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Brandy HAWK, Plaintiff,

v.

ABERCROMBIE & FITCH CO.; Abercrombie & Fitch Stores, Inc.; Abercrombie & Fitch Management Co.; A&F California, LLC; A&F Ohio, Inc., Defendants.

November 19, 2003.

Complaint

(JURY TRIAL DEMANDED)

CLASS ACTION

Plaintiff, by her undersigned counsel, brings this action seeking relief from the employment discrimination of Defendants Abercrombie & Fitch Co.; Abercrombie & Fitch Stores, Inc.; Abercrombie & Fitch Management Co.; A&F California, LLC and A&F Ohio, Inc., and makes the following allegations.

1. Abercrombie & Fitch Co. and defendant subsidiaries thereof (collectively, hereinafter "Defendants," "Abercrombie" or "the Company") comprise a national retailer of clothing that discriminates against minority individuals including Latinos, Asian Americans and African Americans (hereinafter "minorities") on the basis of race, color and/or national origin with respect to the Company's employment policies. In marketing its clothing and accessories, Abercrombie seeks to promote a lifestyle and a culture. The culture is embodied in what Abercrombie calls: "Classic American Style." "Classic American" does not mean *all Americans*. Rather, this culture, as evidenced by Abercrombie's policies and practices as well as the by Company sales floors, website and advertisements, is young and *white*.

2. Notwithstanding the Company's facially neutral hiring policies, Abercrombie enforces its "Classic American" policy through a combination of explicit and implicit directives aimed at all levels of employees. As a result, those few minorities whom Abercrombie does hire are disproportionately assigned to less visible positions such as the night shift or stock room work.

3. The absence of diversity in Abercrombie's sales staff is gaining notoriety across the county. The Pennsylvania EEOC is currently investigating Abercrombie & Fitch for the charges stated in this Complaint. In Northern California, the EEOC issued a Letter of Determination with respect to a charge of discrimination

against Abercrombie that included the following conclusion:

The preponderance of the evidence supports Charging Party's claim that he was denied a permanent position as a Brand Representative, denied an assignment and terminated because of his national origin. Moreover, evidence obtained during the course of the investigation revealed that Latinos and Blacks, as a class, were denied permanent positions, denied assignments and treated in an unfair manner with regard to recruitment based on their race and national origin, and that Respondent failed to maintain employment records as required by Title VII.

See Exhibit A. Because Abercrombie's discriminatory practices stem from national policies, the deleterious effects manifest country-wide.

JURISDICTION AND VENUE

4. This Court has original jurisdiction to hear this Complaint and adjudicate the claims stated herein under 28 U.S.C. §§ 1331, 1343, 2201, 2202, and 42 U.S.C. § 2000e-5(f), this action being brought under the Civil Rights Act of 1866, 42 U.S.C. § 1981, the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e et seq., and the Civil Rights Act of 1991, Pub. L. 102-166, 105 Stat. 1071 (Nov. 21, 1991), to redress and enjoin the discriminatory employment practices of Abercrombie & Fitch Co.

5. Venue is proper in this District by reason of 28 U.S.C. §1391(b). Defendant Abercrombie & Fitch Stores, Inc., an Ohio corporation, is licensed to do business in New Jersey and operates retail stores throughout New Jersey. During the relevant time period, Defendant Abercrombie & Fitch Co. and Abercrombie & Fitch Management Co. have maintained branches in New Jersey. Members of the Plaintiff Class reside in New Jersey and throughout the United States. Because Abercrombie maintains many retail stores in New Jersey, a substantial number of the acts and omissions that give rise to this case occurred here.

PARTIES

6. Plaintiff **Brandy Hawk** is an African-American woman and a resident of Burlington, New Jersey. She filed timely Title VII administrative charges of discrimination with the Equal Employment Opportunity Commission ("EEOC") on July 17, 2003. See Exhibit B.

7. Defendant **Abercrombie & Fitch Co.** is a Delaware corporation with its principal place of business located at Four Limited Parkway East, Reynoldsburg, Ohio 43068. Abercrombie maintains offices and does business in this judicial district at:

- a. Abercrombie & Fitch at the Cherry Hill Mall, 2000 Rte. 38, Suite 722, Cherry Hill, NJ 08002;
- b. Abercrombie & Fitch at Freehold Raceway Mall, 3710 Route 9, Box 1404, Space D108, Freehold, NJ 07728;
- c. Abercrombie & Fitch at Bridgewater Commons, 400 Commons Way, Bridgewater, NJ

08807;

d. Abercrombie & Fitch at Menlo Park Mall, 100 Menlo Park #380, Edison, NJ 08837;
e. Abercrombie & Fitch at Short Hills, 1200 Morris Turnpike, Suite B-133, Short Hills, NJ 07078; and
f. Abercrombie & Fitch at Rockaway, Rout 80 & Mt. Hope Avenue, Space 2080, Rockaway, NJ 07866.

8. One of the largest retail clothing chains in the country Abercrombie owns over 600 stores in 48 states, employing more than 22,000 individuals nationwide. More than 45 of Defendants' stores are located in New Jersey and Philadelphia. An overwhelmingly disproportionate number of the Company's Brand Representatives are white. The virtual absence of minority Brand Representatives is a remarkable result which evidences intentional and/or systematic discrimination.

9. Defendant **Abercrombie & Fitch Management Co.**, formerly known as Abercrombie & Fitch Stores, Inc., is a Delaware corporation and a wholly owned subsidiary of Abercrombie & Fitch Co. Defendant's principal place of business is Foulkstone Plaza, #102; 1409 Foulk Road, Willmington, DE 19803. Abercrombie & Fitch Management Co. operated all Abercrombie stores from July 1996 until August 9, 2000.

10. Defendant **Abercrombie & Fitch Stores, Inc.** is an Ohio Corporation and a wholly owned subsidiary of Abercrombie & Fitch Co. Abercrombie & Fitch Stores, Inc.'s principal place of business is 6301 Fitch Path, New Albany, Ohio 43054. From August 9, 2000 until April 26, 2002, the Ohio based Abercrombie & Fitch Stores, Inc. operated all Abercrombie stores. Since May 2002, the Ohio based Abercrombie & Fitch Stores, Inc. operated all Abercrombie stores except those in California and Ohio.

11. Since May 2002, defendant **A&F California, LLC**, a wholly owned Abercrombie subsidiary operating as an Ohio limited liability company, controls the operations of Abercrombie's California business.

12. Since May 2002, defendant **A&F Ohio, Inc.**, is a wholly owned, Ohio based owned subsidiary of Abercrombie, operating all Abercrombie stores in Ohio. A&F Ohio, Inc.'s principal place of business is 6301 Fitch Path, New Albany, Ohio 43054.

DISCRIMINATORY PRACTICES

13. Though Abercrombie has promulgated equal employment opportunity and anti-discrimination polices and procedures which are supposed to apply to all employees and all divisions, Abercrombie has not established any meaningful practices or controls to ensure that the objectives of those policies and procedures are achieved. In fact, Abercrombie has affirmatively established hiring and assignment policies, both explicit and implicit, which contradict and belie the Company's own self-proclaimed equal employment policies.

14. More specifically, Abercrombie has intentionally and systematically implemen-

ted a general practice of discriminating against minority sales representatives in the areas of hiring, job assignments, training, transfer and promotion opportunities. This general practice exists throughout Abercrombie, is followed by management at all levels, and is evidenced by Abercrombie's overwhelmingly white sales staff.

15. To this end, Abercrombie systematically recruits white sales applicants and discourages sales applications from minority applicants. The Company refuses to hire qualified minority applicants as Brand Representatives to work on the sales floors based upon its subjective and unvalidated criteria rather than upon a determination of whether the applicant would be a responsible and effective Brand Representative.

16. To the extent that Abercrombie hires minorities, Abercrombie channels most to stock room and overnight shift positions and away from positions in the stores that are in the public eye.

THE "A&F LOOK"

17. Abercrombie implements its discriminatory employment policies in part through a formal and rigorous "Appearance Policy," which requires that Brand Representatives fit the Abercrombie mold known as the "A&F Look." The "A&F Look" is code for the Company's "whites only" approach to marketing its clothing and to employing its Brand Representatives,

18. Abercrombie publishes and disseminates an employee policy manual, wherein the Company describes the "A&F Look" and the "A&F Look Disciplinary Policy," closely regulating employee appearance. The "A&F Look" is an entirely subjective style of dress and appearance that the Company calls its "classic American style." The Company bombards its employees and patrons with depictions of the so-called "A&F Look" and the Company's portrayal of the "classic American style" in a number of publications, including the "A&F Look Book"; "A&F Look Video"; A&F catalogue; and A&F Quarterly, a magazine featuring almost all white models.

19. The Company also requires its stores to display, in both customer and employee only areas of the store, posters of white models; photographs and post cards of white models and Abercrombie videos and/or Abercrombie TV (hereinafter "A&F TV"), depicting almost all white models.^[FN1] An example of a poster displayed in the employee area of Abercrombie stores is attached as Exhibit C to the Complaint.

FN1. A&F TV is a series of short films available on the web and/or in stores, depicting white Abercrombie models engaging in sporting and other social activities.

20. In addition to the promotional materials supplied by the Company, store managers are instructed to develop their own examples of the "A&F" look, as dictated by the corporate office. For example, in May, 2003, an Abercrombie District Man-

ager instructed all stores in her district to create a collage exhibiting Brand Representatives fitting the Abercrombie Look, and then to place the collage in the store stock rooms. When questioned about whether people in the stock room might object to the absence of minorities in a collage representing the Abercrombie image, the District Manager instructed the store managers to post the collage in the managers' offices instead.

21. The Company uses the above detailed multiple media approach to convey and reinforce the exclusive "Abercrombie Look". The Company mandates that managers hire Brand Representatives who fit within the narrow confines of its whites only image and policy.

22. The visual media posted throughout Abercrombie stores, and the overwhelmingly white force of Brand Representatives on the sales floors, also communicate a strong and unwelcoming message to minorities entering Abercrombie with the intent of seeking employment.

ENFORCING THE IMAGE

23. Abercrombie rigorously maintains the "A&F Look" by a multi-tiered system of enforcement. First, all Abercrombie employees are instructed on the A&F Look Disciplinary Policy which provides that:

- a. all [Abercrombie] Brand Representatives and Management are required to comply with the Look Disciplinary Policy;
- b. all levels of management are responsible for ensuring consistent administration of the Look Disciplinary Policy; and
- c. noncompliance with the A&F Look may subject an employee to various disciplines including termination.

24. The Company also monitors its stores through its regional and district managers and corporate representatives. These managers and corporate representatives visit stores frequently to ensure that each store is properly implementing the Company's discriminatory employment policies and practices. Upon discovering a minority working on the Abercrombie sales floor, a member of management may arrange to have the hours of the employee "zeroed out," the equivalent of termination, or transfer the employee to the stock room or overnight shifts and outside of the public eye.

25. Abercrombie further scrutinizes and enforces compliance with the "A&F Look" by requiring all stores to submit to corporate headquarters, on a quarterly basis, a picture of their Brand Representatives who fit the "Look." Corporate officials then select photos as exemplary models and disseminate these photos to all stores nationwide. The Brand Representatives in the pictures are almost invariably white. See Exhibit D.

DISCRIMINATORY RESULTS

26. The discriminatory practices of Abercrombie have affected the Named Plaintiff and the absent Class members whom she seeks to represent in the following ways, among others:

a. Abercrombie has intentionally and/or systematically failed and refused to recruit or hire minorities for sales positions at all levels on an equal basis with whites because of their race, thereby discriminating against those minorities who were not hired as a Brand Representative, including Plaintiff Brandy Hawk.

b. Abercrombie's policies, procedures and practices which are stated in facially neutral terms such as "the A&F Look," have produced an adverse and disparate impact against minority employees with respect to hiring.

CLASS ALLEGATIONS

27. Plaintiff brings this action on her own behalf, and on behalf of a Class consisting of all minorities who have unsuccessfully sought employment as Brand Representatives at any Abercrombie store since November 19, 1999. The Class consists of Plaintiffs who were denied a position as a Brand Representative as a result of the ethnic or race-based discriminatory practices of Abercrombie.

28. In June, 2003 Abercrombie reported over 22,000 full and part-time employees working in a total of 615 stores. This number fluctuates up during periods of high retail sales such as the Christmas season, the start of Summer or the start of the school year. Though the number of plaintiffs remains undetermined, the large number of current employees and the high rate of turnover in the retail industry substantiates the impracticality of joinder.

29. There are questions of law and fact common to the members of the Class, including but not limited to:

a. whether Abercrombie implemented policies directed at excluding minorities from the Abercrombie store sales floors;

b. whether Abercrombie discriminated against minority applicants and/or employees because of their race with respect to hiring for sales positions;

c. whether Abercrombie's actions and omissions occurred because of malice, an evil motive, recklessness, or a callous indifference to federally protected rights;

d. whether a significant disparity exists between the available labor pool and the proportion of minorities hired as Brand Representative; and

e. whether Abercrombie's facially neutral hiring criteria is a cause of the statistical disparity.

30. The claims of Brandy Hawk are typical of the claims of the absent members of the proposed Class. Ms. Hawk has been injured as a result of Abercrombie's fa-

cially neutral policies which, as applied, maintain a disproportionately white sales force.

31. As Named Plaintiff, Brandy Hawk will fairly and adequately protect the interests of the proposed Class. She has no conflict of interest with the members of the proposed Class and she is represented by counsel who are both competent and experienced in complex class action litigation and employment discrimination litigation.

32. Abercrombie's discriminatory hiring and assignment policies and practices are not based on grounds peculiar to any individual Plaintiff or Class member, but rather on grounds, including race and national origin, generally applicable to all of the members of the proposed Class, thereby making appropriate final equitable relief, and monetary relief in the form of compensatory and punitive damages, with respect to the proposed Class as a whole.

33. Because Abercrombie's conduct with respect to Class members is based on race and/or ethnicity, rather than on any individual characteristics of its employees and job applicants, the questions of law and fact common to the compensatory damages claims of the proposed Class predominate over any questions affecting only individual Class members. For this and other reasons, certification of the proposed Class is superior to other available methods for the fair and efficient adjudication of the controversy.

34. The proposed Class may be certified as a nationwide Class under Rules 23(b)(2) and/or (b)(3), as appropriate.

UNCOVERING DISCRIMINATION

35. Jeffrey Campbell, Jr. was employed by Abercrombie at the Cherry Hill Mall as a Security Supervisor from on or about April 6, 2003 until June 24, 2003, the date of his unlawful and retaliatory termination.

36. Prior to his termination, Campbell observed a regular flow of persons entering the store, seeking employment. Campbell also observed Brand Representatives recruiting potential employees from the sales floor. A majority of applicants were minorities, but virtually no minorities were hired to work on the sales floor.

37. Campbell's security position also required that he travel to other stores in the district. In each of the five Abercrombie stores he visited, King of Prussia, Oxford Valley, Lehigh Valley and Willow Grove, Campbell also noted the absence of minority Brand Representatives.

38. During his discussions with managers and managers in training at the Cherry Hill Mall Abercrombie, Campbell learned that the Company's Human Resources department encouraged store managers to employ only white Brand Representatives and that minorities who were hired as Brand Representatives would be at risk of losing

their job or their positions on the sales floor.

39. On or about May 12, 2003, in accordance with the policies set forth in the Company's Associate Handbook, Campbell registered an internal complaint with his Supervisor, John Caireiro ("Caireiro") about Abercrombie's hiring practices. The next day, May 13, Campbell filed a formal written complaint with Abercrombie regarding its discriminatory practices. See Exhibit E.

40. In May of 2003, Campbell met with investigators from the Equal Employment Opportunity Commission ("EEOC") and reported the unlawful discrimination practices by Abercrombie. Campbell then informed Abercrombie that he had reported the unlawful conduct to the EEOC. Shortly thereafter, Campbell was fired.

ALLEGATIONS OF NAMED PLAINTIFF BRANDY HAWK

41. On or about May 7, 2003, Brandy Hawk submitted a written application for the position of Brand Representative at Abercrombie's Cherry Hill, New Jersey store. Ms. Hawk indicated that she was a full time college student, varsity athlete, possessed comparable retail experience, and was willing to work flexible hours.

42. Shortly thereafter, on or about May 10, 2003, Brandy Hawk was interviewed for the position by Keri Renfroe ("Renfroe"), Assistant Manager. During this interview, Renfroe informed Ms. Hawk that Renfroe would recommend Ms. Hawk for the position of Brand Representative. However, Abercrombie never hired Brandy Hawk.

43. Subsequently Ms. Hawk was informed that Renfroe's recommendation was rejected and Ms. Hawk was not hired because Renfroe's supervisor, Sherry Donchez, would not permit Ms. Hawk to work on the sales floor. Donchez further stated that Ms. Hawk did not have the "image" Abercrombie wanted to portray.

44. Upon information and belief, Abercrombie hired a white employee as opposed to hiring Ms. Hawk.

45. Brandy Hawk was denied employment with Abercrombie because she is African-American.

46. On July 17, 2003, Ms. Hawk registered her complaint with the Philadelphia office of the EEOC. See Exhibit B.

PLAINTIFFS' CLAIMS

The Civil Rights Act of 1866, 42 U.S.C. § 1981

47. Plaintiff restates and realleges paragraphs 1 - 46, inclusive, as though set forth here in full.

48. Abercrombie has discriminated against Plaintiffs, including absent members of the proposed Class, by denying them the rights enjoyed by white applicants and em-

ployees with respect to the terms and conditions of their employment relationship with Abercrombie and to the enjoyment of all benefits, privileges, terms and conditions of that relationship, in violation of the Civil Rights Act of 1866, [42 U.S.C. § 1981](#), as amended.

49. Abercrombie's conduct has been intentional, deliberate, willful and conducted in callous disregard of the rights of Plaintiffs.

50. By reason of Abercrombie's discrimination, Plaintiffs are entitled to all legal and equitable remedies available under [Section 1981](#), including but not limited to compensatory damages in an amount to be determined by the ultimate trier of fact but which exceed the jurisdictional threshold of this Court, interest, exemplary or punitive damages, attorneys fees, and the costs of this action.

NOTICE OF FUTURE CLAIMS FOR RELIEF:

Title VII Of The Civil Rights Act Of 1964, [42 U.S.C. § 2000E](#)

Disparate Treatment

51. Plaintiff restates and realleges paragraphs 1 - 50, inclusive, as though set forth here in full.

52. Abercrombie engaged in intentional and systematic discrimination against Plaintiff and all members of the proposed Class with respect to recruitment and hiring based upon race and national origin. There is no business necessity for a retail clothing chain to hire, fire and or otherwise deny employment opportunity to individuals on the basis of their race or their national origin. Intentional discrimination on this basis violates Title VII of the Civil Rights Act of 1964, [Title 42 U.S.C. § 2000e](#) et seq., as amended by the Civil Rights Act of 1991.

53. As a consequence of Abercrombie's intentional discriminatory actions, minority applicants and employees have been denied employment, resulting in the loss of past and future wages and other job benefits.

54. Abercrombie's conduct has been intentional, deliberate, willful and conducted in callous disregard of the rights of Plaintiffs.

55. By reason of Abercrombie's discrimination, Plaintiffs are entitled to all legal and equitable remedies available under [Section 2000e](#).

56. In light of the ongoing investigation of the administrative charges filed by Plaintiff and others, the EEOC has not yet issued a right to sue letter to Plaintiff Brandy Hawk. When the EEOC issues the letter, Plaintiff intends to amend this Complaint to assert a claim for relief under Title VII of the Civil Rights Act of 1964, [42 U.S.C. §§ 2000e](#), et seq.

Disparate Impact

57. Plaintiff restates and realleges paragraphs 1 - 56, inclusive, as though set forth here in full.

58. As applied, Abercrombie's facially neutral policies, such as its promotion of the "A&F Look," have a direct, adverse and disparate impact on minority sales applicants. The Company's policies are unvalidated, arbitrary and cannot be justified by business necessity. Any justification proffered for Defendants' policies would fail because less discriminatory alternatives exist that could address that necessity. This disparate impact is the consequence of unlawful discrimination and violates Title VII of the Civil Rights Act of 1964, [Title 42 U.S.C. § 2000e-2 et seq.](#), as amended by the Civil Rights Act of 1991.

59. As a consequence of Abercrombie's intentional discriminatory actions, minority applicants and employees have been denied employment, resulting in the loss of past and future wages and other job benefits.

60. Abercrombie's conduct has been reckless and conducted in callous disregard of the rights of Plaintiffs.

61. By reason of Abercrombie's discrimination, Plaintiffs are entitled to all legal and equitable remedies available under [Section 2000e](#).

62. In light of the ongoing investigation of the administrative charges filed by Plaintiffs and others, the EEOC has not yet issued a right to sue letter to Plaintiff Brandy Hawk. When the EEOC issues the letter, Plaintiff intends to amend this Complaint to assert a claim for relief under Title VII of the Civil Rights Act of 1964, as amended in 1991, [42 U.S.C. §§ 2000e](#), et seq.

JURY DEMAND

63. Plaintiff demands trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that the Court:

- a. certify this action as a class action on behalf of the proposed Class;
- b. designate Brandy Hawk as Representative Plaintiff for a Class of all persons who applied for a position as Brand Representative and were denied employment as a result of the race-based discriminatory practices of Abercrombie;
- d. designate counsel for Plaintiff Brandy Hawk as Class Counsel;
- e. adjudge, decree and declare the practices of Abercrombie complained of herein to be violative of the rights of Plaintiff and all members of the proposed Class;

f issue a permanent prohibitory injunction prohibiting Abercrombie and its officers, agents, employees, and successors from implementing the discriminatory policies and practices complained of herein;

g issue a permanent mandatory injunction requiring that Abercrombie adopt policies and practices that ensure equal treatment of employees and applicants of all races and national origins, and that reduce the opportunity for Abercrombie managers to violate the requirements of Title VII and [42 U.S.C. § 1981](#);

h. order Abercrombie to provide appropriate job relief to Plaintiff and Class members in the form of hiring or assignment for persons who should have been hired or considered for a position as "brand representative" and any other job relief determined to be appropriate;

i. enter judgment in favor of Plaintiffs against Abercrombie for all available remedies and damages under law and equity, including but not limited to back pay, front pay, and past and future mental anguish and pain and suffering in amounts to be determined at trial;

j. order Abercrombie to pay exemplary and punitive damages to Plaintiff and the Class in amounts to be determined at trial, commensurate with Abercrombie's ability to pay and to deter future conduct of this nature;

k. order Abercrombie to pay the attorneys' fees, costs and expenses and expert witness fees of Plaintiff associated with this action;

l. order Abercrombie to pay pre-judgment and post-judgment interest, as provided by law;

m. grant such other and further legal and equitable relief as may be found appropriate and as the Court may deem just or equitable; and

n. retain jurisdiction until such time as the Court is satisfied that Abercrombie has remedied the practices complained of herein and is determined to be in full compliance with the law.

Dated: November 19, 2003

Respectfully submitted,

—
Sidney L. Gold, Traci M. Greenberg (TG 0501), SIDNEY L. GOLD & ASSOCIATES, P.C.,
1835 Market Street, Suite 515, Philadelphia, PA 19103, (215) 569-1999

—
Joseph C. Kohn, Martin J. D'Urso (MD 6576), Hilary Cohen, Diana Liberto, KOHN,
SWIFT & GRAF, P.C., One South Broad Street, Suite 2100, Philadelphia, PA 19107,
(215) 238-1700

—
Bryan L. Clobes (BC 7273), Melody Forrester, Jeffrey D. Lerner, MILLER FAUCHER AND

CAFFERTY, One Logan Square, Suite 1700, Philadelphia, PA 19103, (215) 864-2800
Cleo Fields, RAINBOW/PUSH COALITION, 930 East 50th Street, Chicago, IL 60615,
(773) 373-3366

James F. Keller, Zachary Gottesman, GOTTESMAN & ASSOCIATES, 2121 URS Center, 36
East 7th Street, Cincinnati, Ohio 45202, (513) 651-2121
Attorneys for the Plaintiff and the Class

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