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JAN 29 2002

ROBERT H. SHERWELL, CLERK  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT, LOUISIANA

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION

FILED  
USDC, WESTERN DISTRICT OF LA  
ROBERT H. SHERWELL, CLERK  
DATE 3 6 02  
BY DB

CHRIS BANKS, ET AL

CONSOLIDATED

CIVIL ACTION NO. 01-1345

SHERWELL

VERSUS

JUDGE STAGG

LORILLARD TOBACCO COMPANY

MAGISTRATE JUDGE PAYNE

**PLAINTIFF JACKIE STRICKLAND'S FIRST SUPPLEMENTAL COMPLAINT**

NOW INTO COURT, through undersigned counsel, comes Plaintiff, JACKIE STRICKLAND (hereinafter "Strickland"), who files Plaintiff Jackie Strickland's First Supplemental Complaint, and would respectfully supplement plaintiff's Complaint by adding the following paragraphs:

12. Paragraphs 1 through 11 of the U.S. Equal Employment Opportunity Commission's Complaint against Lorillard Tobacco Company are hereby incorporated by reference and adopted herein.

13. Furthermore, the actions of Lorillard as described in paragraphs 4-6 of Strickland's Complaint constitute violations of Title VII of the Civil Rights Act of 1964 and Title I of the Civil Rights Act of 1991, for which Strickland sues.

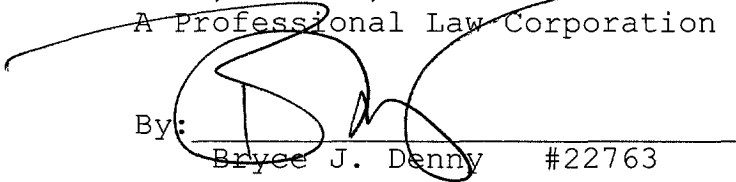
14. The pecuniary losses sustained by Strickland as a result of Lorillard's Title VII violations include lost wages in the past, front pay, punitive damages, reasonable and necessary attorneys' fees and compensatory damages.

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WHEREFORE, PREMISES CONSIDERED, Strickland prays for all relief requested in her original Complaint, and for such other and further relief to which Strickland may show herself entitled for claims raised in this supplemental petition, including but not limited to back and front pay, punitive damages, reasonable attorneys' fees, pre- and post-judgment interest, and compensatory damages.

**PLAINTIFF DEMAND TRIAL BY JURY FOR ALL ISSUES  
RAISED IN HER COMPLAINT AND IN THIS SUPPLEMENTAL COMPLAINT**

~~COOK, YANCEY, KING & GALLOWAY~~  
A Professional Law Corporation

By:   
Bryce J. Denny #22763

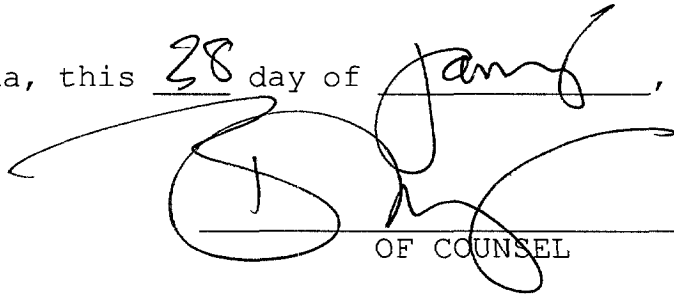
333 Texas Street  
Suite 1700  
P. O. Box 22260  
Shreveport, LA 71120-2260  
Telephone: (318) 221-6277  
Telecopier: (318) 227-7850

ATTORNEYS FOR PLAINTIFF JACKIE  
STRICKLAND

CERTIFICATE

I HEREBY CERTIFY that a copy of the above and foregoing has been served on all counsel of record by placing a copy of same in the United States Mail, properly addressed and with adequate postage affixed thereon.

Shreveport, Louisiana, this 28 day of January, 2002.

  
\_\_\_\_\_  
OF COUNSEL

**COOK, YANCEY, KING & GALLOWAY**  
A PROFESSIONAL LAW CORPORATION  
333 TEXAS STREET, SUITE 1700  
POST OFFICE BOX 22260  
SHREVEPORT, LOUISIANA 71120-2260  
www.cykg.com

Bryce J. Denny\*

Board Certified - Labor Law  
Texas Board of Legal Specialization

January 28, 2002

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dennyb@cykg.com

\*Also admitted in Texas

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**Via Hand Delivery**

Honorable Robert Shemwell  
U.S. District Clerk  
300 Fannin Street  
Shreveport, LA 71101

ROBERT H. SHEM WELL, CLERK  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT, LOUISIANA

RE: Consolidated Cause No. 5:01cv1345; *Chris Banks, et al v. Lorillard Tobacco Company*; In the United States District Court for the Western District of Louisiana, Shreveport Division

Dear Mr. Shemwell:

Enclosed for filing is an original and two copies of **Jackie Strickland's Motion for Leave to Intervene and Motion For Leave to File Supplemental Complaint, with accompanying Order**. Please return a file-stamped copy of the above pleading to the undersigned at the letterhead address.

By copy of this letter and accompanying pleading, all counsel of record have been notified.

Sincerely,

Bryce J. Denny

BJD:lgr  
Encls.

cc: Wm. Daniel Wellons (all with enclosures)  
Stephen X. Munger  
Kurt N. Peterson  
N. Eleanor Graham

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION

FILED  
USDC, WESTERN DISTRICT OF  
ROBERT H. SHERWELL, CLERK

CHRIS BANKS ET AL  
VERSUS  
LORILLARD TOBACCO COMPANY

CIVIL ACTION NO. 5:01CV1345  
JUDGE STAGG  
MAG. JUDGE PAYNE

DATE 1/30/02  
RB

NOTICE OF DEFICIENT DOCUMENT

**NOTICE TO FILER OF DEFICIENT DOCUMENT: YOU MUST RETURN THIS NOTICE WITH ANY PAPERS FILED TO CORRECT THE PROBLEMS NOTED BELOW TO INSURE THAT THE DOCUMENT IN QUESTION WILL NOT BE REFERRED TO CHAMBERS FOR AN ORDER TO STRIKE. SEND ONLY THE REQUESTED PAGE OR PAGES. DO NOT SEND A COMPLETE NEW DOCUMENT UNLESS THAT IS WHAT WAS REQUESTED.**

The Motion for Leave to Intervene and to File Supplemental Complaint filed on January 29, 2002 on behalf of Jackie Strickland does not conform to the requirements for documents filed in this court for the reason or reasons noted below.

REASONS:

You do not indicate whether opposing counsel consent to the granting of this ex parte motion.

LR7.4.1W, which governs motions not requiring memorandum states: "Prior to filing any motion under this section, with the exception of #10, the moving party shall attempt to obtain consent for the filing and granting of such motion from all parties having an interest to oppose, and a certificate of this attempt shall be included in the motion." [#10 is a motion to withdraw as counsel.]

LR7.6W states: "Prior to filing any motion for leave to intervene, to amend pleadings or to file a third-party complaint, the moving party shall attempt to obtain consent for the filing and granting of such motion from all parties having an interest to oppose."

LR7.9W states that "A motion for continuance or extension of time shall be accompanied by the applicant's attorney that (1) there is or is not opposition to the request; and, if there is opposition, the reasons therefor, or, (2) if neither is obtainable, a statement of the efforts made by the applicant to secure the same."

The motion cannot be referred to chambers until this deficiency is corrected.

If the deficiency is not corrected within ten (10)\*\* days from date of this notice, the document will be referred to the court for a determination as to whether it should be stricken.

**\*\*Any and all deadlines for filing previously set remain in effect! Issuance of this deficiency notice does not amount to an extension of any deadline. If an extension of time within which to file is desired, the attorney must seek such extension from the assigned judge!**

Shreveport, Louisiana, January 30, 2002.

ROBERT H. SHERWELL  
CLERK OF COURT

By Deborah Berry Deputy Clerk

COPY SENT  
DATE: January 30, 2002  
BY: db  
TO: RSP, Denny, Munger, Wellons, Peterson, Graham

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**COOK, YANCEY, KING & GALLOWAY**

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January 31, 2002

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JAN 31 2002

\*Also admitted in Texas

ROBERT H. SHEMWELL, CLERK  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT, LOUISIANA

**Via Hand Delivery**

Honorable Robert Shemwell  
U.S. District Clerk  
1167 Federal Building  
300 Fannin Street  
Shreveport, LA 71101

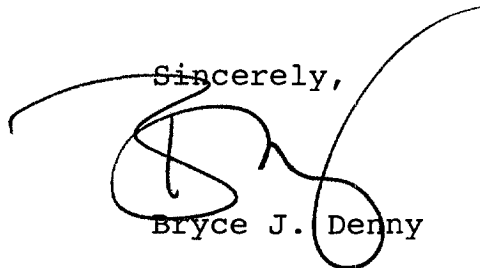
RE: Cause No. CV01-1564-S; *Jackie Strickland v. Lorillard Tobacco Company*; In the United States District Court for the Western District of Louisiana, Shreveport Division

Dear Mr. Shemwell:

Enclosed is a copy of a Notice of Deficient Document and an original and one copy of the correction page according to the Notice. Please place the original correction page with the original Motion for Leave to Intervene and Motion for Leave to File Supplemental Complaint that was filed on January 29, 2002. Also, please return a file-stamped copy of this correction page to the undersigned via the waiting messenger.

By copy of this letter and pleading, all counsel of record have been notified.

Sincerely,



Bryce J. Denny

BJD:lgr

Encls.

cc: Honorable Magistrate Judge Payne (w/encls.)