

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,

Plaintiff,

v.

A&E Tire, Inc.

Defendant.

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**COMPLAINT**

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**NATURE OF THE ACTION**

This is an action under Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.* (“Title VII”), and Title I of the Civil Rights Act of 1991, 42 U.S.C. § 1981a, to correct unlawful employment practices on the basis of sex, and to provide appropriate relief to Egan Joseph Woodward, who was adversely affected by such practices.

As alleged with greater particularity below, the United States Equal Employment Opportunity Commission (“EEOC” or “Commission”) alleges that Defendant, A&E Tire, Inc. (“A&E” or “A&E Tire”) engaged in unlawful discrimination against Woodward, a transgender male, when it failed to hire Woodward because of his sex.

**JURISDICTION AND VENUE**

1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 451, 1331, 1337, 1343 and 1345. This action is authorized and instituted pursuant to Section 706(f)(1),(3), and 706(g) of Title VII of the Civil Rights Act of 1964, as amended, 42

U.S.C. § 2000e-5(f)(1), (3), and (g), and pursuant to Section 102 of the Civil Rights Act of 1991, 42 U.S.C. § 1981a.

2. The employment practices alleged to be unlawful were and are now being committed within the jurisdiction of the United States District Court for the District of Colorado.

### **PARTIES**

3. Plaintiff, the Equal Employment Opportunity Commission, is the agency of the United States of America charged with the administration, interpretation and enforcement of Title VII and is expressly authorized to bring this action by Sections 706(f)(1) and (f)(3) of Title VII, 42 U.S.C. § 2000e-5(f)(1) and (3).

4. At all relevant times, Defendant A&E Tire, a Denver corporation, has continuously been doing business in the State of Colorado and has continuously had at least 15 employees.

5. At all relevant times, Defendant has continuously been an employer engaged in an industry affecting commerce under Sections 701(b), (g) and (h) of Title VII, 42 U.S.C. §§ 2000e(b), (g) and (h).

### **CONDITIONS PRECEDENT**

6. More than thirty days prior to the institution of this lawsuit, Egan Joseph Woodward filed a charge with the Commission alleging violations of Title VII by Defendant.

7. The EEOC provided Defendant with notice of the charge.

8. EEOC investigated the charge of discrimination.

9. On June 30, 2016, the Commission issued a determination informing Defendant of the results of its investigation.

10. In that determination, the EEOC informed Defendant that it had reasonable cause to believe Defendant had violated Title VII in that Defendant failed to hire Charging Party because of his sex, male, and/or transgender status.

11. The Commission's determination included an invitation for Defendant to join with the Commission in informal methods of conciliation in an endeavor to eliminate the unlawful employment practices and provide appropriate relief.

12. Defendant participated with EEOC in conciliation, during which process Defendant and EEOC communicated regarding the alleged unlawful employment practices and how to eliminate and remedy them.

13. The Commission and Defendant were unable to reach an agreement acceptable to the Commission through the conciliation process.

14. On June 27, 2017, the Commission issued Defendant a Notice of Failure of Conciliation.

15. All conditions precedent to the institution of this lawsuit have been fulfilled.

### **GENERAL ALLEGATIONS**

16. On or about May 15, 2014, Defendant posted an ad for a managerial administrative and dispatch position online.

17. On or about May 16, 2014, Woodward completed an application for this managerial position at an A&E Tire store.

18. Woodward also gave Defendant a copy of his resume.

21. That very same day, just after Woodward completed the application, Manager Derrick Haight interviewed him in person.

22. During the interview, Woodward was wearing traditional male attire (black dress pants and a black and gold striped shirt).

23. Woodward also had a goatee.

24. During the interview, Haight did not realize Woodward was a transgender male.

25. Haight interviewed Woodward for about 45 minutes.

26. Woodward and Haight got along well during the interview.

27. Haight and Woodward discussed that they had similar backgrounds.

28. In the same vein, Haight told Woodward that Haight was a good old boy from Nebraska.

29. Both Haight and Woodward grew up in mid-west states.

30. Haight and Woodward also spoke about annual salary.

31. When asked by Haight what his salary goals were, Woodward suggested an annual salary of \$25,000.00.

32. Haight responded that he could pay \$30,000.00 or \$32,000.00.

33. At the end of the interview, Haight told Woodward that Woodward had the job so long as he could pass all of the screening process, which included a drug test and criminal background check.

34. After the interview, Haight asked Woodward to take a tour of A&E's premises.

35. Haight and Woodward drove to various locations in Haight's vehicle.

36. When Haight introduced Woodward to the other A&E employees, he introduced Woodward to them as their new manager.

37. Haight also drove Woodward across the street to a building Defendant recently purchased to serve as A&E's new service offices.

38. The building was still under construction.

39. Haight asked Woodward to go home and sketch what Woodward wanted the offices to look like, since that's where they would all soon be working.

40. After completing the tour, Haight reiterated to Woodward that Haight wanted Woodward in the position, and that as long as Woodward passed the various screenings, the position was his.

41. Haight then told Woodward that hopefully Woodward could in come in later that week to complete the drug test.

42. Before he left A&E Tire that day, Defendant also asked Woodward to complete a "screening consent form" providing Defendant with authorization to complete a background check and providing certain other personal information.

43. In response to a question on the form asking for other names, Woodward provided his former name, the one assigned to him at birth, which is typically associated with the female sex.

44. In response to a question asking him to identify his sex, Woodward stated he was female.

45. Woodward also provided his assigned name at birth on the second page of his application.

46. Approximately an hour after Woodward left A&E Tire, Haight called Woodward and told him, "I see on your drug test that you checked female."

47. Woodward confirmed that this was no mistake.

48. Haight abruptly hung up after stating, "Oh, that's all I need."

49. Woodward attempted multiple times over the next three weeks to follow up with Defendant about completing his background screenings and starting employment.

50. On June 10, 2014, Woodward finally managed to speak with Haight.

51. On June 10, 2014, Haight informed Woodward that Defendant was giving the position to a different applicant.

52. The selected applicant, Stephen Montes, did not apply for the position with Defendant until May 21, 2014.

53. Defendant did not interview Montes until June 6, 2014.

54. Montes began employment on or about June 10, 2014.

55. Montes began employment about three weeks after Defendant failed to hire Woodward after offering Woodward the job.

### **STATEMENT OF CLAIMS**

#### **[Disparate Treatment/Failure to Hire Because of Sex – 42 U.S.C. § 2000e-2(a)]**

56. The allegations and facts found in the preceding paragraphs are fully incorporated herein.

57. On or about May 16, 2014, Defendant engaged in unlawful employment practices in violation of Section 2000e-2(a) of Title VII, by refusing to hire Woodward because of his sex.

58. Defendant's decision not to hire Woodward was predicated on unlawful sex-based considerations, specifically that he is a transgender male and/or because Woodward did not conform to the Defendant's sex- or gender-based preferences, expectations, or stereotypes.

59. The effect of the practices complained of above has been to deprive Woodward of equal employment opportunities and otherwise adversely affect his status as an employee because of his sex.

60. The unlawful employment practices complained of in the forgoing paragraphs were intentional.

30. The unlawful employment practices complained of in the forgoing paragraphs were done with malice or with reckless indifference to Woodward's federally protected rights.

### **PRAYER FOR RELIEF**

Wherefore, the Commission respectfully requests that this Court:

A. Grant a permanent injunction enjoining Defendant, its officers, agents, servants, employees, attorneys, and all persons in active concert or participation with it, from engaging in any unlawful practices that discriminates against an employee or applicant because of their sex, including on the basis of gender identity;

B. Order injunctive relief, including policies, practices, and programs which provide equal employment opportunities regardless of sex and gender identity and which eradicate the effects of Defendant's past and present unlawful employment practices;

B. Order Defendant to make Woodward whole, by providing appropriate back-pay with prejudgment interest, in amounts to be determined at trial, and other affirmative relief necessary to eradicate the effects of its unlawful employment practices;

C. Order Defendant to make Woodward whole by providing compensation for past and future non-pecuniary losses resulting from the unlawful employment practices described in the foregoing paragraphs, including emotional pain, suffering, inconvenience, loss of enjoyment of life, and humiliation, in amounts to be determined at trial.

D. Order Defendant to pay Woodward punitive damages for its malicious or recklessly indifferent conduct described in the foregoing paragraphs, in amounts to be determined at trial;

E. Grant such further relief as the Court deems necessary and proper in the public interest; and

F. Award the Commission its cost of this action.

James L. Lee  
Acting General Counsel

Gwendolyn Reams  
Associate General Counsel

Mary Jo O'Neill  
Regional Attorney  
Phoenix District Office

Loretta Medina  
Supervisory Trial Attorney

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EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION  
Denver Field Office  
303 East 17<sup>th</sup> Avenue, Suite 410  
Denver, CO 80203



Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_ , who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify)*: \_\_\_\_\_ .

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<p><b>I. (a) PLAINTIFFS</b></p> <p>EQUAL EMPLOYMENT OPPORTUNITY COMMISSION</p> <p><b>(b)</b> County of Residence of First Listed Plaintiff _____ (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p><b>(c)</b> Attorneys (Firm Name, Address, and Telephone Number)</p> <p>IRIS HALPERN, EEOC, 303 17TH AVE. DENVER, CO 80203, 303.866.1374</p>	<p><b>DEFENDANTS</b></p> <p>A &amp; E TIRE, Inc.</p> <p>County of Residence of First Listed Defendant <u>DENVER</u> (IN U.S. PLAINTIFF CASES ONLY)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys (If Known)</p> <p>Marilee Langhoff, 1001 S. Monaco Pkwy., Ste 360, Denver, CO 80224, 720.639.2870</p>
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<p><b>II. BASIS OF JURISDICTION</b> (Place an "X" in One Box Only)</p> <p><input checked="" type="checkbox"/> 1 U.S. Government Plaintiff ' 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 2 U.S. Government Defendant ' 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p><b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>PTF</th> <th>DEF</th> <th></th> <th>PTF</th> <th>DEF</th> </tr> </thead> <tbody> <tr> <td>Citizen of This State</td> <td>' 1</td> <td>' 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td>' 4</td> <td>' 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>' 2</td> <td>' 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td>' 5</td> <td>' 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>' 3</td> <td>' 3</td> <td>Foreign Nation</td> <td>' 6</td> <td>' 6</td> </tr> </tbody> </table>		PTF	DEF		PTF	DEF	Citizen of This State	' 1	' 1	Incorporated or Principal Place of Business In This State	' 4	' 4	Citizen of Another State	' 2	' 2	Incorporated and Principal Place of Business In Another State	' 5	' 5	Citizen or Subject of a Foreign Country	' 3	' 3	Foreign Nation	' 6	' 6
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Citizen or Subject of a Foreign Country	' 3	' 3	Foreign Nation	' 6	' 6																				

**IV. NATURE OF SUIT** (Place an "X" in One Box Only) Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p><b>PERSONAL INJURY</b></p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<p><b>REAL PROPERTY</b></p> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<p><b>CIVIL RIGHTS</b></p> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<p><b>LABOR</b></p> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<p><b>PROPERTY RIGHTS</b></p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark	<p><b>SOCIAL SECURITY</b></p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
	<p><b>PRISONER PETITIONS</b></p> <p><b>Habeas Corpus:</b></p> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty	<p><b>IMMIGRATION</b></p> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<p><b>FEDERAL TAX SUITS</b></p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

**V. ORIGIN** (Place an "X" in One Box Only)

XI Original Proceeding     2 Removed from State Court     3 Remanded from Appellate Court     4 Reinstated or Reopened    ' 5 Transferred from Another District (specify)     6 Multidistrict Litigation - Transfer     8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): TITLE VII

Brief description of cause:  AP Docket    Sex Discrimination

**VII. REQUESTED IN COMPLAINT:**     CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.    DEMAND \$ \_\_\_\_\_    CHECK YES only if demanded in complaint: JURY DEMAND: ' Yes    X' No

**VIII. RELATED CASE(S) IF ANY** (See instructions):    JUDGE \_\_\_\_\_    DOCKET NUMBER \_\_\_\_\_

DATE 09/29/2017    SIGNATURE OF ATTORNEY OF RECORD s/ Iris Halpern

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

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**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**

## Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.  
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.  
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.  
**PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.  
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.  
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.