

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

MELVIN NEWSOME, et al.	*	
Plaintiffs,	*	
v.	*	Civil Action No: 01-2257 (WDQ)
UP-TO-DATE LAUNDRY, INC., et al.	*	
Defendants.	*	

* * * * *

DEFENDANTS’ MOTION FOR PARTIAL SUMMARY JUDGMENT

Plaintiffs Melvin Newsome, Joseph Lloyd, Veronica Johnson, Herbert Datcher and Rudolph Curtis have brought claims of race discrimination in employment under 42 U.S.C. §1981 against Defendants Up-To-Date Laundry, Inc., Nancy Stair and Brad Minetree. Defendants move the Court, through their undersigned attorneys, pursuant to Fed.R.Civ.P. 56, to grant them summary judgment with respect to the following claims in this case, for reason that the record adduced through discovery in this case demonstrates that there are no genuine issues of material fact that would permit a fact finder to find in Plaintiff’s favor with respect to these claims:

- Plaintiff Newsome’s complaints that he was denied overtime hours, assigned to the sorting area, or “soil room”, and suffered a reduction of work hours because of his race and his complaint of a hostile work environment;
- Plaintiff Datcher’s complaints that he was denied overtime hours, assigned to the soil room, and suffered a reduction of work hours because of his race;
- Plaintiff Curtis’ claims that he was denied overtime hours, assigned to the soil room and

suffered a reduction of work hours because of his race;

- Plaintiff Lloyd's complaints that he was denied overtime hours and assigned to the soil room because of his race; and
- Plaintiff Johnson's complaints that she was denied overtime hours, assigned weekend shifts and suffered a reduction of work hours because of her race and her complaint of a hostile work environment.

The grounds and authorities in support of this motion are set forth in the accompanying Memorandum.

For the reasons set forth in the accompanying Memorandum, Defendant requests that its motion be granted, that judgment be entered in its favor with respect to the claims set forth above, and that it be granted its costs, including attorneys' fees, incurred in defending against these claims.

Respectfully submitted,

/s/

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