

**JOHN LAWYER, ESQ.**  
**12 MAIN STREET**  
**ANYWHERE, USA**  
**Attorneys for Plaintiff**

\_\_\_\_\_  
**JANE DOE,**

**Plaintiff,**

**vs.**

\_\_\_\_\_  
**SUPERIOR COURT OF NEW JERSEY**  
**LAW DIVISION**  
**[insert] COUNTY**

**Docket Number: \_\_\_\_\_**

**ABC, INC., ABC MEDICAL, INC., and**  
**ABC X-RAY, INC.,**

**Defendants.**

**CIVIL ACTION**

**VERIFIED COMPLAINT AND JURY**  
**DEMAND**

**Plaintiff, Jane Doe, maintaining her principal residence at [insert address], by way of Complaint against the Defendant, says:**

**THE PARTIES**

- 1.** The plaintiff Jane Doe is a United States Citizens and a resident of [insert] County.
- 2.** The defendant ABC, Inc., upon information and belief, is a [insert] Corporation lawfully doing business in the State of [insert] and maintaining its principal place of business at [insert address], and is licensed to do business in this State. Upon further information and belief defendant ABC, Inc. is in the medical equipment manufacturing business specializing in X-Ray machines.
- 3.** The defendant ABC Medical, Inc., upon information and belief, is a [insert] Corporation lawfully doing business in the State of [insert] and maintaining its principal place of business at [insert address] and is licensed to do business in this State. Upon further information and belief defendant ABC Medical, Inc. is in the medical treatment business specializing in X-Ray machines.
- 4.** The defendant ABC X-Ray, Inc., upon information and belief, is a [insert] Corporation lawfully doing business in the State of [insert] and maintaining its principal place of business at [insert address], and is licensed to do business in this State. Upon further information and belief defendant ABC Medical, Inc. is in the medical

**FIRST COUNT**

- 5.** Plaintiff was hired by defendant on or about [insert date]. At all relevant times, plaintiff was the defendant=s Bookkeeper.
- 6.** Throughout plaintiff=s employment with defendant she received consistent praise for her good work along with annual performance bonuses and raises.
- 7.** On or about [insert date], plaintiff=s employment was terminated.
- 8.** Plaintiff was told that her employment was being terminated because her employer felt that she should Aspend more time with her children.@

9. Upon information and belief, plaintiff was replaced by another worker making approximately one-half her then salary.
10. At the time of her termination, plaintiff was approximately [insert] month=s pregnant.
11. Previously, prior to her termination, plaintiff had told defendant about her pregnancy.
12. The reasons stated for plaintiff=s termination are without merit and cannot be substantiated by defendant. The reasons given by defendant for plaintiff=s termination were a pretext for the real reason, which is plaintiff=s pregnancy.
13. By terminating plaintiff, defendant denied equal employment opportunities to plaintiff because of her pregnancy.
14. As a direct and proximate result of defendant=s termination of plaintiff, plaintiff was deprived of her employment and equal employment opportunities because of her pregnancy.
15. As a further direct and proximate result of defendant=s termination of plaintiff, plaintiff has been deprived of income and wages, and has been deprived of valuable pension benefits as well as payment for a substantial amount of overtime which has not been compensated to plaintiff. Plaintiff has also lost payment of unused personal days and bonus earnings including stock options which were promised to her.
16. As a further result of defendant=s termination of plaintiff, plaintiff has suffered severe humiliation, embarrassment and emotional distress.
17. Plaintiff has suffered and will continue to suffer injuries as a result of defendant=s wrongful and discriminatory acts.
18. The foregoing actions of the defendants violate New Jersey=s Law Against Discrimination, codified at N.J.S.A. 10:5-1 et seq., which prohibits discrimination against women because of pregnancy.

WHEREFORE, plaintiff demands judgment against the defendant for compensatory damages, including damages for front pay, back pay, bonuses and personal days, lost pension benefits, unpaid overtime, emotional distress, consequential damages, punitive damages, pre- and post-judgment interest, reasonable attorneys= fees multiplied under the Law Against Discrimination, and costs of suit.

## **SECOND COUNT**

19. Plaintiff repeats the foregoing allegations as if same were repeated at length herein.
20. The foregoing actions of the defendants violate Title VII of the Civil Rights Act of 1964, as amended, which prohibit, discrimination on the basis of sex.

WHEREFORE, plaintiff demands judgment against the defendants for compensatory damages, including damages for front pay, back pay, bonuses and personal days, lost pension benefits, unpaid overtime, emotional distress, consequential damages, punitive damages, pre- and post-judgment interest, reasonable attorney=s fees, and costs of suit.

---

JOHN LAWYER

DATED:

**DESIGNATION OF TRIAL COUNSEL**

John Lawyer, Esq., is hereby designated as trial counsel in this matter.

---

JOHN LAWYER

DATED:

**JURY DEMAND**

The plaintiff hereby demands a jury as to all issues.

---

JOHN LAWYER

DATED:

**DEMAND FOR PRODUCTION OF INSURANCE AGREEMENTS**

Pursuant to R. 4:10-2(b), demand is hereby made that you disclose to the undersigned whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in the action or to indemnify or reimburse for payment made to satisfy the judgment. If so, please attach a copy of each, or in the alternative state, under oath and certification: (a) policy number; (b) name and address of insurer; c) inception and expiration date: (d) names and addresses of all persons insured thereunder; (e) personal injury limits; (f) property damage limits; and (g) medical payment limits.

---

JOHN LAWYER

DATED:

**CERTIFICATION PURSUANT TO R. 4:5-1**

I hereby certify the matters in controversy in this action are not the subject of any other action pending in any other court or of a pending arbitration proceeding, and that no other action or arbitration proceeding is contemplated.

---

JOHN LAWYER

---

DATED: March 11, 2020

STATE OF NEW JERSEY :  
SS.:  
COUNTY OF [insert] :

1. I am the plaintiff in the foregoing Complaint.

 $NA < E$ 

John Lawyer, An  
Attorney At Law In The State Of  
New Jersey