

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
Pro Se [Non-Prisoner] Complaint Form

[Enter the full name of the plaintiff in this
action]
CATHERINE AMILA BROWN

) Civil Action No.
) _____
) (to be assigned by Clerk)

v.

[Enter the full name of each defendant in this
action. If possible, please list only one
defendant per line.]

Cynthia Pennington

Denise Forrester

Julia T. Cannon

Pat Mitchel

Mark A. Delledonne

Victoria A. Mackey

South Carolina Employment Sec.
Commission

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CLERK OF DISTRICT COURT
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If allowed by statute, do you wish to have a trial by jury? Yes X No _____

[If any answer requires additional space, please use additional paper and attach hereto.]

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this
action?

Yes _____ No X

B. If your answer to A is Yes, describe the lawsuit in the space below. [If more than one lawsuit, describe on another sheet of paper using the same outline.]

1. Parties to this previous lawsuit:

Plaintiff: _____

Defendant(s): _____

2. Court: _____
(If federal court, name the district; if state court, name the county)

3. Docket Number: _____

4. Name(s) of Judge(s) to whom case was assigned: _____

5. Status of Case: _____
(For example, was the case dismissed? Settled? Appealed? Still Pending?)

6. Date lawsuit was filed: _____

7. Date of disposition (if concluded): _____

C. Do you have any other lawsuit(s) pending in the federal court in South Carolina?

Yes _____ No X

II. PARTIES

In Item A below, place your name and address in the space provided. [If additional plaintiffs, do the same on another sheet of paper.]

A. Name of Plaintiff: Catherine Amila Brown

Address: 100 Idlewild Avenue; Greenville, SC 29605

In Item B below, place the full name of the defendant, and his/her/its address, in the space provided. Use Item C for additional defendants, if any.

B. Name of Defendant: Cynthia Pennington, Mauldin High Cafeteria

Address: 701 East Bulter Road, Mauldin, SC 29662; Denise

Forrester, Mauldin High Cafeteria, 701 East Bulter Road,

Mauldin, SC 29662; Julia T. Cannon & Pat Mitchell,

Greenville County Schools Administration, 301 East

Camperdown Way, Greenville, SC 29601;

C. *Additional Defendants (provide the same information for each defendant as listed in Item B above):*

Mark A Delledone, EEOC 301 North Main Street, Greenville, SC
29601; Victoria A. Mackey, EEOC Charlotte District Office,
129 West Trade Street, Suite 400, Charlotte, NC 28202;
South Carolina Employment Security Commission, Post Office
Box 995, Columbia, SC 29202

III. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the name(s) of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets of paper if necessary.

Pat Mitchell, the Director of Greenville County School District's
Human Resource, allows his staff members to terminate hourly
wage employee without his human resource department being
aware of the firing till after the firing and such type activity
unfair to the fired employee especially if his staff does not
inform the fired employee of its rights to appeal its firing to
other administrative levels.(see exhibit 6) In this case the
employee firing takes place on the 17th and human resource was
notified on the 18th, thereby strippin the employee of a fair
hearing before the firing.

III. STATEMENT OF CLAIM - *continued.*

Mark A. Delledonne and Victoria A. Mackey both employed as
Investigators with THE EQUAL EMPLOYMENT OPPORTUNITY COMMISSIONS
viewed the Plaintiff commission files with the same information
that the commission filed the three charges against the school
district but months later dismissed the charges citing, "no finding
is made as to another other issues that might be construed",
asking the plaintiff via telephone conversation and goin to the
incident location asking working employees about the way the
working supervisor treats her working employees is a very weak
investigation to warrant a dismissal of someone who has been
unfairly treated as the plaintiff in this matter.

THE SOUTH CAROLINA EMPLOYMENT SECURITY COMMISSION relied upon
Julia Cannon's report in supporting there reasons to disqualify
unemployment benefits for 8 weeks the plaintiff were firedunfairly,
erronous information relied upon,by the commission, and lost of
wages, and lost of unemployment benefits for 8 weeks really sit
plaintiff in the cost of living expenses.

(see additional pages with exhibits)

Two white females Denise Forrester and Cynthia Pennington worked as a team to fire one black female, Catherine Brown, from her duties at Mauldin High Cafeteria after Catherine had worked 4 years and five months with the Greenville County Food and Nutrition services in the District of Greenville County schools.

The Cafeteria immediately supervisor, Denise Forrester, takes a written statement from Food Service Operator Cynthia Pennington, during a time that Cynthia and Food Service Operator, Catherine Brown worked the same serving line, on the very same date and time however, supervisor Denise Forrester, did not, take a statement from Catherine Brown against Cynthia Pennington, Denise used Cynthia's statement to write an incident warning report against the black employee and use Cynthia Pennington, the white female, as her material witness against Catherine, the black employee.

(See Exhibits 1, 2, and 3)

In a separate matter the same two white females Denise Forrester and Cynthia Pennington teamed to have Catherine fired when on November 17, 2008, Catherine put a glass bottle of juice, in the freezer Catherine removed the bottle from the freezer placed the bottle in the "designated area for employee personnel food items" near the microwave about 8-10 feet from the freezer.

Meanwhile, while the bottle was there in the designated area Cynthia Pennington picks up Catherine's bottle being waving and shaking the bottle until the bottom gave way to the bottle in the "designated area for employee personal item". Once the bottle broke supervisor Denise Forrester walks to the area of the broken glass

(Exhibit 4)

On November 17, 2008, in Mauldin High Cafeteria Office, Supervisor, Denise Forrester and Area Manager, Julia Cannon ~~team to fire me~~ of my duties at Mauldin High Cafeteria, However, On November 18, Julia Cannon follow-up letter to the firing does not mention Catherine's rights to appeal their firing decision through other administrative levels through the District.

(Exhibit 5)

Therefore, Catherine was fired from her employment on erroneous information gathered by three white females that had no love for a 65 year old black senior citizen who worked hard for the district four years and 5 months with an income and insurance before being fired without the proper notification of her rights to appeal.

IV. RELIEF.

State briefly and exactly what you want this court to do for you.

Monetary damages to pay back for loss of wages and unemployment
benefits; Actual and punitive damages; Decree to have the
Greenville School District to apply the Appeal procedures to
hourly employees, in writin, after a firing.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 18th day of JUNE, 2010.

Catherine Amilia Brown
Signature of Plaintiff