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U.S. DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA
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U.S. DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA
FILED MAY 28 1999
RICHARD T. MARTIN
CLERK

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

DOROTHY BANKS, TINA BROOKS, SHIRLEY BROWN,
ANNETTE GRAY, MARY L. HOLMES, ANNIE JOHNSON,
AMY LANE, ROSA MALVEAU, DOROTHY MCPPIPE,
ALMA NEWMAN, MAGGIE TUCKER, BERTHA TWINE,
BERTHELLA WALLACE, EDNA WELCH,
MARY WILLIAMS, and NELLIE WILLIAMS

VERSUS

EAST BATON ROUGE PARISH SCHOOL BOARD,
INGRID KELLEY, WARREN L. PRATT, JR.,
DR. PRESS L. ROBINSON, SR., JACQUELINE MIMS,
PATRICE NIQUILLE, PATRICIA HAYNE-SMITH,
NOEL HAMMATT, ROGER MOSER, DANIEL R.
HENDERSON, ELDON R. LEDOUX, DALTON DEVALL,
WILLIAM P. BLACK, and JAMES MANLEY

* CIVIL ACTION
* NO. 98-974
* SECTION "A"
* MAG. 2
*
* JURY REQUESTED
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FIRST AMENDED COMPLAINT

Plaintiffs, Dorothy Banks, Tina Brooks, Shirley Brown, Annette Gray, Mary L. Holmes, Annie Johnson, Amy Lane, Rosa Malveau, Dorothy McPipe, Alma Newman, Maggie Tucker, Bertha Twine, Berthella Wallace, Edna Welch, Mary Williams, and Nellie Williams reurge all of the allegations in their original Complaint except to eliminate as a party defendant, Patrice Niquille.



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DATE: 05/28/99

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CC CN

Therefore, the introduction, Paragraph 4, Paragraph 28 and Count III of their original Complaint are amended as follows:

Plaintiffs, Dorothy Banks, Tina Brooks, Shirley Brown, Annette Gray, Mary L. Holmes, Annie Johnson, Amy Lane, Rosa Malveau, Dorothy McPipe, Alma Newman, Maggie Tucker, Bertha Twine, Berthella Wallace, Edna Welch, Mary Williams, and Nellie Williams, complain against defendants, East Baton Rouge Parish School Board (“EBRPSB” or “School Board”), Ingrid Kelley, Warren L. Pratt, Jr., Dr. Press L. Robinson, Sr., Jacqueline Mims, Patricia Hayne-Smith, Noel Hammatt, Roger Moser, Daniel R. Henderson, Eldon R. Ledoux, Dalton Devall, William P. Black, and James Manley alleging:

4.

Defendants, Ingrid Kelley, Warren L. Pratt, Jr., Dr. Press L. Robinson, Sr., Jacqueline Mims, Patricia Hayne-Smith, Noel Hammatt, Roger Moser, Daniel R. Henderson, Eldon R. Ledoux, Dalton Devall and William P. Black are persons of full age of majority who are residents of Baton Rouge, Louisiana and who are members of the EBRPSB.

28.

Upon information and belief, defendants Manley and School Board members, Ingrid Kelley, Warren L. Pratt, Jr., Dr. Press L. Robinson, Sr., Jacqueline Mims,

Patricia Hayne-Smith, Noel Hammatt, Roger Moser, Daniel R. Henderson, Eldon R. Ledoux, Dalton Devall, and William P. Black established the conditions, qualifications and job description for a full-time janitorial position with the intent to retaliate against female employees who had filed a lawsuit with the School Board; alternatively, the conditions that they placed on this new position had a discriminatory impact on the plaintiffs.

COUNT III

Defendants, East Baton Rouge Parish School Board, Ingrid Kelley, Warren L. Pratt, Jr., Dr. Press L. Robinson, Sr., Jacqueline Mims, Patricia Hayne-Smith, Noel Hammatt, Roger Moser, Daniel R. Henderson, Eldon R. Ledoux, Dalton Devall, William P. Black, and James Manley have discriminated against plaintiffs under color of state law in violation of the Civil Rights Act of 1871, 42 U.S.C. §1983.

WHEREFORE, plaintiffs specifically reurge and reallege all allegations, averments and prayers as stated in their original Complaint. Plaintiffs further pray for all general and equitable relief.

Respectfully submitted,

ROBEIN, URANN & LURYE, P.L.C.



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CERTIFICATE OF SERVICE

I certify that a copy of the above and foregoing has been served on all counsel of record by depositing same in the United States Mail, postage prepaid, this 25th day of May 1999.



Nancy Picard