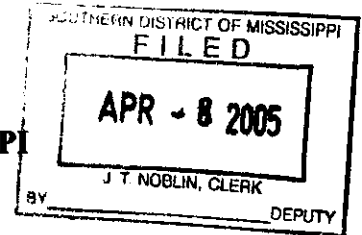


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**



**EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION**

PLAINTIFF

VS.

CIVIL ACTION NO. 3: 04 CV 793 WSU

**HANNON'S FOOD SERVICES OF JACKSON
INC., d/b/a KENTUCKY FRIED CHICKEN**

DEFENDANT

RENATA BICKHAM GIBSON

INTERVENOR

COMPLAINT OF INTERVENOR

JURY TRIAL REQUESTED

COMES NOW the Intervener, Renata Bickham Gibson, by and through counsel,
and files this complaint of Intervener as follows:

1. This complaint is directed against Defendant herein, Hannon's Food Services of Jackson, Inc., d/b/a Kentucky Fried Chicken and filed pursuant to §706(f)(1) of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-5(f)(1). At all relevant times, Defendant, Hannon's Food Services of Jackson, Inc., d/b/a Kentucky Fried Chicken is a Mississippi corporation doing business in the State of Mississippi and the City of Jackson with at least 15 (fifteen) employees. The Defendant may be served with this complaint pursuant to the provisions of the *Federal Rules of Civil Procedure*.

2. At all times relevant to the pending action, the Defendant has continuously been a Mississippi corporation doing business within the Jackson, Mississippi, and has continuously had at least 15 employees. At all relevant times, the Defendant has been an

employer engaged in an industry affecting commerce with the meaning of §701(b), (g) and (h) of Title VII , 42 U.S.C. §§ 2000e(b), (g) and (h).

3. The Intervenor, Renata Bickham Gibson, filed a charge of employment discrimination with the EEOC, the Plaintiff herein, against the Defendant on or around June 12, 2002, more than ninety days prior to the filing of this action. On September 29, 2004, the United States Equal Employment Opportunity Commission filed a lawsuit under Title VII of the Civil Rights Acts of 1964, as amended against Defendant, Hannon Food Services of Jackson, d/b/a KFC based upon the charge of discrimination filed by the Intervenor.

4. The Defendant has engaged in unlawful employment practices at its facility located at Highway 80 West, Jackson, Mississippi, in violation of § 703(a) (1) and §704(a) of title VII, 42 U.S.C. § 2000e-2(a)(1) and § 2000e-3(a), through the actions of its manager, Curtis Stringfellow.

5. Stringfellow sexually harassed the Intervenor, Renata Bickham Gibson, by making unwelcome sexual advances toward her, by touching her in inappropriate and offensive ways, by offering her enhanced employment opportunities if she would have sex with him, and by withholding benefits from her if she would not acquiesce in his demands.

6. The conduct of Mr. Stringfellow was sufficiently severe or pervasive to alter the terms and conditions of the employment of the Intervenor. The Intervenor suffered tangible job detriments, such as denials of transfers, reduction in hours of work, and termination.

7. On at least three occasions, the Intervener contacted the main office of the Defendant and complained about Mr. Stringfellow's conduct. During her third call to the main office of Defendant, she spoke with one of the Defendant's owners. The Intervener also complained to the assistant manager at the Defendant's facility where she worked. The Defendant knew that Mr. Stringfellow was sexually harassing the Intervener; yet, it refused to take any remedial action.

8. Soon after the third call, Mr. Stringfellow asked the Intervener to withdraw her complaint against him. She refused. Subsequently, the Intervener was terminated in retaliation for having opposed this conduct.

9. The Intervener has been deprived of equal employment opportunities and otherwise adversely affected with respect to her employment status because of her sex. Such actions on the part of the Defendant were intentional and were committed with malice.

10. As a direct result of the Defendant's actions, the Intervener sustained and suffered actual losses and is entitled to other compensatory damages for past and future pecuniary losses, including, but not limited to, direct financial losses, emotional pain, suffering, loss of enjoyment of life, and humiliation.

11. The conduct of the Defendant was so malicious and reckless so as to entitle the Intervener to recover attorney fees, litigation expenses and punitive damages in addition to actual compensatory damages herein.

WHEREFORE, PREMISES CONSIDERED, Intervener requests the following relief:

Award Renata Bickham Gibson her appropriate back pay with prejudgment interests;

Award Renata Bickham Gibson compensation for past and future pecuniary losses;

Award Renata Bickham Gibson compensation for past and future non-pecuniary losses; including, but not limited to, emotional pain and suffering, loss of enjoyment of life, and humiliation;

Award Renata Bickham Gibson her attorney fees and costs of court;

Renata Bickham Gibson requests all other relief appropriate in the premises.

DATED: April 8, 2005.

Respectfully submitted,

RENATA BICKHAM GIBSON

BY: 
ANGELA GRAY MARSHALL
HER ATTORNEY

Angela G. Marshall
MSB#100168
P.O. Box 6971
Jackson, MS 39282
(601) 346-4488