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ORIGINAL

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

SEP 27 2000

JAMES R. LARSEN, CLERK
DEPUTY
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

10 EQUAL EMPLOYMENT OPPORTUNITY
11 COMMISSION,

12 Plaintiff,

13 v.

14 OCTON HOLDINGS INC.,
15 dba COMFORT INN VALLEY,

16 Defendant.

CS-00-0356-EFS

CIVIL ACTION NO.

COMPLAINT

JURY TRIAL DEMAND

NATURE OF THE ACTION

18 This is an action under Title VII of the Civil Rights Act of 1964, as amended (including the
19 1978 Pregnancy Discrimination Act amendments to Title VII), and Title I of the Civil Rights Act of
20 1991 to correct unlawful employment practices on the basis of sex and to provide appropriate relief
21 to Kerri Wallace and similarly situated female employees. The Equal Employment Opportunity
22 Commission alleges that Octon Holdings Inc., doing business as Comfort Inn Valley, terminated Ms.
23 Wallace and others similarly situated because of their sex and pregnancy. Plaintiff seeks monetary
24 and injunctive relief, including pecuniary and nonpecuniary compensatory damages.

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COMPLAINT - PAGE 2

1 Kerri Wallace and similarly situated employees of equal employment opportunities and otherwise
2 adversely affect their status as employees of Octon Holdings Inc. because of sex and pregnancy.

3 9. The unlawful employment practices complained of in paragraph 7 above were
4 intentional.

5 PRAYER FOR RELIEF

6 Wherefore, the Commission respectfully requests that this Court:

7 A. Grant a permanent injunction enjoining defendant, its officers, successors, agents,
8 assigns, and all persons in active concert or participation with it, from engaging in any other
9 employment practice which discriminates on the bases of sex and pregnancy.

10 B. Order defendant to institute and carry out policies, practices, and programs which
11 provide equal employment opportunities for all employees, and which eradicate the effects of its past
12 and present unlawful employment practices.

13 C. Order defendant to make whole Kerri Wallace and similarly situated female
14 employees by providing appropriate back pay with prejudgment interest, in amounts to be
15 determined at trial, and other affirmative relief necessary to eradicate the effects of its unlawful
16 employment practices.

17 D. Order defendant to make whole Kerri Wallace and similarly situated female
18 employees by providing compensation for past and future pecuniary losses resulting from the
19 unlawful employment practices described in paragraph 7 above, including past and future out-of-
20 pocket expenses, in amounts to be determined at trial.

21 E. Order defendant to make whole Kerri Wallace and similarly situated female
22 employees by providing compensation for past and future nonpecuniary losses resulting from the
23 unlawful practices complained of in paragraph 7 above, including without limitation emotional pain,
24 suffering, and loss of enjoyment of life, in amounts to be determined at trial.

25 F. Grant such further relief as the Court deems necessary and proper in the public
26 interest.

27 G. Award the Commission its costs of this action.

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DATED this 26th day of September, 2000.