

EXHIBIT "1"
PLAINTIFF'S AMENDMENT TO COMPLAINT
AND PETITION FOR PUNITIVE DAMAGES
 IN THE UNITED STATES DISTRICT COURT
 FOR THE EASTERN DISTRICT OF NORTH CAROLINA
 SOUTHERN DIVISION
 NO: 7:12-CV-20FL

FILED
APR 17 2012
 JULIE A. RICHARDS, CLERK
 US DISTRICT COURT, EDNC
 BY DEP CLK

SHERRYL LYNN JACOBS)
 Plaintiff,)
 vs.)
)
 ROBESON COUNTY PUBLIC LIBRARY)
 BOARD OF DIRECTORY FOR ROBESON)
 COUNTY PUBLIC LIBRARY, ROBERT F.)
 FISHER, HORACE STACY, GAYLE)
 McLEAN, TINA MELLEEN-STEPP-)
 THOMAS, ELIZABETH TOWNSEND,)
 LARRY McGOUGAN)
 Defendants.)

Plaintiff's Amendment to Complaint

This case was originally filed on 19 January 2012 [Doc. 1], as a Violation of Americans with Disabilities Act (ADA) and Retaliatory Discrimination Lawsuit.

After careful consideration and review of the law I realized that what the Defendants: Robert F. Fisher, Horace Stacy, Gayle McLean, Tina Mellen-Stepp-Thomas, Elizabeth Townsend, and Larry Mcgougan did to me was Harassment and Retaliation for my filing a Workers Compensation Claim against the Robeson County Library. The Plaintiff therefore amends her Complaint filed on January 19, 2012 [Doc. 1] as follows:

1.

Paragraph 4. (D) reads: X other as specified below: Violation of the Americans with

Disabilities Act and Retaliatory Discrimination -Paragraph 4. (D) is changed to read as follows:

X other as specified below: Violation of the ADA, Retaliatory Discrimination, and Harassment.)

2.

Paragraph 6. (E) reads: X other as specified below: Disability and Discriminatory

Retaliation as it was related to my disabilities. - Paragraph 6. (E) is changed to read as follows: “

X other as specified below: Disability, Harassment, and Discriminatory Retaliation related to my disabilities.

3.

Paragraph 9. reads: “The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated against and harassed me in terms of the conditions of my employment is as follows: Refused to provide work area equipment to satisfy Work Place Evaluation. Requiring me to use my lunchtime to travel from one duty location to another duty location (I was the only employee who was consistently denied their lunch break). Refusal of authorized breaks, as were authorized by the Employee Manual. Took away my position and awarded it to a Part-Time Employee. Took away my office and moved me to a work space where they knew the equipment was broken and far beyond what was required by the Work Place Evaluation.

Paragraph 9. Is changed to read as follows: “The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated, retaliated against, and harassed me in terms of the conditions of my employment is as follows: After my initial on the job neck injury and finalization of my Workers Compensation Claim Mr. Fisher took away my

supervisory position and awarded it to a Part-Time Employee. They refused to provide me with a work area equipped to satisfy the Work Place Evaluation thus accommodating my disability. I was required to use my lunchtime to travel from one duty location to another duty location (I was the only employee who was consistently denied their lunch break). I regained my supervisory position under Ms Stepp-Thomas, but as soon as I was diagnosed with Bilateral Carpel Tunnel all my breaks were taken away, in direct violation of the Library's Employee Manual. She took away my supervisory position and awarded it to a Part-Time Employee. Took away my office and moved me to a work space where they knew the equipment was broken and far beyond what was required by the Work Place Evaluation. I was even denied permission to speak with any other employees during or after work.

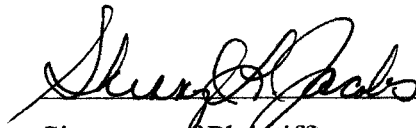
4.

In accordance with The Civil Rights Act of 1991 (Pub. L. 102-166) (CRA) amended sections 101(4), 102 and 509 of the ADA of 1990. In addition, section 102 of the CRA amended the statutes by adding a new section following section 1977 (42 U.S.C. 1981) to provide for the recovery of compensatory and punitive damages in cases of intentional violations of Title VII, the ADA, and section 501 of the Rehabilitation Act of 1973 (Rehab Act). Per Title V, Americans with Disabilities Act of 1990, SEC. 12201 [Section 501] as amended, it is hereby requested that the Plaintiff be granted compensatory damages in the amount of \$230,000.00, back pay and front pay, which is actually less than I would have made if I had stayed with this employer for another ten years and retired. In addition, request the court award compensatory and punitive damages in the amount of \$750,000.00 because the defendants continually displayed various forms of discrimination, including outright intentional exclusion, communication barriers, and failure to

make modifications to existing facilities and practices, relegation to lesser, benefits, and job responsibilities. The defendants acted with malice and reckless indifference causing the plaintiff to suffer severe mental anguish and inconvenience. Request the court hold the defendants responsible for all expert witness fees, court costs, and attorney's fees.

13 April 2012

Date



Signature of Plaintiff

Post Office Box 175, Orrum, NC 28369

Phone: 910-740-3683/628-6334

Address and Phone Number of Plaintiff