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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

DANIELLE DORSCH,

Plaintiff,

vs.

STATE OF IDAHO DEPARTMENT OF
FISH AND GAME, a political subdivision of
the State of Idaho; JOHN/JANE DOES I
through X whose true identities are presently
unknown;

Defendants.

Case No. 17-428

**COMPLAINT AND DEMAND
FOR JURY TRIAL**

COMES NOW, Plaintiff Danielle M. Dorsch, by and through her counsel of record, Chad M. Nicholson of McConnell Wagner Sykes & Stacey, PLLC, and for cause of action against Defendants Idaho Department of Fish and Game and John/Jane Does I through X, alleges as follows:

PARTIES

1. At all times referenced herein Plaintiff Danielle Dorsch (“Plaintiff”) was a resident of Bingham County, Idaho and is presently a resident of Ada County, Idaho.

2. At all times material hereto, Defendant State of Idaho Department of Fish and Game (“IDFG”), was and is a political subdivision of the State of Idaho, with its administrative offices principally located in Boise, Ada County, Idaho.

3. Defendants, John/Jane Does I through X, whose true identities are presently unknown (the “Doe Defendants”) are now, and at all times relevant to this action were, entities or individuals who were the agents, employees, independent contractors, subdivisions, franchisees, wholly-owned subsidiaries, or divisions of IDFG, or are entities or individuals acting on behalf of, in a master/servant or principal/agent relationship with, or in concert with IDFG.

JURISDICTION AND VENUE

4. Count I of this action asserts civil claims arising under 42 U.S.C. § 2000e, *et seq.* (collectively “Federal Law Claims”). This Court has jurisdiction over such counts pursuant to 28 U.S.C. §§ 1331 and 1343.

5. Count II of this action asserts civil claims arising under the laws of the State of Idaho (“State Law Claims”). This Court has jurisdiction over the State Law Claims pursuant to 28 U.S.C. § 1367(a) since such claims are so related to the Federal Law Claims that they form part of the same case or controversy.

6. This Court is an appropriate venue for this cause of action pursuant to 28 U.S.C. 1391(b)(1) and (b)(2) as the actions complained of took place in this judicial District.

GENERAL ALLEGATIONS

7. IDFG has more than 500 employees.

8. Plaintiff is an female.

9. Plaintiff became a full-time employee of IDFG on or about June 1, 2008.

10. In October 2013, Plaintiff was advised by her supervisor Chris Jeszke, that her position at Magic Valley Fish Hatchery was being eliminated, that Plaintiff was being offered a

lateral transfer to Grace Fish Hatchery and asked if Plaintiff had ever considered being a “stay-at-home-mom.” When Plaintiff asked Mr. Jeszke about his comment and what would happen if Plaintiff refused the transfer, Mr. Jeszke advised that Plaintiff would be “Put on the back burner to percolate.”

11. In November 2013, I filed a complaint of sex discrimination based on Mr. Jeszke’s comments.

12. IDFG investigated Plaintiff’s sex discrimination complaint and Plaintiff was transferred to the Springfield Hatchery effective February 3, 2014. Doug Engemann was the manager of the Springfield Hatchery and Brandon Filloon was the assistant manager. Brian Grant was the Complex Manager of the complex which encompassed the Springfield Hatchery.

13. Plaintiff was the only full-time female employee at the Springfield Hatchery and was not welcome at that site. Upon Plaintiff’s arrival, both Mr. Engemann and Mr. Filloon stated that they “did not get to choose her” when referring to Plaintiff.

14. On or about June 25, 2015, Plaintiff advised Mr. Grant of concerns regarding Mr. Engemann’s treatment of Plaintiff.

15. On or about July 8, 2015, Plaintiff advised IDFG Human Resources department that Mr. Engemann was creating a hostile work environment. When making this report, Plaintiff advised that she had audio recordings which substantiated her complaints.

16. In response to IDFG Human Resources’ request for additional documentation supporting Plaintiff’s complaint, on or about July 18, 2015, Plaintiff provided additional documentation, including a statement that she had evidence of her complaints in the form of recorded conversations.

17. By memorandum dated August 6, 2015, entitled Letter of Expectation – Audio recording in the workplace, IDFG advised Plaintiff that she could not record conversations, even

those to which she was a party. This letter further advised that if Plaintiff continued to make audio recordings, her employment with IDFG would be terminated.

18. On or about October 8, 2015 Mr. Engemann performed an annual review (“October ’15 Review”) of Plaintiff’s performance for the period of November 30, 2014 to October 8, 2015 and gave Plaintiff an overall rating of “Does Not Achieve Performance Standards” (“DNA”). According to the terms of the October ’15 Review, the DNA rating was based, *inter alia*, on Plaintiff’s recording conversations that Plaintiff was a part of to document the hostile work environment, Plaintiff’s asserting complaints to Mr. Engemann and Mr. Filloon about their treatment of her, and Plaintiff’s asserting complaints to Mr. Grant regarding Mr. Engemann’s and Mr. Fillon’s treatment of Plaintiff.

19. In or about January of 2016, IDFG has adopted a policy which expressly prohibits electronic recordings without the full knowledge and consent of all parties.

20. During the course of her employment, Plaintiff submitted thirteen (13) applications for promotions or lateral transfers. Upon information and belief, each of these positions was filled by a male applicant.

21. During the course of her employment with IDFG, Plaintiff was consistently treated differently than her male co-workers. This different treatment included but was not limited to:

a. Being written up for recording conversations while, upon information and belief, a male who was also recording conversations did not receive a write up;

b. Mr. Engemann threatened to strangle Plaintiff with a 220 volt extension cord;

c. Mr. Engemann humiliated and belittled Plaintiff privately and in front of other employees by various means, including but not limited to creating “jiggles” about blaming Plaintiff for things that have gone wrong;

- d. Being made the scapegoat for errors at the Springfield Fish Hatchery;
- e. Being given deadlines for projects that cannot be met;
- f. Depriving Plaintiff of resources which should have been available to her to complete her work;
- g. Excluding Plaintiff from communications necessary to carry out her duties;
- h. Dismissal from the Fish Production Career Committee for no legitimate business reason;
- i. Required to work on the Friday after Thanksgiving in contravention of established work practices;
- j. Co-workers throwing papers against the wall when attempting to resolve different calculations;
- k. Changes to policies and procedures which prevented Plaintiff from continuing to gather evidence regarding the hostile work environment and discrimination to which Plaintiff was being subjected; and
- l. Being denied opportunities for advancement and/or lateral transfers.

22. Plaintiff's employment with IDFG ended on March 25, 2016.

23. On September 20, 2016 Plaintiff filed a Charge of Discrimination with the Idaho Human Rights Commission ("IHRC") alleging sex discrimination and retaliation in violation of the Idaho Human Rights Act, Idaho Code § 67-5901 *et seq*, and Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq*. Plaintiff requested that the Charge be filed concurrently with the United States Equal Employment Opportunity Commission ("EEOC").

24. On July 28, 2017, the IHRC issued its Notice of Administrative Dismissal and Right to sue. On September 7, 2017, the EEOC issued its Notice of Right to Sue.

***COUNT I: VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964
AND THE IDAHO HUMAN RIGHTS ACT.***

25. Plaintiff reincorporates the information set forth in Paragraphs 1 through 24 as if set forth herein.

26. The actions of IDFG deprived Plaintiff of opportunities and adversely affected Plaintiff's employment because of her gender in violation of the Civil Rights Act, 42 U.S.C. § 2000e, *et. seq.* and the Idaho Human Rights Act, Idaho Code § 67-5901 *et seq.*, which prohibits discrimination based on gender.

27. IDFG retaliation against Plaintiff for her engaging in protected activity, *i.e.* reporting and opposing a hostile work environment and participating in investigations of such unlawful employment practices, and subjected Plaintiff to adverse employment actions, including but not limited to poor performance reviews and attempting to prevent Plaintiff from gathering evidence in support of her claims in in violation of the Civil Rights Act, 42 U.S.C. § 2000e, *et. seq.* and the Idaho Human Rights Act, Idaho Code § 67-5901 *et seq.*

28. As a result of IDFG's violations of the Civil Rights Act, 42 U.S.C. § 2000e, *et. seq.*, and the Idaho Human Rights Act, Idaho Code § 67-5901 *et seq.*, Plaintiff is entitled to compensatory damages including, but not limited to, lost wages and lost benefits in an amount to be determined with specificity at trial.

29. Plaintiff is entitled to recover her attorneys fees and costs incurred in pursuing this matter pursuant to 42 U.S.C. § 2000e-5(k) and Idaho Code §§ 12-120 and 12-121.

30. Plaintiff hereby reserves this paragraph for the inclusion of a claim for punitive damages pursuant to 42 U.S.C. § 1981a.

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DEMAND FOR JURY TRIAL

Pursuant to Rules 38(a) and 38(b) of the Federal Rules of Civil Procedure, Plaintiff hereby demands a trial by a jury on all issues raised in this action.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

- A. For an amount to be provide at trial, but not less than \$100,000.00, plus interest thereon at the maximum rate allowed by law, for damages allowed under Title VII of the Civil Rights Act of 1964 and/or the Idaho Human Rights Act;
- B. For attorney's fees and cost pursuant to 42 U.S.C. § 2000e-5(k) I.C. § 6-2101, *et seq.*; and
- C. For such other and further legal and equitable relief as the Court deems just and proper.

DATED this 12 day of October, 2017.

McCONNELL WAGNER SYKES &
STACEY ^{PLLC}

BY: /s/ Chad M. Nicholson
Chad M. Nicholson
Attorneys for Plaintiff Danielle Dorsch

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the
District of Idaho

Danielle M. Dorsch

Plaintiff(s)

v.

State of Idaho Department of Fish and Game and
John/Jane Does I through X whose true identities are
presently unknown,

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) State of Idaho Department of Fish and Game
600 S. Walnut Street
Boise, Idaho 83712

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you
are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ.
P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of
the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney,
whose name and address are: Chad M. Nicholson
McConnell Wagner Sykes & Stacey PLLC
827 E. Park Blvd., Suite 201
Boise, Idaho 83712

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.
You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

CIVIL COVER SHEET

JS 44 (Rev. 12/12)

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Danielle M. Dorsch

DEFENDANTS

State of Idaho Department of Fish and Game and John/Jane Does I through whose true identities are presently unknown

(b) County of Residence of First Listed Plaintiff Ada
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Ada
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)
McCConnell Wagner Sykes & Stacey PLLC
827 E. Park Blvd., Suite 201, Boise, Idaho 83712
208-489-0100

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	IMMIGRATION	FEDERAL TAX SUITS	
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from Another District (specify)
- 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. § 2000e, et seq.

Brief description of cause:
Gender Discrimination

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMANDS CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE
10/12/2017

SIGNATURE OF ATTORNEY OF RECORD
/s/ Chad M. Nicholson

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an "X" in one of the six boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.