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7 Attorney for Plaintiff

8 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES, NORTH DISTRICT**

10
11 **SAMUEL RICHARDS**

12 Plaintiff,

13
14 vs.

15 **ACME NETWORKING SOLUTIONS, INC.,**
16 **and Does 1 through 30, inclusive**

17
18 Defendants

Case No.:

GENERAL CIVIL

**COMPLAINT FOR DAMAGES:
TORTIOUS DISCHARGE IN
VIOLATION OF PUBLIC POLICY**

JURY TRIAL DEMANDED

19
20 **COMES NOW** plaintiff SAMUEL RICHARDS and alleges as follows:

21 1. Defendants Doe 1 through Doe 30, inclusive, are sued herein under fictitious names.
22 Their true names and capacities are unknown to plaintiff. When their true names and capacities
23 are ascertained, plaintiff will amend this complaint by inserting their true names and capacities
24 herein. Plaintiff is informed and believes and thereon alleges that each of the fictitiously named
25 defendants is responsible in some manner for the occurrences herein alleged, and that plaintiff's
26 damages as herein alleged were proximately caused by those defendants. Each reference in this
27 complaint to "defendant," "defendants," or a specifically named defendant refers also to all
28 defendants sued under fictitious names.

1 against an employee for making a safety complaint or complaints in the workplace.

2 10. As a direct, foreseeable and proximate result of defendants' wrongful acts, plaintiff has
3 suffered, and continues to suffer, substantial losses of earnings and employment benefits, and has
4 suffered humiliation, embarrassment, mental and emotional distress and discomfort, all to his
5 damage in an amount according to proof.

6 11. Defendants' acts as herein before described were committed maliciously, fraudulently
7 or oppressively with the intent of injuring plaintiff, and/or with a willful and conscious disregard
8 of plaintiff's right to work in an environment free from retaliation. Because these acts were
9 carried out by managerial employees in a despicable, deliberate and intentional manner, plaintiff
10 is entitled to recover punitive damages in a sum sufficient to punish and deter future such
11 conduct.

12 **WHEREFORE**, based on the foregoing, plaintiff prays for relief against defendants, and
13 each of them, as follows:

- 14
- 15 1. For special damages including lost wages, lost employee benefits, bonuses, vacation
16 benefits, and general damages in an amount in excess of the minimal jurisdictional limits of this
17 court;
 - 18 2. For punitive damages in a sum sufficient to deter;
 - 19 3. For attorney fees under Code of Civil Procedure §1021.5, or as otherwise allowable by
20 law;
 - 21 4. For costs of suit incurred;
 - 22 5. For prejudgment interest;
 - 23 6. For such other and further relief as this court may deem just and proper.
- 24

25 Dated: August 3, 2000

26 _____
27 **JAMES W. JOHNSTON**
28 Attorney for Plaintiff,
SAMUEL RICHARDS

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Plaintiff hereby demands a jury trial on all issues.

Dated: August 3, 2000

JAMES W. JOHNSTON
Attorney for Plaintiff,
SAMUEL RICHARDS