CLOSED, HTS, TRLSET

# U.S. District Court Middle District of Florida (Jacksonville) CIVIL DOCKET FOR CASE #: 3:03-cv-00837-JHM-HTS

U.S. Equal Employmen v. Conam Management Assigned to: Senior Judge John H. Moore, II Referred to: Magistrate Judge Howard T. Snyder

Demand: \$0

Cause: 28:1331 Fed. Question: Employment Discrimination

represented by **Delner Franklin-Thomas** 

Date Filed: 09/30/2003

Jury Demand: Plaintiff

Date Terminated: 01/11/2005

Nature of Suit: 442 Civil Rights: Jobs

Jurisdiction: U.S. Government Plaintiff

Equal Employment Opportunity

Commission Suite 2700

2 S Biscayne Blvd Miami, FL 33131 305/530-6001

Email: delner.franklin-thomas@eeoc.gov

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

## **Gwendolyn Y. Reams**

Equal Employment Opportunity Commission Miami District Office One Biscayne Tower 2 S. Biscayne Blvd., Suite 2700 Miami, FL 33131 305/530-6010

ATTORNEY TO BE NOTICED

## John C. Weaver

LEAD ATTORNEY

Equal Employment Opportunity Commission One Biscayne Tower 2 South Biscayne Blvd, Suite 2700 Miami, FL 33131 305/536-7247 Email: john.weaver@eeoc.gov LEAD ATTORNEY ATTORNEY TO BE NOTICED

#### Michael J. Farrell

Jill S. Schwartz & Associates, PA Suite 200

## **Plaintiff**

**United States Equal Employment Opportunity Commission** 

1 of 7

180 Park Ave N Winter Park, FL 32789 407/647-8911

Fax: 407/628-4994

Email: mfarrell@schwartzlawfirm.net

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

## Intervenor Plaintiff

#### **Christine Pickell**

## represented by Archibald J. Thomas, III

Archibald J. Thomas, III, P.A. 1301 Riverplace Blvd. Suite 1640 Jacksonville, FL 32207 904/396-2322 Fax: 904/398-3271 Email: archibald@iob.rights.co

Email: archibald@job-rights.com LEAD ATTORNEY

ATTORNEY TO BE NOTICED

#### **Philip Daniel Williams**

Magid & Williams, P.A.
3100 University Boulevard, South, Suite
115
Jacksonville, FL 32216
904/725-6161
Email: court@magidwilliams.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

## **Defendant**

## **Conam Managemet Corporation**

doing business as Conam Property Services, LTD.

## represented by F. Damon Kitchen

Constangy, Brooks & Smith, LLC P.O. Box 41099
Jacksonville, FL 32203
904/356-8900
Fax: 904/356-8200
Email: dkitchen@constangy.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

#### Jack R. Wallace

Constangy, Brooks & Smith, LLC 200 W Forsyth St - Ste 1610 PO Box 41099 Jacksonville, FL 32203-1099 904/356-8900

Fax: 904/356-8200

Email: jwallace@constangy.com

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

## **Intervenor Defendant**

Conam Managemet Corporation doing business as
Conam Property Services, LTD.

represented by F. Damon Kitchen

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Jack R. Wallace

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

<b>Date Filed</b>	#	Docket Text	
09/30/2003	1	COMPLAINT for injunctive relief filed; jury demand (lph) (Entered: 09/30/2003)	
09/30/2003		MAGISTRATE JUDGE CASE ASSIGNMENT Magistrate assigned: Howard T Snyder (lph) (Entered: 09/30/2003)	
09/30/2003		SUMMONS(ES) issued for Conam Management . Consent(s) issued. (lph) (Entered: 09/30/2003)	
10/01/2003	2	NOTICE of designation under Local Rule 3.05 - TRACK 2. (ctc) (lph) (Entered: 10/01/2003)	
01/06/2004	<u>3</u>	MOTION by Conam Management to dismiss complaint (lph) (Entered: 01/07/2004)	
01/06/2004	<u>3</u>	REQUEST for oral argument by Conam Management re: [3-1] motion to dismiss complaint (lph) (Entered: 01/07/2004)	
01/06/2004	4	MEMORANDUM by Conam Management in support of [3-1] motion to dismiss complaint (lph) (Entered: 01/07/2004)	
01/07/2004	<u>5</u>	UNOPPOSED MOTION by Christine Pickell with memorandum in support to intervene by Christine Pickell (unopposed) referred to Magistrate Judge Howard T. Snyder (lph) (Entered: 01/08/2004)	
01/14/2004	<u>6</u>	ORDER granting [5-1] motion to intervene by Christine Pickell and the Clerk of the Court is directed to file, forthwith, the Intervenor's Complaint and Demand for Jury Trial, attached to the Motion. (Signed by Magistrate Judge Howard T. Snyder) ctc (pam) (Entered: 01/15/2004)	
01/14/2004	7	INTERVENOR'S COMPLAINT by U.S. Equal Employmen, Christine Pickell against Conam Management and Demand for Jury Trial (pam) (Entered: 01/15/2004)	

01/26/2004	8	RESPONSE by U.S. Equal Employmen to [3-1] motion to dismiss complaint and MOTION for oral argument (lph) (Entered: 01/26/2004)		
01/26/2004	9	CASE MANAGEMENT REPORT (lph) (Entered: 01/27/2004)		
01/29/2004	<u>10</u>	CASE MANAGEMENT AND SCHEDULING ORDER setting Joining of parties, amending of pleadings on 4/30/04; Discovery cutoff 9/10/04; dispositive motion filing deadline for 10/25/04 Pretrial statement due on or before 3/10/05; Pretrial conference for 11:30 3/17/05; Jury trial set for trial term commencing 4/4/05; Scheduled for Sr. Judge John H. Moore II ( signed by Sr. Judge John H. Moore II ) ctc (lph) (Entered: 01/29/2004)		
02/03/2004	<u>11</u>	ANSWER and affirmative defenses to [7-1] intervenor complaint by Conam Management (lph) (Entered: 02/03/2004)		
02/06/2004	<u>12</u>	MOTION by Conam Management with memorandum in support to require expert witness reports referred to Magistrate Judge Howard T. Snyder (lph) (Entered: 02/09/2004)		
02/23/2004	<u>13</u>	RESPONSE by Christine Pickell to [12-1] motion to require expert witness reports (lph) (Entered: 02/24/2004)		
02/26/2004	<u>14</u>	JOINT MOTION by U.S. Equal Employmen, Christine Pickell for protective order, and to quash defendant's subpoenas referred to Magistrate Judge Howard T. Snyder (mfk) (Entered: 02/27/2004)		
02/26/2004	<u>15</u>	RESPONSE by U.S. Equal Employmen to [12-1] motion to require expert witness reports (lph) (Entered: 02/27/2004)		
03/01/2004	<u>16</u>	ORDER denying [3-1] oral argument requested; this case is hereby STAYED for a period of 60 days; the parties are ordered to engage in further settlement discussions in a good-faith and reasonable effort to resolve the plaintiff's claims; the parties are further ordered to advise the Court within 60 days of ths date of this order, of the results of these conciliation efforts and whether they have reached settlement or whether the stay of this case should be lifted. (Signed by Sr. Judge John H. Moore II) ctc (lph) (Entered: 03/01/2004)		
05/14/2004	<u>17</u>	MEMORANDUM by Conam Management in opposition to [14-1] joint motion for protective order, [14-2] joint motion to quash defendant's subpoenas (lph) (Entered: 05/17/2004)		
05/18/2004	<u>18</u>	ORDER TO SHOW cause for for failure to adhere to an order of this Court: Response due on 6/1/04 for Conam Management, for Christine Pickell, for Conam Management, for U.S. Equal Employment Scheduled for Sr. Judge John H. Moore II; the stay previously entered in this case is hereby LIFTED. (Signed by Sr. Judge John H. Moore II) ctc (lph) (Entered: 05/18/2004)		
05/28/2004	<u>19</u>	JOINT RESPONSE by U.S. Equal Employmen, Conam Management, Christine Pickell to [18-1] order dated May 18, 2004 (map) (Entered: 06/01/2004)		
06/07/2004	20	ORDER denying [12-1] motion to require expert witness reports; denying request for fees and costs in connection with the motion, which is contained within [13-1] motion response ( Signed by Magistrate Judge Howard T. Snyder ) ctc (lph) (Entered: 06/07/2004)		

06/08/2004	<u>21</u>	ORDER vacating [18-1] order ( Signed by Sr. Judge John H. Moore II ) ctc (lph) (Entered: 06/08/2004)		
06/14/2004	<u>22</u>	NOTICE of filing supplemental authority by Conam Management re: [17-1] opposition memorandum (lph) (Entered: 06/15/2004)		
06/25/2004	23	ORDER: Plaintiffs shall have 11 days from the date of this order within which t show the Motion for protective order (#14) was timely. (Signed by Magistrate Judge Howard T. Snyder) ctc (lph) (Entered: 06/28/2004)		
07/06/2004	<u>24</u>	JOINT RESPONSE by U.S. Equal Employmen, Christine Pickell to [23-1] order (lph) (Entered: 07/07/2004)		
07/08/2004	<u>25</u>	MOTION by Conam Management for leave to file reply to plaintiff and intervenor's joint response to court order dated 6/25/04 referred to Magistrate Judge Howard T. Snyder (lph) (Entered: 07/08/2004)		
07/14/2004	<u>26</u>	SUPPLEMENTAL local rule 3.01(g) certification re <u>25</u> Motion for leave to file by Conam Managemet Corporation. (LPH, ) (Entered: 07/15/2004)		
07/27/2004	27	RESPONSE in opposition re <u>25</u> Motion for leave to file <i>PLAINTIFFS' MOTION IN OPPOSITION TO DEFENDANT'S MOTION FOR LEAVE TO REPLY TO PLAINTIFF'S AND INTERVENOR'S JOINT RESPONSE TO COURT ORDER DATED JUNE 25</i> , 2004 filed by United States Equal Employment Opportunity Commission. (Brown, Jennifer) (Entered: 07/27/2004)		
07/27/2004	28	RESPONSE in opposition re <u>25</u> Motion for leave to file <i>PLAINTIFF'S MOTIO IN OPPOSITION TO DEFENDANT'S MOTION FOR LEAVE TO REPLY TO PLAINTIFF'S AND INTERVENOR'S JOINT RESPONSE TO COURT ORDER DATED JUNE 25</i> , 2004 filed by United States Equal Employment Opportunity Commission. (Brown, Jennifer) (Entered: 07/27/2004)		
07/29/2004	<u>29</u>	ORDER granting <u>25</u> Motion for leave to file and the Clerk of the Court shall fil the reply attached to the Motion. Signed by Judge Howard T. Snyder on 7/29/2004. (Snyder, Howard) (Entered: 07/29/2004)		
07/29/2004	<u>30</u>	REPLY re <u>24</u> Response by Conam Managemet Corporation. (LPH, ) (Entered: 07/30/2004)		
08/11/2004	31	JOINT MOTION to extend discovery and dispositive motion deadlines by Conam Managemet Corporation, Christine Pickell, United States Equal Employment Opportunity Commission. (LPH, ) (Entered: 08/12/2004)		
08/17/2004	32	ORDER granting 31 Motion to extend time. Signed by Judge John H. Moore II on 8/17/2004. (CDF) (Entered: 08/17/2004)		
08/24/2004	33	MOTION for leave to file <i>Amended Answer and Affirmative Defenses</i> by Conam Managemet Corporation. (Attachments: # 1 # 2 # 3)(Wallace, Jack) (Entered: 08/24/2004)		
08/24/2004	34	MEMORANDUM in support of Motion for Leave to Amend Answer and Affirmative Defenses filed by Conam Managemet Corporation. (Wallace, Jack) (Entered: 08/24/2004)		
08/30/2004	<u>35</u>	ORDER denying 14 Motion for protective order, denying 14 Motion to quash. Signed by Judge Howard T. Snyder on 8/30/2004. (Snyder, Howard) (Entered:		

1					
		08/30/2004)			
09/10/2004	<u>36</u>	RESPONSE to motion re <u>33</u> MOTION for leave to file <i>Amended Answer and Affirmative Defenses</i> filed by Christine Pickell, United States Equal Employn Opportunity Commission. (Attachments: # <u>1</u> Exhibit A# <u>2</u> Exhibit B)(LPH, ) (Entered: 09/13/2004)			
09/17/2004	<u>37</u>	Botice of Correction and of filing amended AFFIDAVIT of Christine Pickell re: 36 Response to motion by Christine Pickell. (LPH, ) (Entered: 09/20/2004)			
09/24/2004	<u>38</u>	ORDER directing Defendant to file a reply. Signed by Judge Howard T. Snyder on 9/24/2004. (Snyder, Howard) (Entered: 09/24/2004)			
10/05/2004	<u>39</u>	REPLY to response to motion re <u>33</u> MOTION for leave to file <i>Amended Answer</i> and <i>Affirmative Defenses</i> filed by Conam Managemet Corporation. (Attachments: # <u>1</u> Exhibit A Excerpts of Pickell Deposition# <u>2</u> Exhibit B Defendant's Answer and Affirmative Defenses to Plaintiff's Complaint)(Wallace, Jack) (Entered: 10/05/2004)			
10/25/2004	<u>40</u>	ORDER granting 33 Motion for leave to file. Signed by Judge Howard T. Snyder on 10/25/2004. (Snyder, Howard) (Entered: 10/25/2004)			
10/27/2004	<u>41</u>	AMENDED ANSWER and affirmative defenses to <u>1</u> Complaint by Conam Managemet Corporation. (LPH, ) (Entered: 10/27/2004)			
10/27/2004	<u>42</u>	AMENDED ANSWER and affirmative defenses to 7 Intervenor Complaint by Conam Managemet Corporation. (LPH, ) (Entered: 10/27/2004)			
11/08/2004	<u>43</u>	Joint MOTION for Extension of Time to File <i>Dispositive Motion</i> by Conam Managemet Corporation. (Wallace, Jack) (Entered: 11/08/2004)			
11/10/2004	<u>44</u>	ORDER granting 43 Motion for Extension of Time to File. Signed by Judge John H. Moore II on 11/10/2004. (CDF) (Entered: 11/10/2004)			
01/03/2005	<u>45</u>	CONSENT DECREE by United States Equal Employment Opportunity Commission. (Attachments: # 1 Exhibit sexual harassment policy and notice posting)(Brown, Jennifer) (Entered: 01/03/2005)			
01/11/2005	<u>46</u>	ORDER accepting and ratifying Consent Decree and dismissing case with prejudice. Signed by Judge John H. Moore II on 1/11/2005. (VMF) (Entered: 01/11/2005)			

PACER Service Center						
Transaction Receipt						
05/30/2007 14:55:31						
PACER Login:	hs0328	Client Code:	eeoc+++++++++++++++++++++++++++++++++++			
<b>Description:</b>	Docket Report	Search Criteria:	3:03-cv-00837-JHM-HTS			
Billable Pages:	4	Cost:	0.32			

7 of 7