

DRAFT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

JANE DOE

CIVIL ACTION

VERSUS

NUMBER

ABC CORPORATION

SECTION

PLAINTIFF'S INITIAL DISCOVERY DISCLOSURES

Pursuant to Fed.R.Civ.P. 26(a)(1) and Local Rule 26.3(E), plaintiff hereby submits the following:

I.

The name, address and telephone number of each individual likely to have discoverable information that plaintiff may use to support her claims (unless solely for impeachment) and the subjects of the information are as follows:

1. Plaintiff, Jane Doe
629 James Avenue
New Orleans, Louisiana 70118
Phone: (504) 888-6923

Plaintiff has knowledge of the facts supporting the allegations contained in the complaint.

2. James Johnson
869 Remington
New Orleans, Louisiana 70118
Phone: (504) 869-3242

Mr. Johnson is a defendant in this matter. He was plaintiff's supervisor and has knowledge regarding the hostile work environment that plaintiff was subjected to in the course of her employment at ABC Corporation.

3. Glenn Perkins
8629 Jennings Road
New Orleans, Louisiana 70128
Phone: (504) 823-6874

Mr. Perkins has knowledge of plaintiff's employment at ABC Corporation while working under the supervision of James Johnson. Mr. Perkins also contributed to the hostile working environment that plaintiff was subjected to during her employment.

4. Gary Lanier
1624 Palm Avenue
New Orleans, Louisiana
Phone: (504) 828-6800

Mr. Lanier has knowledge of plaintiff's employment with ABC and various other matters as set forth in the complaint. Mr. Lanier expressed concern to James Johnson regarding his actions that constituted sexual harassment of plaintiff during her employment.

5. Ms. Lynn Gaskin
1318 Jones Road
New Orleans, Louisiana 70115
Phone: (504) 897-3844

Ms. Gaskin was a secretary in plaintiff's division during her employment and is aware of plaintiff's working conditions.

6. Dr. Kevin Cooper
Cooper Family Medical Center
8964 Perkins Road
New Orleans, Louisiana 70169

Dr. Cooper is aware of and has treated plaintiff for the emotional distress she suffered as a result of the matters set forth in her complaint. He continues to render medical services to plaintiff and is currently prescribing medication for plaintiff's nerve condition as a result of the acts and conduct of defendants. As her treating physician, Dr. Cooper has information relevant to plaintiff's claims for actual and compensatory damages including, but not limited to, such items as medical expenses for treatment and medication.

II.

A description of the documents, data compilations and tangible things that are in the possession, custody or control of plaintiff which she may use in support of her claims (unless solely for impeachment) are:

1. Note from Johnson to plaintiff entitled "three things I want to do to you."
2. Romantic greeting card sent from Johnson to plaintiff.
3. Correspondence from Johnson to plaintiff regarding "multiple massage methods-weekend getaway" sent to plaintiff in inter-department delivery routing envelope.
4. Gift items from Johnson to plaintiff.
5. All documents that are part of plaintiff's EEOC file, including, but not limited to, charge of discrimination and notice of right to sue.

All items referenced above will be made available for review, inspection and copying at a

mutually convenient time and date.

III.

Plaintiff's computation of damages claimed are as follows:

Back pay: \$83,000.00

Front pay: as yet uncalculated

Mental pain and suffering: \$250,000.00

Punitive damages: \$250,000.00

As soon as any further computation is made by category, plaintiff will provide the information to defendants. Further, plaintiff intends to retain an expert economist and all documents generated regarding computation of damages will be made available for inspection and copying promptly upon receipt.

Counsel for plaintiff, Jane Doe