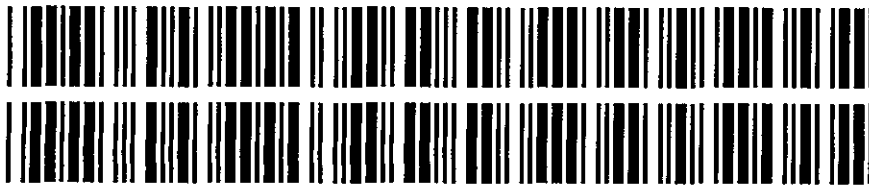
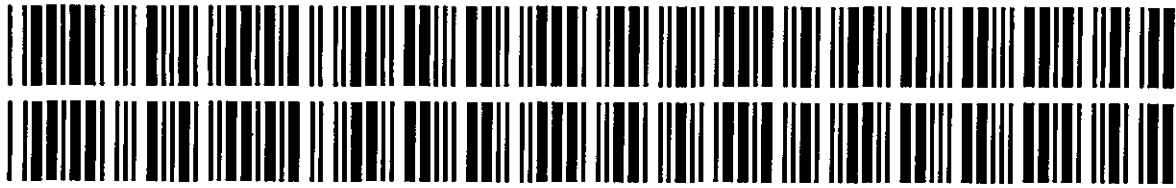


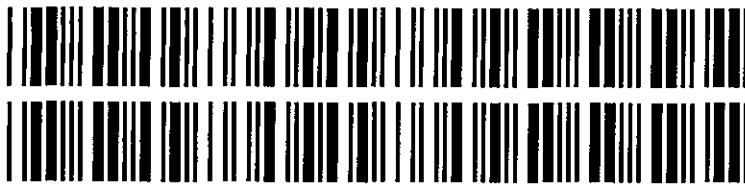
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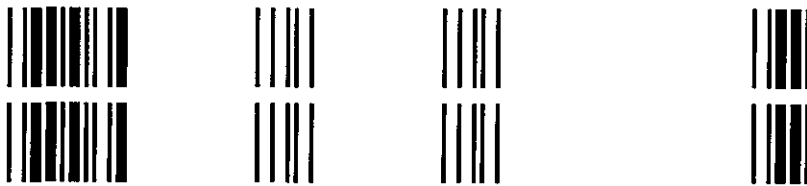
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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

U. S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,)	CASE NO.:
Plaintiff,)	COMPLAINT - CIVIL RIGHTS
v.)	EMPLOYMENT DISCRIMINATION
TITANIUM METALS CORPORATION,)	JURY TRIAL DEMAND
INC. d/b/a TIMET,)	(42 U.S.C., §§ 2000e, et seq.)
Defendant.)	CV-S-00-1172-DWH-RJJ

NATURE OF THE ACTION

This is an action brought under Title VII of the Civil Rights Act of 1964, as amended, and Title I of the Civil Rights Act of 1991, to correct unlawful employment practices on the basis of sex, and to provide appropriate relief to Sherrie Sullivan ("Ms. Sullivan"), and other similarly situated female employees who were adversely affected by such practices. Plaintiff Equal Employment Opportunity Commission (the "EEOC" or "Commission") alleges that Ms. Sullivan and other similarly situated female employees were discriminated against when they were sexually harassed and subjected to a hostile work environment, because of their sex (female), during their employment with Defendant Titanium Metals Corporation, d/b/a Timet ("Defendant Employer").

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ORIGINAL

JURISDICTION AND VENUE

1
2 1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 451, 1331, 1337,
3 1343 and 1345.

4 2. This action is authorized and instituted pursuant to § 706(f)(1) and (3) of Title VII
5 of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e-5(f)(1) and (3) ("Title VII") and
6 pursuant to Section 102 of the Civil Rights Act of 1991, 42 U.S.C. § 1981a.

7 3. The employment practices alleged to be unlawful were committed within the
8 jurisdiction of the United States District Court for the District of Nevada.

9 **PARTIES**

10 4. Plaintiff, Equal Employment Opportunity Commission, (the "Commission") is the
11 agency of the United States of America charged with the administration, interpretation and
12 enforcement of Title VII and is expressly authorized to bring this action under § 706(f)(1) and (3)
13 of Title VII, 42 U.S.C., § 2000e-5(f)(1) and (3).

14 5. At all relevant times, Defendant Employer Titanium Metals Corporation, d/b/a
15 Timet has continuously been doing business in the State of Nevada, and the City of Henderson,
16 and has continuously had at least fifteen (15) employees.

17 6. At all relevant times, Titanium Metals Corporation, d/b/a Timet has continuously
18 been an employer engaged in an industry affecting commerce within the meaning of §§ 701 (b),
19 (g) and (h) of Title VII, 42 U.S.C., §§ 2000e-(b), (g) and (h).

20 **STATEMENT OF CLAIMS**

21 7. More than thirty (30) days prior to the institution of this lawsuit, Sherrie Sullivan
22 filed a charge with the Commission alleging violations of Title VII by Defendant Employer. The
23 Commission has issued a Letter of Determination finding that Ms. Sullivan and other similarly
24 situated females were subjected to unlawful sexual harassment in violation of Title VII. All
25 conditions precedent to the institution of this lawsuit have been fulfilled.

26 8. Since at least June of 1996, Defendant Employer has engaged in unlawful
27 employment practices at its Henderson, Nevada location, in violation of § 703(a) of Title VII, 42
28 U.S.C. § 2000e-2(a) by sexually harassing Ms. Sullivan and other similarly situated female

1 employees, which affected the terms and conditions of their employment.

2 9. Although Defendant Employer had notice of the sexual harassment, it failed to
3 exercise reasonable care to prevent and/or promptly correct the sexually harassing behavior.

4 10. The effect of the practices complained of above has been to deprive Ms. Sullivan
5 and other similarly situated females of equal employment opportunities and to otherwise adversely
6 affect their employment status because of their sex, female.

7 11. The unlawful employment practices of in paragraphs 8 through 10 above were
8 intentional.

9 12. The unlawful employment practices complained of above were committed with
10 malice or reckless indifference to the federally protected rights of Ms. Sullivan and other similarly
11 situated females.

12 12. As a direct and proximate result of the aforesaid acts of Defendant, Ms. Sullivan
13 and other similarly situated females have each suffered emotional pain, suffering, inconvenience,
14 loss of enjoyment of life, humiliation and damages, according to proof.

15 13. As a direct and proximate result of the aforesaid acts of Defendant, other similarly
16 situated females each suffered a loss of earnings in an amount according to proof.

17 **PRAYER FOR RELIEF**

18 Wherefore, the Commission respectfully requests that this Court:

19 A. Grant a permanent injunction enjoining Defendant Employer, its officers,
20 successors, assigns and all persons in active concert or participation with them, from engaging in
21 any employment practice which discriminates on the basis of sex;

22 B. Order Defendant Employer to institute and carry out policies, practices, and
23 programs which provide equal employment opportunities for women, and which eradicate the
24 effects of its past and present unlawful employment practices;

25 C. Order Defendant to make whole other similarly situated females by providing
26 appropriate backpay with prejudgment interest, in amounts to be determined at trial, and other
27 affirmative relief necessary to eradicate the effects of its unlawful employment practices;

28 D. Order Defendant Employer to make whole Ms. Sullivan and other similarly

1 situated females to providing compensation for past and future nonpecuniary losses resulting from
2 the unlawful practices complained of in paragraphs 8 through 10 above, including emotional pain,
3 suffering, inconvenience, loss of enjoyment of life, and humiliation, in amounts to be determined
4 at trial;

5 E. Order Defendant Employer to pay Ms. Sullivan and other similarly situated females
6 punitive damages for its malicious and reckless conduct described in paragraphs 8 through 10
7 above, in amounts to be determined at trial;

8 F. Grant such further relief as the Court deems necessary and proper in the public
9 interest;

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H. Award the Commission its costs in this action.

JURY TRIAL DEMAND

The Commission requests a jury trial on all questions of fact raised by its complaint.

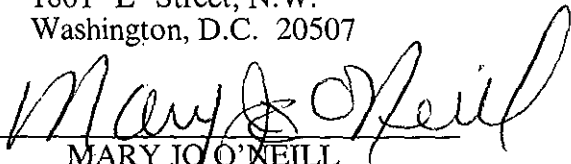
Respectfully submitted,

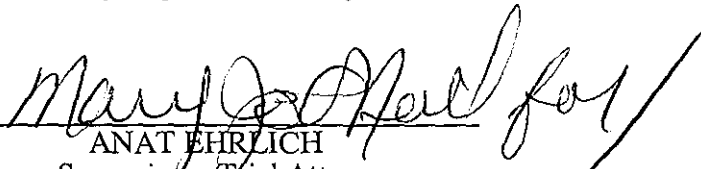
C. GREGORY STEWART
General Counsel

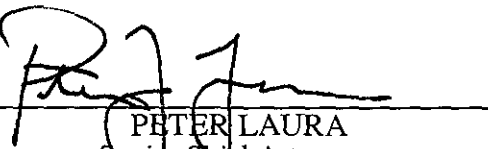
GWENDOLYN REAMS
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Dated: Sept 28, 2000

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