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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
2003 JAN -8 PM 1:14

SOUTHERN DISTRICT
OF ILLINOIS
LAURA A. BRIGGS
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Cause No. 1:02-cv-1632-JDT

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III. JURISDICTION AND VENUE

4. Jurisdiction is conferred on this Court in that this action is brought pursuant to Title VII and the Equal Pay Act.

5. Plaintiff was at all times relevant to this case an employee, as defined in Title VII and the Equal Pay Act.

6. Defendant is an employer, as defined in Title VII and the Equal Pay Act.

7. Plaintiff timely filed a charge of discrimination with the Equal Employment Opportunity Commission, claiming sex discrimination under Title VII and violations of the Equal Pay Act.

8. Plaintiff received a Notice of Right to Sue within ninety (90) days of the filing of this Complaint.

9. Venue properly lies within the Southern District of Indiana.

10. A written consent signed by the Plaintiff is attached to this Complaint, in compliance with 29 U.S.C. § 216(b).

IV. FACTUAL ALLEGATIONS

11. Plaintiff was a dispatcher for the Indianapolis Department of Public Works. Plaintiff began employment with Defendant on July 24, 1989 and continued in that employment until she resigned on August 16, 2001.

12. Plaintiff performed the same or substantially similar job duties and work hours as all other dispatchers. Defendant paid male dispatchers of similar experience more than Plaintiff and other female dispatchers for doing substantially similar work.

13. Defendant exhibited a pattern of discrimination by paying female dispatchers less

than similarly situated male dispatchers, who performed equal or substantially similar work at the same location. The pattern displays Defendant's intention to discriminate against female employees, including Plaintiff, based upon sex, in violation of Title VII and the Equal Pay Act.

14. Plaintiff suffered emotional distress as a result of Defendant's unlawful acts.

15. Plaintiff suffered economic damages as a result of Defendant's unlawful acts.

16. Defendant's actions were intentional, willful, malicious and were done in reckless disregard of Plaintiff's legal rights under Title VII and the Equal Pay Act.

V. RELIEF SOUGHT

WHEREFORE, Plaintiffs respectfully request that the Court enter judgment in their favor and award the following relief:

a. Damages in the amount of the difference between the wages actually received by the Plaintiffs and the wages paid to male employees for equal work within the meaning of the Equal Pay Act and interest thereon, together with an additional equal amount as liquidated damages as authorized by the Act;

b. Compensation for mental anguish, humiliation, physical pain, suffering and loss of the enjoyment of life suffered as a result of the Defendants' unlawful employment practices;

c. Compensatory damages, pursuant to Title VII;

d. Punitive damages, pursuant to Title VII;

e. Lost future earnings;

f. All costs and attorney fees incurred in litigating this action;

g. Pre- and post-judgment interest; and,

h. Any and all other legal and/or equitable relief to which Plaintiff is entitled.

DEMAND FOR JURY TRIAL

The Plaintiff, by counsel, respectfully requests a jury trial for all issues deemed so triable.

Respectfully submitted:



Amy Ficklin DeBrot (#17294-49)

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