

FILED

MAY 18 2012

JULIE A. RICHARDS, CLERK
US DISTRICT COURT, EDNC
BY LRF DEP CLK

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
NO: 7:12-CV-20FL

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 MELLEN-STEPP-)

THOMAS, ELIZABETH TOWNSEND,)

LARRY McGOUGAN)

Defendants.)

**RESPONSE TO DEFENDANT'S
ANSWER TO MY AMENDED
COMPLAINT**

Plaintiff's respond to Defendants Answer to Plaintiff's Amendment to Complaint Follows:

RESPONSE TO FIRST DEFENSE

The Plaintiff didn't think it necessary to read the ADA to the Defendant's Attorney. I thought that with his many years of education and experience that he would know that Harassment is included in the ADA.

RESPONSE TO SECOND DEFENSE

Elizabeth Townsend and Larry McGougan's names were not listed and thereby served on the original complaint because none of the defendants would provide me with their information, but the Robeson County Library Board of Directors was named in the original complaint and as

members of said Board of Directors, Elizabeth Townsend and Larry McGougan should still be included as named Defendants.

RESPONSE TO THIRD DEFENSE

All claims of the Defendants are denied. The Defendants themselves provided me with the proof of both my disability and the harassment.

RESPONSE TO FOURTH DEFENSE

Based on the fact that Defendant's have admitted their guilt, by providing me with the proof that their claims that no ADA violations existed were baseless and the attached proof that I was hired as a Disabled Veteran, I therefore pray the court for immediate relief through a Summary Judgment.

CONCLUSION

For the foregoing reasons, I, Sherryl Lynn Jacobs, Plaintiff request that the Defendants Robert F. Fisher, Horace Stacy, Gayle McLean, Tina Mellen-Stepp-Thomas, Elizabeth Townsend, and Larry McGougan's. Motion to Dismiss be denied in it's entirety and that I be given immediate relief from each of the afore named defendants and Robeson County Public Library.

15 May 2012

Date

Attachment

Copy of VA Disability Check



Signature of Plaintiff

Post Office Box 175, Orrum, NC 28369

Phone: 910-740-3683/628-6334

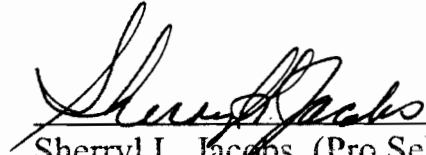
Address and Phone Number of Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon Plaintiff by depositing a copy thereof in the United States Mail, first-class, postage prepaid, addressed as follows:

Law Office of William R. Purcell, II, PLLC
ATTN: Mr. William R. Purcell, II
210 West Cronly Street
Post Office Box 1567
Laurinburg, North Carolina 28352

This the 16th day of May, 2012



Sherryl L. Jacobs (Pro Se)
Post Office Box 175
Orrum, North Carolina 28369