

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

BARBARA ANN WILSON,)	
)	
Plaintiff,)	
)	
v.)	2:10-cv-02386-KOB
)	
WELLS FARGO BANK, N.A.)	
)	
Defendant.)	

PLAINTIFF'S DAMAGES LIST

Plaintiff seeks an award of the following damages:

1. Back pay/consequential loss of past wages in the amount of \$62,841.60, plus interest.
(\$872.80/week x 72 weeks from 12/4/10-4/23/12)
2. Front pay and/or consequential loss of future wages in an amount to be determined by the Court and/or jury (21 years x \$45,385.60 increased by the value of any and all raises, bonuses and other compensation such as the value of benefits and pension the Plaintiff would have reasonably been expected to earn in the future but for the Defendants' unlawful acts, reduced to present value)
3. Damages for mental anguish in an amount to be determined by the Jury.
4. Instatement into a suitable position for which the Plaintiff is qualified and in which she will have limited to no contact with library patrons.
5. Injunctive or other affirmative relief as the Court determines fit and just.
6. Punitive damages (as against the Library Board) in an amount to be determined by the jury.

7. Reasonable attorney's fees in an amount to be determined by the Court upon petition of counsel for the Plaintiff.

8. Costs, as determined by the Court.

Respectfully submitted,

/s/ Adam Morel

Adam Morel

Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on all counsel of record by electronic filing.

This the 26th day of March, 2012.

s/ Adam P. Morel

OF COUNSEL