

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

-----X Case No.:
JENICE E JETER,

Plaintiff,

COMPLAINT

-against-

JURY TRIAL DEMANDED

A&E TELEVISION NETWORKS, LLC;

Defendant.

-----X

Plaintiff Jenice E Jeter, by her attorneys, Filippatos PLLC, hereby alleges against Defendant A&E Television Networks, LLC ("A&E" or the "Network") as follows:

NATURE OF THE CASE

1. Plaintiff Jenice Jeter is a 60-year-old Black woman, who has devoted 25 years (as of September 28, 2023) of her life to her employer, A&E, in spite of being consistently sexually harassed and tormented by a supervisor. Ms. Jeter made great personal sacrifices to advance up the corporate ladder only to be denied promotions she deserved solely because of her age.

2. As a result of Defendant's unlawful conduct as alleged herein, Plaintiff brings this action against her employer, A&E, and certain of her supervisors and co-workers for discriminating and retaliating against her and subjecting her to a hostile work environment based on her age (60) and gender/sex (female) in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e et seq., ("Title VII"); the Age Discrimination in Employment Act of 1967 ("ADEA"), 29 U.S.C. §§ 621 et seq.

3. Plaintiff seeks damages, as well as injunctive and declaratory relief, to redress the injuries she has suffered – physical, emotional, and pecuniary – as a result of being discriminated against and retaliated against by Defendant on the basis of her age and for refusing Broadcast Operations Vice President William Pedlow's (Mr. Pedlow) unwanted sexual advances.

PARTIES, JURISDICTION, VENUE, AND ADMINISTRATIVE PREREQUISITES

4. At all times relevant hereto, Plaintiff was and is a resident of the State of Connecticut, County of Fairfield.

5. Plaintiff is a 60-year-old Black woman.

6. At all times relevant hereto, Plaintiff has been an employee of Defendant A&E.

7. At all times relevant hereto, Defendant A&E was and is a Delaware corporation authorized to do business in the State of Connecticut and maintains a principal place of business at 250 Harbor Dr, Stamford, CT, 06902, where all the relevant parties worked.

8. Upon information and belief, Defendant A&E employs approximately 1500 employees on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Plaintiff is proceeding herein.

9. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §1331.

10. Venue is proper in this district, pursuant to 28 U.S.C. §1391(b)(1) and (2), as one or more Defendant reside in the District of Connecticut, and a substantial part of the acts complained of herein occurred in this district.

11. By (a) timely filing a Charge of Discrimination with the Equal Employment Opportunity Commission ("EEOC"); (b) receiving a Notice of Right to Sue from EEOC on April 12, 2023; and (c) commencing this action within 90 days of the issuance of the Notice of Right to Sue by the EEOC, Plaintiff has satisfied all procedural prerequisites for the commencement of the instant action.

FACTUAL ALLEGATIONS

12. Before joining A&E in 1998, Plaintiff acquired 15 years of experience as an Administrative Assistant (and temporary employee working) within various industries, such as

insurance, law, and the cable network industry.

13. Plaintiff graduated with a bachelor of arts degree in Literary English & Theater degree with a minor in Secondary Education from Lehman College in 1996. She then received a masters' degree in Administration from Metropolitan College of New York in 1999, followed by a masters' degree in Religious Leadership Administration from New York Theological Seminary in 2019, and then a doctorate degree in Ministry in Religious Education from New York Theological Seminary in 2022.

14. While pursuing her masters' degree in Administration, Plaintiff worked at A&E's New York Office as a temporary employee in 1997. In September 1998 to January 2001 Plaintiff was hired full-time as an Administrative Assistant at A&E's New York office in the Advertising Sales Department with an annual salary of \$30k. Working full-time while pursuing her masters' degree, Plaintiff was a Program Manager who designed literacy program for New Providence Women's Shelter.

15. In January 2001, Plaintiff was subsequently hired as a Commercial Operations Coordinator at A&E's Stamford Office with an annual salary of \$30k-35k. When Plaintiff was hired for this position, she was the oldest employee in the Commercial Operations team at 38 years old.

16. In 2016, Plaintiff was finally given a title change to Broadcast Operations Administrator at A&E's Stamford office with an annual salary of \$50,000, which eventually increased to \$79,500.

17. Plaintiff showed great promise at A&E. Plaintiff had a great demeanor, willingness to learn, work ethic, and was committed to and passionate about A&E, which remains with her to this day, 25 years (as of 9/28/2023) after first joining A&E.

18. Plaintiff has consistently excelled in her performance. In fact, in 2020, Plaintiff

received an A&E Networks/Broadcast Operations Spotlight Award.

I. Plaintiff is Sexually Harassed

19. Plaintiff's assimilation into the Network during her initial five years went smoothly; however, things began to take a turn for the worse beginning in 2003 when Plaintiff started being sexually harassed by Mr. Pedlow.

20. The inappropriate behavior began in the form of uncomfortable emails and slowly evolved into obsessive and controlling behavior.

21. Mr. Pedlow would unwantedly send Plaintiff emails stating: "I saw you walking by and liked how your hair was blowing in the wind," or "I hope to see you today." He would also make flirtatious comments and give her unwanted compliments regularly. Plaintiff made it clear that she was not interested in him by ignoring many of these unwanted communications and/or responding with short responses in the hopes that he would stop his behavior. However, Mr. Pedlow's misconduct has persisted.

22. Plaintiff feared that Mr. Pedlow would ruin her career since he held the higher title of Broadcast Operations Director. Plaintiff felt powerless to more forcefully stand up against his behavior for fear of losing her job.

23. In 2016, Plaintiff was moved to the position of Broadcast Operations Administrator, but Mr. Pedlow continued to repeatedly demonstrate his obsession with Plaintiff.

24. For instance, Mr. Pedlow would repeatedly walk past Plaintiff's office located at the other end of the floor to uninvitedly ask her how her day was," particularly and often when no one else was around. This behavior did not stop even after Plaintiff started working remotely in 2019. In fact, during a 2023 zoom meeting, Mr. Pedlow remarked that he "hoped to see" Plaintiff "during our community days," which Plaintiff was required to attend in person.

25. Moreover, although Mr. Pedlow was not her direct supervisor, he administered

Plaintiff's 2022 performance review in September 2022, while her manager, Media Operations Senior Manager, Karla Mpanga (Ms. Mpanga), was on maternity leave. In that performance review, Mr. Pedlow claimed that Plaintiff needed one-on-one meetings with him to improve her "interpersonal skills" as an excuse to be alone with her.

26. A few days later, on September 30, 2022, Plaintiff attended A&E's annual meeting in New York. Plaintiff tried to avoid Mr. Pedlow but he somehow managed to find her and attempted to give her a humiliating "fist bump."

27. Notably, Mr. Pedlow is widely known to have sexually harassed women, particularly Black women, for years, initially by sending them inappropriate emails that later escalate to more improper conduct. Nevertheless, Mr. Pedlow was promoted by the Network to Vice President and only received one "slap on the wrist" warning for sexually harassing a blonde white woman years ago.

28. Moreover, in 2020, Plaintiff was told by a female Black Broadcast Operations/Media Operations Coordinator that she too had been "warned about Bill.," Likewise, on or around October 18, 2022, Kevin Mattavous, a former Officer Manager at A&E, told a colleague named Victoria Chapman that: "Bill Pedlow was known for having a thing for Black women, but Human Resources warned him years ago following a complaint by a blonde white woman." Plaintiff was even told by a former information technology ("IT") employee that another woman had performed sexual favors for Mr. Pedlow to receive a promotion.

29. Another former Black female colleague told Plaintiff about how she too had received uninvited and flirtatious messages over email from Mr. Pedlow, and even printed some of them out for Plaintiff to see, including some in which he made remarks along the lines of: "I want to get with you."

30. In addition, it was apparent that the Network's Human Resources ("HR")

department knew about Mr. Pedlow's conduct based on former Human Resources Vice President, Tom Tooker's (Mr. Tooker) statement: "Oh, I know who you are talking about," when Plaintiff approached her to complain about Mr. Pedlow.

31. Furthermore, in October 2022 and January 2023, respectively, two Black female employees told Plaintiff that they too received uninvited and unwelcomed email messages from Mr. Pedlow.

32. Mr. Pedlow even impeded Ms. Jeter's growth and advancement potential at A&E. In fact, in January 2022, Mr. Zimmerman specifically told Plaintiff that: "Bill Pedlow is not going to let that happen" in relation to a promotion for which she was lobbying.

B. A&E Repeatedly Fails to Promote Plaintiff Solely Because of Her Age

33. Ms. Jeter did not receive a single promotion since she started working at A&E in 1998, when she was 38 years old. The one time she received a change in title— not a promotion — was when she moved over to the Broadcast Operations team in 2016.

34. Throughout these years, Plaintiff was constantly passed over for promotions solely because of her age.

35. While Plaintiff was still on the Commercial Operations team, she repeatedly requested to be promoted to Manager and Specialist, but was never promoted, even as A&E expanded and more leadership roles opened up resulting in nearly every other employee on the team — all of whom were younger — receiving promotions, some multiple times.

36. In October 2013, Plaintiff again unsuccessfully applied for a promotion with her then-Manager Michael Mastro. At her "interview" for this promotion, Plaintiff asked Mr. Mastro: "What's the matter? You seem upset that I am here to interview for the position." Mr. Mastro exploded and said: **"It's because of your age."** The "interview" was over at this point, and Plaintiff went directly to the then-Human Resources Director, Danielle Martin, to complain about

what Mr. Mastro had said, which seemed to stun Ms. Martin. Nevertheless, nothing was of course done to address Mr. Mastro's conduct.

37. Then, when Plaintiff joined the Broadcast Operations team in 2016 at the age of 64, her chances of receiving a promotion did not improve. She never received a promotion while the younger employees on her team were consistently promoted over her.

38. In June 2018, Plaintiff inquired about being promoted to supervisor with Mr. Pedlow and former Digital Distribution Director Robert Jackson (Mr. Jackson) – who appeared to be bothered by her request – to no avail.

39. Mr. Pedlow wanted to keep Plaintiff under his thumb while Mr. Jackson wanted to use Ms. Jeter to train two younger employees whom he was keen on promoting — Ms. Mpanga and Broadcast Operations Manager, Jennifer Rhoden (Ms. Rhoden). Ms. Mpanga was subsequently promoted twice, first to Manager and then to Senior Manager, while Ms. Rhoden was also promoted twice, first to Supervisor and then to Manager.

40. In another instance taking place in August 2018, Plaintiff met with George Krug, Broadcast Operations Senior Vice President, about coming up with a proposal that would elevate her to a supervisory role. Mr. Krug gave Plaintiff the green light to create and present such proposal, but when he notified Mr. Jackson and Mr. Pedlow, they immediately denied Plaintiff's proposal.

41. Notably, Mr. Jackson made his animus about Plaintiff's age clear. Specifically, in October 2017, when Plaintiff notified Mr. Jackson that she needed therapy for her ankle after suffering a hairline fracture, he responded, without hesitation: **"You fractured it because of your age."** Plaintiff complained to Ms. Martin about what Mr. Jackson had said to her, but nothing was ever done to address her concerns.

42. Further, during an August 2020 weekly staff meeting, Mr. Jackson, was asked to

share his opinion about a separation agreement that was being presented to workers who were 55 and older. In response, Mr. Jackson chuckled and said: "I don't know how happy I'll be yet; I am waiting to see what others are going to do." Mr. Jackson's disdain towards older employees like Plaintiff could not have been any clearer.

43. Ms. Mpanga too harbored ageist animus against Plaintiff after becoming her manager by actively preventing Plaintiff from receiving promotions.

44. For instance, in February 2021, Plaintiff inquired about what appeared to be an open manager, but Ms. Mpanga's response was also to chuckle and say: "There is no manager's position." However, later that year, Ms. Rhoden was moved into the manager role in question.

45. Then, on December 16, 2021, Plaintiff again expressed interest in receiving a promotion, this time to the role of Supervisor. Plaintiff even offered to take on this role for no additional compensation. Ms. Mpanga told Plaintiff that she would speak to Mr. Pedlow and get back to her but never followed through.

46. Moreover, Ms. Mpanga blatantly lied to Plaintiff by claiming that "Jennifer [Rhoden] was never a Supervisor, and that role never really existed." To the contrary, Ms. Mpanga had emailed the Broadcast Operations team just days earlier to announce that Ms. Rhoden had been promoted to Manager.

47. After Plaintiff followed up with Ms. Mpanga about her promotion request on December 23, 2021, Ms. Mpanga dismissed Plaintiff, claiming that she "wanted to give others a chance for that role."

48. In January 2023, the newest member of Plaintiff's team, Amiyla Beauduy, who is younger and less experienced than Plaintiff, was promoted to Senior Administrator. Plaintiff was not even made aware that this position was available.

49. It became a common refrain for the Network to claim that Plaintiff was being

passed up for the multitude of promotions for which she expressed interest because of her amorphous “communication skills.” This was clear pretext, however. Plaintiff enrolled in and completed communication classes for the better part of 15 years (from approximately 2006-2021) and was even a guest instructor at Manhattanville College from 2015 to 2018, where she successfully participated in multiple speaking engagements. In addition, Plaintiff is on the board of countless nonprofit organizations, such as the Boys and Girls Club, where she has received awards for her exceptional board leadership and devoted service. Plaintiff is also a practicing minister. In short, to claim that Plaintiff was not worthy of receiving a single promotion throughout her 25-year tenure at the Network is pure fiction.

C. Plaintiff Endures a Hostile Work Environment

50. As soon as Plaintiff moved to a new role within the Broadcast Operations team in 2016 at the age of 54, she was demeaned and shut out by her supervisors and coworkers.

51. For example, Ms. Rhoden became distant and cold towards Plaintiff after learning that Plaintiff had been given an Administrator title. Ms. Rhoden clearly felt that Plaintiff did not deserve the title, harboring ageist bias against her.

52. Since then, Ms. Rhoden has actively enlisted several individuals, including Ms. Mpanga, to make Plaintiff’s work environment difficult and hostile towards her based on her age. Several colleagues who had been friendly towards Plaintiff suddenly began to act differently and coldly shortly after speaking with Ms. Rhoden.

53. Further, during weekly staff meetings, Plaintiff is constantly and deliberately intentionally ignored, as if her voice does not matter. As one example, in April 2021, Plaintiff’s name was excluded from a presentation on which she worked, while the names of all the other members of the Broadcast Operations team were listed.

54. Plaintiff’s colleagues, particularly Ms. Rhoden and Ms. Mpanga, constantly gave

Plaintiff intimidating and mean glares. For instance, at the 2018 A&E holiday party, Ms. Rhoden, Ms. Mpanga, and another female employees stared Plaintiff down and made her feel highly uncomfortable as if she was the most hated person in the room.

55. Plaintiff has also been routinely subjected to verbal mistreatment. By way of example only, when others have received promotions over Plaintiff, they would mockingly and repeatedly proclaim "God is Good" in front of her, insulting her and her religious practices.

56. Ms. Rhoden would also deliberately ignore instructions given by Plaintiff. For instance, when Plaintiff sent instructions to the Broadcast Operations team, on how to create a billboard record in 2019, Ms. Rhoden refused to comply with her directions.

57. Ms. Rhoden would also gratuitously create obstacles for Plaintiff by manufacturing problems that Plaintiff had to address. For example, in January 2023, Ms. Rhoden purposely left Plaintiff with having to complete and correct a mistake-ridden and time consuming task on a Friday evening, despite knowing that Plaintiff had to work on weekends.

58. The hostile treatment towards Plaintiff became so palpable that two newer employees, Adina McCray and Tiffany Gill, each brought it up to Plaintiff in separate conversations.

59. A&E has utterly failed to take any action to help Plaintiff or improve her work environment.

60. In addition, Plaintiff has been active member of A&E's Diversity Advisory Council and has been involved in various recruitment and career development initiatives. She has even become the co-chair of an employee resource group. In her 2021 Performance Review, Ms. Mpanga acknowledged Plaintiff's commitment to Diversity, Equity, and Inclusion ("DEI"), stating that "Her commitment [to DEI] is not only a great representation to our department but of great benefit to the Company." However, after Ms. Mpanga and Ms. Rhoden suddenly inserted

themselves into some of the committees Plaintiff was on, Plaintiff had no choice but to discontinue most of her DEI work because their presence worsened her anxiety. Plaintiff presently only participates in one committee and an initiative that does not involve her coworkers.

D. Plaintiff Alerts HR about the Sexual Harassment and Hostile Work Environment She Has Faced, and She is Immediately Retaliated Against

61. In 2021, Plaintiff notified Human Resources Director, Dan Zimmerman (Mr. Zimmerman) about the inappropriate emails she had been sent by Mr. Pedlow. Unsurprisingly, no actions were taken as Mr. Zimmerman completely ignored Plaintiff's complaints, even though he himself was well aware of Mr. Pedlow's history of engaging in sexual harassment.

62. Also in 2021, Plaintiff also complained in written feedback about Ms. Mpanga's performance that Ms. Mpanga showed favoritism towards employees with whom she appeared to be friends and were unduly influenced by them with regard to her decision-making.

63. Unfortunately, both Ms. Mpanga and Mr. Pedlow quickly retaliated against Plaintiff for her protected activities by denying her a promotion in early-2022.

64. To make the retaliation even more evident, Plaintiff received a negative performance review in 2022, even though her performance had not changed since Ms. Mpanga gave her a positive performance review in 2021. In the 2021 performance review, Ms. Mpanga wrote about Plaintiff: "She is actively engaged in working on her areas of development while reinforcing her strengths. Once achieved, she will be an example for newer members in the team in all the A+E values as well as she already is in work ethic."

65. In contrast, in Plaintiff's 2022 performance review, Ms. Mpanga harped on trivial one-on-one conversations with Plaintiff and certain minor infractions that had no place in a performance review. For instance, Ms. Mpanga wrote: "There are comments that you make that do not actively address issues with the team but are counterproductive to open dialogue and

achieving a collaborative approach to completing the work."

66. Yet, in 2021, Ms. Mpanga praised Plaintiff for "communicat[ing] her concerns and asks questions for clarification in ways that often benefits the team." Of course, the only difference between Plaintiff's way of communicating in 2021 and 2022 was that she complained about Ms. Mpanga's harassing behavior in 2022.

67. Moreover, as further retaliation, Mr. Pedlow, who administered Plaintiff's 2022 performance review while Ms. Mpanga was on maternity leave, threatened to place Plaintiff on a six-month probationary period if she failed to improve her performance despite not indicating the areas upon which she needed to improve.

E. Plaintiff Complains Again to HR about the Sexual Harassment and Retaliation She Had Endured at A&E

68. On September 30, 2022, Plaintiff filed a written complaint with A&E's HR department about the sexual harassment and retaliation she faced at A&E via her written rebuttal to her negative 2022 performance review.

69. Plaintiff stated that the 2022 performance review was issued in clear retaliation for the honest feedback she provided about Ms. Mpanga and for "diverting or ignoring [Mr. Pedlow's] direct and indirect uncomfortable advances via emails."

70. Plaintiff also complained about how Mr. Pedlow's comments and threats at the time he administered her performance review left her fearful of losing her job, and feeling helpless, voiceless, completely ignored, and afraid that no one at the Network supported her or cared about her plight.

F. The Onslaught of Discriminatory and Retaliatory Conduct Perpetrated Against Plaintiff Continues Unabated to this Day

71. On October 4, 2022, Plaintiff had a zoom meeting with Mr. Tooker to discuss the allegations she made in rebuttal to her 2022 performance review, in particular her complaints about

the sexual harassment she has had to endure. Mr. Tooker of course was already fully aware of Mr. Pedlow's penchant for engaging in sexual harassment.

72. On November 11, 2022, Plaintiff met with Mr. Zimmerman at A&E's Stamford office to discuss her complaints.

73. However, it was clear that Mr. Zimmerman's goal was to minimize Plaintiff's concerns and further marginalize her status at the Network.

74. Mr. Zimmerman tried to dismiss the previous conversations he had had with Plaintiff in which she expressed her concerns. When Plaintiff asked him why he never responded to an email she sent towards the end of 2021 requesting to be able to give feedback about her manager, Mr. Zimmerman claimed that he "did not know" how he missed that email and that he "should have responded," but demurred that there was no such practice at the Network of a subordinate evaluating their manager.

75. Further, when Plaintiff reminded Mr. Zimmerman that she had alerted him about Mr. Pedlow's inappropriate emails in 2021, he claimed: "I don't recall, but if it was something being said that happened 15 years ago, I might have yet to remember. So, it wasn't just something about something blowing in the breeze?"

76. Mr. Zimmerman further indicated he was not involved in any investigation into Plaintiff's complaints and that he planned to speak to Mr. Tooker with an "unbiased" opinion about the situation.

77. Plaintiff felt utterly unsupported by Mr. Zimmerman who distanced himself from any investigation into her allegations and feigned ignorance about his previous conversations with Plaintiff in which she revealed Mr. Pedlow's misconduct.

78. Then, in late-November 2022, Mr. Tooker informed Plaintiff that the investigation into her complaint had been completed but, unsurprisingly, that he could not find any evidence

to substantiate her claims and/or any evidence of any policy violations. Mr. Tooker claimed that the emails sent by Mr. Pedlow could not be found as they were deleted pursuant to A&E's policy to automatically delete emails that were over three years old. However, Plaintiff had been told that these emails could in fact still be retrieved if necessary.

79. Despite her formal complaints, Plaintiff has had to continue to endure a hostile work environment, retaliation, and sexual harassment. It is clear that Mr. Tooker and Mr. Zimmerman have done nothing to assist Plaintiff in any way, leaving her in an even more vulnerable position.

80. For his part, Mr. Pedlow, who was fully aware that Plaintiff had no interest in engaging in any "one-on-one meetings" with and was repulsed by him, still scheduled a meeting for October 21, 2022 in retaliation for her complaints against him. The mere thought of being alone with Mr. Pedlow made Plaintiff feel anxious, restless, and highly fearful of what may transpire if she denied Mr. Pedlow's request to meet. Plaintiff pleaded with Mr. Tooker who fortunately agreed to cancel the meeting.

81. Further, even though Plaintiff's formal complaint was supposed to remain confidential, the entire Broadcast Operations team somehow became aware of it. In fact, on October 21, 2022, a coworker of Plaintiff's, Janet Dos Santos, sent Plaintiff a message wishing her the best when Plaintiff took a Wellness Day, a gesture that had never been previously made.

82. Then, on December 23, 2022, Plaintiff received an email from a coworker who threateningly wrote: "I hope you are not dealing with a big problem." After Plaintiff forwarded this message to Mr. Tooker as proof that others on her team knew about her complaints, she never received a response from him.

83. As a result of Defendant's unlawful actions, Plaintiff has been left devastated, humiliated, and traumatized. Not only was she blatantly sexually harassed by Mr. Pedlow, but

A&E has inexplicably refused to protect her and has instead embarked on a crusade of unlawful retaliation.

84. Plaintiff has been made to feel petrified and emotionally distressed because of Mr. Pedlow's continued sexual harassment. For instance, Plaintiff recently experienced increased anxiety after (a) Mr. Pedlow sent her information about her compensation in December 2022; (b) before a February 21, 2023, weekly staff meeting in which she anticipated having to hear Mr. Pedlow's voice; and c) when she saw Mr. Pedlow's name listed next to hers in an email distribution list on February 22, 2023.

85. Despite Plaintiff's determination to remain optimistic about, and committed, to her career at A&E, the ruthless discrimination and retaliation she continues to suffer at the Network has rendered Plaintiff distraught and crest fallen. Plaintiff's emotional distress is clear and cognizable given that A&E allowed its employees to press their unlawful campaign against her without repercussion, while ignoring its obligations to seriously investigate Plaintiff's complaints of age discrimination, sexual harassment, and retaliation and take meaningful action.

86. A&E has falsely painted Plaintiff as an individual who lacks "interpersonal skills" and is not "good enough" to even receive one promotion, causing severe damage to her career, good name, reputation, professional ambitions, and potential employment prospects.

FIRST CAUSE OF ACTION
DISCRIMINATION AND HOSTILE WORK ENVIRONMENT UNDER TITLE VII
Against Defendant A&E

87. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint as if fully set forth herein.

88. Based on the facts alleged herein, Defendant A&E has engaged in unlawful employment practices prohibited by Title VII by discriminating against Plaintiff because of and subjecting her to a hostile work environment based upon her gender/sex (female).

89. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages including but not limited to economic and pecuniary losses (past and future) – such as income, salary, benefits, bonuses, commission, and other compensation that her employment entailed, severe emotional, psychological and physical stress, distress, anxiety, pain and suffering; the inability to enjoy life's pleasures; and other non-pecuniary losses and special damages.

90. Accordingly, as a result of the unlawful conduct of A&E set forth herein Plaintiff has been damaged and is entitled to the maximum compensation available to her under this law, including, but not limited to, punitive damages.

SECOND CAUSE OF ACTION
RETALIATION UNDER TITLE VII
Against Defendant A&E

91. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint as if fully set forth herein.

92. Based on the facts alleged herein, A&E engaged in unlawful employment practices prohibited by Title VII by retaliating against Plaintiff for engaging in protected activities by complaining of discrimination, retaliation based on her gender/sex (female).

93. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages, including, but not limited to, economic and pecuniary losses (past and future) – such as income, salary, bonuses, and other compensation that her employment entailed, severe emotional, psychological, and physical stress, distress, anxiety, pain and suffering, the inability to enjoy life's pleasures, and other non-pecuniary losses and special damages.

94. Accordingly, as a result of the unlawful conduct of A&E set forth herein, Plaintiff has been damaged and to the maximum compensation available to her under this, including, but not limited to, punitive damages.

THIRD CAUSE OF ACTION
AGE DISCRIMINATION UNDER ADEA
Against Defendant A&E

95. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint as if fully set forth herein.

96. Based on the facts alleged herein, Defendant A&E has engaged in unlawful employment practices prohibited by the ADEA by discriminating against Plaintiff because of and subjecting her to a hostile work environment based upon her age (60).

97. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages including but not limited to economic and pecuniary losses (past and future) – such as income, salary, benefits, bonuses, commission, and other compensation that her employment entailed, severe emotional, psychological and physical stress, distress, anxiety, pain and suffering, the inability to enjoy life's pleasures, and other non-pecuniary losses and special damages.

98. Accordingly, as a result of the unlawful conduct of A&E, Plaintiff has been damaged and is entitled to the maximum compensation available to her under this law, including, but not limited to, liquidated damages.

FOURTH CAUSE OF ACTION
RETALIATION UNDER ADEA
Against Defendant A&E

99. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint as if fully set forth herein.

100. Based on the facts alleged herein, A&E engaged in unlawful employment practices prohibited by the ADEA by retaliating against Plaintiff for engaging in protected activities by complaining of discrimination, retaliation based on her age (60).

101. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages including but not limited to economic and pecuniary losses (past and future) – such as income, salary, benefits, bonuses, commission, and other compensation that her employment entailed, severe emotional, psychological and physical stress, distress, anxiety, pain and suffering, the inability to enjoy life's pleasures; and other non-pecuniary losses and special damages.

102. Accordingly, as a result of the unlawful conduct of A&E, Plaintiff has been damaged and is entitled to the maximum compensation available to her under this law, including, but not limited to, liquidated damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests a judgment against the Defendant:

A. Declaring that Defendant engaged in unlawful employment practices prohibited under federal and state laws by discriminating and retaliating against Plaintiff on the basis of her gender, and age;

B. Awarding damages to Plaintiff for all lost wages and benefits resulting from Defendant' unlawful discrimination and retaliation and to otherwise make her whole for any losses suffered as a result of such unlawful employment practices;

C. Awarding Plaintiff compensatory damages for mental, emotional, and physical injury, distress, pain and suffering, and injury to her reputation in an amount to be proven at trial;

D. Awarding Plaintiff punitive damages;

E. Awarding Plaintiff liquidated damages;

F. Awarding Plaintiff attorneys' fees, costs, disbursements, and expenses incurred in the prosecution of this action; and

G. Awarding Plaintiff such other and further relief as the Court may deem equitable, just, and proper to remedy Defendant' unlawful employment practices.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues of fact and damages stated herein.

Dated: July 11, 2023
White Plains, New York

Respectfully submitted,

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