

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHRISTIE VAN, CHARMELLA)	
LEVIEGE, MARIA PRICE, HELEN)	Case No. 14-CV-08708
ALLEN, JACQUELINE BARRON,)	
THERESA BOSAN, SHRANDA)	JUDGE SHARON JOHNSON COLEMAN
CAMPBELL, KETURAH CARTER,)	
MICHELLE DAHN, TONYA EXUM,)	Jury Trial Demanded
JEANNETTE GARDNER, ARLENE)	
GOFORTH, CHRISTINE HARRIS,)	
ORISSA HENRY, LAWANDA JORDAN,)	
DANIELLE KUDIRKA, TERRI LEWIS-)	
BLEDSON, CONSTANCE MADISON,)	
CEPHANI MILLER, MIYOSHI)	
MORRIS, STEPHANIE SZOT,)	
SHIRLEY THOMAS-MOORE, ROSE)	
THOMAS, TONI WILLIAMS,)	
BERNADETTE CLYBURN, MARTHA)	
CORBIN, ANGELA GLENN,)	
LADWYNA HOOVER, OGERY)	
LEDBETTER, LATRICIA SHANKLIN,)	
ANTOINETTE SULLIVAN, DERRICKA)	
THOMAS, and NICHEA WALLS, each)	
individually and on behalf of similarly)	
situated persons,)	
)	
Plaintiffs,)	
)	
v.)	
)	
FORD MOTOR COMPANY,)	
)	
Defendant.)	

**FIRST AMENDED CLASS ACTION COMPLAINT FOR
INJUNCTIVE, MONETARY AND CLASS WIDE RELIEF**

INTRODUCTION

The Plaintiffs, Christie Van, Charmella Leviege, Maria Price, Helen Allen, Jacqueline Barron, Theresa Bosan, Shranda Campbell, Keturah Carter, Michelle Dahn, Tonya Exum, Jeannette Gardner, Arlene Goforth, Christine Harris, Orissa Henry, Lawanda Jordan, Danielle Kudirka, Terri Lewis-Bledsoe, Constance Madison, Cephani Miller, Miyoshi Morris, Stephanie Szot, Shirley Thomas-Moore, Rose Thomas, Toni Williams, Bernadette Clyburn, Martha Corbin, Angela Glenn, LaDwynna Hoover, Ogery Ledbetter, Latricia Shanklin, Antoinette Sullivan, Derricka Thomas, and Nichea Walls (hereafter, the “Named Plaintiffs”), each individually and on behalf of persons similarly situated, complain against the Defendant, Ford Motor Company as follows:

1. This is a proceeding for declaratory and injunctive relief and damages to redress the deprivation of Plaintiffs’ and Plaintiff’s similarly situated individuals’ civil rights under Title VII of the Civil Rights Act of 1964, as amended (42 U.S.C. § 2000e *et seq.*) (“Title VII”), under 42 U.S.C. § 1981 (“Section 1981”), under the Americans with Disabilities Act, as amended (42 U.S.C. §12101) (“ADA”), and for state law causes of action.

JURISDICTION AND VENUE

2. Jurisdiction over the Plaintiffs’ federal law claims exists pursuant to 28 U.S.C. § 1331 as these claims involve Federal Questions under Title VII (42 U.S.C. § 2000e-5), and Section 1981 (42 U.S.C. § 1981 and §1981a), and the ADA (29 U.S.C. §12101).

3. This Court also has Supplemental Jurisdiction pursuant to 28 U.S.C. § 1367 over the Plaintiffs’ state law claims which arise out of the same nucleus of operative fact giving rise to the federal law claims.

4. Defendant Ford Motor Company operates at least two facilities in the Chicago area.

5. Ford's Chicago Assembly Plant is located at 12600 South Torrence Avenue in Chicago, Illinois and in this judicial district.

6. Ford's Chicago Stamping Plant is located at 1000 E. Lincoln Hwy in Chicago Heights, Illinois and in this judicial district.

7. All of the named plaintiffs and putative class members were employed at either Ford's Chicago Assembly Plant or its Chicago Stamping plant or both between January 1, 2012 and the present.

8. Ford is an "employer" within the meaning of Title VII (42 U.S.C. § 2000e-(b)), and the ADA (42 U.S.C. § 12111).

9. Ford is engaged in an "industry affecting commerce" as that phrase is used in Title VII.

10. Ford employs more than 4,000 employees at its Chicago Assembly Plant and more than 800 employees at its Chicago Stamping plant.

11. The Court has jurisdiction over the parties and the subject matter.

12. Venue is appropriate in the Northern District of Illinois pursuant to 28 U.S.C. § 1391(b) as the unlawful employment practices stated herein were, in whole or in part, committed within the Northern District of Illinois.

13. Venue further lies within this judicial district under 28 U.S.C. § 1391(c), since Defendant Ford Motor Company does business in this judicial district -- Ford operates at

least three (3) plants including the Chicago Assembly Plant and Stamping Plant in this judicial district.

THE PARTIES

14. Each of the thirty-three (33) Named Plaintiffs are or were employed by Defendant at its Assembly Plant or Stamping Plant in this judicial district and most reside here as well.

15. The putative members of the plaintiff class all live or work (or previously worked) for Ford within this judicial district at Ford's Assembly Plant or Stamping Plant.

EEOC CHARGES

16. Each of the following Named Plaintiffs timely filed written charges with the EEOC asserting employment discrimination, sexual harassment and retaliation: Christie Van (Ex. 1(A)), Charmella Leviege (Ex. 2(A)), Maria Price (Ex. 3(A)), Helen Allen (Ex. 4(A)), Jacqueline Barron (Ex. 5(A)), Theresa Bosan (Ex. 6(A)), Shrandia Campbell (Ex. 7(A)), Keturah Carter (Ex. 8(A)), Michelle Dahn, (Ex. 9(A)), Tonya Exum (Ex. 10(A)), Jeannette Gardner (Ex. 11(A)), Arlene Goforth (Ex. 12(A)), Christine Harris (Ex. 13(A)), Orissa Henry (Ex. 14(A)), Lawanda Jordan (Ex. 15(A)), Danielle Kudirka (Ex. 16(A)), Terri Lewis-Bledsoe (Ex. 17(A)), Constance Madison (Ex. 18(A)), Cephani Miller (19(A)), Miyoshi Morris (Ex. 20(A)), Stephanie Szot (Ex. 21(A)), Shirley Thomas-Moore (Ex. 22(A)), Rose Thomas (Ex. 23(A)) and Toni Williams (Ex. 24(A)).

17. The EEOC issued Notices of Right to Sue to these Named Plaintiffs. (The Notices of Right to Sue are attached as Exhibits 1(B)-24(B)).

18. Each of these Named Plaintiffs' claims are timely filed in federal court within ninety (90) days of their receipt of their Right to Sue Letters.

19. This Complaint alleges acts of unlawful harassment and discrimination occurring between February 14, 2012 and the present (hereafter, the "Relevant Time Period"), however, Antoinette Sullivan only seeks redress for acts which occurred subsequent to July 11, 2012.

**THE EEOC DETERMINED THAT NAMED PLAINTIFFS ARE MEMBERS
OF A CLASS OF WOMEN WHO WERE SEXUALLY HARASSED
AND WHO WERE UNLAWFULLY DISCRIMINATED AGAINST**

20. The EEOC conducted an investigation of Ford's Chicago Assembly Plant and its Chicago Stamping Plant based on the Charges of Discrimination (Ex's. 1(A)-24(A)) filed by the Named Plaintiffs.

21. After its investigation, the EEOC concluded that several of the Named Plaintiffs were members of a Class of women who were sexually harassed and were subjected to gender discrimination and/or race discrimination.

22. The EEOC issued a Determination for Named Plaintiff Christie Van who worked at Ford's Chicago Assembly Plant finding:

The Charging Party alleged that she and a Class of employees were discriminated against based on their sex, female, in that they were subjected to sexual harassment and gender based harassment and that they were further harassed and subjected to different terms and conditions of employment in retaliation for engaging in protected activity, in violation of Title VII.

The Charging Party further alleged that she and a Class of employees were discriminated against based on their race, Black, in that they were subjected to racial harassment and that they were further harassed and subjected to different terms and conditions of employment in retaliation for engaging in protected activity, in violation of Title VII.

* * *

I have determined that the evidence obtained in the investigation establishes reasonable cause to believe that Respondent discriminated against Charging Party and a Class of employees based on their sex, female, in that they were subjected to sexual harassment and gender based harassment, in violation of Title VII.

I have further determined that the evidence obtained in the investigation establishes reasonable cause to believe that Respondent discriminated against Charging Party and a Class of employees based on their race, Black, in that they were subjected to racial harassment, in violation of Title VII.

(Ex. 1(C)).

23. The EEOC has made similar Determinations for Plaintiffs who also work at the Ford Chicago Assembly Plant including Named Plaintiffs Leviege (Ex. 2(C)), Price (Ex. 3(C)), Allen (Ex. 4(C)), Barron (Ex. 5(C)), Carter (Ex. 8(C)), Dahn (Ex. 9(C)), Gardner (Ex. 11(C)), Lewis-Bledsoe (Ex. 17(C)), Miller (Ex. 19(C)), and Williams (Ex. 24(C)).

24. The EEOC issued a Determination for Named Plaintiff Shranda Campbell who worked at Ford's Chicago Stamping Plant finding:

The Charging Party alleged that she was discriminated against based on her sex, female, in that she was subjected to sexual harassment and that she was further harassed and subjected to different terms and conditions of employment in retaliation for engaging in protected activity, in violation of Title VII.

I have determined that the evidence obtained in the investigation establishes reasonable cause to believe that Respondent discriminated against Charging Party and a Class of employees based on their sex, female, in that they were subjected to sexual harassment and gender based harassment, in violation of Title VII.

(Ex. 7(C)).

25. The EEOC has made similar Determinations for Named Plaintiff Tonya Exum who also works at the Ford Chicago Stamping plant. (Ex. 10(C)).

OTHER NAMED PLAINTIFFS

26. Plaintiffs Bernadette Clyburn, Martha Corbin, Angela Glenn, LaDwyna Hoover, Ogery Ledbetter, Latricia Shanklin, Antoinette Sullivan, Derricka Thomas and Nichea Walls also worked for Ford at the Chicago Assembly and/or Stamping Plants.

27. Plaintiffs Clyburn, Corbin, Glenn, Hoover, Ledbetter, Shanklin, Sullivan, Derricka Thomas and Walls also experienced gender discrimination, sexual harassment and/or a hostile working environment during the Relevant Time Period of the type and nature which Van, Barron, Campbell and the rest of the Named Plaintiffs complained about to the EEOC.

28. From 2012 to present, the EEOC received more than two dozen charges of unlawful sexual harassment, gender discrimination, race discrimination and retaliation against Ford based on conduct occurring at Ford's Chicago Assembly and Stamping plants.

29. Plaintiffs Clyburn, Corbin, Glenn, Hoover, Ledbetter, Shanklin, Sullivan, Derricka Thomas and Walls are each members of the Class of women described by the EEOC in its Determinations. (See, e.g., Ex. 1(C)).

30. Given that dozens of charges of sexual harassment, gender discrimination and race discrimination were filed and were or are pending at the EEOC, Ford and the EEOC was adequately apprised that an ongoing pattern and practice of sexual

harassment, gender discrimination and race discrimination was taking place at the Ford Chicago Assembly Plant and Stamping Plant.

31. Ford chose not to conciliate any of the EEOC Determinations issued. (See, Ex's. 1(C)-5(C), 7(C)-11(C), 17(C), 19(C) and 24(C)).

32. Because Plaintiffs Clyburn, Corbin, Glenn, Hoover, Ledbetter, Shanklin, Sullivan, Derricka Thomas and Walls allege unlawful harassment and discrimination that are substantially similar to those of the dozens of other women who are Named Plaintiffs who timely filed EEOC Charges, these Plaintiffs are eligible to file their claims in this matter under the "single filing" or "piggybacking" rule.

33. Plaintiffs Clyburn, Corbin, Glenn, Hoover, Ledbetter, Shanklin, Sullivan, Derricka Thomas and Walls hereby piggyback their claims in this lawsuit with those of the above Named Plaintiffs who filed timely file charges with the EEOC.

34. It would be futile to require Plaintiffs Clyburn, Corbin, Glenn, Hoover, Ledbetter, Shanklin, Sullivan, Derricka Thomas and Walls and all women who experienced sexual harassment and gender or racial discrimination at Ford from 2012-present to file EEOC charges.

35. Named Plaintiff Christie Van currently works at the Stamping Plant.

36. Based on the single filing rule/piggybacking rule, the prior Charges filed by the Named Plaintiffs and the EEOC Determinations issued for Named Plaintiffs Exum and Campbell (Ex's. 7(C) and 8(C)), Named Plaintiff Christie Van is able to claim harassment and discrimination based on acts occurring while she has been working at the Ford Chicago Stamping Plant without the need to file additional EEOC Charges.

37. It would be futile to require Van to file an additional Charge to allege acts occurring while she was working at the Stamping Plant.

PRIOR DISCRIMINATION AND SEXUAL HARASSMENT AT FORD

38. Prior to this lawsuit, at least nine people sued Ford for sexual harassment, sex discrimination, race discrimination, assault, battery intentional infliction of emotional distress and negligent retention in *Rivera v. Ford Motor Company*, No. 95-CV-2990 in the United States District Court for the Northern District of Illinois.

39. In 1997, a total of 14 women filed a Class action lawsuit against Ford Motor Company in a case known as *Warnell v. Ford Motor Company*, No. 98-CV-1503 in the United States District Court for the Northern District of Illinois.

40. In 1999, the EEOC attempted to reach a settlement with Ford requiring Ford to pay \$17.5 million toward training and to create a fund to compensate victims. The EEOC Conciliation Agreement also subjected Ford to workplace monitoring for a period of 3 years.

41. The EEOC investigated Ford's Stamping and Assembly Plants in 1994-1995 and again in 1998. As a result of those investigations, the EEOC issued findings in the form of a Determination which states:

I have determined that the evidence obtained in the investigation establishes reasonable cause to believe that a Class of female employees at Ford's Chicago area manufacturing facilities, including the Charging Party, has been subjected to sexual harassment by managers and non-managers. The women have been called sexually degrading names such as bitches, whores and offensive references to female genitalia, as well as being subjected to Plaintiff's profanity. They have been physically touched, grabbed and groped, and have had body parts massaged without their consent. They have had to endure sexual comments and innuendos including suggestive references to female body parts and their functions. In addition, the women

have been subjected to sexually explicit graffiti, including drawings of male and female genitalia with sexual terms and, at times, references to specific named women throughout the facilities. The presence of Plaintiff's pornographic materials such as calendars and Plaintiff's pictures of nude women also contributes to the hostile and sexually offensive environment.

42. The EEOC also found Ford sexually harassed and discriminated against a Class of females on at least eight (8) occasions including in connection with Charges of Discrimination filed by Michelle Sheets, Traci Graham, Rebecca Curwick, Juanita Rivera, Veronica Kuznieski, Jeannette Jones, Wilynthia Wiseman and Mary Ann Allegria.

43. Ford is a recidivist offender that has willfully ignored the issues and evidence raised in prior litigation and EEOC findings and has failed to take measures to eradicate known discrimination and harassment from the workplace.

44. Ford knowingly allowed sexual harassers, molesters and sex offenders to remain in the workplace and repeat heinous acts of sexual harassment on Ford's female employees.

45. Ford engaged in a pattern and practice of discrimination, harassment and retaliation, and the Plaintiffs have been subjected to harassment, discrimination and a hostile working environment including, but not limited to:

- a. Sexual assault and attempted rape;
- b. Unwelcomed and unwanted sexual advances;
- c. Requests for sexual favors;
- d. Unwanted and unwelcomed touching and groping;
- e. Being subjected to jeers, lewd comments, sexual suggestions, cat-calls and the like;

- f. Being stared at by male employees who were focused on certain parts of plaintiff's body and/or "elevator eyes";
- g. Being subjected to comments or offers of sexual contact or males telling Plaintiff what they could or would like to do to Plaintiff (and other women);
- h. Being subjected to men exposing their genitals and/or showing pictures of their genitals;
- i. Being subjected to men sharing or displaying pornographic images in the workplace;
- j. Graffiti in the workplace;
- k. By being ridiculed for having complained and/or being admonished not to complain in the future and/or not to use the harassment hotline;
- l. Female employees are referred to as "bitches," "hoes," "whores," "sluts" and "dogs" on an ongoing basis;
- m. Sexually offensive graffiti is painted on the walls in the plants and defendants did not take effective corrective action;
- n. Male employees also place sexually offensive graffiti about female employees in the men's bathrooms;
- o. Male employees routinely undress in full view of female employees at various areas of the plant;
- p. Male employees fail to properly button their uniforms such that their pubic hair is exposed;
- q. Male employees would routinely stare at female employees in a sexually offensive manner;
- r. Male employees would routinely make crude and lewd comments directed at female employees, such as "Are you cold? I can tell that you are cold by looking at your nipples."
- s. Female employees are sometimes exposed to condoms thrown into their work areas or tool boxes;

- t. Female employees are subjected to whistles, offensive touching, gazing and comments such as “what color are your underclothes?” on a daily basis;
- u. At various times, male employees would rub against females, pretending as though they dropped something on the floor;
- v. In many instances, this harassment occurs in the presence of Ford’s supervisors and Ford would take no disciplinary action, or insufficient action, against employees who engage in such sexually offensive conduct;
- w. Defendants’ Human Resources and Labor Relations personnel routinely reveal confidential medical information regarding female employees to Plaintiff’s workers in the plants;
- x. After such information is leaked, male employees subjected female employees to ridicule, offensive jokes and embarrassment;
- y. Male employees have historically been paid for overtime that they did not work, while female employees are required to work every hour that they are paid;
- z. Male employees are allowed personal days even when not entitled to them, while female employees are harassed and are not given such days off;
- aa. Female employees that complained were written up or threatened with termination;
- bb. Ford’s male supervisors routinely assigned tasks to employees on a discriminatory basis by assigning better tasks to those female employees who submit to their sexual advances or who agree to go out with them;
- cc. The less desirable tasks would be assigned to the female employees who reject or do not submit to their sexual advances;
- dd. On many occasions, female employees would see soiled sanitary napkins moved from the ladies room to the aisles where they are in full view of male employees and supervisors;
- ee. They would make lewd comments such as “look at these -- old nasty bitches” as they walked past;

- ff. Male employees and supervisors regularly sabotage the work areas of female employees in different and innumerable ways;
 - gg. On numerous occasions, female employees would have phallic symbols (penis-like objects) thrown in their work areas, tool boxes, or thrown at them. Such objects would sometimes be carved out of rubber hoses, Styrofoam, etc. by some male employees during their breaks;
 - hh. Some female employees would frequently find pictures of penises placed on their tool boxes or work areas;
 - ii. On a daily basis, women are harassed, denigrated and referred to as "bitch," "stupid bitch," "you fucking people," "mother-fuckers," "cunt," and "fucking bitches";
 - jj. Male employees and supervisors call woman who make sexual harassment complaints "snitch bitches";
 - kk. At various locations in Defendant's plants, posters and drawings that are humiliating to women are posted or displayed, including: pictures and posters of nude women, sex organs, female private parts, people performing sex acts, lesbians having intercourse, penises, pictures of black women performing oral sex on white men, etc. Some of these pictures are in full view at various places throughout the plants.
46. Male employees routinely make discriminatory and harassing remarks and gestures in front of supervisors and managers who take no action to discipline employees, to eradicate the harassment or maintain an appropriate workplace environment.
47. Defendant maintained a pattern and practice of inferior treatment of females with respect to the terms and conditions of employment, including job assignments, harassment, training, promotions and overtime assignments.
48. Ford's pattern and practice of harassment and discrimination and a hostile working environment from the 1980's and 1990's has continued through and including the present time.

49. Ford is aware of the ongoing discrimination and harassment which occurs on a daily basis in an open manner, such that it is observed by employees and supervisors, and has turned a blind eye toward it.

SEX AT FORD

50. Historically, Ford employees have organized parties which have been held both on and off site at the respective plants at which strippers and/or prostitutes were present.

51. During these parties which were attended by both management and hourly employees, various employees engaged in lewd and lascivious behavior, including sexual acts.

52. These parties and the lewd, disgusting and foul activities involved were, on information and belief, recorded and captured on video and on camera.

53. Tickets to such parties were sold in the plants during working hours.

54. Invitations to such parties were distributed throughout the plants, both orally and in writing.

55. The videos and photos from prior parties, including visual depictions of strippers, prostitutes, nudity, sex acts and pornographic material relating to the parties, were frequently distributed and displayed throughout the plants.

56. In approximately 1997 or 1998 NBC acquired a copy of a tape from a sex party and broadcast portions of the tape on television as part of the coverage of the *Warnell* case.

57. On numerous occasions – both during the 1980's and 1990's, as well as during the Relevant Time Period, various male supervisors and managers have used their offices, the parking lot and various places throughout the plant, including on the roof to have sexual relations with other employees during work.

58. The frequent sex that takes place in the building contributes to the hostile and offensive work environment.

59. Top ranking employees in both management and human resources regularly engaged in sex at work.

60. That Superintendents and Human Resource Management engaged in sex at Ford made it untenable for women to complain about sexual harassment, a hostile working environment and discrimination to these supervisors and managers or to go to Human Resources and Labor Relations about these problems.

61. When the Named Plaintiffs and other women began complaining about sexual harassment, Ford's Labor Relations Supervisor, Jim Larese confronted then-union chairman Grant Morton and told him "your people better stop complaining."

62. Other Labor Relations personnel, including Fluretta Drummer and Natalie Dahringer confronted Morton, told him they were upset that women were filing sexual harassment complaints with the EEOC, and told him that complainers would be terminated if they did not drop their EEOC charges.

63. Ford engaged in a practice of intimidation and retaliation which, on information and belief, had the effect of making additional sexual harassment victims reluctant to complain.

PLAINTIFF CLASS

64. This case is being brought under Fed. R. Civ. P. Rule 23(b)(2), or, in the alternative, pursuant to Fed. R. Civ. P. Rule 23(b)(3).

65. In addition to the Named Plaintiffs, there are more than one thousand women working at the two plants who have been subjected to, or who work within the same hostile working environment in which the Named Plaintiffs are employed.

66. Numerous women beyond the Named Plaintiffs filed EEOC charges and filed internal complaints about sexual harassment and the hostile workplace environment to which they are subjected at Ford and forced to endure.

67. The Class Claims include sex discrimination and sexual harassment under Title VII and race discrimination and harassment under Title VII and 42 U.S.C. § 1981. In addition, various Named Plaintiffs are asserting individual claims.

68. The Plaintiff Class includes: all present or former female employees who suffered discrimination (based on gender, sexual harassment or race) while working at the Ford Chicago Assembly Plant or the Ford Chicago Stamping Plant from 2012 through the present.

69. The Class includes the following sub-Classes: (1) female employees who suffered sexual harassment or gender discrimination; and (2) females who suffered harassment or discrimination based on race.

70. The EEOC's issued "reasonable cause" Determinations with respect to these class allegations. (Ex's. 1(C)-5(C), 7(C)-11(C), 17(C), 19(C) and 24(C)).

71. The members of the Class, and each sub-Class, are so numerous as to render joinder impractical.

72. There are questions of law and fact which are common to the Class and those questions predominate over questions which may not be common.

73. The claims of the Named Plaintiffs, who are class representatives, are typical of the claims of the absent Class members.

74. The Named Plaintiffs will fairly and adequately protect the interests of the Class and the sub-classes.

75. The Class action mechanism is the most efficient and most appropriate mechanism for resolving this controversy.

COUNT 1

TITLE VII-SEXUAL HARASSMENT AND HOSTILE WORK ENVIRONMENT

(VAN, LEVIEGE, PRICE, ALLEN, BARRON, BOSAN, CAMPBELL, CARTER, DAHN, EXUM, GARDNER, GOFORTH, HARRIS, HENRY, JORDAN, KUDIRKA, LEWIS-BLED SOE, MADISON, MILLER, MORRIS, SZOT, THOMAS-MOORE, R. THOMAS, WILLIAMS, CLYBURN, CORBIN, GLENN, HOOVER, LEDBETTER, SHANKLIN, SULLIVAN, D. THOMAS, WALLS, and all similarly situated women)

76. Plaintiffs adopt, reallege and incorporate by reference the allegations contained in paragraphs 1-75 of this Complaint as and for this paragraph.

77. The individual Named Plaintiffs identified in this Count adopt and incorporate by reference all allegations of sexual harassment and of a hostile work environment alleged in their respective EEOC Charges and Charge Outlines (Ex's. 1(A)-24(A)) as if set forth here.

78. Several of the Named Plaintiffs, including Ogery Ledbetter and Martha Corbin have experienced decades of sexually harassing conduct at Ford, but the extent that sexual harassment has run rampant in the last few years is the worst they ever saw.

79. The Named Plaintiffs and other similarly situated female employees have been sexually harassed, in one or more of the following ways, by being subjected to:

- a. Unwanted or unwelcome sexual advances;
- b. Unwelcome and unwanted touching,
- c. Requests for sexual favors;
- d. Stories of sexual conquests, desires or escapades;
- e. Comments about the female anatomy;
- f. Comments about individual women's body parts;
- g. Comments about what a male "would like to do" to or with a particular female sexually;
- h. Comments of a sexually suggestive nature,
- i. Name calling using names demeaning toward women such as "bitch", "slut" or "whore" or "hoe";
- j. Graffiti and/or pornography images;
- k. Pictures of genitalia and/or of a sexual nature
- l. Lurid, foul and offensive language, and/or
- m. Other conduct of a sexually inappropriate nature for the workplace.

80. Named Plaintiffs and other similarly situated female employees were sexually harassed in that they were touched, groped and sexually assaulted by Ford's supervisors, managers and employees, including but not limited to the following instances, by way of example:

- a. Superintendent Myron Alexander repeatedly groped Latricia Shanklin's and other similarly situated women's buttocks, and attempted to do the same to Ogery Ledbetter, while saying "I'm going to feel that booty before you leave and you can't do nothing about it."
- b. Alexander inappropriately touched, caressed, hugged, lifted, squeezed, and/or attempted to kiss Shanklin, Ledbetter, Terri Lewis-Bledsoe, Martha Corbin, Michelle Dahn and similarly situated female co-workers, despite that these women repeatedly told Alexander that they did not want to be touched.
- c. Alexander forcibly grabbed Miyoshi Morris by the wrist, pulled out his penis and forced her hand to touch his penis as she struggled to break free from his grasp.
- d. Alexander physically assaulted Jeannette Gardner and made her believe she was about to be raped when he grabbed her right arm from behind, forcefully twisted it behind her back, bent her down over a desk against her will and pushed himself up against her backside while two other male Supervisors, George Melchore and Kevin Taylor watched and did nothing.

e. Christie Van was repeatedly groped and inappropriately touched on her buttocks, thigh, shoulders and back by numerous male employees, including co-workers Bruce (last name unknown) and Kenny (last name unknown) and men that Van did not know.

f. Ken Millender repeatedly touched, groped and slapped Tonya Exum's buttocks and did the same to numerous women at Ford's Stamping Plant.

g. Exum and other similarly situated have been inappropriately touched in a sexually harassing way on the back, shoulders and arms by several male co-workers, including Neely Clemons and Marquis Sullivan, despite that Exum repeatedly and explicitly told these men "keep your hands to yourself."

h. Superintendent Darryl Galloway regularly touched Danielle Kudirka and other similarly situated female employees on the shoulders, necks and arms and insisted on hugging Kudirka even though she told him she did not want to be touched.

i. Supervisor Buck Owens inappropriately touched Charmella Leviege's breasts and asked her "when's the last time you had sex?"

j. Coby Millender repeatedly touched, grabbed and tried to kiss Miyoshi Morris and numerous similarly situated women even though they did not want to be touched.

k. Ron Woods repeatedly grabbed and touched Arlene Goforth's buttocks when he walked by her station.

l. Co-workers named Rappa (last name unknown) and Jeremy (last name unknown) repeatedly groped Michelle Dahn's buttocks and breasts.

m. Supervisor Robert Powell regularly and inappropriately touched subordinate female employees, including that he repeatedly touched Theresa Bosan, Angela Glenn and other similarly situated female employees on the shoulders, arms and back and when Glenn told him to stop, he told her "I do it with all the women and I'm going to keep doing it to you" and "you belong to me now."

n. Male supervisors regularly stood directly behind female employees who were bent over working, such that when the female stood up or backed up, her buttocks bumped into the man's penis/pelvis, including Robert Powell (who did this to Theresa Bosan and other women) and Kendall Brooks (who did it to Jacqueline Barron and other women).

o. Supervisor Rich Murray pushed his penis/pelvis into/against Shrandia Campbell's buttocks and Supervisor Mike Reese stepped in close behind Nichea Walls and pressed his penis/pelvis against Walls' buttocks.

p. Supervisor Rich Murray inappropriately touched Campbell's shoulders, waist and body making her feel uncomfortable and violated.

q. Kendall Brooks repeatedly slapped and groped Barron's buttocks, grabbed her hair and groped her breasts.

r. Jabari Muse grabbed and squeezed Maria Price's buttocks, and reached inside her coveralls and groped her breasts.

s. Group Leader Lance Caldman forcibly pulled Michelle Dahn into a utility closet against her will, forcefully unzipped her coveralls, pulled her shirt up as high as he could, forced his hand down her pants and attempted to rape her before she finally broke free.

t. Keturah Carter was inappropriately touched on her neck, back, shoulders and the top of her buttocks by men she worked with, including LaDell Conway, who made the unwanted statement to Carter that he wanted to massage her full body.

u. Christine Harris has been repeatedly touched, groped and gyrated against by her Team Leader Tony (last name unknown), and after she complained, Tony further humiliated her, held her down and "dry humped" her from behind.

v. Ford employee Chris Martin repeatedly and inappropriately touched and rubbed Stephanie Szot's back, shoulders and arm at work and groped her buttocks.

w. An employee named John (last name unknown), after repeatedly telling Derricka Thomas that he liked her buttocks and that he wanted to bite it, approached her from behind, put his hands around her waist and bit her buttocks.

x. Supervisor Jeffrey Bivens made a sexual pass at LaDwyna Hoover when he called her into his office to have her sign some paperwork, turned the lights down, and touched or caressed her arm and hand.

y. A co-worker named "Reggie" (last name currently unknown) hugged and gyrated his crotch against Charmella Leviege.

z. Other male supervisors and managers including Union Building Chairman Coby Millender, Kevin ("Red") Marshall and Reggie Easter constantly and repeatedly greeted many of the Named Plaintiffs and numerous other female co-workers with unwanted and uncomfortable touches and hugs.

81. The sexually harassing conduct of which the Named Plaintiffs complain, was unwelcome, unwanted and non-consensual.

82. In addition to being sexually harassed themselves, the named Plaintiffs were subjected to a hostile working environment, in that they were forced to endure hostile working conditions in which other women were harassed, as more particularly described in other allegations of this Count.

83. Sexually harassing touching and other conduct was so pervasive and so widespread that the Named Plaintiffs and similarly situated women were constantly in fear for their own safety and of being touched.

84. Each of the incidents described in this Count were offensive and harassing to the Named Plaintiffs and similarly situated women who observed these occurrences and/or who heard other women complain about them.

85. As further examples of sexually harassing behavior, the Named Plaintiffs and other similarly situated employees were exposed to male supervisors, managers and other employees engaging in one or more of the following types of conduct and sexually harassing behavior:

- a. having sex in the workplace, the parking lot, the roof of the building and other areas of the workplace;
- b. talking about sexual escapades which took place both in and outside of the workplace;
- c. making unwelcome requests for sexual favors and grotesque sexual acts;
- d. offering money, drugs and alcohol for sex;
- e. showing their penises and asking women to "suck it";
- f. showing "dick pic's" or videos of themselves masturbating using their cell phones;
- g. showing women pornographic magazines or pornographic cell phone images and/or videos;

- h. commenting about women's vaginas and breasts;
- i. commenting about their desire to perform sex acts on the Named Plaintiffs and similarly situated women;
- j. jeering, making lewd comments, sexual suggestions and cat-calls;
- k. referring to new female employees as "fresh meat";
- l. talking and gesturing about the size of their penis;
- m. commenting women's buttocks with statements that women had a "big booty", "loose booty", "nice ass" and "fat ass."
- n. making bets with each other about which male would be the first to have sex with new female employees;
- o. assigning the women to work areas requiring them to constantly bend over in front of the male supervisor with their buttocks in the air;
- p. constantly staring at women's breasts and buttocks;
- q. offering better job assignments, better overtime opportunities and better opportunities for promotions if the Named Plaintiffs and similarly situated women had sex with them;

- r. demoting and/or assigning the Named Plaintiffs and similarly situated women to less desirable job opportunities when they rejected male supervisors' sexual requests;
- s. ridiculing the Named Plaintiffs and similarly situated women during sexual harassment training sessions;
- t. asking the Named Plaintiffs and similarly situated women to be their "work wife" even after the women had rejected their sexual advances;
- u. stalking several of the Named Plaintiffs and similarly situated female employees who rejected their sexual advances.

86. The foregoing conduct is degrading, offensive and sexually harassing to the Named Plaintiffs and similarly situated women.

87. Similarly situated men were not required to endure sexual harassment as a term or condition of their employment.

88. The types of sexually harassing behavior mentioned throughout this Count were experienced by the Named Plaintiffs and other similarly situated women on almost a daily basis.

89. These instances of sexual harassment were continuous, severe and pervasive.

90. Each of the incidents described in this Complaint were offensive and unwanted by the Named Plaintiffs and other similarly situated women.

91. By being forced to endure, experience and/or observe the conduct alleged in this Count and elsewhere in the Complaint and Exhibits 1(a)-24(a), each of the Named Plaintiffs and other putative class members were subjected to a hostile working environment.

92. These occurrences resulted in the Named Plaintiffs being sexually harassed.

93. These occurrences are but several examples of events that happened with regularity at Ford to the Named Plaintiffs and contributed to a sexually harassing workplace environment which affected all of the Named Plaintiffs and their similarly situated female employees.

94. Not only is sexual harassment ongoing, pervasive and offensive, but it has led to what is a dangerous workplace environment in which the Named Plaintiffs and similarly situated women do not feel safe.

**PLAINTIFFS COMPLAINED ABOUT SEXUAL HARASSMENT BUT
DEFENDANT FAILED TO TAKE PROMPT REMEDIAL ACTION**

95. As a direct and proximate result of the foregoing acts of sexual harassment, each of the Named Plaintiffs and other similarly situated women have been damaged in that they have lost time from work, have suffered anxiety, humiliation and emotional distress, and have otherwise suffered physical or psychological injuries.

96. The Named Plaintiffs and numerous similarly situated female employees repeatedly complained about sexual harassment during the Relevant Time Period by calling Ford's sexual harassment hotline, and making numerous reports to their supervisors, union, and Ford's Labor Relations and/or Human Resources department.

97. Ford failed to take prompt remedial action to stop sexual harassment in the workplace.

98. After the Named Plaintiffs and other similarly situated female employees complained about sexual harassment, male co-workers mocked their complaints and left behind spray-painted and chalk-marked graffiti depicting penises and testicles in the Complainers' work area and lunch area.

99. Male co-workers anonymously left totems of banana's sticking up in the air and symbols depicting penises in the complainers' work area, which were degrading to the Named Plaintiffs who experienced it such as Helen Allen and similarly situated sexually harassed women.

100. The above mentioned occurrences and numerous other occurrences like them, and Ford's failure to promptly take remedial action to stop these occurrences from continuing, resulted in the Plaintiffs being sexually harassed.

101. As a direct and proximate result of the foregoing acts of sexual harassment, each of the Named Plaintiffs and other similarly situated women have been damaged in that they have lost time from work, have suffered anxiety, humiliation and emotional distress, and have otherwise suffered physical or psychological injuries.

COUNT 2

TITLE VII-GENDER/SEX DISCRIMINATION

(VAN, LEVIEGE, PRICE, ALLEN, BARRON, BOSAN, CAMPBELL, CARTER, DAHN, EXUM, GARDNER, GOFORTH, HARRIS, HENRY, JORDAN, KUDIRKA, LEWIS-BLED SOE, MADISON, MILLER, MORRIS, SZOT, THOMAS-MOORE, R. THOMAS, WILLIAMS, CLYBURN, CORBIN, GLENN, HOOVER, LEDBETTER, SHANKLIN, SULLIVAN, D. THOMAS, WALLS, and all similarly situated women)

102. Plaintiffs adopt, reallege and incorporate by reference the allegations contained in paragraphs 1-101 of this Amended Complaint, as if set forth here.

103. Plaintiffs adopt and incorporate by reference all allegations of sexual harassment and of a hostile work environment alleged in their respective EEOC Charges and Charge Outlines (Ex's. 1(A)-24(A)) as if set forth here.

104. Plaintiffs and other women have been treated differently than their male counterparts.

105. Plaintiffs and other women have been subjected to hostile working environment, sexual harassment, gender discrimination and discriminatory comments from supervisors and coworkers which males are not required to endure as a condition of their employment.

106. Plaintiffs and other women have been given different work assignments than male counterparts and have been told that they are not being assigned to perform certain tasks "because they are women."

107. Plaintiffs and other women have been subjected to comments of a derogatory nature toward women, including that they are regularly referred to as "bitches", "hoes" and "sluts."

108. Women are not viewed as equals, but rather as sexual objects at Ford.

109. Being constantly exposed to unwanted sexual comments and discussion is offensive and degrades the Named Plaintiffs and similarly situated women.

110. Females are treated differently than similarly situated male employees who are not required to endure sexual harassment as a term and condition of their employment.

111. The Named Plaintiffs and numerous similarly situated female co-workers have complained to Ford's sexual harassment hotline and to the Labor Relations and Human Resources Departments about being exposed to a discriminatory, sexually harassing and hostile work environment.

112. Ford has failed to stop and/or remedy this ongoing harassment, and male supervisors and employees continue to openly refer to women as "bitches" and to women who complain as "snitch bitches."

113. Ford failed to promptly disciplined or reassign any males about whom Plaintiffs complained and did not conduct a thorough or timely investigation of Plaintiffs' complaints.

114. Despite numerous prior lawsuits and the EEOC Conciliation Agreement, sexual harassment and sex/gender discrimination continues to be an everyday way of life at Ford.

115. As a direct and proximate result of the foregoing acts of gender discrimination, each of the Named Plaintiffs and other similarly situated women have been damaged in that they have lost or been deprived of income opportunities, have suffered anxiety, humiliation and emotional distress, and have otherwise suffered physical or psychological injuries.

COUNT 3
TITLE VII-RACE DISCRIMINATION
(CHRISTIE VAN, CHARMELLA LEVIEGE, MARIA PRICE, HELEN ALLEN, MIYOSHI MORRIS, and all persons similarly situated)

116. The Named Plaintiffs to this Count and their similarly situated African American employees ("Plaintiffs" for purposes of this Count) adopt, reallege and incorporate by reference the allegations in paragraphs 1- 75 as and for this paragraph.

117. Plaintiffs adopt and incorporate by reference all allegations of sexual harassment and of a hostile work environment alleged in their respective EEOC Charges and Charge Outlines (Ex's. 1(A), 2(A), 3(A), 4(A) and 20(A)) as if set forth here.

118. Plaintiffs are members of a protected Class based on their race: African American.

119. Plaintiffs and other similarly situated African American employees have been subjected to different treatment on the basis of their race, African-American.

120. This claim is brought under Title VII, 42 U.S.C. §2000e *et seq.*

121. Plaintiffs and other similarly situated African American co-workers in the protected Class were discriminated against and subjected to a hostile work environment based on race in violation of Title VII of the Civil Rights Act.

122. Plaintiffs and other similarly situated African Americans were discriminated against in the terms and conditions of their employment, including that they were subjected to lower quality job opportunities and fewer opportunities for raises, overtime and career advancement.

123. Plaintiffs and similarly situated African Americans have been denied the opportunity to work overtime based on their race/color (African American/black), even when the Plaintiffs and others have indicated a willingness to work overtime and/or have requested to do so.

124. African American/black employees at Ford are assigned to lower quality work assignments than white/Caucasian co-workers.

125. Career opportunities at Ford are also more limited at Ford where most management positions are held by whites and most production and maintenance positions are held by blacks.

126. Plaintiffs' white, similarly situated co-workers are given job assignments on certain lines that afford them desks, chairs and a computer that they are permitted to use during work breaks, whereas the Named Plaintiffs and other African American employees are not afforded similar conveniences.

127. Plaintiffs and other similarly situated individuals have been given work assignments which are different and less desirable than white counterparts.

128. Lighter skinned employees are also given preferential treatment to darker skinned employees.

129. Various white team leaders and supervisors at Ford regularly made racially offensive references to Plaintiff and other African-Americans, including stereotypical and derogatory references to their hair, figures and clothes.

130. Plaintiffs and similarly situated individuals have been subjected to name calling such as "nigger," "pickaninny" "shine," "buckwheat," "Aunt Jemima" and "Alfalfa."

131. Because of Plaintiffs' race/color, Plaintiffs and other similarly situated African American employees have been subjected to materially adverse employment actions, including unwarranted discipline, write-ups, suspensions and loss of overtime opportunities.

132. Plaintiff and other similarly situated African Americans have been subjected to discrimination in discipline as well. Whites are not disciplined or are less severely disciplined for similar conduct.

133. By way of example, Miyoshi Morris was terminated, purportedly due to a paperwork issue associated with taking a bereavement leave.

134. Another white employee who was purportedly “terminated” at about the same time as Morris for the same purported reason as Morris but was promptly reinstated and returned to work while Morris was not.

135. Ford has returned Morris’ white co-worker to work but refuses to reinstate Morris because of her race (black).

136. Because of their race/color, plaintiff and other similarly situated African American employees have been subjected to materially adverse employment actions, including unwarranted discipline, write-ups, suspensions, and loss of overtime opportunities.

137. Plaintiffs complained about this to Labor Relations to no avail.

138. Plaintiffs complained about this discrimination on Ford’s hotline, but Ford did not promptly respond to stop ongoing racial discrimination.

139. After Plaintiffs complained about discrimination and harassment, they were regularly referred to by white co-workers and supervisors as “Black Snitch Bitch” – which was extremely racially offensive and derogatory.

140. As a direct and proximate result of the foregoing acts of racial discrimination, each of the Named Plaintiffs and other similarly situated women have been damaged in

that they have lost or been deprived of income opportunities, have suffered anxiety, humiliation and emotional distress, and have otherwise suffered physical or psychological injuries.

COUNT 4

RACE DISCRIMINATION UNDER §1981

(VAN, LEVIEGE, PRICE, ALLEN, BOSAN, CAMPBELL, CARTER, EXUM, GARDNER, GOFORTH, HARRIS, HENRY, JORDAN, LEWIS-BLED SOE, MADISON, MILLER, MORRIS, THOMAS-MOORE, ROSE THOMAS, WILLIAMS, CLYBURN, CORBIN, GLENN, HOOVER, LEDBETTER, SHANKLIN, SULLIVAN, DERRICKA THOMAS, WALLS, and all persons similarly situated)

141. The Named Plaintiffs to this Count and their similarly situated employees (“Plaintiffs” for purposes of this Count) incorporate by reference the allegations contained in paragraphs 1 through 75 and 116-140 of the Complaint.

142. This claim is made under 42 U.S.C. § 1981.

143. Plaintiffs are members of a racial minority (African-American).

144. These acts were done intentionally.

145. Defendant’s treatment of the Plaintiffs and other African-American employees denied them of the full and equal treatment benefit of all laws for the security of persons and property “as is enjoyed by white citizens” in violation of 42 U.S.C. §1981.

146. As a direct and proximate result of the foregoing acts of racial discrimination, each of the Named Plaintiffs and other similarly situated women have been damaged in that they have lost or been deprived of income opportunities, have suffered anxiety, humiliation and emotional distress, and have otherwise suffered physical or psychological injuries.

COUNT 5
TITLE VII-RETALIATION
(CHRISTIE VAN)

147. The Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

148. Plaintiff repeatedly complained about an atmosphere of sexual harassment and racial and gender discrimination at Ford.

149. Plaintiff complained numerous times to Labor Relations and to her Union about inappropriate gestures and remarks by supervisors and co-workers.

150. Plaintiff complained that supervisors were inviting her to have sex with them and that she had been groped.

151. One of Plaintiff's supervisors responded by showing her a picture of his genital parts and said "You know you want it."

152. The Plaintiff and other similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

153. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

154. In retaliation for the Plaintiffs' numerous complaints and for filing charges of discrimination with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. On February 28, 2013, Van was assaulted and attacked from behind out of retaliation for complaining about sexual harassment and racial discrimination in the workplace.
 - i. One of the offenders or an individual on behalf of one of those offenders or on behalf of Ford physically assaulted and attacked Van as she was leaving work. She was thrown down to the ground from behind while walking to her car.
 - ii. Van's assailant stomped on the middle of her back, told her not to look at his face, told her that she was a "black snitch bitch" for complaining about sexual harassment, and told her that she better never come back to her job at Ford.

- iii. The assailant threatened Van that he knew where she lived and would kill her if she came back.
- iv. Van complained to her union and to Labor Relations about this incident but Ford never investigated this incident.
- b. Van has been called “black snitch bitch” by supervisors and co-workers.
- c. Human Resources Manager/Supervisor, Terrence McClain intimidated and berated Plaintiff for talking about sexual harassment in the workplace with other co-workers and with non-Ford employees outside of the workplace.
- d. McClain, in an aggressive manner told Van: “I don’t know what they did where you came from, but you are at Chicago Assembly now and you need to realize that things are run much differently here.”
 - i. McClain did not want sexual harassment investigated because he was also sexually harassing women in the workplace, including but not limited to: exposing his penis to women at work, touching women in unwanted sexual ways, staring at women in an uncomfortable way and making offensive and unwanted comments to women on a regular basis.

- e. McClain told Plaintiff "You need to forget the incident that happened and need to let it go. Or else!"
- f. Labor Relations Specialist, Alex Keweny was present when McClain intimidated and berated and threatened Plaintiff but did nothing about it.
- g. On subsequent occasions, Keweny reinforced that Plaintiff needed to stop complaining as she had been instructed by McClain.
- h. Keweny required Van to continue to work with her harassers, including under her harassing supervisors.
- i. Meanwhile, other personnel in Labor Relations told Plaintiff's Union Chairman that she would be fired unless she stopped complaining or dropped her EEOC charge.
- j. Reese, one of Plaintiff's direct supervisors dismissed her from my work assignment on one or more occasions in retaliation for reporting his sexual harassment and for filing an EEOC charge against him.
- k. Fonseca, one of Plaintiff's direct supervisors assigned her to lower quality job assignments and continued to harass her in a threatening way in retaliation for reporting his sexual harassment and for filing an EEOC charge against him.

l. Dazman Gray, one of Plaintiff's direct supervisors and his fiancé, Ashley Lowe, one of Van's shift supervisors falsely accused Plaintiff of violating a safety rule and had her written up and suspended for a day without pay in retaliation for Plaintiff complaining that Gray had sexually harassed her the week before.

m. The EEOC attempted on at least three occasions to mediate her Charges of Discrimination.

n. When Plaintiff refused to accept Ford's offer, Ford terminated Van's employment effective May 28, 2014 – just days after the EEOC's most recent attempt at mediating this matter proved unsuccessful.

o. Plaintiff was forced to grieve her termination and Ford's refusal to return her to work to arbitration. The arbitrator ruled in Plaintiff's favor after a hearing on the merits.

p. Only after the arbitrator ruled in Plaintiff's favor, Ford returned Plaintiff to work at the Stamping Plant, but has continued to subject her to heightened scrutiny and more dangerous workplace conditions than are afforded other employees who did not complain.

155. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

156. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 6
TITLE VII-RETALIATION
(CHARMELLA LEVIEGE)

157. The Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

158. Plaintiff and other similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

159. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

160. In retaliation for the Plaintiff's numerous complaints and for filing charges of discrimination with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. repeatedly assigning unfair discipline against Plaintiff in an effort to write her up;
- b. reassigned her to different job assignments that did not match her medical restrictions.

c. sent Plaintiff home early for the remainder of a shift without pay;

d. denied Plaintiff overtime opportunities that were otherwise offered to employees who did not complain;

161. Ford's retaliatory acts deprived Plaintiff of the other financial opportunities Ford offers to employees who did not complain about sexual harassment or racial discrimination.

162. Ford's retaliatory acts against plaintiff constitute materially adverse employment actions.

163. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 7
TITLE VII-RETALIATION
(MARIA PRICE)

164. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

165. Plaintiff and other similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

166. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

167. Supervisor Alex Curry told Plaintiff after she complained that he and Plaintiff's supervisors at Ford are "tired of hearing your name" and are "trying to set you up." Thereafter, Supervisors retaliated against her.

168. In retaliation for the Plaintiff's numerous complaints and for filing charges of discrimination with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. repeatedly assigning unfair discipline against Plaintiff in an effort to write her up;
- b. denied Plaintiff restroom breaks that were allowed to other employees who did not complain;
- c. suspended Plaintiff and/or sent Plaintiff home early without pay for allegedly being late to work, when she was actually on time for work but was receiving medical attention from a nurse in the medical department at the time her shift began;
- d. denied Plaintiff overtime opportunities that were otherwise offered to employees who did not complain.

169. Ford's retaliatory acts deprived Plaintiff of the other financial opportunities Ford offers to employees who did not complain about sexual harassment or racial discrimination.

170. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

171. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 8
TITLE VII-RETALIATION
(HELEN ALLEN)

172. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

173. Plaintiff and other similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

174. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

175. In retaliation for the Plaintiff's numerous complaints and for filing charges of discrimination with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Disclosing to Other employees who did not have the need-to-know that Plaintiff Complained of discrimination, including:
 - i. Labor Relations representative Natalie Dahrenger held a meeting with Plaintiff's male co-workers and "outed" Plaintiff or allowed others to "out" Plaintiff as the complainer.
 - ii. Ford employee and union Building Chairman Coby Millender told approximately 200 union members that Plaintiff was the complainer who had "filed a sexual harassment lawsuit against Ford."
 - iii. After these two incidents in which both Ford and the Union Chairperson, Millender disclosed Plaintiff as being the "complainer," she experienced numerous anonymous acts of vandalism in her work area and lunch area depicting penises/phalluses and testicles, all meant to mock Plaintiff and make her feel even more harassed and humiliated.
- b. After Plaintiff complained to Ford, Jim Larese, a senior manager overseeing the plant told his immediate staff to "be careful around Helen because she's filing a lawsuit against Ford."
- c. repeatedly assigning unfair discipline against Plaintiff in an effort to write her up;
- d. denied Plaintiff restroom breaks that were allowed to other employees who did not complain;

- e. suspended Plaintiff and/or sent Plaintiff home early without pay;
- f. denied Plaintiff overtime opportunities that were otherwise offered to employees who did not complain.

176. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

177. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 9
TITLE VII-RETALIATION
(Jacqueline Barron)

178. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 115 of the Complaint.

179. Plaintiff and other similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

180. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

181. In retaliation for the Plaintiff's numerous complaints and for filing charges of discrimination with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. After Plaintiff refused her supervisors' requests for sex, she was denied restroom breaks.
- b. Although nothing was being done to remedy her complaints, one of Barron's co-workers tipped Barron off to "watch her back" because her supervisors had informed Kendall Brooks that she had complained.
 - i. Barron was told that Brooks intended to physically harm her for complaining about his constant unwanted touching, groping, lewd comments and unwanted penis pictures and invitations for sex.
 - ii. Plaintiff complained to Natalie Dahrenger at Labor Relations, but she did not want to hear all of the details of Barron's sexual harassment and told Barron to report back to work.
 - iii. Barron asked Labor Relations to return Plaintiff to work in an area of the plant away from sexual harassment and threats of physical violence.
 - 1. Dahrenger told Plaintiff she would contact her "within 24 hours" and let Plaintiff know what Ford could do to remedy the situation.
 - 2. Barron waited for Dahrenger's call, and when it did not come, Barron tried contacting Labor Relations to

determine when she would be returned to work away from her sexual harassers.

3. Dahrenger failed and refused to return Plaintiff to work.

c. Barron contacted the EEOC and complained about ongoing sexual harassment and discrimination in early December, 2012.

d. On January 15, 2014, after Ford became aware Plaintiff filed a sexual harassment charge of discrimination, Ford retaliated against Barron and terminated her.

182. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

183. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 10
TITLE VII-RETALIATION
(THERESA BOSAN)

184. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

185. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

186. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

187. In retaliation for the Plaintiff's engaging in protected activity and making numerous complaints against sexual harassment and discrimination and for rejecting her Supervisor's sexual advances, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. After Plaintiff refused her supervisors' requests for sex and complained about sexual harassment, she was unfairly disciplined.
- b. Supervisor Bivens, acting at the advice and knowledge of Superintendent Chuck (last name unknown), assigned Bosan to the most physically demanding job assignments knowing that she was too small to perform the job.
- c. Bivens and Chuck used this same technique to retaliate against other women who spurned and complained about Bivens' sexual advances, including LaDwyna Hoover.

d. After Bivens assigned Bosan to a job which was impossible for her to effectively perform, Red Marshall told Bosan “We’re not supposed to tell you this, but not all jobs are for women who are as small as you. This one is not for you. You are too little.”

e. Union representative, Mark Allen told Bosan that not only was her job assignment retaliatory and intentional on the part of Jeff Bivens, but that his boss, Superintendent Chuck (last name unknown) condoned Bosan being placed on a physically difficult job because it might get her to quit.

f. Mark Allen stated that it was widely known that “Chuck has it out for you because of your complaining on his supervisors.”

g. When Bosan refused to quit, Ford terminated her in retaliation for her complaining about sexual harassment.

188. Ford’s retaliatory acts against Plaintiff constitute materially adverse employment actions.

189. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 11
TITLE VII-RETALIATION
(SHRANDA CAMPBELL)

190. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

191. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

192. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

193. In retaliation for the Plaintiff's numerous complaints and for filing charges of discrimination with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. repeatedly assigning unfair discipline against Plaintiff in an effort to write her up;
- b. reassigned her to different job assignments that did not match her medical restrictions.
- c. sent Plaintiff home early for the remainder of a shift without pay;
- d. denied Plaintiff overtime opportunities that were otherwise offered to employees who did not complain.

194. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

195. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 12
TITLE VII-RETALIATION
(KETURAH CARTER)

196. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 163 of the Complaint.

197. Plaintiff and other similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

198. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

199. In retaliation for the Plaintiff's numerous complaints and for filing charges of discrimination with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. repeatedly assigning unfair discipline against Plaintiff in an effort to write her up;

- b. denied Plaintiff restroom breaks that were allowed to other employees who did not complain;
- c. suspended Plaintiff and/or sent Plaintiff home early without pay for allegedly being late to work, when she was actually on time for work but was receiving medical attention from a nurse in the medical department at the time her shift began;
- d. forced her to continue working in close proximity with her sexual harasser;
- e. denied Plaintiff overtime opportunities that were otherwise offered to employees who did not complain.

200. Ford's retaliatory acts deprived Plaintiff of the other financial opportunities Ford offers to employees who did not complain about sexual harassment or racial discrimination.

201. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

202. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

203. The EEOC investigated illegal retaliation with respect to this Plaintiff and determined there was reasonable cause to believe she was subjected to illegal retaliation. (Ex. 8(C)).

COUNT 13
TITLE VII-RETALIATION
(MICHELLE DAHN)

204. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 115 of the Complaint.

205. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

206. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

207. In addition, Ford has retaliated against Plaintiff for her protected activity in complaining about sexual harassment in one or more of the following ways:

a. After Plaintiff refused her supervisors' requests for sex and complained about sexual harassment, she was unfairly disciplined, suspended without pay, and subsequently terminated.

i. When Plaintiff attempted to complain, she was told that she should not complain about the men involved in sexually harassing or disciplining her.

- ii. When Plaintiff suffered severe emotional distress and had to take a medical leave, Ford terminated her on the false excuse that she failed to submit certain paperwork, even though she had submitted the appropriate paperwork.
- b. When Plaintiff again complained of this continued harassment and retaliation to Coby Millender, he promised that he could correct the problem and get her back to work, but subsequently refused to have her returned to work unless and until she agreed to have sex with him, which she refused to do.
- c. As a result, the Plaintiff has been terminated and has not been put back to work because she refused her supervisor's sexual advances and complained about sexual harassment.
- d. Plaintiff continued complaining to Ford and subsequently the EEOC about these issues. Thereafter, Plaintiff observed strange vehicles surveilling her house, which upon information and belief are Ford employees or agents stalking her in retaliation for her complaining.

208. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

209. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has

suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 14
TITLE VII-RETALIATION
(TONYA EXUM)

210. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

211. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

212. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

213. In retaliation for the Plaintiff's numerous complaints and for filing charges of discrimination with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. repeatedly assigning unfair discipline against Plaintiff in an effort to write her up;

- b. reassigned her to different job assignments that did not match her medical restrictions.
- c. sent Plaintiff home early for the remainder of a shift without pay;
- d. denied Plaintiff overtime opportunities that were otherwise offered to employees who did not complain;
- e. After Plaintiff refused her supervisors' requests for sex and complained about sexual harassment, she was unfairly disciplined and has been stripped of her "utility" job duties, which has negatively impacted her opportunity for promotions, raises and overtime.

214. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

215. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 15
TITLE VII-RETALIATION
(JEANNETTE GARDNER)

216. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

217. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

218. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

219. In retaliation for the Plaintiff's numerous complaints, for helping other women complain about sexual harassment and for filing charges of discrimination with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was physically and sexually assaulted by her Superintendent, Myron Alexander – one of the men who was sexually harassing her female co-workers -- who demonstrated in front of other Supervisors that women should be "put in their place and should not be allowed to complain;
- b. Plaintiff was unfairly disciplined;
- c. Plaintiff was denied a transfer to a more desirable work assignment with more desirable hours and denied an opportunity for a promotion and/or raise.

220. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

221. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has

suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 16
TITLE VII and ADA-RETALIATION
(ARLENE GOFORTH)

222. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

223. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

224. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

225. In retaliation for the Plaintiff's numerous complaints and for filing charges of discrimination with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. After Plaintiff refused her supervisors' requests for sex and complained about sexual harassment and discrimination, she was reassigned from a job position that she was capable of performing to a job that exacerbated disabling residual side-effects from a previous cancer surgery (an equilibrium imbalance) which violated her restrictions.

- b. In retaliation for Plaintiff complaining about sexual harassment and discrimination, Ford refused to have her reassigned to her previous position which matched her disability restrictions and instead laid her off without pay, purportedly due to “no work available.”
- c. Ford refuses to return Plaintiff to work.

226. Ford’s retaliatory acts against Plaintiff constitute materially adverse employment actions.

227. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 17
TITLE VII-RETALIATION
(CHRISTINE HARRIS)

228. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

229. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

230. Supervisors have gone out of their way to make the Plaintiff’s job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

231. In retaliation for refusing her supervisor's requests for sex, for the Plaintiff's numerous complaints, and for filing charges of discrimination with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Subjected Plaintiff to unfair and unwarranted discipline;
- b. Told Plaintiff not to complain and not to go to Labor Relations;
- c. Plaintiff was told that she was a probationary employee and that complaining would get her fired;
- d. Plaintiff was told "Ford doesn't give a damn about your complaint."
- e. Plaintiff was told "Ford doesn't care about workplace conditions, especially for new people" and "Ford only cares about the bottom line."
- f. When Plaintiff insisted on complaining, she was refused adequate training on a new job assignment, unfairly criticized on her performance and terminated.

232. Ford's retaliatory acts against Plaintiff, including termination constitute materially adverse employment actions.

233. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 18
TITLE VII/ADA-RETALIATION
(ORISSA HENRY)

234. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

235. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

236. Supervisors have gone out of their way to make Plaintiff and other similarly situated individuals' jobs more difficult, have made it clear that they were going to make their jobs more difficult and their life in the plant miserable, and have taken extra measures to make the performance of the Plaintiff's and other similarly situated individuals' job duties more difficult and/or to subject them to increased scrutiny and/or discipline.

237. In retaliation for refusing her supervisor's requests for sex, for the Plaintiff's numerous complaints, and for filing charges of sexual harassment and discrimination with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was unfairly disciplined, suspended without pay and laid off purportedly because there was "no work available", whereas Employees that did not complain about sexual harassment were not disciplined for the same issues and were not suspended without pay or laid off.
- b. Denied placement on a job that fit her restrictions and refused to allow her to apply ice or cold packs intermittently to her hands when and if they swelled during work.

238. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

239. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 19
TITLE VII-RETALIATION
(LAWANDA JORDAN)

240. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

241. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

242. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

243. In retaliation for refusing her supervisor's requests for sex, for the Plaintiff's numerous complaints, and for filing charges of discrimination with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was unfairly disciplined and her performance was overly scrutinized.
- b. Plaintiff was assigned to less desirable job placements.
- c. Plaintiff was denied restroom breaks while employees who did not complain continued to receive regular restroom breaks.

- d. When Plaintiff complained to another Supervisor, Ken Perry about continuing retaliation, he told Plaintiff he was not going to do anything to stop retaliation, sexual harassment or discrimination.

244. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

245. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 20
TITLE VII-RETALIATION
(DANIELLE KUDIRKA)

246. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 115 of the Complaint.

247. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

248. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable,

and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

249. In retaliation for refusing her supervisor's requests for sex, for the Plaintiff's numerous complaints, and for filing charges of discrimination with the Illinois Department of Human Rights and the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was unfairly disciplined and sent home without pay for the remainder of a shift and/or suspended.
- b. Plaintiff was placed on less desirable job assignments.
- c. Plaintiff was denied substantial overtime opportunities that other employees who did not complain continued to receive.
- d. Plaintiff was denied bathroom breaks that other workers who did not complain continued to receive.

250. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

251. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 21
TITLE VII-RETALIATION
(TERRI LEWIS-BLED SOE)

252. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

253. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

254. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

255. In retaliation for refusing her supervisor's requests for sex, for the Plaintiff's numerous complaints, and for filing charges of discrimination with the Illinois Department of Human Rights and the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was unfairly disciplined.
 - i. Supervisor George Melchore, acting at the instruction of Superintendent Myron Alexander repeatedly denied Plaintiff requests to complain about sexual harassment to Ford's Labor Relations Department and disciplined or threatened to discipline Plaintiff.
- b. Plaintiff was denied requests to use the restroom which were afforded to other similarly situated employees who did not complain about sexual harassment.

- c. Ford denied Plaintiff use of the same tools at work that other employees are provided, assigned her to a more difficult and less desirable job assignment in an effort to “set her up” to fail.
- d. Ford denied Plaintiff the same overtime opportunities offered to other similarly situated employees who did not complain about sexual harassment.

256. Ford’s retaliatory acts against Plaintiff constitute materially adverse employment actions.

257. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 22
TITLE VII-RETALIATION
(CONSTANCE MADISON)

258. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

259. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

260. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

261. In retaliation for refusing her supervisor's requests for sex, for the Plaintiff's numerous complaints, and for filing charges of discrimination and sexual harassment with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was informed that Building Superintendent "Chuck" was "out to get" Plaintiff because he was upset Plaintiff filed a sexual harassment complaint.
 - i. Chuck is well known for targeting employees for termination or in an effort to force them to quit when they have complained about sexual harassment and discrimination.
- b. Plaintiff was unfairly demoted to a less desirable shift even though men with less seniority were not moved.
- c. Plaintiff was subjected to increased performance scrutiny, criticism and unfair discipline.
- d. Plaintiff by assigning her to a less desirable job and/or job assignments that do not match her medical restrictions.

262. Ford's manipulation of Plaintiff's job placement has materially altered the terms and conditions of her employment.

263. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

264. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 23
TITLE VII-RETALIATION
(CEPHANI MILLER)

265. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

266. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

267. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

268. In retaliation for refusing her supervisor's requests for sex, for the Plaintiff's numerous complaints, and for helping other similarly situated women complain and for filing charges of discrimination and sexual harassment with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was unfairly disciplined and suspended without pay.
- b. Ford subjected Plaintiff to higher workplace scrutiny and unfair performance critiques.
- c. Ford demoted Plaintiff because she rebuked and complained about Supervisor Willie Fonseca sexually harassing her and other similarly situated women.
- d. Ford demoted Plaintiff because she helped other women complain against sexual harassment and Superintendent Myron Alexander viewed her as a threat to expose his ongoing and rampant sexual harassment of other women in the workplace.

269. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

270. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 24
TITLE VII-RETALIATION
(MIYOSHI MORRIS)

271. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

272. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

273. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

274. In retaliation for refusing her supervisor's requests for sex, for the Plaintiff's numerous complaints, and for filing charges of discrimination and sexual harassment with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was unfairly disciplined;
- b. Plaintiff was held to increased performance scrutiny.
- c. Plaintiff was deprived of overtime opportunities.
- d. Plaintiff was terminated, purportedly due to a paperwork issue, but a similarly situated white male employee who did not complain about sexual harassment and who was also purportedly terminated for an identical paperwork reason was allowed back to work.
- e. Ford has failed to return Plaintiff to work.

275. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

276. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 25
TITLE VII-RETALIATION
(STEPHANIE SZOT)

277. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 115 of the Complaint.

278. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

279. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

280. In retaliation for refusing her supervisor's and other male co-workers' requests for sex, and for the Plaintiff's numerous complaints, and for filing charges of discrimination and sexual harassment with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff has been stalked and assaulted by one of her sexual harassers, both in and outside of the workplace, and Ford refuses to do punish the stalker.

b. Plaintiff was told that Ford would not reassign her stalker to another shift because he was too important and valuable, and that if she wanted relief from his hostile, aggressive and threatening conduct at work, she could either be reassigned from her shift that received a 10% shift premium to a lower paying, less desirable work assignment that would not receive as many overtime hours or alternatively, Defendant would “figure out a reason” to suspend Plaintiff for 30 days.

i. Plaintiff was forced to accept a lower paying job assignment in order to avoid a thirty-day suspension without pay, however, her sexual harasser continued to be allowed to work the higher paying and more desirable shift.

c. Plaintiff has also been deprived of substantial wages, including substantial overtime opportunities since complaining.

281. Ford’s retaliatory acts against Plaintiff constitute materially adverse employment actions.

282. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 26
TITLE VII-RETALIATION
(SHIRLEY THOMAS-MOORE)

283. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

284. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

285. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

286. In retaliation for refusing her supervisor's and other male co-workers' requests for sex, and for the Plaintiff's numerous complaints and helping other women to complain, and for filing charges of discrimination and sexual harassment with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff has been demoted and transferred to a less desirable job position that pays less money;
- b. Plaintiff has been afforded fewer overtime hours than similarly situated employees who did not complain.

287. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

288. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 27
TITLE VII-RETALIATION
(ROSE THOMAS)

289. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

290. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

291. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

292. In retaliation for refusing her supervisor's and other male co-workers' requests for sex, and for the Plaintiff's numerous complaints, and for filing charges of discrimination and sexual harassment with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was subjected to heightened performance scrutiny and unfairly disciplined;
- b. Plaintiff suffered experienced extreme emotional distress and took a medical leave of absence to treat her condition, but when she

attempted to return, Ford insisted on placing her back to work under the supervision of her sexual harassers.

- c. Ford used the excuse that because it could not allow her to work with her sexual harassers, it would not return her to work, and instead terminated her employment.

293. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

294. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 28
TITLE VII-RETALIATION
(TONI WILLIAMS)

295. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

296. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

297. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

298. In retaliation for refusing her supervisor's and other male co-workers' requests for sex, and for the Plaintiff's numerous complaints, and for filing charges of discrimination and sexual harassment with the EEOC, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was subjected to increased performance scrutiny and discipline or threats of discipline, including suspensions without pay.
- b. Plaintiff's Supervisor refused her requests to go for medical treatment even when she experienced extreme emotional distress, elevated blood pressure and severe chest pains at work and told her "Ford is a stressful place. Deal with it."
 - i. Plaintiff's chest pains were so severe that she went to Ford's medical department anyway and the medical department told Plaintiff to go to the hospital for evaluation.
- c. When Plaintiff attempted to return to work, Ford told Plaintiff that she had "walked off the job" and that she was fired.
- d. The real reason Ford terminated Plaintiff was because she had complained about sexual harassment.

299. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

300. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has

suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 29
TITLE VII-RETALIATION
(BERNADETTE CLYBURN)

301. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

302. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

303. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

304. In retaliation for refusing her supervisor's and other male co-workers' requests for sex, and for the Plaintiff's numerous complaints, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. After Plaintiff complained about ongoing sexual harassment, she was subjected to increased performance scrutiny and unfairly disciplined.
- b. Plaintiff was subjected to physical assault by her Superintendent who was upset that Plaintiff was filing complaints.

c. Plaintiff was deprived of overtime opportunities that were afforded to other employees who did not complain about sexual harassment and discriminatory workplace practices.

305. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

306. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 30
TITLE VII-RETALIATION
(MARTHA CORBIN)

307. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

308. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

309. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

310. In retaliation for refusing her supervisor's and other male co-workers' requests for sex, and for the Plaintiff's numerous complaints regarding sexual harassment

and discrimination, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was subjected to increased performance scrutiny and unfairly disciplined and/or threatened with unfair discipline.
- b. Plaintiff was assigned to less desirable job placements, with much less opportunity for promotions.

311. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

312. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 31
TITLE VII-RETALIATION
(ANGELA GLENN)

313. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

314. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

315. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

316. In retaliation for refusing her supervisor's and other male co-workers' requests for sex, and for the Plaintiff's numerous complaints regarding sexual harassment and discrimination, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was subjected to heightened performance scrutiny.
- b. Plaintiff was assigned to less desirable job placements and not provided adequate instruction in an effort to set her up to fail.
- c. Plaintiff was unfairly disciplined.
- d. Plaintiff was terminated.

317. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

318. As a result of the foregoing, Plaintiff has suffered damages of an ongoing and continuous nature.

COUNT 32
TITLE VII-RETALIATION
(LADWYNA HOOVER)

319. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

320. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

321. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable,

and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

322. In retaliation for refusing her supervisor's and other male co-workers' requests for sex, and for the Plaintiff's numerous complaints regarding sexual harassment and discrimination, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was subjected to heightened performance scrutiny and was unfairly disciplined.
- b. Supervisor Bivens assigned Hoover to the most physically demanding job assignments knowing that she was too small to perform the job. He used this same retaliatory technique to against other women who spurned his sexual advances, including Theresa Bosan.
- c. Ford knew that the particular position to which Bosan and Hoover were assigned was impossible for either of these employees to effectively perform as the Ergonomics manager, Red Marshall confessed to Bosan: "We're not supposed to tell you this, but not all jobs are for women who are as small as you. This one is not for you. You are too little."

- d. Superintendent Chuck (last name unknown) condoned Hoover being placed on a physically difficult job because it might get her to quit.
- e. This retaliatory technique by Bivens was well known to the union as a way Chuck, Bivens and Ford got “complainers” to quit.
- f. Ford’s retaliatory and inappropriate job reassignment imperiled Plaintiff and caused her to become injured, and she required multiple surgeries for her injuries.
- g. Hoover requested that her medical leave be extended to accommodate the extended medical treatment she required.
- h. Ford typically granted medical leave extensions to injured employees who did not complain and whose workplace injuries required similar extensive surgeries and treatment.
- i. However, because Hoover was a known “complainer”, Ford did not grant her leave extension and terminated her employment.

323. Ford’s retaliatory acts against Plaintiff constitute materially adverse employment actions.

324. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has

suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 33
TITLE VII-RETALIATION
(OGERY LEDBETTER)

325. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

326. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

327. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

328. In retaliation for refusing her supervisor's and other male co-workers' requests for sex, and for the Plaintiff's numerous complaints regarding sexual harassment and discrimination, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was subjected to increased performance scrutiny and unfairly disciplined and/or threatened with unfair discipline.
- b. Plaintiff was assigned to less desirable job placements, with much less opportunity for promotions.

329. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

330. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 34
TITLE VII-RETALIATION
(LATRICIA SHANKLIN)

331. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

332. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

333. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

334. In retaliation for refusing her supervisor's and other male co-workers' requests for sex, and for the Plaintiff's numerous complaints regarding sexual harassment and discrimination, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was subjected to increased performance scrutiny, and was unfairly disciplined, including that she was suspended or threatened of being suspended without pay.
- b. Plaintiff was assigned to less desirable job placements.

- c. Plaintiff was not allowed bathroom breaks.
- d. Plaintiff was denied overtime and promotional opportunities.

335. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

336. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 35
TITLE VII-RETALIATION
(ANTOINETTE SULLIVAN)

337. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

338. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

339. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

340. In retaliation for refusing her supervisor's and other male co-workers' requests for sex, and for the Plaintiff's numerous complaints regarding sexual harassment and discrimination, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was subjected to increased performance scrutiny, and was unfairly disciplined, including that she was suspended or threatened of being suspended without pay.
- b. Plaintiff was assigned to less desirable job placements.
- c. Plaintiff was not allowed bathroom breaks.
- d. Plaintiff was denied overtime and promotional opportunities.

341. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

342. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 36
TITLE VII-RETALIATION
(DERRICKA THOMAS)

343. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

344. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

345. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

346. In retaliation for refusing her supervisor's and other male co-workers' requests for sex, and for the Plaintiff's numerous complaints regarding sexual harassment and discrimination, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was subjected to increased performance scrutiny, and was unfairly disciplined, including that she was suspended or threatened of being suspended without pay.
- b. Plaintiff was assigned to less desirable job placements.
- c. Plaintiff was not allowed bathroom breaks.
- d. Plaintiff was denied overtime and promotional opportunities.

347. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

348. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 37
TITLE VII-RETALIATION
(NICHEA WALLS)

349. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 146 of the Complaint.

350. Plaintiff and similarly situated individuals have been retaliated against for refusing sexual advances, comments, innuendo, and lurid foul and offensive language.

351. Supervisors have gone out of their way to make the Plaintiff's job more difficult, have made it clear that they were going to make her life in the plant miserable, and have taken extra measures to subject Plaintiff and others who complained about sexual harassment and discrimination to increased scrutiny and/or discipline.

352. In retaliation for refusing her supervisor's and other male co-workers' requests for sex, and for the Plaintiff's numerous complaints regarding sexual harassment and discrimination, Ford has retaliated against this Plaintiff in one or more of the following ways:

- a. Plaintiff was subjected to increased performance scrutiny, and was unfairly disciplined, including that she was suspended or threatened of being suspended without pay.
- b. Plaintiff was assigned to less desirable job placements.
- c. Plaintiff was not allowed bathroom breaks.
- d. Plaintiff was denied overtime and promotional opportunities.

353. Ford's retaliatory acts against Plaintiff constitute materially adverse employment actions.

354. As a direct and proximate result of the foregoing acts of retaliation, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has

suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 38
TITLE VII – NATIONAL ORIGIN DISCRIMINATION
(DANIELLE KUDIRKA)

355. Plaintiff adopts, realleges and incorporates by reference the allegations of paragraphs 1-75 and 246-251 of this Amended Complaint.

356. Plaintiff's national origin is Lithuanian.

357. Plaintiff's work performance meets Ford's legitimate expectations.

358. Plaintiff experienced discrimination based on her national origin at Ford, including that:

- a. Plaintiff's supervisors and co-workers mocked Plaintiff's Lithuanian accent and heritage;
- b. Plaintiff's supervisors and co-workers communicated to Plaintiff that she was inferior for not being born in America;
- c. Plaintiff's supervisors gave preferences to American-born workers who did not have a Lithuanian accent, including more desirable job assignments and more overtime hours;
- d. Plaintiff was told she was not eligible for the most desirable work assignments because she was "foreign" and "dumb."

359. Due to the continuous and ongoing discriminatory treatment, Plaintiff was humiliated and the terms and conditions of her employment were materially adversely affected.

360. Plaintiff complained about national origin discrimination to Ford through her supervisors, union, Ford's hotline and Ford's Labor Relations Department.

361. Despite Plaintiff's Complaints, Ford has not taken prompt remedial action to stop ongoing national origin discrimination against Plaintiff.

362. Ford told Plaintiff to stop complaining and to stop seeking requesting more desirable work assignments which deprived Plaintiff of future promotional opportunities.

363. When Plaintiff complained, she was further demeaned, discriminated against and told to stop trying to improve her job opportunities because "you should be very happy you have a job at Ford" and "most immigrants cannot get this job."

364. As a result of illegal national origin discrimination, Plaintiff has suffered adverse employment actions, including reduced overtime opportunities, lost opportunities for job advancement and promotions, and being relegated to less desirable job positions.

365. As a direct and proximate result of the foregoing acts of national origin discrimination, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 39
ADA- FAILURE TO ACCOMMODATE/RETALIATION
(CHRISTIE VAN)

366. Plaintiff adopts, realleges and incorporates by reference the allegations of paragraphs 1-156 of this complaint as and for this paragraph.

367. This claim is brought under the Americans with Disabilities Act, as amended ("ADA").

368. Plaintiff is a qualified individual with a disability (Major Depression, and Severe and Generalized Anxiety Disorder) all of which were caused by the harassment and discrimination she endured at Ford.

369. As a result of her condition, Plaintiff took a medical leave of absence.

370. Thereafter, while on leave, Ford required Plaintiff to be examined by a company doctor and to submit to multiple IME's, including one with Dr. Alexander Obolsky from the Northwestern Medical Faculty Foundation.

371. Dr. Obolsky released Van to return to work with the only restriction being that Ford should not place Van in proximity to her harassers.

372. Ford refused to return Van to work despite the return being authorized by its own physician.

373. Van was forced to file a grievance and take the matter to arbitration to win her job back.

374. The arbitrator ruled in Van's favor and against Ford at the arbitration.

375. Ford has knowledge of Plaintiff's disability.

376. Plaintiff requested a reasonable accommodation – that she be allowed to work without being directly supervised by the same sexual harassers about whom she previously complained.

377. Ford refused to engage in an interactive process and refused to provide Plaintiff with the reasonable accommodation she requested.

378. Ford forced Plaintiff to pay for the costs associated with the medical visits for the IMEs which Ford required.

379. Ford required plaintiff to undergo IMEs on September 24, 2013, September 30, 2013 and October 8, 2013.

380. Thereafter, Ford withheld and refused to provide plaintiff with the results of the IMEs for more nearly four months, thus delaying her return to work and denying Plaintiff her wages and benefits.

381. As a direct and proximate result of the foregoing acts of disability discrimination and failure to reasonably accommodate the Plaintiff, Plaintiff has been damaged in that she has lost or been deprived of income opportunities, has suffered anxiety, humiliation and emotional distress, and has otherwise suffered physical or psychological injuries.

COUNT 40
BATTERY
(CHRISTIE VAN)

382. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1- 156 and 366-382 as and for this paragraph.

383. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

384. Defendant took no steps to prevent Plaintiff from suffering a battery.

385. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

386. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 41
BATTERY
(CHARMELLA LEVIEGE)

387. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-146 and 157-163 as and for this paragraph.

388. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

389. Defendant took no steps to prevent Plaintiff from suffering a battery.

390. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

391. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 42
BATTERY
(MARIA PRICE)

392. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-146 and 164-171 as and for this paragraph.

393. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

394. Defendant took no steps to prevent Plaintiff from suffering a battery.

395. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

396. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 43
BATTERY
(HELEN ALLEN)

397. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-146 and 172-177 as and for this paragraph.

398. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

399. Defendant took no steps to prevent Plaintiff from suffering a battery.

400. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

401. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 44
BATTERY
(THERESA BOSAN)

402. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-146 and 184-189 as and for this paragraph.

403. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

404. Defendant took no steps to prevent Plaintiff from suffering a battery.

405. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

406. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 45
BATTERY
(SHRANDA CAMPBELL)

407. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-146 and 190-195 as and for this paragraph.

408. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

409. Defendant took no steps to prevent Plaintiff from suffering a battery.

410. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

411. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 46
BATTERY
(KETURAH CARTER)

412. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1- 146 and 196-203 as and for this paragraph.

413. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

414. Defendant took no steps to prevent Plaintiff from suffering a battery.

415. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

416. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 47
BATTERY
(MICHELLE DAHN)

417. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1- 115 and 204-209 as and for this paragraph.

418. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

419. Defendant took no steps to prevent Plaintiff from suffering a battery.

420. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

421. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 48
BATTERY
(TONYA EXUM)

422. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1- 146 and 210-215 as and for this paragraph.

423. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

424. Defendant took no steps to prevent Plaintiff from suffering a battery.

425. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

426. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled,

suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 49
BATTERY
(JEANNETTE GARDNER)

427. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1- 146 and 216-221 as and for this paragraph.

428. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

429. Defendant took no steps to prevent Plaintiff from suffering a battery.

430. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

431. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 50
BATTERY
(ARLENE GOFORTH)

432. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1- 146 and 222-227 as and for this paragraph.

433. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

434. Defendant took no steps to prevent Plaintiff from suffering a battery.

435. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

436. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 51
BATTERY
(CHRISTINE HARRIS)

437. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-146 and 228-233 as and for this paragraph.

438. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

439. Defendant took no steps to prevent Plaintiff from suffering a battery.

440. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

441. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 52
BATTERY
(DANIELLE KUDIRKA)

442. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-115 and 246-251 and 355-365 as and for this paragraph.

443. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

444. Defendant took no steps to prevent Plaintiff from suffering a battery.

445. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

446. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 53
BATTERY
(TERRI LEWIS-BLED SOE)

447. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-146 and 252-257 as and for this paragraph.

448. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

449. Defendant took no steps to prevent Plaintiff from suffering a battery.

450. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

451. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 54
BATTERY
(MIYOSHI MORRIS)

452. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-146 and 271-276 as and for this paragraph.

453. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

454. Defendant took no steps to prevent Plaintiff from suffering a battery.

455. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

456. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 55
BATTERY
(STEPHANIE SZOT)

457. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-115 and 277-282 as and for this paragraph.

458. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

459. Defendant took no steps to prevent Plaintiff from suffering a battery.

460. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

461. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 56
BATTERY
(MARTHA CORBIN)

462. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-146 and 307-312 as and for this paragraph.

463. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

464. Defendant took no steps to prevent Plaintiff from suffering a battery.

465. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

466. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled,

suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 57
BATTERY
(ANGELA GLENN)

467. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-146 and 313-318 as and for this paragraph.

468. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

469. Defendant took no steps to prevent Plaintiff from suffering a battery.

470. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

471. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 58
BATTERY
(LADWYNA HOOVER)

472. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-146 and 319-324 as and for this paragraph.

473. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

474. Defendant took no steps to prevent Plaintiff from suffering a battery.

475. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

476. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 59
BATTERY
(OGERY LEDBETTER)

477. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-146 and 325-330 as and for this paragraph.

478. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

479. Defendant took no steps to prevent Plaintiff from suffering a battery.

480. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

481. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 60

BATTERY
(DERRICKA THOMAS)

482. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-146 and 343-348 as and for this paragraph.

483. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

484. Defendant took no steps to prevent Plaintiff from suffering a battery.

485. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

486. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 61
BATTERY
(NICHEA WELLS)

487. Plaintiff adopts and incorporates by reference the allegations in paragraphs 1-146 and 349-354 as and for this paragraph.

488. Plaintiff was subjected to a harmful or offensive touching, without her consent, by one or more of the Defendant's supervisors, managers and/or employees.

489. Defendant took no steps to prevent Plaintiff from suffering a battery.

490. The supervisors, managers and/or employees engaging in this conduct did so with the intent to harm the Plaintiff.

491. As a direct and proximate result of the foregoing conduct, the Plaintiff suffered personal injuries, bodily damage, became sore, lame, sick and disabled, suffered mental anguish, anxiety and humiliation, emotional distress and other forms of personal injury and bodily damage.

COUNT 62
ASSAULT
(CHRISTIE VAN)

492. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-156 and 366-386 as and for this paragraph.

493. The foregoing acts by the Defendant were done intentionally.

494. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

495. Defendant took no steps to prevent Plaintiff from being assaulted.

496. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 63
ASSAULT
(CHARMELLA LEVIEGE)

497. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 157-163 and 387-391 as and for this paragraph.

498. The foregoing acts by the Defendant were done intentionally.

499. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

500. Defendant took no steps to prevent Plaintiff from being assaulted.

501. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 64
ASSAULT
(MARIA PRICE)

502. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 164-171 and 392-396 as and for this paragraph.

503. The foregoing acts by the Defendant were done intentionally.

504. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

505. Defendant took no steps to prevent Plaintiff from being assaulted.

506. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 65
ASSAULT
(HELEN ALLEN)

507. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 172-177 and 397-401 as and for this paragraph.

508. The foregoing acts by the Defendant were done intentionally.

509. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

510. Defendant took no steps to prevent Plaintiff from being assaulted.

511. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 66
ASSAULT
(THERESA BOSAN)

512. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 184-189 and 402-406 as and for this paragraph.

513. The foregoing acts by the Defendant were done intentionally.

514. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

515. Defendant took no steps to prevent Plaintiff from being assaulted.

516. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 67
ASSAULT
(SHRANDA CAMPBELL)

517. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 190-195 and 407-411 as and for this paragraph.

518. The foregoing acts by the Defendant were done intentionally.

519. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

520. Defendant took no steps to prevent Plaintiff from being assaulted.

521. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 68
ASSAULT
(KETURAH CARTER)

522. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 196-203 and 412-416 as and for this paragraph.

523. The foregoing acts by the Defendant were done intentionally.

524. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

525. Defendant took no steps to prevent Plaintiff from being assaulted.

526. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 69
ASSAULT
(MICHELLE DAHN)

527. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-115, 204-209 and 417-421 as and for this paragraph.

528. The foregoing acts by the Defendant were done intentionally.

529. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

530. Defendant took no steps to prevent Plaintiff from being assaulted.

531. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 70
ASSAULT
(TONYA EXUM)

532. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 210-215 and 422-426 as and for this paragraph.

533. The foregoing acts by the Defendant were done intentionally.

534. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

535. Defendant took no steps to prevent Plaintiff from being assaulted.

536. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 71
ASSAULT
(JEANNETTE GARDNER)

537. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 216-222 and 427-431 as and for this paragraph.

538. The foregoing acts by the Defendant were done intentionally.

539. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

540. Defendant took no steps to prevent Plaintiff from being assaulted.

541. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 72
ASSAULT
(ARLENE GOFORTH)

542. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 222-227 and 432-436 as and for this paragraph.

543. The foregoing acts by the Defendant were done intentionally.

544. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

545. Defendant took no steps to prevent Plaintiff from being assaulted.

546. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 73
ASSAULT
(CHRISTINE HARRIS)

547. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 228-233 and 437-441 as and for this paragraph.

548. The foregoing acts by the Defendant were done intentionally.

549. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

550. Defendant took no steps to prevent Plaintiff from being assaulted.

551. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 74
ASSAULT
(ORISSA HENRY)

552. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146 and 234-239 as and for this paragraph.

553. The foregoing acts by the Defendant were done intentionally.

554. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

555. Defendant took no steps to prevent Plaintiff from being assaulted.

556. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 75
ASSAULT
(LAWANDA JORDAN)

557. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146 and 240-245 as and for this paragraph.

558. The foregoing acts by the Defendant were done intentionally.

559. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

560. Defendant took no steps to prevent Plaintiff from being assaulted.

561. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 76
ASSAULT
(DANIELLE KUDIRKA)

562. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-115, 246-251, 355-365 and 442-446 as and for this paragraph.

563. The foregoing acts by the Defendant were done intentionally.

564. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

565. Defendant took no steps to prevent Plaintiff from being assaulted.

566. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 77
ASSAULT
(TERRI LEWIS-BLED SOE)

567. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 252-257 and 447-451 as and for this paragraph.

568. The foregoing acts by the Defendant were done intentionally.

569. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

570. Defendant took no steps to prevent Plaintiff from being assaulted.

571. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 78
ASSAULT
(CONSTANCE MADISON)

572. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146 and 258-262 as and for this paragraph.

573. The foregoing acts by the Defendant were done intentionally.

574. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

575. Defendant took no steps to prevent Plaintiff from being assaulted.

576. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 79
ASSAULT
(CEPHANI MILLER)

577. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146 and 265-270 as and for this paragraph.

578. The foregoing acts by the Defendant were done intentionally.

579. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

580. Defendant took no steps to prevent Plaintiff from being assaulted.

581. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 80
ASSAULT
(MIYOSHI MORRIS)

582. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 271-276 and 452-456 as and for this paragraph.

583. The foregoing acts by the Defendant were done intentionally.

584. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

585. Defendant took no steps to prevent Plaintiff from being assaulted.

586. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 81
ASSAULT
(STEPHANIE SZOT)

587. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-115, 277-282 and 457-461 as and for this paragraph.

588. The foregoing acts by the Defendant were done intentionally.

589. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

590. Defendant took no steps to prevent Plaintiff from being assaulted.

591. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 82
ASSAULT
(SHIRLEY THOMAS-MOORE)

592. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146 and 283-287 as and for this paragraph.

593. The foregoing acts by the Defendant were done intentionally.

594. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

595. Defendant took no steps to prevent Plaintiff from being assaulted.

596. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 83
ASSAULT

(ROSE THOMAS)

597. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146 and 288-295 as and for this paragraph.

598. The foregoing acts by the Defendant were done intentionally.

599. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

600. Defendant took no steps to prevent Plaintiff from being assaulted.

601. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

**COUNT 84
ASSAULT
(TONI WILLIAMS)**

602. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146 and 294-299 as and for this paragraph.

603. The foregoing acts by the Defendant were done intentionally.

604. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

605. Defendant took no steps to prevent Plaintiff from being assaulted.

606. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 85

ASSAULT
(BERNADETTE CLYBURN)

607. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146 and 300-306 as and for this paragraph.

608. The foregoing acts by the Defendant were done intentionally.

609. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

610. Defendant took no steps to prevent Plaintiff from being assaulted.

611. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 86
ASSAULT
(MARTHA CORBIN)

612. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 307-312 and 462-466 as and for this paragraph.

613. The foregoing acts by the Defendant were done intentionally.

614. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

615. Defendant took no steps to prevent Plaintiff from being assaulted.

616. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 87
ASSAULT
(ANGELA GLENN)

617. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 313-318 and 467-471 as and for this paragraph.

618. The foregoing acts by the Defendant were done intentionally.

619. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

620. Defendant took no steps to prevent Plaintiff from being assaulted.

621. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 88
ASSAULT
(LADWYNA HOOVER)

622. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 319-324 and 472-476 as and for this paragraph.

623. The foregoing acts by the Defendant were done intentionally.

624. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

625. Defendant took no steps to prevent Plaintiff from being assaulted.

626. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 89
ASSAULT
(OGERY LEDBETTER)

627. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 325-330 and 477-481 as and for this paragraph.

628. The foregoing acts by the Defendant were done intentionally.

629. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

630. Defendant took no steps to prevent Plaintiff from being assaulted.

631. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 90
ASSAULT
(LATRICIA SHANKLIN)

632. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146 and 331-337 as and for this paragraph.

633. The foregoing acts by the Defendant were done intentionally.

634. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

635. Defendant took no steps to prevent Plaintiff from being assaulted.

636. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 91
ASSAULT
(DERRICKA THOMAS)

637. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 343-348 and 482-486 as and for this paragraph.

638. The foregoing acts by the Defendant were done intentionally.

639. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

640. Defendant took no steps to prevent Plaintiff from being assaulted.

641. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 92
ASSAULT
(NICHEA WALLS)

642. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 349-354 and 487-491 as and for this paragraph.

643. The foregoing acts by the Defendant were done intentionally.

644. These acts placed Plaintiff in fear or reasonable apprehension of an immediate battery or harmful or offensive touching.

645. Defendant took no steps to prevent Plaintiff from being assaulted.

646. As a direct and proximate result of the Defendant's conduct, the Plaintiff was damaged.

COUNT 93
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(CHRISTIE VAN)

647. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-156, 366-386 and 492-496 as and for this paragraph.

648. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

649. Defendant's conduct and the conduct of its employees and managers was extreme, outrageous and beyond the bounds of moral decency.

650. Defendant's conduct and the conduct of its managers and employees was so outrageous that no reasonable person could be expected to endure it.

651. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 94
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(CHARMELLA LEVIEGE)

652. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 157-163, 387-391 and 497-501 as and for this paragraph.

653. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

654. Defendant's conduct and the conduct of its employees and managers was extreme, outrageous and beyond the bounds of moral decency.

655. Defendant's conduct and the conduct of its managers and employees was so outrageous that no reasonable person could be expected to endure it.

656. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 95
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(MARIA PRICE)

657. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 164-171, 392-396 and 502-506 as and for this paragraph.

658. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

659. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

660. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

661. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 96
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(HELEN ALLEN)

662. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 172-177, 397-401 and 507-511 as and for this paragraph.

663. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

664. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

665. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

666. As a result of Defendant's conduct and the conduct of its managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 97
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(THERESA BOSAN)

667. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 184-189, 402-406 and 512-516 as and for this paragraph.

668. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

669. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

670. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

671. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 98
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(SHRANDA CAMPBELL)

672. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 190-195, 407-411 and 517-521 as and for this paragraph.

673. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

674. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

675. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

676. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 99
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(KETRUAH CARTER)

677. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 196-203, 412-416 and 522-526 as and for this paragraph.

678. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

679. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

680. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

681. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 100
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(MICHELLE DAHN)

682. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-115, 204-209, 417-421 and 527-531 as and for this paragraph.

683. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

684. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

685. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

686. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 101
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(TONYA EXUM)

687. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 210-215, 422-426 and 532-536 as and for this paragraph.

688. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

689. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

690. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

691. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress, including Post Traumatic Stress Disorder and was damaged.

COUNT 102
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(JEANNETTE GARDNER)

692. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 216-222, 427-431 and 537-541 as and for this paragraph.

693. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

694. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

695. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

696. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 103
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(ARLENE GOFORTH)

697. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 222-227, 432-436 and 542-546 as and for this paragraph.

698. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

699. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

700. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

701. As a result of Defendant's conduct and the conduct of its managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 104
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(CHRISTINE HARRIS)

702. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 228-233, 437-441 and 547-551 as and for this paragraph.

703. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

704. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

705. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

706. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 105
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(ORISSA HENRY)

707. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 234-239 and 552-556 as and for this paragraph.

708. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

709. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

710. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

711. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 106
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(LAWANDA JORDAN)

712. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 240-245 and 557-561 as and for this paragraph.

713. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

714. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

715. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

716. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 107
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(DANIELLE KUDIRKA)

717. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-115, 246-251, 355-365, 442-446 and 562-566 as and for this paragraph.

718. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

719. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

720. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

721. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 108
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(TERRI LEWIS-BLED SOE)

722. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 252-257, 447-451 and 567-571 as and for this paragraph.

723. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

724. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

725. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

726. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 109
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(CONSTANCE MADISON)

727. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 258-262 and 572-576 as and for this paragraph.

728. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

729. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

730. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

731. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 110
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(CEPHANI MILLER)

732. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 265-270 and 577-581 as and for this paragraph.

733. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

734. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

735. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

736. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 111
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(MIYOSHI MORRIS)

737. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 271-276, 452-456 and 582-586 as and for this paragraph.

738. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

739. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

740. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

741. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 112
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(STEPHANIE SZOT)

742. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-115, 277-282, 457-461 and 587-591 as and for this paragraph.

743. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

744. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

745. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

746. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 113
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(SHIRLEY THOMAS-MOORE)

747. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 283-287 and 592-596 as and for this paragraph.

748. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

749. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

750. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

751. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 114
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(ROSE THOMAS)

752. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 288-295 and 597-601 as and for this paragraph.

753. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

754. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

755. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

756. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 115
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(TONI WILLIAMS)

757. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 294-299 and 602-606 as and for this paragraph.

758. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

759. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

760. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

761. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 116
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(BERNADETTE CLYBURN)

762. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 300-306 and 607-611 as and for this paragraph.

763. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

764. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

765. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

766. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 117
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(MARTHA CORBIN)

767. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 307-312, 462-466 and 612-616 as and for this paragraph.

768. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

769. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

770. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

771. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 118
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(ANGELA GLENN)

772. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 313-318, 467-471 and 617-621 as and for this paragraph.

773. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

774. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

775. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

776. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 119
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(LADWYNA HOOVER)

777. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 319-324, 472-476 and 622-626 as and for this paragraph.

778. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

779. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

780. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

781. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 120
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(OGERY LEDBETTER)

782. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 325-330, 477-481 and 627-631 as and for this paragraph.

783. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

784. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

785. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

786. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 121
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(LATRICIA SHANKLIN)

787. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 331-337 and 632-636 as and for this paragraph.

788. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

789. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

790. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

791. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 122
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(DERRICKA THOMAS)

792. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 343-348, 482-486 and 637-641 as and for this paragraph.

793. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

794. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

795. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

796. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

COUNT 123
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(NICHEA WALLS)

797. The Plaintiff adopts, realleges and incorporates by reference all of the allegations in paragraphs 1-146, 349-354, 487-491 and 642-646 as and for this paragraph.

798. Defendant, through its supervisors, managers and employees, intended to cause Plaintiff severe emotional distress.

799. Defendant's conduct and the conduct of its supervisors, managers and employees was extreme, outrageous and beyond the bounds of moral decency.

800. Defendant's conduct and the conduct of its supervisors, managers and employees was so outrageous that no reasonable person could be expected to endure it.

801. As a direct and proximate result of the Defendant's conduct and the conduct of its supervisors, managers and employees, the Plaintiff suffered severe emotional distress and was damaged.

PRAYER FOR RELIEF

WHEREFORE, for the foregoing reasons, the plaintiff and Plaintiff's similarly situated persons, respectfully request that this Court provide the following equitable and monetary relief:

- a. Advance this case on the docket, order a speedy hearing at the earliest practical book date and cause this case to be expedited in every possible way;
- b. Order Ford to implement effective steps to eliminate and remediate harassment and discrimination in the workplace;
- c. Enjoin Ford from discriminating against or harassing the Named Plaintiff and Ford's employees;

- d. Appoint a monitor to supervise workplace conditions in each plant for a period of at least five (5) years;
- e. Retain jurisdiction for the monitoring period to enforce the terms of any injunction, agreement or order;
- f. Award back pay, lost future earnings, and reimbursement for lost income and for lost fringe benefits;
- g. Award compensatory damages;
- h. Award liquidated damages, if applicable;
- i. Award punitive damages;
- j. Award prejudgment interest;
- k. Award reasonable attorney's fees, expert witness fees, expenses and Plaintiff's costs;
- l. Grant such Plaintiff's relief as the Court deems equitable and just.

PLAINTIFFS DEMAND A TRIAL BY JURY

Respectfully submitted,
HUNT & ASSOCIATES, P.C.

By: /s/ Keith L. Hunt (electronic signature)
An Attorney for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that I am an attorney in this cause and that I caused to be served Plaintiffs' First Amended Class Action Complaint For Injunctive, Monetary and Class Wide Relief on counsel for all parties of record as listed below by email through the Court's CM/ECF system on May 1, 2015.

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