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10 GLORIA CORRAL

FILED
Los Angeles Superior Court

FEB 17 2009

John A. Clarke, Executive Officer/Clerk
By SHAUNYA WESLEY, Deputy

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF LOS ANGELES**

13 GLORIA CORRAL, an individual,

14 Plaintiff,

15 v.

16 TEAMSTERS JOINT COUNCIL NO. 42,
17 an unincorporated association;
18 JOINT COUNCIL OF TEAMSTERS NO.
19 42, INVESTMENT AND
20 CONSTRUCTION ASSOCIATION, INC.,
21 a California corporation;
22 JIM SANTANGELO, an individual
23 PAUL J. MIHALOW, an individual; and
24 DOES 1 through 100, inclusive,

25 Defendants.

Case No. BC405973

D-30

FIRST AMENDED COMPLAINT FOR DAMAGES FOR:

1. **SEXUAL HARASSMENT IN VIOLATION OF FEHA, CAL. GOV. CODE § 12900, et seq.**
2. **DISCRIMINATION BASED ON SEX IN VIOLATION OF FEHA, CAL. GOV. CODE § 12900, et seq.**
3. **FAILURE TO PREVENT SEXUAL HARASSMENT AND DISCRIMINATION IN VIOLATION OF FEHA, CAL. GOV. CODE § 12900, et seq.**
4. **RETALIATION IN VIOLATION OF FEHA, CAL. GOV. CODE § 12900, et seq.**
5. **WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY**
6. **DEFAMATION PER SE**

DEMAND FOR JURY TRIAL

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THE FELDMAN LAW FIRM
A PROFESSIONAL LAW CORPORATION

FILED IN THE COUNTY OF LOS ANGELES, CALIFORNIA, FEBRUARY 17, 2009, AT 10:00 AM.

1 Plaintiff GLORIA CORRAL alleges as follows on knowledge as to herself and her own
2 acts, and on information and belief as to all other matters:

3 **GENERAL ALLEGATIONS**

4 1. Plaintiff GLORIA CORRAL ("Plaintiff") is, and at all times herein mentioned
5 was, an adult individual residing in the County of Los Angeles, in the State of California who
6 was employed by Defendants TEAMSTERS JOINT COUNCIL NO. 42, JOINT COUNCIL OF
7 TEAMSTERS NO. 42, INVESTMENT AND CONSTRUCTION ASSOCIATION, INC., and
8 each of them, from May 1, 2006 through June 20, 2008, as a Secretary. Prior to her termination,
9 Plaintiff received all positive feedback regarding her work performance, including being told that
10 her work was "impeccable."
11

12 2. Plaintiff is informed, believes, and thereon alleges that Defendant TEAMSTERS
13 JOINT COUNCIL NO. 42 ("TEAMSTERS (JC 42)"), is, and at all relevant times herein
14 mentioned has been, an unincorporated association, conducting business in California, with its
15 principle place of business in the County of Los Angeles, in the State of California.
16

17 3. Plaintiff is informed, believes, and thereon alleges that Defendant JOINT
18 COUNCIL OF TEAMSTERS NO. 42, INVESTMENT AND CONSTRUCTION
19 ASSOCIATION, INC. ("JC 42 (I&C)"), is, and at all relevant times herein mentioned has been,
20 a corporation, incorporated under the laws of the State of California, conducting business in
21 California, with its principle place of business in the County of Los Angeles, in the State of
22 California.
23

24 4. Plaintiff is informed, believes, and thereon alleges that Defendant JIM
25 SANTANGELO ("SANTANGELO") is, and at all times herein was, an individual employed by
26 Defendants TEAMSTERS (JC 42), JC 42 (I&C), and each of them, as President, who resides,
27 and at all relevant times herein resided, in the County of Los Angeles, in the State of California.
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1 5. Plaintiff is informed, believes, and thereon alleges that Defendant PAUL J.
2 MIHALOW ("MIHALOW") is, and at all times herein was, an individual employed by
3 Defendants TEAMSTERS (JC 42), JC 42 (I&C), and each of them, as Assistant to the President,
4 who resides, and at all relevant times herein resided, in the County of Los Angeles, in the State
5 of California.

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7 6. Plaintiff is ignorant of the true names and capacities of defendants sued herein
8 under the fictitious names DOES 1 through 100, inclusive, and therefore sues these defendants
9 by such fictitious names. Plaintiff will seek leave of court to amend this complaint to allege their
10 true names and capacities when ascertained. Plaintiff is informed and believes and thereon
11 alleges that each of the fictitiously named defendants is responsible as hereinafter shown for the
12 occurrences and injuries to Plaintiff as herein alleged.

13
14 7. Plaintiff is informed, believes, and thereon alleges that, at all times herein
15 mentioned, Defendants, and each of them, were the agents of each and all of the other
16 defendants, and in doing the things hereinafter alleged, were acting in the course and scope of
17 such agency and with the permission and consent of their co-defendants.

18 8. Venue is proper under California Government Code Section 12965(b) and
19 California Code of Civil Procedure Section 395 in that Plaintiff's injuries were incurred within
20 this jurisdiction, and the acts giving rise to this action occurred, in whole or in substantial part, in
21 the County of Los Angeles, in the State of California. Sub-venue is also proper in the Central
22 District pursuant to Los Angeles Superior Court Local Rule 2.0(c).

23
24 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

25 9. Plaintiff exhausted her administrative remedies by filing a complaint against each
26 of the named defendants herein with the California Department of Fair Employment and
27 Housing ("DFEH") within one year from the date of Defendants' last adverse employment
28 action, and thereafter receiving "Right-to-Sue" letters from the DFEH.

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FIRST CAUSE OF ACTION
FOR SEXUAL HARASSMENT
IN VIOLATION OF THE FAIR EMPLOYMENT AND HOUSING ACT ("FEHA")
CAL. GOV. CODE § 12900, et seq.
(As Against All Defendants)

10. Plaintiff incorporates by this reference each and all of the allegations contained in paragraphs 1 through 9 of this complaint as fully as though set forth at length herein.

11. California Government Code Section 12940(j)(1) makes it an unlawful employment practice for an employer or any person "because of . . . sex . . . to harass an employee."

12. Plaintiff was continuously employed by Defendants TEAMSTERS (JC 42), JC 42 (I&C), and each of them, from May 1, 2006 through June 20, 2008, and at all relevant times herein.

13. Defendants TEAMSTERS (JC 42), JC 42 (I&C), and each of them, are "employers" within the meaning of California Government Code Section 12940(j)(4)(A), and are subject to FEHA as employers of one (1) or more persons.

14. At all relevant time herein, Defendants, SANTANGELO, MIHALOW, and each of them, were supervisors with immediate or successively higher authority over Plaintiff within the meaning of California Government Code Section 12926(r), who were employed by Defendants TEAMSTERS (JC 42), JC 42 (I&C), and each of them.

15. Defendants, SANTANGELO, MIHALOW, and each of them, are personally liable under FEHA for sexual harassment because they were supervisors of Defendants TEAMSTERS (JC 42), JC 42 (I&C), and each of them, within the meaning of California Government Code Section 12926(r), who harassed Plaintiff because of her sex.

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1 16. Defendants TEAMSTERS (JC 42), JC 42 (I&C), and each of them, are
2 vicariously and strictly liable under FEHA for sexual harassment of Plaintiff by Defendants,
3 SANTAGELO, MIHALOW, and each of them, because Defendants, SANTAGELO,
4 MIHALOW, and each of them, were supervisors of Defendants TEAMSTERS (JC 42), JC 42
5 (I&C), and each of them, within the meaning of California Government Code Section 12926(r).
6

7 17. Defendants, SANTAGELO, MIHALOW, and each of them, made unwanted
8 sexual advances toward Plaintiff and subjected her to unwanted verbal and/or physical conduct
9 of a sexual nature. Defendant SANTAGELO constantly subjected Plaintiff to unwanted verbal
10 and/or physical conduct of a sexual nature including, but not limited to, offering to give her a
11 raise in exchange for sex, repeatedly trying to kiss her on the mouth, showing and sending her
12 sexually explicit emails, commenting on her breasts, asking to come to her hotel room during a
13 business trip, suggesting he be her "sugar daddy" by telling her she needed someone with money
14 to "take care of" her by paying for her housing, car, and bills, telling her he had been purposely
15 driving past her house, asking her whether she believed he was attractive, wrongfully accusing
16 her of behaving inappropriately with other men, including accusing her of being "all over" a
17 trustee Plaintiff was merely speaking with, repeatedly asking her to have dinner with him, and
18 asking her to go away with him. Moreover, when Plaintiff rejected his advances,
19
20 SANTAGELO reacted by actively avoiding her, refusing to assign her work, and reminding
21 her that her employment was at-will for a period after she rejected him. Defendant MIHALOW
22 subjected Plaintiff to unwanted verbal and/or physical conduct of a sexual nature including, but
23 not limited to, constantly sending Plaintiff sexually explicit emails.
24

25 18. The harassing conduct was so severe and/or pervasive as to alter the conditions of
26 Plaintiff's employment and create a hostile and abusive work environment that affected tangible
27 aspects of her compensation, terms, conditions, and/or privileges of employment.
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1 19. The harassing conduct was so widespread and/or persistent that a reasonable
2 person in Plaintiff's circumstances would have considered the work environment to be hostile
3 and/or abusive, and Plaintiff in fact considered the work environment created by Defendants, and
4 each of them, to be hostile and/or abusive.

5 20. Plaintiff's continued employment was conditioned, by words and conduct, on
6 Plaintiff's acceptance of sexual advances and conduct by Defendants, and each of them. For
7 example, in or around March of 2008, Plaintiff requested a meeting with SANTANGELO to
8 discuss upcoming salary increases. SANTANGELO required Plaintiff discuss her request for a
9 raise over dinner at a hotel restaurant. At dinner, Plaintiff presented SANTANGELO with a list
10 of her duties and responsibilities and explained why she believed she was entitled to more than
11 the customary flat percentage raise. SANTANGELO would not even look at Plaintiff's list.
12 Instead, SANTANGELO responded by telling Plaintiff a story of a former employee who "got in
13 all kinds of trouble for messing around with his secretary" and commented, "I'd be an idiot if I
14 did anything like that." SANTANGELO then asked Plaintiff if she knew how aspiring actresses
15 get their jobs and suggested that they do so by "working on their backs." After dinner,
16 SANTANGELO proposed, "What if I said you can make \$700.00 a week more if all you did was
17 pass through those doors and go to a room with me?" motioning toward the hotel. Plaintiff
18 refused SANTANGELO's sexual advances. When SANTANGELO informed Plaintiff that she
19 would not receive the requested percentage increase, he told her she never get the increase no
20 matter how much work she did, how well she did it, or how fast she did it. Plaintiff knew then
21 that she would never get ahead at the Joint Counsel unless she accepted SANTANGELO's
22 sexual advances.

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26 21. Employment decisions, including denial of her requests for a raise and promotion,
27 and her termination, were made based on her acceptance and/or rejection of the above-described
28 sexual advances and conduct by Defendants, and each of them.

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1 22. At the time they engaged in the above-described sexual advances and conduct,
2 Defendants, SANTAGELO, MIHALOW, and each of them, were supervisors, within the
3 meaning of California Government Code Section 12926(r), of Defendants TEAMSTERS (JC
4 42), JC 42 (I&C), and each of them.

5 23. Defendants, and each of them, knew or should have known of the harassing
6 conduct by Defendants, SANTAGELO, MIHALOW, and each of them, and failed to take
7 immediate and appropriate corrective action.

8 24. As a direct and proximate result of the acts of Defendants, and each of them, as
9 alleged above, Plaintiff has suffered and will continue to suffer economic damages, including
10 lost wages and benefits, and other compensatory damages in an amount to be ascertained at the
11 time of trial.

12 25. As a further direct and proximate result of the acts of Defendants, and each of
13 them, as alleged above, Plaintiff has suffered mental, physical, and emotional distress, including
14 but not limited to high blood pressure, nausea, depression, humiliation, anxiety, nervousness,
15 sleeplessness, and has been generally damaged in an amount to be ascertained at the time of trial.

16 26. As a further direct and proximate result of the acts of Defendants, and each of
17 them, as alleged above, Plaintiff will necessarily continue to expend sums in the future for the
18 treatment of the emotional, physical, and mental injuries sustained by Plaintiff as a result of said
19 Defendants, and each of them, acts in an amount to be ascertained at the time of trial.

20 27. The above-described acts of Defendants, and each of them, were willful,
21 intentional and malicious and done with the intent to vex, injure and annoy Plaintiff and warrant
22 the imposition of exemplary and punitive damages in an amount sufficient to punish said
23 Defendants, and each of them, and to deter others from engaging in similar conduct. Defendants,
24 and each of them, authorized and ratified the wrongful acts of their agents and employees, knew
25 in advance that their agents and employees were likely to commit such acts and employed them
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1 with conscious disregard of the rights or safety of others, and/or their officers, director, or
2 managing agents were themselves guilty of oppression, fraud, and malice.

3 28. As a further direct and proximate result of the above-described acts of
4 Defendants, and each of them, Plaintiff has necessarily incurred attorney's fees and costs and,
5 pursuant to the provisions of California Government Code Section 12965(b), Plaintiff is entitled
6 to the reasonable value of such attorney's fees.
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8 **SECOND CAUSE OF ACTION**

9 **FOR DISCRIMINATION BASED ON SEX**

10 **IN VIOLATION OF THE FAIR EMPLOYMENT AND HOUSING ACT ("FEHA")**

11 **CAL. GOV. CODE § 12900, et seq.**

12 **(As Against Defendants TEAMSTERS (JC 42), JC 42 (I&C), and DOES 1-100, inclusive)**

13 29. Plaintiff incorporates by this reference each and all of the allegations contained in
14 paragraphs 1 through 28 of this complaint as fully as though set forth at length herein.
15

16 30. California Government Code Section 12940(a) makes it an unlawful employment
17 practice "[f]or an employer, because of the . . . sex . . . any person, to refuse to hire or employ the
18 person or to refuse to select the person for a training program leading to employment, or to bar or
19 to discharge the person from employment or from a training program leading to employment, or
20 to discriminate against the person in compensation or in terms, conditions, or privileges of
21 employment."
22

23 31. Plaintiff was continuously employed by Defendants TEAMSTERS (JC 42), JC 42
24 (I&C), and each of them, from May 1, 2006 through June 20, 2008, and at all relevant times
25 herein.

26 32. Defendants TEAMSTERS (JC 42), JC 42 (I&C), and each of them, are
27 "employers" within the meaning of California Government Code Section 12926(d), and are
28 subject to FEHA as employers of five (5) or more persons.

1 33. Defendants, and each of them, subjected Plaintiff to adverse employment action
2 that caused Plaintiff to suffer materially adverse changes in the terms, conditions, and/or
3 privileges of her employment, by refusing to promote Plaintiff, and by terminating her
4 employment, in whole or in part, because of her sex.

5 34. For example, Plaintiff applied for the position of office manager. Plaintiff wrote a
6 long letter to SANTANGELO outlining why she should be chosen for the position. When she
7 presented the letter to SANTANGELO, he chuckled, "the girls would eat you up" and shredded
8 the letter. Instead, SANTANGELO hired a man for the position. SANTANGELO said he hired
9 a man for the position because he did not "want to deal with the women anymore," referring to
10 the all female secretarial staff.

11 35. As a direct and proximate result of the acts of Defendants, and each of them, as
12 alleged above, Plaintiff has suffered and will continue to suffer economic damages, including
13 lost wages and benefits, and other compensatory damages in an amount to be ascertained at the
14 time of trial.

15 36. As a further direct and proximate result of the acts of Defendants, and each of
16 them, as alleged above, Plaintiff has suffered mental, physical, and emotional distress, including
17 but not limited to high blood pressure, nausea, depression, humiliation, anxiety, nervousness,
18 sleeplessness, and has been generally damaged in an amount to be ascertained at the time of trial.

19 37. As a further direct and proximate result of the acts of Defendants, and each of
20 them, as alleged above, Plaintiff will necessarily continue to expend sums in the future for the
21 treatment of the emotional, physical, and mental injuries sustained by Plaintiff as a result of said
22 Defendants, and each of them, acts in an amount to be ascertained at the time of trial.

23 38. The above-described acts of Defendants, and each of them, were willful,
24 intentional and malicious and done with the intent to vex, injure and annoy Plaintiff and warrant
25 the imposition of exemplary and punitive damages in an amount sufficient to punish said
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1 the imposition of exemplary and punitive damages in an amount sufficient to punish said
2 Defendants, and each of them, and to deter others from engaging in similar conduct. Defendants,
3 and each of them, authorized and ratified the wrongful acts of their agents and employees, knew
4 in advance that their agents and employees were likely to commit such acts and employed them
5 with conscious disregard of the rights or safety of others, and/or their officers, director, or
6 managing agents were themselves guilty of oppression, fraud, and malice.

7
8 50. As a further direct and proximate result of the above-described acts of
9 Defendants, and each of them, Plaintiff has necessarily incurred attorney's fees and costs and,
10 pursuant to the provisions of California Government Code Section 12965(b), Plaintiff is entitled
11 to the reasonable value of such attorney's fees.

12 **FOURTH CAUSE OF ACTION**

13 **FOR RETALIATION**

14 **IN VIOLATION OF THE FAIR EMPLOYMENT AND HOUSING ACT ("FEHA")**

15 **CAL. GOV. CODE § 12900, et seq.**

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17 **(As Against Defendants TEAMSTERS (JC 42), JC 42 (I&C), and DOES 1-100, inclusive)**

18 51. Plaintiff incorporates by this reference each and all of the allegations contained in
19 paragraphs 1 through 50 of this complaint as fully as though set forth at length herein.

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21 52. California Government Code Section 12940(h) provides that it is an unlawful
22 employment practice "[f]or any employer, labor organization, employment agency, or person to
23 discharge, expel, or otherwise discriminate against any person because the person has opposed
24 any practices forbidden under this part or because the person has filed a complaint, testified, or
25 assisted in any proceeding under [FEHA]."

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27 53. Plaintiff was continuously employed by Defendants TEAMSTERS (JC 42), JC 42
28 (I&C), and each of them, from May 1, 2006 through June 20, 2008, and at all relevant times
herein.

1 54. Defendants TEAMSTERS (JC 42), JC 42 (I&C), and each of them, are
2 “employers” within the meaning of California Government Code Section 12926(d), and are
3 subject to FEHA as employers of five (5) or more persons.

4 55. Plaintiff exercised her rights under FEHA and engaged in legally protected
5 activity by complaining about sexual harassment and discrimination in the workplace to
6 management of Defendants TEAMSTERS (JC 42), JC 42 (I&C), and each of them.

7 56. Defendants, and each of them, terminated Plaintiff, in whole or in part, in
8 retaliation for Plaintiff’s exercise of rights guaranteed under the FEHA, as described above.

9 57. As a direct and proximate result of the acts of Defendants, and each of them, as
10 alleged above, Plaintiff has suffered and will continue to suffer economic damages, including
11 lost wages and benefits, and other compensatory damages in an amount to be ascertained at the
12 time of trial.

13 58. As a further direct and proximate result of the acts of Defendants, and each of
14 them, as alleged above, Plaintiff has suffered mental, physical, and emotional distress, including
15 but not limited to high blood pressure, nausea, depression, humiliation, anxiety, nervousness,
16 sleeplessness, and has been generally damaged in an amount to be ascertained at the time of trial.

17 59. As a further direct and proximate result of the acts of Defendants, and each of
18 them, as alleged above, Plaintiff will necessarily continue to expend sums in the future for the
19 treatment of the emotional, physical, and mental injuries sustained by Plaintiff as a result of said
20 Defendants, and each of them, acts in an amount to be ascertained at the time of trial.

21 60. The above-described acts of Defendants, and each of them, were willful,
22 intentional and malicious and done with the intent to vex, injure and annoy Plaintiff and warrant
23 the imposition of exemplary and punitive damages in an amount sufficient to punish said
24 Defendants, and each of them, and to deter others from engaging in similar conduct. Defendants,
25 and each of them, authorized and ratified the wrongful acts of their agents and employees, knew
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1 in advance that their agents and employees were likely to commit such acts and employed them
2 with conscious disregard of the rights or safety of others, and/or their officers, director, or
3 managing agents were themselves guilty of oppression, fraud, and malice.

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5 61. As a further direct and proximate result of the above-described acts of
6 Defendants, and each of them, Plaintiff has necessarily incurred attorney's fees and costs and,
7 pursuant to the provisions of California Government Code Section 12965(b), Plaintiff is entitled
8 to the reasonable value of such attorney's fees.

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10 **FIFTH CAUSE OF ACTION**

11 **FOR WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY**

12 **(As Against Defendants TEAMSTERS (JC 42), JC 42 (I&C), and DOES 1-100, inclusive)**

13 62. Plaintiff incorporates by this reference each and all of the allegations contained in
14 paragraphs 1 through 61 of this complaint as fully as though set forth at length herein.

15 63. Plaintiff was terminated on June 20, 2008 by Defendants, and each of them,
16 because of her sex and for complaining about sexual harassment and discrimination.

17 64. Plaintiff's termination by Defendants, and each of them, as described above, was
18 against the public policy of the State of California as evidenced by Article 1, Section 1 of the
19 California Constitution, as well as the enactment of the California Fair Employment and Housing
20 Act (Cal. Gov. Code § 12940 et seq.).

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22 65. As a direct and proximate result of the acts of Defendants, and each of them, as
23 alleged above, Plaintiff has suffered and will continue to suffer economic damages, including
24 lost wages and benefits, and other compensatory damages in an amount to be ascertained at the
25 time of trial.

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1 66. As a further direct and proximate result of the acts of Defendants, and each of
2 them, as alleged above, Plaintiff has suffered mental, physical, and emotional distress, including
3 but not limited to high blood pressure, nausea, depression, humiliation, anxiety, nervousness,
4 sleeplessness, and has been generally damaged in an amount to be ascertained at the time of trial.
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6 67. As a further direct and proximate result of the acts of Defendants, and each of
7 them, as alleged above, Plaintiff will necessarily continue to expend sums in the future for the
8 treatment of the emotional, physical, and mental injuries sustained by Plaintiff as a result of said
9 Defendants, and each of them, acts in an amount to be ascertained at the time of trial.

10 68. The above-described acts of Defendants, and each of them, were willful,
11 intentional and malicious and done with the intent to vex, injure and annoy Plaintiff and warrant
12 the imposition of exemplary and punitive damages in an amount sufficient to punish said
13 Defendants, and each of them, and to deter others from engaging in similar conduct. Defendants,
14 and each of them, authorized and ratified the wrongful acts of their agents and employees, knew
15 in advance that their agents and employees were likely to commit such acts and employed them
16 with conscious disregard of the rights or safety of others, and/or their officers, director, or
17 managing agents were themselves guilty of oppression, fraud, and malice.
18

19 69. As a further direct and proximate result of the above-described acts of
20 Defendants, and each of them, Plaintiff has necessarily incurred attorney's fees and costs and,
21 pursuant to the provisions of California Government Code Section 12965(b), Plaintiff is entitled
22 to the reasonable value of such attorney's fees.
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SIXTH CAUSE OF ACTION

FOR DEFAMATION PER SE

(As Against All Defendants)

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5 70. Plaintiff incorporates by this reference each and all of the allegations contained in
6 paragraphs 1 through 69 of this complaint as fully as though set forth at length herein.

7 71. Defendants, and each of them, made false statements of fact which tend directly
8 to injure Plaintiff in her occupation, profession, and reputation to persons other than Plaintiff.
9 Defendants, and each of them, made false negative statements about Plaintiff to at least one
10 prospective employer to which Plaintiff applied for employment following her termination.
11 These statements by Defendants, and each of them, not only damaged Plaintiff's reputation, but
12 also tend directly to injure Plaintiff in respect to her occupation by imputing to her general
13 disqualification in those areas which her occupation and/or other occupations generally require.
14

15 72. The persons to whom Defendants, and each of them, published the above-
16 described statements reasonably understood that the statements were about Plaintiff and
17 reasonably understood the statements as impugning to her general disqualification in those areas
18 which her occupation and/or other occupations generally require. Such statements made re-
19 employment of Plaintiff more difficult.

20 73. Defendants, and each of them, made the above-described statements knowing
21 them to be false and with malice, hatred, and ill will toward Plaintiff.
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23 74. The above-described statements were made by agents and/or employees of
24 Defendants, and each of them, in the course and scope of their employment, and Defendants, and
25 each of them, knew of and ratified said conduct.

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1 75. As a direct and proximate result of the acts of Defendants, and each of them, as
2 alleged above, Plaintiff has suffered and will continue to suffer economic damages, including
3 lost wages and benefits, and other compensatory damages in an amount to be ascertained at the
4 time of trial.

5 76. As a further direct and proximate result of the acts of Defendants, and each of
6 them, as alleged above, Plaintiff has suffered mental, physical, and emotional distress, including
7 but not limited to high blood pressure, nausea, depression, humiliation, anxiety, nervousness,
8 sleeplessness, and has been generally damaged in an amount to be ascertained at the time of trial.

9 77. As a further direct and proximate result of the acts of Defendants, and each of
10 them, as alleged above, Plaintiff will necessarily continue to expend sums in the future for the
11 treatment of the emotional, physical, and mental injuries sustained by Plaintiff as a result of said
12 Defendants, and each of them, acts in an amount to be ascertained at the time of trial.

13 78. The above-described acts of Defendants, and each of them, were willful,
14 intentional and malicious and done with the intent to vex, injure and annoy Plaintiff and warrant
15 the imposition of exemplary and punitive damages in an amount sufficient to punish said
16 Defendants, and each of them, and to deter others from engaging in similar conduct. Defendants,
17 and each of them, authorized and ratified the wrongful acts of their agents and employees, knew
18 in advance that their agents and employees were likely to commit such acts and employed them
19 with conscious disregard of the rights or safety of others, and/or their officers, director, or
20 managing agents were themselves guilty of oppression, fraud, and malice.

21 79. As a further direct and proximate result of the above-described acts of
22 Defendants, and each of them, Plaintiff has necessarily incurred attorney's fees and costs and
23 Plaintiff is entitled to the reasonable value of such attorney's fees to the extent provided by law.

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WHEREFORE, Plaintiff prays judgment as against all Defendants, and each of them, as follows:

1. For compensatory damages against all Defendants, and each of them, according to proof;
2. For special damages against all Defendants, and each of them, according to proof;
3. For general damages against all Defendants, and each of them, according to proof;
4. For an award of attorney's fees, in an amount the court determines to be reasonable, as authorized by the provisions of California Government Code Section 12965(b), or as otherwise provided by law; and
5. For exemplary and punitive damages according to proof.

Dated: February 16, 2009

THE FELDMAN LAW FIRM
A Professional Corporation

By: 

RAVEN W. SARNOFF
Attorneys for Plaintiff
GLORIA CORRAL

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DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury as to all issues so triable.

Dated: February 16, 2009

THE FELDMAN LAW FIRM
A Professional Corporation

By: 

RAVEN W. SARNOFF
Attorneys for Plaintiff
GLORIA CORRAL

THE FELDMAN LAW FIRM
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