

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**10 CV 4334 (JSB)**

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MELISSA ZARDA, ET ANO.,

**PLAINTIFF'S SUPPLEMENTAL  
REQUESTS TO CHARGE**

Plaintiffs,

-against-

RAYMOND MAYNARD., and

ALTITUDE EXPRESS,

Defendants.  
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Plaintiffs, by their attorney, pursuant to Rule 51 of the Federal Rules of Civil Procedure, respectfully request that the Court give the following supplemental instructions to the jury, and such other instructions as may be submitted hereafter in accordance with later proceedings in this action.

**DISCRIMINATION AGAINST SEXUAL ORIENTATION IS A CLAIM THAT  
COULD ONLY BE BROUGHT IN THIS STATE AFTER 2003**

In 2003, New York's Sexual Orientation Non-Discrimination Act, known as SONDA, took effect. SONDA "prohibits discrimination on the basis of actual or perceived sexual orientation in employment, housing, public accommodations, education, credit, and the exercise of civil rights. Any testimony that you have heard about actions that took place before 2003 are not a part of this case, and an employer could legally discriminate against gay persons in this state before 2003.

SONDA protects employees from identifying as being gay or straight, and the fact that an employers' customers might be upset about hearing that someone is gay or straight

