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4 IN THE SUPERIOR COURT OF THE STATE OF MAJOR
5 IN AND FOR THE COUNTY OF JAMNER
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7 RUFUS JONES,

8 Plaintiff,

9 v.

10 BRAHMIN PREPARATORY
11 SCHOOL,

12 Defendant.
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Cause No. 20XX - 2-99324

COMPLAINT FOR DAMAGES

14 COMES NOW the plaintiff and hereby asserts the following:

15 **I. PARTIES, JURISIDICITION AND VENUE**

16 1.1 At all times material herein, plaintiff Rufus Jones, an African
17 American, was a resident of Jamner County, Washington.

18 1.2 Defendant Brahmin Preparatory School is a Major corporation
19 and does business in Jamner County, Major.

20 1.3 Jurisdiction is proper for the claims alleged.

21 1.4 Venue for this action is proper in Jamner County Superior Court.

22 **II. FACTS REGARDING DEFENDANT AND ITS AGENTS**

23 2.1 Defendant is an employer as that term is defined under Major's
24 Law Against Discrimination.
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1 2.2 At all times material herein, Francis Winslow was the principal
2 of Brahmin Preparatory School, and is defendant's agent.

3 2.3 Francis Winslow is Caucasian.

4 **III. FACTS REGARDING PLAINTIFF RUFUS JONES**

5 3.1 Plaintiff was hired by defendant Brahmin Preparatory School in
6 April, 20XX-3 as a teacher in the History Department.

7 3.2 Plaintiff and defendant entered into a one-year employment
8 contract in or around April 28, 20XX-3, which has been renewed for a
9 subsequent one-year term.

10 3.3 During the time of plaintiff's employment with defendant school,
11 faculty administrators and staff of defendant have had meetings to discuss the
12 issue of defendant's failure to address diversity issues.

13 3.4 Specifically, many of these discussions focused on the retention
14 of faculty and the need to focus school resources on diversity related issues.

15 3.5 On April 15, 20XX-3, another teacher at defendant school, Robin
16 Peterson sent an e-mail to faculty and staff regarding her concern about the
17 alarming rate that faculty of color were leaving Brahmin Preparatory School,
18 calling for a community meeting.

19 3.6 Head Master Francis Winslow responded to Ms. Peterson's e-
20 mail, persuading her to call off this meeting.

21 3.7 Robin Peterson was not disciplined for the e-mail of April 15,
22 20XX-2.

23 3.8 At a faculty meeting on September 30, 20XX-2, plaintiff raised
24 his objection to the defendant's invitation to Walther von Stroheim to
25 campus to give an endowed lecture. Plaintiff reported his concerns about
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1 the invitation, stating that it was a serious setback to the defendant's diversity
2 efforts. Plaintiff told the audience about von Stroheim's offensive views.

3 3.9 A white male colleague then stood up, pointed at plaintiff and
4 spoke in an aggressive tone.

5 3.10 On October 10, 20XX-2, at Francis Winslow's direction, Vice-
6 Head MasterLynn Polonius confronted plaintiff in his office and "suggested"
7 that he apologize for his comments.

8 3.11 Prior to that time, defendant rescinded the invitation to
9 von Stroheim.

10 3.12 On October 21, 20XX-2, defendant took adverse action against
11 plaintiff placing him on probation for his refusal to apologize for his conduct
12 during the meeting of September 30, 20XX-2.

13 **IV. FIRST CAUSE OF ACTION BY PLAINTIFF – RACIAL HOSTILE WORK**
14 **ENVIRONMENT**

15 4.1 Plaintiffs re-allege paragraphs 1.1 through 3.12 above.

16 4.2 Defendant, by and through its employees and agents, created a
17 racially hostile work environment in violation of Major law.

18 4.3 The behavior to which plaintiff was subjected was unwelcome
19 and offensive, was because of his race, was severe and/or pervasive, affected
20 the terms and conditions of his employment in that it created a hostile work
21 environment, and is imputed to the defendant.

22 4.4 As a direct and proximate result of defendant's conduct, plaintiff
23 suffered damages to be proven at trial.
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