

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

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DODGE COUNTY, NEBRASKA
FREMONT COUNTY, NEBRASKA

SERINA BOWEN,)	Case No. 8:19-cv-270
)	
Plaintiff,)	
)	
Vs.)	FIRST AMENDED COMPLAINT
)	and
METHODIST FREMONT HEALTH;)	DEMAND FOR JURY
FREMONT HEALTH; DODGE COUNTY,)	
NEBRASKA; MIDLAND UNIVERSITY;)	
FREMONT COMMUNITY HEALTH)	
RESOURCES; KAREN HAASE; and)	
KSB SCHOOL LAW, PC, LLO;)	
)	
Defendants)	

COMES NOW the Plaintiff, by and through her attorney, and for her causes of action against the Defendants and states as follows:

1. This is an action seeking redress for violations of statutorily and constitutionally protected rights guaranteed the Plaintiff by Title VII of the Civil Rights Act, the Constitution of the United States of America (1st Amendment), Neb. Rev. Stat. §§20-123, 20-124, and 20-148, the Nebraska Fair Employment Practices Act, the common law of the State of Nebraska and the public policy of the State of Nebraska.

2. This court has original jurisdiction over the federal law claims and concurrent jurisdiction over the state law claims.

3. Plaintiff is a resident of the State of Nebraska.

4. Defendant Methodist Fremont Health is a Nebraska corporation that owns, operates and/or manages a Fremont, Dodge County, Nebraska hospital. Upon information and belief, Methodist Fremont Health is a corporate entity that resulted from an acquisition, merger, partnership or other legal relationship between Fremont Health and Nebraska Methodist Health

systems that came into existence on or about October 1, 2018 and is a recipient of state and federal funds.

5. Defendant Fremont Health is or was a hospital operating in the City of Fremont, Dodge County, Nebraska at all times alleged herein. Upon information and belief, Defendant Fremont Health was doing business as Fremont Health Medical Center at all times alleged herein, is or was a Nebraska political subdivision, is or was an employer as that term is defined by the laws set forth herein and is or was a recipient of state and federal funds.

6. Defendant Dodge County, Nebraska is a political subdivision located with the State of Nebraska. Upon information and belief, Defendant Dodge County, Nebraska was or is an operator, owner, or manager of Defendant Fremont Health (d/b/a Fremont Health Medical Center) and/or Defendant Methodist Fremont Health and is a recipient of state and federal funds.

7. Defendant Midland University is an institution of higher education located in Fremont, Nebraska and is a recipient of state or federal funds.

8. Defendant Fremont Community Health is an entity operating in the City of Fremont, Dodge County, Nebraska at all times alleged herein. Upon information and belief, Defendant Fremont Community Health was engaged in providing medical services and was an employer as that term is defined by the laws set forth herein and is or was a recipient of state and federal funds.

9. Defendant Karen Haase is an attorney licensed to practice law in the State of Nebraska and was engaged in the practice of law at all times alleged herein.

10. KSB School Law, PC, LLO is a Nebraska corporation that is licensed to do business in the State of Nebraska and was engaged in the practice of law at all times alleged herein. Defendant Karen Haase was a Director and Vice President of Defendant corporation and

was acting the scope and course of her employment with the Defendant corporation at all times alleged herein.

11. Plaintiff fulfilled the administrative prerequisites mandated by Title VII and the Nebraska Fair Employment Practices Act prior to filing this timely action.

12. Plaintiff also filed timely tort claims against the political subdivisions noted herein and by filing this action has withdrawn the tort claims.

13. Defendants Methodist Fremont Health, Fremont Health, Dodge County Nebraska, Fremont Community Health Resources, and Midland University are employers as that term is defined under state and federal law.

14. Plaintiff is female and began working for Fremont Health at the Fremont Health Medical Center in July 2014 and was working most recently as a Student Health Registered Nurse (RN) and was placed at Midland University in Fremont, Nebraska. Plaintiff also worked intermittently as an athletic trainer for Midland University prior to March 13, 2018.

15. Upon information and belief, all Defendants (except Haase and KSB School Law, PC, LLO), jointly controlled the terms, conditions, and privileges of Plaintiff's employment while Plaintiff was placed at Midland University in her capacity as Student Health Registered Nurse for Midland University. Upon information and belief, all Defendants (except Haase and KSB School Law) directly or indirectly contributed to Plaintiff's salary and other job-related benefits during her placement at Midland University. During Plaintiff's placement at Midland, Plaintiff was required to conform to the rules, regulations and procedures of the hospital and the university.

16. On or about March 13, 2018, Plaintiff was terminated from her Student Health RN and athletic trainer positions with Midland University and was involuntarily forced to resign

from her job with the other named Defendants after she engaged in the protected activities noted herein.

17. Plaintiff's supervisor at Midland was Vice President of Student Affairs, Merritt Nelson. Plaintiff's supervisor at the Fremont hospital was Mark Voss. Other known employees of one or more of the Defendants who participated in the illegal actions set forth herein are Jackie Beaten, Manager of Community Health Fremont Health, Bethan Childers, Director of Human Resources for Fremont Health, Deb Jurino, Fremont Health's Risk Manager, and Karen Haase, Director and Vice President of KSB School Law.

18. Other employees, agents, representatives, officers, officials or board members of the Defendants may have participated in the wrongful conduct described herein. At all times alleged, Defendants' employees, agents, representatives, officers, officials or board members were acting in the scope and course of their employment and/or office with the named Defendants and were acting in concert with each other to deprive Plaintiff of her statutory and constitutional rights.

19. In September 2017, a female student of Midland disclosed to Plaintiff that she had been sexually assaulted off-campus. Pursuant to policy and procedure, Plaintiff referred the student to a counselor.

20. Starting in October 2017 and continuing through the date of her separation from employment, Merritt Nelson repeatedly requested and demanded that Plaintiff provide him with confidential student/patient health information of the female assault victim and other Midland University students in violation of state and federal law.

21. Plaintiff refused to provide Merritt Nelson with the information he demanded as she reasonably believed it was illegal for her to do so. After she refused to provide Nelson with

the confidential student health information he demanded, Nelson subjected Bowen to gender-based discrimination and retaliated against her in the terms and conditions of her employment.

22. In January 2018, Plaintiff reported Nelson's illegal requests and conduct, as well as her opposition thereto, to Childers and Jurino. No action was taken in response to Plaintiff's reports regarding Nelson's illegal requests.

23. On or about February 22, 2017, Plaintiff send an email to Karen Haase at KSB School Law seeking confidential legal advice regarding the legality of Nelson's demands, to-wit: whether it was unlawful to share confidential student health information with unauthorized persons and whether such disclosure would violate laws that regulated her nursing license.

24. The legal advice Plaintiff sought from Defendants Haase and KSB School Law involved matters of public concern, to-wit: preservation and/or disclosure of confidential student health information and/or compliance with Nebraska laws, rules, and regulations governing Registered Nurses practicing in the State of Nebraska.

25. On or about March 7, 2018, an employee of KSB School Law telephoned Ms. Bowen and requested additional information regarding her February 22, 2017 email to Defendant Haase. During this conversation, Ms. Bowen gave the employee her personal cellular telephone phone number and her personal g-mail account and directed that any communications from the law firm be through her personal cell phone or her personal g-mail account.

26. Pursuant to Neb. Rev. Stat. § 27-503 et.seq., and other rules, policies and procedures which govern the conduct of attorneys practicing law in the State of Nebraska, Defendants Haase and KSB School Law had a mandatory duty and obligation to maintain confidentiality regarding the communications with Plaintiff. Nebraska law requires that "a lawyer who has had discussions with a prospective client shall not use or reveal information

learned in the consultation” and “a lawyer shall not reveal information relating to the representation of a client unless the client gives informed consent.”

27. On or about March 11, 2018, Defendant Haase sent a responsive email to Ms. Bowen’s February 22, 2017 email which contained her legal advice, legal opinion and memorandum of law. Absent Plaintiff’s consent, Ms. Haase included Merritt Nelson in the responsive email she sent to Ms. Bowen (which also included Bowen’s original email to Haase). Ms. Bowen’s original email to Haase related to matters of public concern. Defendants Haase and KSB School Law negligently breached their duty to Plaintiff by disclosing confidential attorney/client privileged communications to a third party sans Plaintiff’s consent.

28. On or about March 12, 2018, employees of Methodist Fremont Health, Fremont Health, Fremont Community Health Resources and/or Dodge County, Nebraska directed Plaintiff to leave work immediately and report to a meeting on March 13, 2018 at 1:00 p.m. at the hospital.

29. During the March 13, 2018 meeting, Plaintiff was told that due to the communications she had with Defendants Haase and KSB School Law, Merritt Nelson refused to work with her and that she was terminated from her placement at Midland University. Plaintiff was also told that she had to resign or be fired from her employment at the hospital.

30. All Defendants (except Haase and KSB School Law) had a mutual understanding and a meeting of the minds regarding Plaintiff’s separation from employment from the University and the hospital as well as their refusal to re-employ Plaintiff in any capacity at the hospital and university.

31. Plaintiff had a legally protected right to engage in communications with an attorney and to require that said communications remain confidential.

32. During the March 13, 2018 meeting, Plaintiff inquired about other open RN positions at the hospital for which she could be hired. Bowen was told there were no positions available for her. Numerous RN positions were available at the hospital on March 13, 2018. Defendants made it loud and clear that Bowen would never work at the hospital again.

33. Plaintiff subsequently applied for a position with the hospital. Notwithstanding the fact she was qualified for the position she sought with the hospital, Bowen didn't receive an interview.

34. All Defendants (except Haase and KSB School Law) have continued to retaliate against Plaintiff by refusing to hire her for positions she has sought and for which she was qualified and has refused to employ her as an athletic trainer.

35. In May and September 2018, Plaintiff filed charges of discrimination and retaliation with the Nebraska Equal Opportunity Commission against Fremont Health and Midland University.

36. All defendants (except Haase and KSB School Law) acted in concert with each other to deprive Plaintiff of her statutory and constitutional rights when they fired her from the positions she held at Midland and the hospital after she communicated on matters of public concern. Plaintiff was punished for her speech in a manner that would chill a person of ordinary firmness from continuing to engage in the activity in which Plaintiff engaged.

37. Upon information and belief, all Defendants (except Haase and KSB School Law) conspired with each other to deprive the Plaintiff of her statutorily and constitutionally protected rights and that they acted in furtherance of the object of the conspiracy. The conspiracy was based upon Plaintiff's free speech regarding matters of public concern.

38. Defendants knew of Plaintiff's business relationship with the hospital and the University, Defendants interfered with said relationships and it caused substantial damage to the Plaintiff.

39. All Defendants (except Haase and KSB School Law) by and through their employees, representatives, agents, administrators, officials, jointly and individually, engaged in the following negligent acts or omissions:

- a) Failing to properly hire employees;
- b) Failing to properly supervise employees;
- c) Failing to properly train employees;
- d) Failing to properly and timely investigate allegations of misconduct, discrimination and/or retaliation;
- e) Failing to take appropriate remedial action regarding reported alleged misconduct, discrimination and/or retaliation;
- f) Failing to properly educate employees
- g) Failing to protect the rights of the Plaintiff;
- h) Retaliating against the Plaintiff after she engaged in one or more protected activities;
- i) Failing to protect Plaintiff from unlawful retaliation or discrimination;
- j) Discriminating against her due to her gender.

40. Defendant Haase and KSB School Law engaged in the following negligent acts or omissions:

- a) Failing to maintain client communications in a confidential manner;

- b) Sharing confidential attorney/client communications with a third party without consent of the client;
- c) Disclosing confidential attorney-client privileged communications to a third party without client consent;
- d) Failing to properly hire employees;
- e) Failing to properly supervise employees;
- f) Failing to properly train employees;

41. All Defendants (except Haase and KSB School Law) discriminated against Plaintiff due to her gender during her tenure of employment in violation of the Nebraska Fair Employment Practices Act and Title VII of the Civil Rights Act, as amended.

42. As a proximate cause of Defendants' unlawful conduct, Plaintiff has suffered injuries, including, but not limited to: past, present, and future, mental suffering, humiliation, inconvenience, emotional and mental anguish and distress, lost wages and the value of job-related benefits, future lost income and the value of job-related benefits, damage to reputation, other special and general damages not specially set forth herein, and attorney's fees and costs.

COUNT I

Plaintiff incorporates paragraphs 1 through 42 as if fully set forth herein.

43. All Defendants (except Haase and KSB School Law) violated Plaintiff's right to free speech in violation of the Constitution of the United States of America (1st Amendment).

44. As a proximate cause of Defendants' conduct, Plaintiff has suffered general and special damages and will continue to suffer said damages into the future.

COUNT II

Plaintiff incorporates paragraphs 1 through 44 as if fully set forth herein.

45. All Defendants (except Haase and KSB School Law) violated Plaintiff's right to association in violation of the Constitution of the United States of America (1st Amendment).

46. As a proximate cause of Defendants' conduct, Plaintiff has suffered general and special damages and will continue to suffer said damages into the future.

COUNT III

Plaintiff incorporates paragraphs 1 through 46 as if fully set forth herein.

47. All Defendants (except Haase and KSB School Law) violated Plaintiff's right to free speech in violation of Neb. Rev. Stat. Sec. §§ 20-123 and 20-124.

48. As a proximate cause of Defendants' conduct, Plaintiff has suffered general and special damages and will continue to suffer said damages into the future.

COUNT IV

Plaintiff incorporates paragraphs 1 through 48 as if fully set forth herein.

49. All Defendants engaged in tortious interference with Plaintiff's business relationships with the hospital and university.

50. As a proximate cause of Defendants' conduct, Plaintiff has suffered general and special damages and will continue to suffer said damages into the future.

COUNT V

Plaintiff incorporates paragraphs 1 through 50 as if fully set forth herein.

51. As set forth above, all Defendants engaged in negligent acts or omissions regarding the Plaintiff.

52. As a proximate cause of Defendants' conduct, Plaintiff has suffered general and special damages and will continue to suffer said damages into the future.

COUNT VI

Plaintiff incorporates paragraphs 1 through 52 as if fully set forth herein.

53. All Defendants (except Haase and KSB School Law) violated Nebraska public policy by terminating Plaintiff and/or refusing to rehire Plaintiff after she engaged in one more protected activities and/or engaged in free speech and/or associated with an attorney.

54. As a proximate cause of Defendants' conduct, Plaintiff has suffered general and special damages and will continue to suffer said damages into the future.

COUNT VII

Plaintiff incorporates paragraphs 1 through 54 as if fully set forth herein.

55. All Defendants (except Haase and KSB School Law) retaliated against the Plaintiff in violation of the Nebraska Fair Employment Practices Act after she engaged in one or more protected activities.

56. As a proximate cause of Defendants' conduct, Plaintiff has suffered general and special damages and will continue to suffer said damages into the future.

COUNT VIII

Plaintiff incorporates paragraphs 1 through 56 as if fully set forth herein.

57. All Defendants (except Haase and KSB School Law) discriminated against Plaintiff due to her gender in violation of the Nebraska Fair Employment Practices Act and Title VII of the Civil Rights Act.

58. As a proximate cause of Defendants' conduct, Plaintiff has suffered general and special damages and will continue to suffer said damages into the future.

WHEREFORE, Plaintiff respectfully requests that this Court assume jurisdiction herein to all counts alleged and grant the following relief:

- a. Declare Defendants' conduct to be violative of the Plaintiff's rights under the appropriate state or federal laws, common law of the State of Nebraska and/or the Constitution of the United States of America;
- b. Award Plaintiff past, present, and future general and special damages in an amount to be determined by a jury of her peers;
- c. Enter an Order making defendants jointly and severally liable for the general damages;
- d. Award Plaintiff lost wages and the value of past lost job-related benefits;
- e. Direct that Plaintiff be reinstated to her previously held position or award her front pay and the value of future lost job-related benefits;
- f. Award Plaintiff pre and post judgment interest;
- g. Award Plaintiff past, present and future compensatory damages;
- h. Award Plaintiff punitive damages for the federal law claims;
- i. Enjoin Defendants from engaging in any further illegal conduct against the Plaintiff; and
- j. Award Plaintiff costs and attorney's fees and such other and further relief as the Court deems just, reasonable and appropriate to correct the wrongs done to the Plaintiff.

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DEMAND FOR JURY TRIAL

Plaintiff requests trial by jury in OMAHA, Nebraska.

s/Kathleen M. Neary
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and Nebraska Methodist Health Systems that came into existence on or about October 1, 2018 and is a recipient of state or federal funds.

4. Defendant Fremont Health is or was a hospital operating in the City of Fremont, Dodge County, Nebraska at all times alleged herein. Upon information and belief, Defendant Fremont Health was doing business as Fremont Health Medical Center at all times alleged herein, is or was a Nebraska political subdivision, is or was an employer as that term is defined by laws set forth herein and is or was a recipient of state and federal funds.

5. Defendant Dodge County, Nebraska is a political subdivision located within the State of Nebraska. Upon information and belief, Defendant Dodge County, Nebraska was or is an operator, owner, or manager of Defendant Fremont Health (d/b/a Fremont Health Medical Center) and/or Defendant Methodist Fremont Health and is a recipient of state or federal funds.

6. Defendant Midland University is an institution of higher education located in Fremont, Nebraska and is a recipient of state or federal funds.

7. Plaintiff fulfilled the administrative prerequisites mandated by Title VII and NFEPA prior to filing this timely action.

8. Plaintiff also filed a timely tort claim against the political subdivision(s) noted herein and by filing this action has withdrawn said tort claims.

9. Defendants are employers as that term is defined under state and federal law.

10. Plaintiff is female and began working for Fremont Health at the Fremont Health Medical Center in July 2014, and was working most recently as a Student Health

Registered Nurse (RN) and was placed at Midland University in Fremont, NE. Upon information and belief, all Defendants contributed to Plaintiff's salary and/or other job related benefits and jointly controlled the terms, conditions, and privileges of Plaintiff's employment. Plaintiff's work performance was satisfactory.

11. On or about March 13, 2018, Plaintiff was terminated from her position with Midland University and involuntarily forced to resign from Fremont Health after she engaged in the protected activities noted herein.

12. Plaintiff's supervisor at Midland was Vice President of Student Affairs, Merritt Nelson. Plaintiff's supervisor at Fremont Health was Mark Voss. Other known employees of one or more of the Defendants who participated in the illegal actions set forth herein are Jackie Beaten, Manager of Community Health for Fremont Health, Bethany Childers, Director of Human Resources for Fremont Health, and Deb Jurino, Fremont Health's Risk Manager.

13. Other employees, agents, representatives, officers, officials or board members of the Defendants may have participated in wrongful conduct described herein. At all times alleged, Defendants' employees, agents, representatives, officers, officials or board members were acting in the scope and course of their employment and/or office with the named Defendants and may have been acting in concert with each other to deprive Plaintiff of her statutory and constitutional rights.

14. On or about September 2017, a female student of Midland disclosed to Plaintiff that she had been sexually assaulted off-campus. Pursuant to policy and procedure, Plaintiff referred the student to a counselor.

15. Starting on or about October 2017 and continuing through the date of her

involuntary separation from employment, Merritt Nelson repeatedly requested and demanded that Plaintiff provide him with confidential student/patient health information in violation of the law (including, but not limited to confidential information regarding the female assault victim and other Midland University students).

16. Plaintiff refused to provide Merritt Nelson with the requested information as she reasonably believed it was illegal for her to do so. After she refused to provide Nelson with the requested confidential student/patient health patient information, Nelson subjected Bowen to gender-based discrimination, retaliated against her in the terms and conditions of her employment, and subjected her to a hostile working environment.

17. On or about January 2018, Plaintiff reported Nelson's illegal requests and conduct, as well as her opposition thereto, to Childers and Jurino. No action was taken in response to Plaintiff's reports regarding Nelson.

18. On or about February 22, 2018, Plaintiff sought legal advice from an attorney regarding the legality of Nelson's demands, to-wit: sharing confidential student/patient health information with unauthorized persons.

19. On or about March 11, 2018, the attorney emailed a response to Plaintiff's legal question and included Nelson in the responsive email.

20. On or about March 12, 2018, Plaintiff was directed to cease communications with the attorney and to report to a meeting at the hospital on March 13, 2018.

21. Present at the March 13, 2018 hospital meeting were Plaintiff,

Beaton, Childers and Voss. At the meeting, Plaintiff was told that Nelson did not want to continue his working relationship with her and demanded that she resign or she would be terminated. Defendants told Plaintiff that she had to resign or she would be terminated and they further threatened to report her to the State Board of Nursing if she didn't resign.

22. Plaintiff was involuntarily separated from all of the Defendants' employment on March 13, 2018.

23. Defendants have continued to retaliate against her by refusing to hire her for positions for which she is qualified and has refused to employ her as an athletic trainer.

24. Because Plaintiff reasonably believed Nelson's directives and demands to disclose confidential student/patient information violated Title IX, FERPA, HIPPA and other state and federal statutes not specifically set forth herein, she opposed, reported, and refused to disclose such information.

25. The matters upon which Plaintiff spoke, opposed, and reported were matters of public concern and importance.

26. Plaintiff has a legally protected right to engage in communications with an attorney and such communications with said attorney involved matters of public concern.

27. Plaintiff filed charges of discrimination and retaliation against the Defendants with the Nebraska Equal Opportunity Commission in May and September, 2018.

28. Plaintiff engaged in numerous protected activities during and after her employment with Defendants. Defendants retaliated against Plaintiff due to her protected activities.

29. Defendant discriminated against Plaintiff due to her gender.

30. By and through their employees, representatives, agents, and/or officials and/or in acting in concert with each other, Defendants were negligent in one or more of the following ways:

- a) Failing to properly hire employees;
- b) Failing to properly supervise employees;
- c) Failing to properly train employees;
- d) Failing to properly and timely investigate allegations of misconduct, discrimination, and/or retaliation;
- e) Failing to take appropriate remedial action regarding reported alleged misconduct, discrimination and/or retaliation;
- f) Failing to properly educate employees;
- g) Failing to protect the rights of the Plaintiff;
- h) Retaliating against the Plaintiff after she engaged in one or more protected activities;
- i) Failing to properly protect Plaintiff from unlawful retaliation or discrimination;
- j) Failing to protect Plaintiff from discrimination and/or retaliation.

31. As a result of the wrongful conduct of Defendants, Plaintiff suffered injuries, including, but not limited to: past, present, and future, mental suffering,

humiliation, inconvenience, emotional and mental anguish and distress, lost wages and the value of job related benefits, future lost income and value of job related benefits, damage to reputation, other special and general damages, attorney's fees and costs.

32. Defendants' conduct was willful and/or reckless.

COUNT I

Plaintiff incorporates paragraphs 1 through 32 as if fully set forth herein.

33. Defendants violated Plaintiff's right to free speech and freedom of association in contradiction of the Constitution of the United States of America (1st Amendment) and Neb.Rev.Stat. §§ 20-123 and 20-124.

34. Plaintiff has suffered and will continue to suffer general and special damages as a result of Defendants' unlawful conduct.

COUNT II

Plaintiff incorporates paragraphs 1 through 34 as if fully set forth herein.

35. Defendants retaliated against Plaintiff after she engaged in one or more protected activities in violation of the Nebraska Fair Employment Practices Act.

36. Plaintiff has suffered and will continue to suffer general and special damages as a result of Defendants' unlawful conduct.

COUNT III

Plaintiff incorporates paragraphs 1 through 36 as if fully set forth herein.

37. Defendants violated the public policy of the State of Nebraska by terminating Plaintiff after she engaged in one or more protected activities and/or engaged in free speech and/or associated with an attorney.

38. Plaintiff has suffered and will continue to suffer general and special damages as a result of Defendants' unlawful conduct.

COUNT IV

Plaintiff incorporates paragraphs 1 through 38 as if fully set forth herein.

39. Defendants were negligent in their treatment of the Plaintiff as noted above in violation of the common law of the State of Nebraska.

40. Plaintiff has suffered and will continue to suffer general and special damages as a result of Defendants' unlawful conduct.

COUNT V

Plaintiff incorporates paragraphs 1 through 40 as if fully set forth herein.

41. Defendants discriminated against the Plaintiff due to her gender in violation of Title VII of the Civil Rights Act and the Nebraska Fair Employment Practices Act.

42. Plaintiff has suffered and will continue to suffer general and special damages as a result of Defendants' unlawful conduct.

43. Due to Defendants' willful conduct, punitive damages are appropriate under federal law.

WHEREFORE, Plaintiff respectfully requests that this Court assume jurisdiction herein as to all counts alleged herein and grant the following relief:

a. Declare Defendants' conduct to be violative of the Plaintiff's rights under the appropriate state or federal law(s) and/or U.S. Constitution;

b. Award Plaintiff past, present, and future general and special damages in amount to be determined by a jury of her peers;

- c. Award the Plaintiff lost wages and the value of job-related benefits;
- d. Direct that Defendants reinstate the Plaintiff or award her front pay and the value of job- related benefits;
- e. Award Plaintiff pre and post judgment interest;
- f. Award Plaintiff punitive damages for the claims arising under Title VII;
- g. Enjoin Defendants from engaging in any further illegal actions against the Plaintiff;
- g. Award Plaintiff costs and reasonable attorney's fees and such other and further relief as the Court deems just and reasonable and appropriate to correct the wrong done to the Plaintiff.

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DEMAND FOR JURY TRIAL

Plaintiff requests trial by jury in OMAHA, Nebraska.

s/Kathleen M. Neary
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