2021_diversity_annual_report.pdf).

- 1 a. Google employs discriminatory hiring policies and practices and denies  
2 qualified Black applicants employment because of their race;
- 3 b. Google employs policies and practices that result in occupational  
4 segregation by race and racial steering;
- 5 c. Google employs discriminatory pay policies and practices, including  
6 assigning Black employees to positions at lower “levels” and to lower  
7 paying jobs than it assigns non-Black employees;
- 8 d. Google employs discriminatory advancement policies and practices,  
9 including placing Black employees into positions without advancement  
10 opportunities and denying or delaying advancement opportunities to Black  
11 employees;
- 12 e. Google fails to credit its Black employees for their experience on the same  
13 basis as non-Black employees and fails to recognize Black employees for  
14 timely promotions, pay adjustments, and title changes on the same basis as  
15 non-Black employees;
- 16 f. Google maintains discriminatory compensation practices and  
17 systematically pays its Black employees lower wages and/or denies them  
18 opportunities to increase their earnings;
- 19 g. Google employs racially discriminatory performance assessment,  
20 management, and review policies and practices, which result in Black  
21 employees being rated lower than their performance warrants and results in  
22 Black employees being denied advancement opportunities, compensation,  
23 and other benefits and in unwarranted performance management and  
24 discipline, including termination;
- 25 h. Google takes adverse actions against its Black employees, such as  
26 unwarranted performance management actions, reduction in job  
responsibilities, demotions, transfers, constructive discharges, reduction in  
pay, and discharges on account of their race and/or their rejection of or  
unwillingness to tolerate a racially discriminatory or hostile work  
environment;
- i. Google relies on race and negative stereotypes about the abilities and  
potential of Black employees in making employment decisions;
- j. Google denies Black employees important resources, grooming,  
managerial and administrative support, special project work, training, and  
business opportunities because of race;
- k. Google humiliates, intimidates, harasses, and demeans its Black employees  
and otherwise creates a hostile and offensive work environment;
- l. Google takes adverse actions against its Black employees who report,  
reject, oppose, or are otherwise unwilling to tolerate discrimination or  
racially hostile work environments; and

THIRD AMENDED  
COMPLAINT

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m. Google refuses to undergo impartial, thorough investigations or take meaningful corrective action against co-workers and managers who engage in racial harassment and racial discrimination.

34. Google’s policies and practices demonstrate that it fundamentally devalues equal employment opportunity. Google, for instance, engages in similar discrimination against other protected classes. A court certified a class of over 10,000 female California Google employees paid less than men because Google “(a) assign[s] women to lower ‘Levels’ (i.e. salary bands) than it assigns men; (b) assign[s] women to jobs that do not compensate as highly as those populated largely by men; (c) promot[es] women more slowly and at lower rates than it promotes men; and (d) pay[s] women less than it pays men performing similar work.” (*Ellis v. Google*, No. CGC-17-561299 (Superior Ct. of S.F. Cnty.), First Amended Complaint, ¶ 3.) One of the class representatives alleges, consistent with Plaintiff’s experience, that she was “placed . . . into Level 3, even though she had four years of directly relevant work experience.” (*Id.* ¶ 59.) Google recently agreed to settle *Ellis* for \$118 million, in addition to certain programmatic relief.

35. The intentional and disparate impact discrimination described above is ongoing and constitute a continuing violation of the civil rights laws.

36. The racially discriminatory policies and practices at Google are uniform and national in scope. Class members are relying on Plaintiffs and this lawsuit to protect their rights.

**Plaintiffs Were Subjected to and Harmed by Defendant’s Unlawful Conduct**

**April Curley**

37. April Curley, like other class members, was subjected to a hostile work environment and harmed by Google’s racially discriminatory practices throughout her tenure.

1 When she complained, sought to change these practices, and advocated for others, she suffered  
2 retaliation.

3 38. Curley worked as a People Programs Specialist I, also known as a University  
4 Programs Specialist, from 2014 until she was unlawfully terminated in 2020. Curley worked for  
5 Google in New York, NY from her hire in 2014 until approximately December 2018, and then  
6 transferred to the Washington, D.C. office, where she worked until her termination.  
7

8 39. Because of Google’s abysmal underrepresentation of Black employees, Google  
9 recruited Curley to design and scale a program of outreach to Historically Black Colleges and  
10 Universities and to recruit Black students. When Google hired Curley, she had been successfully  
11 performing a similar role at Teach for America for three years, and held a Master’s degree along  
12 with an additional two years of work experience. Yet Google “under-leveled” Curley. At the time  
13 Google hired her, her Master’s degree and five years of professional experience should have  
14 corresponded to Level 5, yet Google assigned her to only Level 3—entry level post-bachelor’s  
15 degree—and never promoted her or gave her merit pay increases. Indeed, Google never assigned  
16 Curley to the higher level she deserved despite her stellar qualifications and performance.  
17

18 40. Non-Black employees performing the same responsibilities, on the other hand,  
19 were assigned to higher levels and compensated more, both at hire and as their careers  
20 progressed, because of their race. For example, while Curley was working in New York, a white  
21 male who joined Curley’s team was placed in a Level 4 even though he performed the same work  
22 as Curley recruiting from HBCUs, and his pay was soon adjusted even higher.  
23

24 41. Nonetheless, Curley’s talent, hard work, and experience paid off—she established  
25 a strong pipeline of talented Black engineering candidates, providing Google access to a wealth of  
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1 previously untapped technical expertise and leadership potential. Thanks to Curley’s efforts,  
2 Google started to see an increase in its Black technical hiring. Curley enjoyed the recognition of  
3 her peers and the acclaim of the participants in the campus experiences she created.

4 42. In her role, Curley discovered that Google was biased against and reluctant to hire  
5 Black talent, subjecting Black students to more stringent hiring practices than non-Black  
6 candidates. Plaintiff vocally opposed Google’s systemic discrimination, including the following  
7 discriminatory employment practices, among others:  
8

- 9
- 10 • Google viewed Black candidates through harmful racial stereotypes and hiring  
11 managers deemed Black candidates not “Googley” enough, a plain dog whistle for  
12 race discrimination;
  - 13 • Google interviewers “hazed” and undermined Black candidates, regularly asking  
14 level-inappropriate questions of Black candidates to intentionally tank their  
15 interview scores; and
  - 16 • Google hired Black candidates into lower-paying and lower-leveled roles, with  
17 less advancement potential, based on their race and racial stereotypes.

18 43. Curley and her Black female colleagues advocated to break down these barriers.  
19 Google was openly hostile to this advocacy for equal employment opportunities, and made clear  
20 to Curley that she was supposed to be only window dressing. Google expected Curley and her  
21 Black colleagues to execute the majority-white management’s marketing-focused Black  
22 recruitment strategies and never raise any concerns while doing so. Curley and her teammates’  
23 advocacy quickly earned them a reputation within Google’s discriminatory management culture  
24 as “difficult,” “negative,” and “hard to work with.”

25 44. Because Google intended Curley to be a marketing ploy rather than a real  
26 champion for Black opportunity and change, Google sought at every turn to marginalize her and  
prevent her from advocating for herself and other Black Google employees and applicants.

1           45.     Google hired a revolving door of managers to supervise Curley, many of whom  
2 harbored animus toward Black employees and especially Black women. Google selected  
3 managers who engaged in the following harassing and hostile actions, among other things:

- 4           • One of Curley’s managers while she worked in New York frequently mistook  
5 Curley and her two Black female colleagues for each other and called them by  
6 each other’s names;
- 7           • The same manager called Curley and her Black female colleagues “the girls” or  
8 demeaning labels other than their names;
- 9           • Curley’s managers, including those throughout her tenure in New York, refused to  
10 acknowledge or let Curley and her Black female colleagues speak in or present  
11 during important meetings;
- 12           • One of Curley’s managers while she worked in New York escribed Curley and her  
13 Black female peers’ work as “low-level”;
- 14           • Curley’s managers, including those while she worked in New York, created work  
15 environments so hostile that Curley’s female peers were forced to leave the  
16 company, or suffered emotional distress;
- 17           • Curley’s managers, including those while she worked in New York, ignored and  
18 devalued Curley and her Black female peers’ expertise at their jobs and with Black  
19 students, even though the managers lacked the same level of success;
- 20           • Curley’s managers, including those while she worked in New York, refused to  
21 support or nominate Curley or her Black female colleagues for pay and  
22 advancement opportunities;
- 23           • Curley’s managers, including those while she worked in New York, discouraged  
24 Curley and her Black female peers from challenging Google’s racially  
25 discriminatory practices against Black students; and
- 26           • Curley’s managers, including those while she worked in New York, demeaned and  
sexualized Curley as a Black woman, including by asking her which colleagues  
she wanted to sleep with.

46.     Curley also faced frequent racial harassment and hostility throughout her tenure at  
Google, including in New York. Among other things, Google employees frequently “badge-  
checked” her in New York, demanding to see her Google ID to prove that she was a Google

1 employee, which they did not demand of non-Black employees. Non-Black Google employees  
2 would also assume because of Curley's race that she was responsible for menial tasks like  
3 restocking office supplies.

4 47. Curley sought help and reform and reported this conduct and several managers to  
5 Google's HR department and upper management. These complaints were ignored, and worse,  
6 resulted in increased discrimination and harassment. Google conducted no meaningful  
7 investigations and took no corrective actions. To the contrary, Google repeatedly promoted  
8 managers who discriminated, retaliated, and created a hostile work environment.  
9

10 48. Among Curley's nine supervisors, only one was a Black woman. This manager  
11 was also the only one to advocate for Curley's advancement. In 2018, while Curley worked in  
12 New York, the manager put Curley up for a level increase, which would have adjusted Curley's  
13 pay and job level to account for the higher-level work she was already performing. Curley's pay  
14 adjustment was approved, yet when the time came for her level increase to be announced, Google  
15 falsely claimed it lacked the budget to adjust her pay.  
16

17 49. Curley later learned that her skip-level white manager (her manager's manager)  
18 based out of New York had blocked her pay and level increase. In or around the end of 2017 or  
19 early 2018, while still working in New York, Curley asked this skip-level manager at a holiday  
20 function why Curley did not receive a pay and level increase. Although that manager worked on  
21 the same floor as Curley in New York and the two enjoyed a cordial relationship, she explained to  
22 Curley that she and other Google employees considered Curley "intimidating," "unwelcoming,"  
23 and "angry"—a stereotype with which Black women in America are all too familiar.  
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1           50.     When Curley asked the skip-level manager in a follow-up conversation in New  
2 York how she could address these perceptions to earn a pay or level increase, the manager  
3 explained that Curley’s speaking voice seemed “accented” and therefore unfriendly-sounding, or  
4 words to that effect. The skip-level manager encouraged Curley to begin meetings by disclosing  
5 her “accent” at the start of meetings, to assure those unfamiliar with her natural speaking voice, as  
6 an African American woman, that she is not as intimidating or angry as she sounds. Curley’s  
7 manager also compared Curley’s “accent” to that of a disability.

9           51.     Between the pretextual statement that Google lacked the budget to adjust Curley’s  
10 pay; her skip-level manager’s statements citing Curley’s perceived “unfriendliness” because of  
11 her “accent” as an African American woman; and the swift pace at which her non-Black peers  
12 received pay and level adjustments (including the non-Black men hired to perform similar work  
13 to Curley described above), Curley understood that she did not receive a pay or level increase  
14 because of her race.

16           52.     Curley was never considered for advancement opportunities. Her African  
17 American female manager, the only one who advocated for Curley’s advancement, lasted less  
18 than two years in the role. Throughout late 2019, Google repeatedly reprimanded Curley and cut  
19 her annual compensation for speaking up in team meetings and challenging internal practices.

21           53.     Curley again sought help and filed an HR complaint in January 2020. Google  
22 conducted no investigation and instead the complaint doomed Curley’s career at Google.

23           54.     In spring of 2020, a group of the dozen or so Black and Latinx employees within  
24 University Programs, including Curley, assembled to address the many issues facing people of  
25 color at Google, including but not limited to lack of advancement opportunities, exclusion from  
26

1 leadership, underpayment, underleveling, and high attrition. The group met several times and  
2 developed a list of desired reforms.

3           55. In plain retaliation for Curley’s leadership role in this advocacy group, in June  
4 2020, Google placed her on an informal performance improvement plan (“PIP”). Despite  
5 Curley’s strong performance during the informal PIP, in early August 2020, Google intensified its  
6 retaliation, warning Curley to either accept severance immediately or be placed on a formal  
7 performance improvement plan, where it was clear that Google would terminate her employment  
8 at the end of the plan. Curley chose to fight for her job and began a formal 30-day performance  
9 improvement plan that was slated to end on September 17, 2020.

10  
11           56. While on the PIP, Curley advised Google she was preparing a detailed report about  
12 its racial bias in hiring practices. In response, Google ended Curley’s PIP early and unlawfully  
13 terminated her employment on September 11, 2020, freezing out her access to the document and  
14 her ability to complete and submit her report documenting the discriminatory practices.

15  
16           57. As a result of Google’s unlawful conduct, Curley, like other class members, has  
17 lost wages, promotional opportunities, and other benefits, and suffered irreparable harm to her  
18 career, emotional distress, and other nonpecuniary losses. Google’s actions have caused and  
19 continue to cause Plaintiff substantial losses in earnings and other employment benefits, in an  
20 amount to be determined by a jury.

21  
22 **Desiree Mayon**

23           58. Desiree Mayon worked as a Technical Program Manager at Google from August  
24 2019, until she was unlawfully terminated in September 2021. Like other Black Google  
25 employees, Mayon was subjected to a racially hostile work environment and harmed by Google’s  
26

1 racially discriminatory employment practices throughout her tenure. When she complained,  
2 sought to change these practices, and advocated for herself and others, she suffered retaliation.

3           59. When Google recruited Mayon, she was well qualified to excel: she was a  
4 successful senior technical program manager for a global online e-commerce company, held two  
5 bachelor's degrees, and had over 18 years of professional work experience managing technical  
6 software projects. Mayon speaks Vietnamese, Mandarin, Spanish, and American Sign Language  
7 and is able to code using 7 different languages. Despite her considerable experience and  
8 outstanding credentials, and consistent with its company-wide discriminatory practices, Google  
9 "under-leveled" Mayon, placing her in Level 4 and refusing to place her in a higher level and  
10 otherwise denying her advancement opportunities during her tenure.

11  
12           60. Throughout her employment, Google marginalized and undermined Mayon,  
13 refusing to credit her outstanding work or provide her with support, resources and opportunities  
14 because of her race. Consistent with its systemic race discrimination, Google denied Mayon merit  
15 pay increases and other compensation. Google subjected Mayon to race and sex discrimination  
16 and an unflinchingly hostile work environment. Google's supervisors and employees knew,  
17 participated, and encouraged the discrimination and hostile work environment.

18  
19           61. Google's racially hostile work environment is severe, pervasive, and continued  
20 throughout Mayon's employment. Examples of the racial hostility to which Google subjected  
21 Mayon, includes but is not limited to the following:

- 22  
23           • Google employees made racist references about Mayon's skin color; one colleague  
24 said "I thought black people didn't get sunburns" as it was "historically  
25 impossible" due to slaves working outside all day at plantations;  
26

- 1 • Mayon was subjected to racist comments, such as “well, you don’t really look that  
2 black,” implying that being a Black person or having darker skin color is a  
3 problem;
- 4 • Mayon’s colleague ordered her to ask, “how can I serve you?” before addressing  
5 him;
- 6 • Mayon was “badge checked” by a Google employee and told she could not use the  
7 only woman’s restroom in the building. The Google employee then chased Mayon  
8 around the bathroom while proclaiming, “your people are not welcome here,”  
9 referring to African Americans;
- 10 • Google employees regularly “badge checked” Mayon (and other Black employees)  
11 despite her visibly wearing her badge, but did not “badge check” her non-Black  
12 visiting friend;
- 13 • Mayon was the subject of racial slurs and racialized and racially stereotypical  
14 comments, including being called a “bitch” and aggressive, and being told “she  
15 was not smart enough to be technical.” Mayon was told she is “loud and every  
16 stereotype of a black woman”;
- 17 • Mayon’s colleague told Mayon that she “doesn’t have to speak to people like  
18 you,” meaning Black people;
- 19 • Mayon was subjected to racist and offensive comments by her team’s lead,  
20 including being told she was “incompetent,” “needs to go back to grammar  
21 school,” and needs to “learn how to speak proper English”;
- 22 • Consistent with stereotypes about Black women, Mayon was labelled as  
23 “aggressive” by HR, and told by management to use her “womanly ways,” and  
24 “dumb herself down”;
- 25 • Google’s Chief of Staff dismissed Mayon’s concerns regarding racial  
26 discrimination and ordered her not to “bring her Blackness to work,” or words to  
that effect;
- Mayon’s concerns regarding racial discrimination were minimized when a  
colleague asked, “why do all Black people feel attacked?”; and
- After an intense meeting, Mayon’s manager used his body to push Mayon back  
down into her chair;

62. Mayon sought help and reported the scope and severity of the discrimination and harassment to numerous supervisors, Human Resources, and even to Google executive-level

1 employees, to no avail. To the contrary, the discrimination escalated, and Mayon suffered severe  
2 retaliation.

3           63. On June 8, 2020, a senior level executive at Google sent a companywide email  
4 addressing the killings of four Black Americans—Ahmaud Arbery, Dreasjon Reed, Breonna  
5 Taylor, and George Floyd. The email encouraged Google employees to “stand together against  
6 injustices,” and to use at least 30 minutes of the next day to “educate yourself” about racial  
7 injustice. The senior-level executive went on to proclaim, “I’ve been spending some time  
8 reflecting on the recent headlines and what I can do better as an ally. I welcome any feedback . . .  
9 I stand in solidarity with the Black community.”

10  
11           64. Hopeful and following the executive’s directive to respond, Mayon replied to the  
12 executive’s email and provided an account of some of the racial discrimination she experienced  
13 as a Black woman at Google. After replying to the email, Mayon’s concerns were not addressed  
14 and Mayon continued to suffer discriminatory treatment. Google’s messaging was plainly  
15 insincere lip service.

16  
17           65. Indeed, after Mayon again raised the issue of race discrimination, her manager  
18 screamed at her and slammed his door, hitting Mayon in the face. After realizing Mayon was  
19 injured, rather than apologizing, Mayon’s manager jerked open the door and said, “It is always  
20 something with you,” or words to that effect, and stormed off.

21  
22           66. Human Resources refused to conduct a full and fair investigation or take  
23 meaningful corrective action to halt the discrimination in response to any of her complaints.  
24 Instead, HR chastised Mayon and demanded that she just “assume the best intent” of her  
25 colleagues and managers.  
26

1           67.     In further acts of discrimination and retaliation, HR allowed the same manager that  
2 hit Mayon with the door to give her an inaccurate and unwarranted “Needs Improvement”  
3 performance review. This was plainly retaliatory and consistent with Google’s racially  
4 discriminatory performance management and review practices.

5           68.     As a result of Google’s severe and escalating discrimination and retaliation,  
6 Mayon’s health deteriorated, requiring her to take medical leaves. After returning from her  
7 second medical leave, Mayon was assigned to a new manager, who continued to escalate  
8 Google’s campaign of discrimination and retaliation. During a heated meeting in which Mayon’s  
9 discriminatory treatment was discussed, her manager was accusatory and demanded Mayon learn  
10 her place and how to just keep her head down and do her job.

11           69.     Consistent with Google’s discriminatory performance and disciplinary practices, it  
12 continued its punitive witch hunt against Mayon. Google issued her false and unfair “write-ups”  
13 for attendance while she was on approved medical leave. Worse, Google placed Mayon on an  
14 unwarranted PIP for not being “Googley” enough and because she “pissed off [a level 7  
15 manager].” Mayon and other Black employees clearly understand the term “Googley” to be a dog  
16 whistle for race discrimination. Google’s racial hostility and retaliation against Mayon continued.  
17 During her PIP evaluations, Mayon’s manager regularly screamed at and berated her, but the HR  
18 representative who attended these meetings failed to interject or halt the abuse, despite Mayon’s  
19 objections.

20           70.     Google’s discrimination, racial harassment and retaliation continued to cause  
21 Mayon’s health to deteriorate, forcing Mayon to take another protected medical leave. While on  
22 medical leave, in plain retaliation for her protected activity reporting racial discrimination an for  
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1 taking protected medical leave, Google falsely accused Mayon of misconduct and then terminated  
2 her employment.

3 71. Google sought to punish Mayon further after it fired her. Google contacted  
4 Mayon's prospective new employer and falsely claimed that Mayon stole property from Google.  
5 As a result of Google's retaliation, Mayon's prospective employer rescinded its job offer.  
6

7 72. As a result of Google's unlawful conduct, Mayon, like other class members, has  
8 suffered considerable harm and damages. She has lost wages, promotional opportunities, and  
9 other benefits, and suffered irreparable harm to her career, emotional distress, and other  
10 nonpecuniary losses. These damages and losses are ongoing.

11 **Ronika Lewis**

12 73. Ronika Lewis worked for Google from February 2020 through March 2023.  
13 Despite her considerable experience and outstanding credentials and performance, Lewis was  
14 subjected to and harmed by Google's discriminatory employment practices and racially hostile  
15 work environment. Among other things, Google denied Lewis advancement opportunities and  
16 compensation and discriminatorily rejected her applications for other positions within Google.  
17 When Lewis sought help and reported her unlawful treatment to Google, she suffered retaliation.  
18

19 74. In 2019, Google began to recruit Lewis to become the Head of Logistics Strategy  
20 Operations and Analytics, for good reason. Lewis had over 20 years of experience as an  
21 engineering and technology management professional and was well qualified to excel at Google.  
22 She served in a senior capacity at multiple tech startups and Fortune 500 companies and as a  
23 technology advisor for public and private universities. Lewis had an excellent industry reputation  
24 and was and is often asked to serve as a board advisor, speaker, and technology instructor.  
25  
26

1           75.     Excited for the career opportunities promised by Google, Lewis left her job and  
2 relocated from Boston to California to accept the role as Google’s Head of Logistics Operations  
3 Strategy and Analytics, a Level 7 position. Unfortunately, after Lewis started at Google, it  
4 eliminated the position of Head of Logistics Operations Strategy and Analytics. Consistent with  
5 its discriminatory, company-wide job and level assignment practices, Google “down-leveled”  
6 Lewis to a Level 6 and lowered her title to Senior Program Manager. Throughout her tenure,  
7 Google refused to place Lewis at the higher level warranted by her experience and performance  
8 and denied her compensation and advancement opportunities.

10           76.     From the moment she started working for Google, Lewis’ performance was  
11 outstanding. During the early days of the coronavirus pandemic in March 2020, Google partnered  
12 with the White House Coronavirus Response Task Force to assist with providing services for  
13 mass testing sites, public registration, and coronavirus tracking. Lewis volunteered in response to  
14 a company-wide email from Google’s Chief Executive Officer and was selected to be the lead site  
15 program manager, where she designed, led, and scaled coronavirus testing sites. Lewis excelled in  
16 the crisis and earned multiple awards for her performance, including a Google Citizenship Award,  
17 an award rarely, if ever, given to new hires at Google.

19           77.     Despite her extraordinary leadership, service, and performance, Google denied  
20 Lewis pay, recognition, and advancement opportunities pursuant to its discriminatory  
21 employment practices. Google also refused to increase Lewis’ job level or compensation. Lewis  
22 asked Google to be promoted multiple times, but she was denied. After receiving an exceeds  
23 expectations rating on her performance review, Lewis again requested a promotion. During a  
24

1 meeting thereafter, Lewis' manager stood up and slammed his fist down on the desk and  
2 demanded, yelling, that she "take that promotion request down," or words to that effect.

3           78. After being denied the opportunity to advance and be promoted, Lewis transferred  
4 to a different role, where her new manager promised to correct her level and increase her pay  
5 after the transfer. However, in order to transfer, Lewis was again required to be "down-leveled."  
6 Lewis transferred roles and was demoted and down-leveled to a Level 5 employee.  
7

8           79. In her new role, Lewis consistently and successfully performed work above her  
9 assigned Level 5 without pay adjustments or advancement. Senior-level executives assured Lewis  
10 she was "doing great work" and that her performance "set the standard." Nevertheless, pursuant  
11 to Google's racially discriminatory performance assessment and review practices, Lewis' stellar  
12 performance was not recognized in her performance review. She again was denied the promised  
13 level correction and pay increase.  
14

15           80. Hoping to escape her discriminatory environment and advance her career, Lewis  
16 accepted a new regulatory compliance role with a different manager. Lewis' new manager agreed  
17 to raise Lewis' level and pay, but again, after her transfer, Google reneged on its promises and  
18 neither Lewis' level nor compensation changed. Despite her outstanding performance, Google  
19 told Lewis she would have to wait at least 2 or 3 years for a promotion. This is contrary to how  
20 Google treats non-Black employees, including those with lesser performance, who are regularly  
21 promoted with less than one year of tenure. Indeed, in her current role, Lewis has observed  
22 multiple new hires with equal or less experience, all offered higher compensation packages than  
23 Lewis.  
24  
25  
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1           81. Throughout her employment, Lewis also received less compensation than her non-  
2 Black peers for the same work. Lewis is aware of several non-Black individuals working at the  
3 same level and reporting to the same supervisors who were more highly compensated than her  
4 despite performing substantially similar work. Google also repeatedly awarded higher  
5 performance-based bonuses to non-Black individuals for the same work as Lewis performed. For  
6 example, on one occasion, Lewis assisted with signing new customer contracts and renewals, for  
7 which she was not compensated, but which her white counterparts were rewarded with substantial  
8 bonuses and eventually promotions. On another occasion, Lewis participated in a team that  
9 reached a large milestone, yet Google awarded twice the bonus to Lewis' non-Black colleagues at  
10 Lewis' level as it did to Lewis for reaching the milestone.  
11

12           82. Throughout her employment, Lewis was subjected to severe and pervasive racial  
13 harassment and Google's racially hostile work environment. For example, a racially hostile  
14 colleague, to slow Lewis' progress and hamper her performance, stole Lewis' work-issued cell  
15 phone and lied about it for days until finally admitting, without repercussion, that he "had it the  
16 whole time." After witnessing the incident, another Google employee told Lewis to ignore it  
17 because "every third person here is like him," meaning racially biased. During her tenure, Lewis  
18 had to endure a barrage of additional racist comments and treatment, such as being told:  
19

- 20           • "You're not smart enough to work at Google";
- 21           • "You should be a Doordash driver instead of working at Google";
- 22           • "You are a liar and people like you are liars," referring to Black people; and
- 23           • "I want to see you take a bone off someone's plate and bite into it" at a Google  
24 sponsored country club event.  
25  
26

1           83.     Rather than receiving the grooming and support that her white colleagues enjoyed,  
2 Google undermined and devalued Lewis at every turn. Lewis was marginalized and excluded by  
3 superiors and peers; she was placed on teams that were understaffed, had work assignments  
4 constantly changing, and was pulled into unscheduled meetings to present to Google Executives  
5 with no advance warning, when other colleagues worked collaboratively in secret preparing for  
6 these meetings.  
7

8           84.     Throughout her employment, Lewis repeatedly complained and reported to  
9 numerous supervisors of Google’s discriminatory pay, treatment, and hostile work environment.  
10 In an attempt to seek help, Lewis also made complaints to Google’s HR department, to no avail.  
11 To the contrary, the discrimination escalated and Lewis suffered severe retaliation. When Lewis  
12 complained of discrimination, she was told that she was not being “Googley.”  
13

14           85.     Google’s worsening working environment and targeting led Lewis to have  
15 significant health issues which continued to worsen. Because of Google’s treatment, Lewis even  
16 passed out at work. Google was unsympathetic; when she notified Google she required surgery,  
17 Google forced Lewis to postpone the surgery multiple times causing her further harm.

18           86.     After Lewis added her claims to this suit in June 2022, and in further retaliation for  
19 her protected activity, Google changed her management reporting structure and substantially  
20 modified her duties. Google required Lewis to perform substantial new duties without an  
21 adjustment to her level, compensation, or title. Google began revoking Lewis’ access to necessary  
22 software and leaving her out of important meetings. Google gave Lewis an unwarranted and  
23 discriminatory “Not Enough Impact” rating on her 2023 end-of-year performance review,  
24 effectively a death knell for her career at Google.  
25  
26

1           87. In early 2023, Google’s discrimination and retaliation culminated in Google  
2 terminating Lewis’ employment, purportedly because her “position [was] being eliminated”  
3 because of “changes in business needs.”

4           88. But Google promptly began re-hiring for Lewis’ position and continued filling  
5 many similar positions. Lewis therefore applied for several open positions in or around March  
6 2023, some of which were clearly designed to fill her own vacancy.

7           89. Lewis therefore applied to positions in Google Distributed Cloud, including her  
8 own (Product Manager II) as well as Group Outbound Product Manager (a position she had  
9 previously held), and Senior Outbound Product Manager. All of the positions would have been  
10 based out of California. By the time of her applications, Lewis had approximately four years of  
11 experience at Google, including successful performance in the exact positions she applied for,  
12 plus over twenty years of tech management experience before Google.

13           90. Yet without interviewing Lewis, Google hired less-qualified white men for all of  
14 the positions and refused to consider Lewis for the positions because of her race and in retaliation  
15 for her protected activity.

16           91. For the Product Manager II position, Google hired a white man who joined Google  
17 in 2018 one year out of grad school as a Technical Account Manager, who had approximately  
18 seven years of work experience before Google. For the Outbound Product Manager position,  
19 Google hired a white man who started at Google in 2018 as a customer engineer and had  
20 approximately a decade less experience than Lewis.  
21  
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23  
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1           92.     Lewis' treatment was consistent with Google's companywide layoffs in 2023,  
2 under which Google disproportionately terminated the employment of its Black and African  
3 American workforce.

4           93.     As a result of Google's discrimination and retaliation, Lewis has been  
5 considerably harmed. She has lost compensation and jobs, suffered extreme emotional distress,  
6 and her career and reputation have been irreparably harmed.

7  
8 **Rayna Reid**

9           94.     Rayna Reid worked for Google as a Staffing Channels Specialist, from October  
10 2018, until she was constructively discharged in January 2020. When Google recruited Reid, she  
11 was well qualified to excel: she was a successful Managing Director for a national firm, held a  
12 Master's Degree in education, a Juris Doctorate, a New York license to practice law, and had over  
13 7 years of experience, including serving as Counsel for the Committee on Education and the  
14 Workforce at the United States House of Representatives. Despite her considerable experience  
15 and outstanding credentials, and consistent with Google's firm-wide discriminatory practices,  
16 Reid, like other class members, was subjected to and harmed by Google's discriminatory  
17 employment practices and racially hostile work environment throughout her tenure. When she  
18 complained to Google on multiple occasions and sought to change these practices, she suffered  
19 retaliation.  
20

21  
22           95.     Reid originally applied to work at Google's New York campus. After multiple  
23 rounds of interviews, Google denied Reid a job in New York but offered her a position at  
24 Google's Austin, Texas or Mountain View campuses. Excited for the career opportunities  
25 promised by Google, Reid left her existing job and moved to Austin to work for Google.  
26

1           96. Consistent with Google’s discriminatory job placement and levelling practices,  
2 Google “under-leveled” Reid, placing her at Level 3 because of her race. Indeed, Google gave a  
3 white male hired after Reid a Level 4 position even though he had considerably less experience  
4 than Reid. Throughout her tenure, Google refused to place Reid at the higher level she deserved  
5 and denied her compensation and advancement opportunities.  
6

7           97. Google also subjected Reid to racial harassment and a racially hostile work  
8 environment, including being subjected to racial stereotypes as a Black woman. During her first  
9 month at Google, Reid’s managers called her into a room to discuss what they described as “the  
10 elephant in the room,” and accused her of not liking working in Austin. Having only worked at  
11 Google for a couple of weeks, Reid was shocked as she had never expressed that she did not like  
12 Austin.  
13

14           98. A few months later, Google demanded Reid meet for an early mid-year  
15 performance review with her manager. During the meeting, Reid’s manager’s sole critique was  
16 that Reid was not being “Googley” enough and “not smiling enough.” Once again, Reid was  
17 dumbfounded. After the meeting, in an attempt to understand being “Googley,” Reid scrolled  
18 through her manager’s public social media posts. She discovered in her manager’s social media  
19 racist anti-Black imagery of a cartoon “Mammy” caricature of an African American woman,  
20 smiling while holding a child. In the post, Reid’s manager replaced the child’s face with his own.  
21 Appalled, Reid alerted Human Resources for help and to report the discrimination, to no avail.  
22

23           99. Consistent with Google culture and company-wide practices, Reid was subjected  
24 to severe and pervasive harassment and a racially hostile work environment that throughout her  
25 employment, including not limited to, the following conduct:  
26

- 1 • Colleagues openly made racist comments about her hair and announced racist  
2 sentiments regarding African Americans such as, “Black men are disgusting”;
- 3 • Being tokenized and talked to based on racial stereotypes that she did not belong  
4 and “should be happy” to be at Google and was not “acting grateful enough” to be  
5 at Google;
- 6 • During a meeting, a manager used a Black woman gesture trope and started  
7 snapping her fingers around in the air. Reid alerted Human Resources, but its  
8 response was only that managers “will make assumptions about you”;
- 9 • Reid was regularly mistaken for a cafeteria worker, even being asked to restock  
10 out-of-stock food;
- 11 • Reid was denied time to grieve the loss of her uncle and was instructed that it  
12 would look bad if she took time off, causing her to fly to and from her uncle’s  
13 funeral on the same day; and
- 14 • Accused of being unable to communicate “beyond one word.”

15 100. Reid reported to HR Google’s discriminatory pay, treatment, and hostile work  
16 environment on a number of occasions without remedy. To the contrary, the discrimination  
17 escalated and Reid suffered serve retaliation. After complaining multiple times, Reid was placed  
18 on a PIP in a plain act of further discrimination and retaliation. Reid was outperforming her non-  
19 Black peers at the time. She was “over exceeding” her hiring number goal, which Google deemed  
20 “mission-critical.” Rather than focus on her objectively excellent performance, Google criticized  
21 her communication skills and suggested she have “coffee chats” with other team members.  
22 Around the same time that Reid was placed on the PIP, Reid won the Google Inclusivity Award,  
23 an act which plainly contradicted the false allegations in her PIP.

24 101. Google made it clear it was targeting Reid for termination. After placing Reid on  
25 the unjustified PIP, Google hired a less educated white male with little to no experience, as a  
26 Level 4 recruiter.

1           102. Google’s escalating discrimination, racial harassment, and retaliation caused  
2 Reid’s health to deteriorate and forced her to take protected medical leave. In January 2020, after  
3 returning from leave, Google continued to target and discriminate and retaliate against Reid,  
4 leaving her no choice but to leave Google on Martin Luther King Jr.’s birthday.

5           103. As a result of Google’s unlawful conduct, Reid, like other class members, has  
6 suffered considerable harm and damages. She has lost wages, promotional opportunities, and  
7 other benefits, and suffered irreparable harm to her career, emotional distress, and other  
8 nonpecuniary losses. These damages and losses are ongoing.

9  
10 **Anim Aweh**

11           104. Anim Aweh, like other Black and African American candidates, was subjected to  
12 and harmed by Google’s racially discriminatory hiring practices. Pursuant to these discriminatory  
13 practices, Google has denied Aweh over ten positions for which she was well qualified because of  
14 her race.

15  
16           105. In November 2021, Google recruited Aweh for an open position at its Mental  
17 Health Initiative in Atlanta, Georgia. Aweh was well qualified to work for Google, and to excel,  
18 in this role. Aweh is Associate Director of a healthcare facility and a board-certified therapist who  
19 earned a master’s degree in social work and has over a decade of experience as a licensed clinical  
20 social worker.

21  
22           106. Aweh interviewed with the head of Google’s Mental Health Initiative and had  
23 three more interviews, all with non-Black Google employees. Throughout the interview process,  
24 interviewers emphasized the importance of “Googleness” to the hiring process without  
25 concretely explaining what it meant.  
26

1           107. Among the interviewers was a non-Black woman who had recently joined the  
2 Mental Health Initiative in a similar role to the one for which Aweh applied. Aweh learned during  
3 the interview that this non-Black woman obtained the position despite lacking experience in  
4 either mental health or in project management.

5           108. On February 14, 2022, Google rejected Aweh’s application for employment on the  
6 basis of her race. Google’s recruiter told Aweh she was rejected because she “did not have  
7 enough experience,” a statement that was plainly false, given her substantial mental health  
8 experience and her knowledge that Google hired at least one non-Black woman (one of her  
9 interviewers) for a similar role in the Mental Health Initiative with zero experience in either  
10 mental health or project management.

11           109. The recruiter also communicated to Aweh that the all-non-Black interviewing  
12 panel did not believe she was “Googley” enough for the position and therefore was not a good  
13 cultural fit for the organization. This was consistent with Google’s pattern or practice of  
14 conducting discriminatory “culture fit” or “Googlyness” screening interviews that is a racial dog  
15 whistle laden with racial bias and stereotypes and is essentially code for racial discrimination.  
16

17           110. Since then, Aweh has applied to but has not been hired, or even extended an  
18 interview, for approximately ten other positions at Google relating to mental health and  
19 wellbeing, including jobs in or based out of California and New York. Aweh has been qualified  
20 for all these positions; these rejections are not based on her qualifications but on her race.  
21

22           111. As a result of Google’s discrimination, Aweh has suffered considerable harm.  
23 Among other things, she has lost jobs and compensation, suffered emotional distress, and her  
24 career and reputation have been irreparably harmed.  
25  
26

1 **Ebony Thomas**

2 112. Ebony Thomas, like other Black and African American candidates, was subjected  
3 to and harmed by Google’s racially discriminatory hiring practices.

4 113. In April 2021, Google recruited Thomas as a recruiter to focus on providing  
5 Google with qualified Black job applicants. Google desperately needed to address its abysmal  
6 underrepresentation of Black professionals.

7 114. Thomas was well qualified to work for Google, and to excel, in this role. She was  
8 a certified diversity recruiter and career coach, with over 20 years of professional work  
9 experience, including 10 years as a recruiter and in the information technology industry. Thomas  
10 successfully made it through multiple interviews, receiving positive feedback, until Google  
11 required her to complete a “cultural fit” interview to assess her “Googlyness.”  
12

13 115. After Thomas’ cultural fit interview, Google informed Thomas that her application  
14 could not move forward. When Thomas asked for feedback about why she was not selected, the  
15 Google recruiter responded: “I thought you were a perfect candidate. I don’t know what  
16 happened.”  
17

18 116. Thomas later learned that though she had received high marks during most of her  
19 interviews about her knowledge and experience, she had been flagged for an additional “cultural  
20 fit” interview for “Googlyness.” Consistent with Google’s racially biased corporate culture and  
21 discriminatory hiring practices, Google deemed that Thomas was not “Googly” enough.  
22 Googlyness is a racial dog whistle laden with racial bias and stereotypes and is essentially code  
23 for racial discrimination.  
24

25 117. On May 17, 2021, Google rejected and refused to hire Thomas because of her race.  
26



1 All Black and/or African American Google employees in or based out of  
2 New York who work or worked for Defendant as a Level 2 through Level  
3 8 employee.

4 123. Plaintiff Aweh seeks to represent a hiring class of:  
5 All Black and/or African Americans who applied to a full-time job at  
6 Google in or based out of New York and were denied employment.

7 124. Plaintiffs Aweh and Lewis seek to represent a hiring class of:  
8 All Black and/or African Americans who applied to a full-time job at  
9 Google in or based out of California and were denied employment.

10 125. Plaintiff Lewis seeks to represent an employee class of:  
11 All Black and/or African American Google employees who work or  
12 worked for Defendant in or based out of California as a Level 2 through  
13 Level 8 employee.

14 126. The classes of Black current and former employees and applicants are so  
15 numerous that joinder of all members is impracticable. Fed. R. Civ. P. 23(a)(1).

16 127. There are questions of law and fact common to the classes, and those questions can  
17 and should be resolved in a single proceeding that furthers this litigation. Fed. R. Civ. P.  
18 23(a)(2).

19 128. The claims alleged by Plaintiffs are typical of the claims of the classes. Fed. R.  
20 Civ. P. 23(a)(3).

21 129. Plaintiffs will fairly and adequately represent and protect the interests of the  
22 classes. Fed. R. Civ. P. 23(a)(4).

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1 130. The proposed classes meet the requirements for certification under Rule 23(b)(2)  
2 and/or Rule 23(b)(3). The questions of law and fact common to the members of the classes  
3 predominate over any questions affecting only individual members, and a class action is superior  
4 to other available methods for the fair and efficient adjudication of the controversy. Fed. R. Civ.  
5 P. 23(b)(3).  
6

7 131. Alternatively, the issues of determining liability and equitable relief are  
8 appropriate for issue certification under Rule 23(c)(4), as are other common issues.

9 **COUNT I**

10 **RACE DISCRIMINATION AND HOSTILE WORK ENVIRONMENT**  
11 **IN VIOLATION OF 42 U.S.C. § 1981**  
**(Nationwide Class and Plaintiffs)**

12 132. Plaintiffs, individually and on behalf of all others similarly situated, reallege the  
13 above paragraphs and incorporates them by reference as though fully stated herein as part of  
14 Count I of this Complaint.  
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16 133. Under 42 U.S.C. § 1981, as amended, people of all races are guaranteed the same  
17 right to make and enforce contracts, regardless of race. The term “make and enforce” contracts  
18 includes the making, performance, modification, and termination of contracts, and the enjoyment  
19 of all benefits, privileges, terms, and conditions of the contractual relationship.

20 134. Defendant maintained a nationwide set of uniform, intentionally discriminatory  
21 employment practices, engaged in a pattern or practice of systemic race discrimination against  
22 Black employees and applicants, and created a racially hostile work environment, which  
23 constitute illegal intentional race discrimination in violation of 42 U.S.C. § 1981.  
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25 135. Plaintiffs and all those similarly situated were subjected to and harmed by  
26 Defendant’s systemic and individual discrimination.

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**COUNT II**

**RETALIATION IN VIOLATION OF  
42 U.S.C. § 1981  
(Plaintiffs Curley, Mayon, Lewis, and Reid)**

136. Plaintiffs reallege each and every paragraph above and incorporates them by reference as though fully stated herein.

137. Plaintiffs engaged in protected activity and suffered retaliation by Defendant in violation of 42 U.S.C. § 1981.

138. Plaintiffs suffered harm as a result of Defendant’s unlawful retaliation.

**COUNT III**

**RACE DISCRIMINATION AND HOSTILE WORK ENVIRONMENT  
IN VIOLATION OF TITLE VII, 42 U.S.C. § 2000e, et seq.  
(Nationwide Class and Plaintiffs Mayon, Lewis and Aweh)**

139. Plaintiffs Mayon, Lewis and Aweh, on behalf of themselves and all others similarly situated, reallege the above paragraphs and incorporates them by reference as though fully stated herein as part of Count II of this Complaint.

140. Plaintiffs Mayon, Lewis, and Aweh filed a charge of race discrimination with the Equal Employment Opportunity Commission (“EEOC”), which placed Defendant on notice of the representative allegations contained in this Complaint. Plaintiffs Mayon, Lewis, and Aweh have exhausted their administrative remedies and received their Notices of Right to Sue from the EEOC and filed their individual and class Title VII claims within 90 days of receipt of such notices.

141. Title VII of the Civil Rights Act of 1964, as amended, makes it unlawful for an employer to discriminate against any individual in the terms, conditions, or privileges of employment on the basis of race, or to limit, segregate, or classify its employees or applicants for

1 employment in any way which deprives or tends to deprive any individual of employment  
2 opportunities or otherwise adversely affect his or her status as an employee on the basis of race.

3 142. By its conduct as alleged herein, Defendant unlawfully discriminated against  
4 Mayon, Lewis, and Aweh and those similarly situated in violation of Title VII, under both  
5 disparate treatment and disparate impact theories of liability.  
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7 143. Plaintiffs and other African Americans who work or worked for Google, or were  
8 denied employment with Google, were harmed by Defendant's conduct.

9 **COUNT IV**

10 **SEX DISCRIMINATION IN VIOLATION OF**  
11 **TITLE VII, 42 U.S.C. § 2000e, *et seq.***  
12 **(Plaintiffs Mayon and Lewis)**

13 144. Plaintiffs Mayon and Lewis reallege each and every paragraph above and  
14 incorporate them by reference as though fully stated herein.

15 145. Mayon and Lewis filed charges of sex discrimination with the EEOC, which  
16 placed Defendant on notice of the allegations contained in this Complaint. Plaintiffs Mayon and  
17 Lewis have exhausted their administrative remedies and received Notices of Right to Sue from  
18 the EEOC and filed their individual Title VII claims within 90 days of receipt of such notice.

19 146. Title VII of the Civil Rights Act of 1964, as amended, makes it unlawful for an  
20 employer to discriminate against any individual in the terms, conditions, or privileges of  
21 employment on the basis of sex, or to limit, segregate, or classify its employees or applicants for  
22 employment in any way which deprives or tends to deprive any individual of employment  
23 opportunities or otherwise adversely affect his or her status as an employee on the basis of sex.  
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1 147. By its conduct as alleged herein, Defendant unlawfully discriminated against  
2 Mayon and Lewis in violation of Title VII.

3 148. Plaintiffs Mayon and Lewis were harmed by Defendant's conduct.  
4

5 **COUNT V**

6 **RETALIATION IN VIOLATION OF**  
7 **TITLE VII, 42 U.S.C. § 2000e, et seq.**  
8 **(Plaintiffs Mayon and Lewis)**

9 149. Plaintiffs Mayon and Lewis reallege each and every paragraph above and  
10 incorporate them by reference as though fully stated herein.

11 150. Plaintiffs Mayon and Lewis engaged in protected activity by complaining to  
12 management of their unlawful treatment.

13 151. Plaintiffs Mayon and Lewis suffered retaliation and materially adverse action  
14 because of their protected activity, in violation of 42 U.S.C. § 2000e-3(a), and were harmed as a  
15 result.

16 **COUNT VI**

17 **RACE DISCRIMINATION AND HOSTILE WORK ENVIRONMENT**  
18 **IN VIOLATION OF FEHA, Cal. Gov. Code §12940, et seq.**  
19 **(California Class and Plaintiffs Mayon, Lewis & Aweh)**

20 152. Plaintiffs Mayon, Lewis, and Aweh, on behalf of themselves and all others  
21 similarly situated, reallege each and every paragraph above and incorporate them by reference as  
22 though fully stated herein.

23 153. California Government Code Section 12940(a) makes it an unlawful employment  
24 practice for an employer to discriminate against a person "in compensation or in terms,  
25 conditions, or privileges of employment" on the basis of race.  
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1 167. Google discriminated and retaliated against Plaintiffs Mayon and Lewis by  
2 ignoring their doctors' orders, denying them an accommodation, subjecting them to increased  
3 scrutiny, unwarranted performance discipline, denied them compensation and advancement  
4 opportunities, and ultimately terminated Plaintiff Mayon's employment.

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6 168. As a direct and proximate result of Defendant's conduct, Plaintiffs Mayon and  
7 Lewis have suffered damages.

8 **COUNT IX**

9 **INTERFERENCE AND RETALIATION IN VIOLATION OF**  
10 **FMLA, 29 U.S.C. § 2615, *et seq.***  
11 **(Plaintiff Mayon)**

12 169. Plaintiff Mayon realleges each and every paragraph above and incorporates them  
13 by reference as though fully stated herein.

14 170. The Family and Medical Leave Act of 1993 allows all eligible employees of  
15 employers with 50 or more employees to take up to 12 workweeks of unpaid, job-protected leave  
16 each year. 29 U.S.C. § 2612(a)(1)(A). Employers may not interfere with FMLA rights. 29  
17 U.S.C. § 2615(a). Pursuant to 29 U.S.C. § 2615(a)(2), it is unlawful for an employer to  
18 discriminate or retaliate against an employee who has taken FMLA leave.

19 171. Plaintiff was eligible for FMLA protections and Defendant was a qualified  
20 employer for purposes of the FMLA.

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22 172. As alleged above, Defendants interfered with Mayon's protected medical leave  
23 and retaliated against her for taking protected medical leave.

24 173. As a direct and proximate result of Defendant's conduct, Mayon has suffered  
25 damages.

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**COUNT X**

**RACE DISCRIMINATION AND HOSTILE WORK ENVIRONMENT  
IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS LAW  
(New York Class and Plaintiff Curley & Aweh)**

174. Plaintiffs Curley and Aweh, individually and on behalf of all others similarly situated, reallege each and every paragraph above and incorporate them by reference as though fully stated herein.

175. Google maintains a substantial corporate presence in New York. Google employs approximately 12,000 people, including Plaintiff Curley.

176. The New York State Human Rights Law (“NYSHRL”), NY Exec. Law § 290, *et seq.*, establishes that it is unlawful, because of an individual’s race, “to bar or to discharge from employment such individual or to discriminate against such individual in compensation or in terms, conditions or privileges of employment.” N.Y. Exec. Law § 296(1)(a).

177. As part of the recent class action lawsuit in New York state court, *Haggan v. Google*, No 518739/2022 (Sup. Ct. N.Y., Kings County) Google entered into a class-wide tolling agreement, effective from October 15, 2020, that tolled the NYSHRL and New York City Human Rights Law, N.Y.C. Admin. Code §§ 8-101 *et seq.* (“NYCHRL”) claims, among others, of all Black/African American Google employees in New York.<sup>6</sup> Plaintiff Curley relies on this tolling agreement in this action.

178. By its conduct as alleged herein, Defendant unlawfully discriminated against Curley and Aweh and those similarly situated in violation of NYSHRL, under both disparate treatment and disparate impact theories of liability.

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<sup>6</sup> See *Haggan v. Google LLC*, No. 518739/2022 (Sup. Ct. N.Y., Kings County, June 30, 2022), Dkt. 3 at 3.

1 179. Google maintained racially discriminatory employment practices and policies,  
2 including but not limited to hiring, pay, job assignment, promotion, and other practices that had a  
3 disparate impact on Black employees who worked for Google in New York.

4 180. Plaintiffs and all others similarly situated have suffered damages as a result of  
5 Google's violation of the NYSHRL.  
6

7 **COUNT XI**

8 **SEX AND SEXUAL ORIENTATION DISCRIMINATION IN VIOLATION OF**  
9 **NEW YORK STATE HUMAN RIGHTS LAW**  
10 **(Plaintiff Curley)**

11 181. Plaintiff Curley realleges each and every paragraph above and incorporates them  
12 by reference as though fully stated herein.

13 182. Google maintains a substantial corporate presence in New York. Google employs  
14 approximately 12,000 people, which included Plaintiff Curley.

15 183. The NYSHRL establishes that it is unlawful, because of an individual's sex or  
16 sexual orientation, "to bar or to discharge from employment such individual or to discriminate  
17 against such individual in compensation or in terms, conditions or privileges of employment."  
18 N.Y. Exec. Law § 296(1)(a).

19 184. Google violated the NYSHRL by discharging Plaintiff, discriminating against her  
20 in compensation and in terms, conditions, or privileges of employment, including by subjecting  
21 her to a hostile work environment, because of her sex.

22 185. Google maintained discriminatory employment practices and policies, including  
23 but not limited to pay, job assignment, promotion, and other practices that had a disparate impact  
24 on female and queer employees who worked for Google in New York.  
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26 186. Plaintiff has suffered damages as a result of Google's violation of the NYSHRL.

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**COUNT XII**

**RETALIATION IN VIOLATION OF  
NEW YORK STATE HUMAN RIGHTS LAW  
(Plaintiff Curley)**

187. Plaintiff Curley realleges each and every paragraph above and incorporates them by reference as though fully stated herein.

188. Plaintiff engaged in protected activity and suffered retaliation by Defendant in violation of NYSHRL, N.Y. Exec. Law § 296(7).

189. Plaintiff suffered harm as a result of Defendant’s unlawful retaliation.

**COUNT XIII**

**RACE DISCRIMINATION AND HOSTILE WORK ENVIRONMENT  
IN VIOLATION OF NEW YORK CITY HUMAN RIGHTS LAW  
(New York Class and Plaintiffs Curley & Aweh)**

190. Plaintiffs Curley and Aweh, individually and on behalf of all others similarly situated, reallege each and every paragraph above and incorporate them by reference as though fully stated herein.

191. Google maintains a substantial corporate presence in New York. Google employs approximately 12,000 people, which included Plaintiff Curley.

192. The NYCHRL, NYC Admin Code § 8-101, *et seq.*, establishes that it is unlawful, because of an individual’s race, “to bar or to discharge from employment such person,” or to “discriminate against such person in compensation or in terms, conditions or privileges of employment.” NYC Admin Code § 8-107.

193. By its conduct as alleged herein, Defendant unlawfully discriminated against Curley and Aweh and those similarly situated in violation of NYCHRL, under both disparate treatment and disparate impact theories of liability.

1 194. Google maintained racially discriminatory employment practices and policies,  
2 including but not limited to hiring, pay, job assignment, promotion, and other practices that had a  
3 disparate impact on Black employees who worked for Google in New York.

4 195. Plaintiffs Curley and Aweh and all those similarly situated have suffered damages  
5 as a result of Google's violation of the NYCHRL.  
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7 **COUNT XIV**

8 **SEX AND SEXUAL ORIENTATION DISCRIMINATION IN VIOLATION OF**  
9 **NEW YORK CITY HUMAN RIGHTS LAW**  
10 **(Plaintiff Curley)**

11 196. Plaintiff Curley realleges each and every paragraph above and incorporates them  
12 by reference as though fully stated herein.

13 197. The NYCHRL, establishes that it is unlawful, because of an individual's sex or  
14 sexual orientation, "to bar or to discharge from employment such person," or to "discriminate  
15 against such person in compensation or in terms, conditions or privileges of employment." NYC  
16 Admin Code § 8-107.

17 198. Google violated the NYCHRL by discharging Plaintiff, discriminating against her  
18 in compensation and in terms, conditions, or privileges of employment, including by creating a  
19 hostile work environment, because of her sex and sexual orientation.

20 199. Google maintained racially discriminatory employment practices and policies,  
21 including but not limited to pay, job assignment, promotion, and other practices that had a  
22 disparate impact on female and queer employees who worked for Google in New York.

23 200. Plaintiff has suffered damages as a result of Google's violation of the NYCHRL.  
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**COUNT XV**

**RETALIATION IN VIOLATION OF  
NEW YORK CITY HUMAN RIGHTS LAW  
(Plaintiff Curley)**

201. Plaintiff Curley realleges each and every paragraph above and incorporates them by reference as though fully stated herein.

202. Google maintains a substantial corporate presence in New York. Google employs approximately 12,000 people, which included Plaintiff Curley.

203. Plaintiff engaged in protected activity and suffered retaliation by Defendant in violation of NYCHRL, N.Y.C. Admin. Code § 8-107(7).

204. Plaintiff suffered harm as a result of Defendant’s unlawful retaliation.

**COUNT XVI**

**PAY DISCRIMINATION IN VIOLATION OF  
CALIFORNIA EQUAL PAY ACT  
(California Class and Plaintiff Lewis)**

205. Plaintiff Lewis, individually and on behalf of all others similarly situated, realleges each and every paragraph above and incorporates them by reference as though fully stated herein.

206. The California Equal Pay Act provides that, “An employer shall not pay any of its employees at wage rates less than the rates paid to employees of another race or ethnicity for substantially similar work, when viewed as a composite of skill, effort, and responsibility, and performed under similar working conditions.” Cal. Labor Code § 1197.5(b).

207. As set forth above, Google paid Plaintiff Lewis and others similarly situated at wage rates less than the rates paid to employees of another race for substantially similar work.



- 1 e. Declare that Defendant engaged in unlawful race discrimination and retaliation  
2 against Plaintiffs, and order all appropriate relief;
- 3 f. Declare that Defendant engaged in unlawful sex and disability discrimination and  
4 retaliation against Plaintiffs Mayon and Lewis, and order all appropriate relief;
- 5 g. Declare that Defendant engaged in unlawful sex and sexual orientation  
6 discrimination and retaliation against Plaintiff Curley, and order all appropriate  
7 relief;
- 8 h. Order Plaintiffs, and all others similarly situated, reinstated to their appropriate  
9 positions, promotions and seniority, and otherwise make Plaintiffs and all others  
10 similarly situated whole;
- 11 i. Award Plaintiffs and all others similarly situated the value of all compensation and  
12 benefits lost and that they will lose in the future as a result of Defendant's  
13 unlawful conduct;
- 14 j. Award Plaintiffs and all others similarly situated compensatory, punitive, and  
15 liquidated damages;
- 16 k. Award Plaintiffs and all others similarly situated prejudgment interest and  
17 attorneys' fees, costs and disbursements, as provided by law;
- 18 l. Award Plaintiffs and all others similarly situated such other make-whole equitable,  
19 injunctive and legal relief as this Court deems just and proper to end the  
20 discrimination and fairly compensate Plaintiffs and others similarly situated; and
- 21 m. Award Plaintiffs and all others similarly situated such other relief as this Court  
22 deems just and proper.
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