

FILED

FEB 13 2012

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION

DENNIS P. IAVARONE, CLERK  
US DISTRICT COURT, EDNC  
BY CS DEP CLK

SHERRYL LYNN JACOBS )  
\_\_\_\_\_)  
\_\_\_\_\_)

(Enter above the full name of the Plaintiff[s] in this  
action).

Case No. 7:12-cv-20-FL  
(To be assigned by the Clerk  
of District Court)

vs.

ROBESON COUNTY PUBLIC LIBRARY)  
BOARD OF DIRECTORY FOR ROBESON COUNTY PUBLIC LIBRARY)  
ROBERT F. FISHER; HORACE STACY)  
GAYLE MCLEAN; TINA MELLEN-STEPP-THOMAS

(Enter above the full name of ALL Defendant[s] in this action.  
Fed.R.Civ.P.10(a) requires that the caption of the complaint  
include the names of all the parties. Merely listing one party and "et al."  
is insufficient. Please attach additional sheets if necessary).

**COMPLAINT**

1. Plaintiff resides at 6564 Wire Grass Road, Orrum, Robeson County, North Carolina 28369
2. Defendant(s)name(s): Robeson County Public Library; Board of Directors for  
the Robeson County Public Library (That were seated from 2007 through 2009); Robeson  
County; Robert F. Fisher; Horace Stacy; Gayle McLean; and Tina Mellen-Stepp-Thomas

Location of principal office(s) of the named defendant(s):

City of Lumberton, Robeson County, North Carolina

Nature of defendant(s) business: Robeson County Public Library; Provides library services to the cities of Fairmont, Lumberton, Pembroke, Rowland, and St. Pauls, North Carolina; Board of Directors, Robeson County Public Library; Oversees all financial and personnel expenditures; Robeson County; Allocates funds to Robeson County Public Library; Robert F. Fisher and Tina Mellen-Stepp-Thomas; Directors, Robeson County Public Library; Horace Stacy, Gayle McLean; sitting members of the Board of Directors, Robeson County Public Library; Oversees personnel actions.

Approximate number of individuals employed by defendant: 20

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on this court by 42 U.S.C. § 2000e-5.

Equitable and other relief are also sought under 42 U.S.C. § 20003-5(g).

4. The acts complained of in this suit concern:

- (A) \_\_\_\_\_ Failure to employ me.
- (B)   X   Termination of my employment.
- (C) \_\_\_\_\_ Failure to promote me.
- (D)   X   Other acts as specified below:

Violation of the Americans with Disabilities Act and Retaliatory Discrimination

5. Plaintiff is:

(A) \_\_\_\_\_ presently employed by the defendant.

(B)  X  not presently employed by the defendant.

The dates of employment were  19 January 1999 thru 9 September 2009 .

Employment was terminated because:

(1)  X  plaintiff was discharged.

(2) \_\_\_\_\_ plaintiff was laid off.

(3) \_\_\_\_\_ plaintiff left job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

(A) \_\_\_\_\_ my race.

(B) \_\_\_\_\_ my religion.

(C) \_\_\_\_\_ my sex.

(D) \_\_\_\_\_ my national origin.

(E)  X  other as specified below:

Disability and Discriminatory Retaliation as it was related to my disabilities.

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are):

Robeson County Library – Board of Directors, 2007 thru 2009

Robert F. Fisher, White, Director, 2007 thru March 2009

Tina Mellen-Stepp-Thomas, White, Director, March 2009 thru December 2009

Gayle McLean, White, Board Member

Horace Stacy, White, Board Member and Member of Friends of the Library

8. The alleged discrimination occurred on or about a period of time from January 2007 through September 2009.

9. The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated against 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.

10. The alleged illegal activity took place at: The Robeson County Public Library, Lumberton, NC and the Fairmont Branch of the Robeson County Public Library, Fairmont, NC.

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s) alleged discriminatory conduct on or about 19 October 2009. I have attached a copy of the Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on 26 October 2011.

12. I seek the following relief:

- (A) X recovery of back pay;
- (B) \_\_\_\_\_ reinstatement to my former job;
- (C) \_\_\_\_\_ trial by jury on all issues so triable; and any other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

17 January 2012

Date

  
Signature of Plaintiff

Post Office Box 175, Orrum, NC 28369

Phone: 910-740-3683/628-6334

Address and Phone Number of Plaintiff