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JANE DOE 1

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

JANE DOE 1, an individual,
Plaintiff,

vs.

COUNTY OF ORANGE, a public
entity; And DOES 1-50, inclusive,
Defendants.

Case No.: 30-2022-01241335-CU-OE-CJC

**PLAINTIFF'S COMPLAINT FOR
DAMAGES FOR:**

- 1. SEXUAL HARASSMENT IN
VIOLATION OF THE FEHA;**
- 2. SEXUAL DISCRIMINATION IN
VIOLATION OF THE FEHA**
- 3. RETALIATION IN VIOLATION
OF THE FEHA; and**
- 4. FAILURE TO INVESTIGATE
AND PREVENT IN VIOLATION
OF THE FEHA.**

DEMAND FOR JURY TRIAL

Assigned for All Purposes

Judge Martha K. Gooding

1 Plaintiff, JANE DOE 1, hereby brings her employment complaint, demanding a trial by
2 jury, against the above-named Defendants and states and alleges as follows:

3 **SUMMARY OF THE CASE**

4 Plaintiff is a Deputy District Attorney with the Orange County District Attorney's Office
5 ("OCDA"). Unfortunately, when District Attorney Todd Spitzer was elected and put into power
6 in 2019, Mr. Spitzer immediately gave Gary Logalbo – Spitzer's close friend for over 25 years –
7 preferential treatment and promoted him into a management position despite knowing Mr.
8 Logalbo had a history sexually harassing female employees. As a result, Plaintiff, and others
9 under Mr. Spitzer's charge, were exposed daily to Mr. Logalbo's sexual harassing comments.

10 Ultimately, Defendant COUNTY OF ORANGE hired an independent investigator to
11 examine the harassment allegations made against Mr. Logalbo. The investigator concluded that
12 Mr. Logalbo committed sexual harassment towards Plaintiff, and that his conduct was
13 sufficiently severe or pervasive to create a hostile work environment.

14 Afterward, Mr. Spitzer embarked on a campaign of retaliation against Plaintiff and other
15 victims of Mr. Logalbo for blowing the whistle on his "*best*" friend. Therefore, Plaintiff and six
16 other female district attorneys were compelled to make complaints of retaliation to Defendant
17 COUNTY ORANGE. In response, Defendant COUNTY ORANGE conducted another
18 independent investigation. The investigation concluded on or about August 2, 2021.

19 Five months later, the investigation findings were finally made available to Plaintiff, and
20 they are stunning. The investigator concluded that Mr. Spitzer "flagrantly" violated Defendant
21 COUNTY OF ORANGE's EEO and Abusive Conduct policies and acted with "malice" towards
22 Plaintiff and the other victims of Mr. Logalbo. The investigator also concluded that Mr. Spitzer
23 knowingly "abused" and "misused" his power as District Attorney, which created a hostile and
24 offensive work environment for Mr. Logalbo's victims, including Plaintiff. Mr. Spitzer's conduct
25 was specifically found to have exposed Plaintiff and other victims of Mr. Logalbo to "gawking"
26 and "humiliation" and had the "effect of gratuitous sabotage" and "undermining of those
27 [victims'] work performance." In short, Defendant COUNTY ORANGE's own investigation
28 found that Mr. Spitzer has "caused unjustified embarrassment and indignity to [his own district

attorneys].” Shockingly, the report reveals that Mr. Sptizer, the County’s chief law enforcement officer, did not cooperate in the investigation and refused to be interviewed. Plaintiff, however, is unaware of any formal investigation, in the history of Orange County, where an elected official was found to have so contemptuously betrayed the public trust.

THE PARTIES

1. At all times mentioned herein, Plaintiff, JANE DOE 1, was an individual and a resident of the State of California. Because Plaintiff is a victim of a sexual harassment of a sensitive and personal nature, her identity is protected in this public filing.

2. Defendant COUNTY OF ORANGE is a California public governmental entity. One of the departments that make up Defendant COUNTY OF ORANGE’s government is the Orange County District Attorney’s Office (“OCDA”). At all times, Plaintiff was an employee of Defendant COUNTY OF ORANGE.

3. Plaintiff is unaware of the true names and capacities of Defendants sued herein as DOES 1 through 50, inclusive, and for that reason sues said Defendants by such fictitious names. Each of the Defendants designated herein as a DOE is negligently, intentionally, or otherwise legally responsible in some manner for the events and happenings herein referred to and caused injuries and damages proximately thereby to the Plaintiff, as herein alleged. Plaintiff will file and serve one or more amendments to this complaint upon learning the true names and capacities of said Defendants.

4. Plaintiff is informed and believes that each of the fictitiously named Defendants is responsible in some manner for, and proximately caused, the injuries and damages to Plaintiff hereinafter alleged.

5. Plaintiff is informed and believes, and based thereon alleges, that each of the Defendants named herein acted as the employee, agent, servant, partner, alter-ego and/or joint ventures of one or more of the other Defendants named herein. In doing the acts and/or omissions alleged herein, each of said Defendants acted within the course and scope of his or her relationship with any other Defendant; and gave and received full consent, permission and ratification to the acts and/or omissions alleged herein.

1 6. Hereinafter in this Complaint, unless otherwise noted, reference to a Defendant shall
2 mean all Defendants, and each of them.

3 **JURISDICTION AND VENUE**

4 7. Jurisdiction in this Court is proper since the acts and omissions complained of
5 occurred in the State of California. The amount in controversy exceeds the jurisdictional
6 minimum of this Court.

7 8. Venue is proper in the County of Orange because the events giving rise to these
8 claims transpired in the County of Orange, at OCDA, North Justice Center, 1275 North
9 Berkeley Avenue, Fullerton, California 92832 and/or OCDA, 434 South Harbor Boulevard
10 Fullerton California, 92832, 814113th Street, Westminster California, 92683.

11 **THE FACTUAL ALLEGATIONS**

12 9. Plaintiff is a Deputy District Attorney with the OCDA.

13 10. Defendant COUNTY OF ORANGE hired Plaintiff in or around August 2019.

14 11. At all times mentioned herein, and at the time each of Plaintiff's causes of action
15 arose, Gary Logalbo was an employee of Defendant COUNTY OF ORANGE and was a
16 "supervisor" of Defendant COUNTY OF ORANGE.

17 **Plaintiff Is Subjected To Sexual Harassment And Discrimination**

18 12. In or around December 2019, Defendant COUNTY OF ORANGE promoted Mr.
19 Logalbo, a Deputy District Attorney within the OCDA, to Head of Court at North Court. From
20 the very beginning of his tenure, Mr. Logalbo could often be heard laughing, telling crude
21 stories, or engaging in conversations with subordinates regarding inappropriate subject matters.
22 This was not only observed by attorneys, but by clerical, investigative staff, and pretty much
23 anyone within earshot of Mr. Logalbo's office. He quickly became known for leering at the legs
24 of the women he worked with, once commenting that a particular female defense attorney in
25 North Court had "*legs that go on for days.*" Mr. Logalbo also seemed to enjoy surprising female
26 subordinates by sneaking up behind them and pressing cold cans of diet coke onto the bare skin
27 of their backs or necks. As he settled into his new supervisory role, this behavior became more
28 frequent, overt, and increasingly sexual in nature. Mr. Logalbo began to reveal certain sexual

1 proclivities including an apparent fascination with bra straps, and often commented to his female
2 subordinates about their feet. In the words of a subordinate female employee, “*Gary became*
3 *creepier and creepier as time went by.*” There were six female prosecutors working under Mr.
4 Logalbo’s supervision during that time. Plaintiff is aware, as is Defendant COUNTY OF
5 ORANGE this point, that each of these women were subject to some form of this pervasive and
6 unwanted behavior. Some specific examples of the sexual harassment directed towards Plaintiff:

- 7 a. In early April 2020, Plaintiff was getting ready for a lunchtime workout and the
8 tag of her sports-bra was exposed on her back. Noticing this, Mr. Logalbo reached
9 over, put his hand on Plaintiff’s skin, and tucked the tag under the bra.
- 10 b. Approximately four weeks later, in early May 2020, Plaintiff was again preparing
11 to leave for a lunchtime workout and was wearing the same sports-bra with the
12 same exposed tag. Mr. Logalbo noticed this and reached over again. When
13 Plaintiff moved away to avoid his touch, Mr. Logalbo said “*What do I have to do,*
14 *be at your house in the morning to help you get dressed?*” This incident was
15 witnessed by a male Deputy District Attorney who later told Plaintiff that Mr.
16 Logalbo’s ongoing behavior was wrong, and he would support her if she decided
17 to make a formal complaint. Well aware of Mr. Logalbo’s close relationship with
18 District Attorney Todd Spitzer, however, Plaintiff decided to say nothing. She
19 simply wanted to do her job.
- 20 c. In August of 2020, Plaintiff was helping plug an electrical cord into an outlet
21 behind a colleague’s desk. Plaintiff was able to reach the outlet, but it required her
22 to turn her back to the open office door and bend over at the waist. At that
23 moment, Mr. Logalbo appeared in the doorway. He stopped, pointed his phone at
24 Plaintiff and took a photo of Plaintiff’s buttocks declaring “*This one is for the*
25 *spank bank, I’ll use it later.*” He then walked away. This took place in front of
26 two other sworn Deputy District Attorneys.
- 27 d. During the first few months of 2020, Plaintiff’s assignment required near constant
28 contact with Mr. Logalbo. Several times per day, she, and other female

1 colleagues, would have to go to his office for professional consultations on
2 pending cases. During these encounters, Mr. Logalbo developed a pattern, which
3 intensified over time, of leering at Plaintiff. He would begin almost every visit by
4 looking her up and down and seemed to have a particular interest in Plaintiff's
5 lower body and legs. This made Plaintiff very uncomfortable.

6 13. As time went on, and Mr. Logalbo settled into his new role as Head of Court, his
7 aberrant behavior towards Plaintiff seemed to increase in boldness and frequency. Mr. Logalbo's
8 leering and sexual commentary became a constant—and totally unwelcome—part of Plaintiff's
9 workday. Moreover, during his tenure as Plaintiff's supervisor, Mr. Logalbo continued to remind
10 her of his close bonds with the elected District Attorney, telling her, as well as others in North
11 Court, that he was "*Todd's best friend*."

12 **Plaintiff Is Retaliated Against**

13 14. Plaintiff is aware of at least one person with managerial authority who attempted to
14 speak to Mr. Logalbo about his behavior and the hostile work environment it was generating.
15 This effort, however, proved ineffective when Mr. Logalbo reportedly responded: "*What are*
16 *they going to do, fire me? I'm Todd's best friend*."

17 15. Despite Mr. Logalbo's relative lack of managerial experience, as well as his widely
18 known harassing behavior, in November 2020, Mr. Spitzer promoted his friend again. This time,
19 Mr. Logalbo was elevated to the position of Senior Assistant District Attorney, or Grade Six.
20 This rank not only involves great responsibility and corresponding financial benefits, but Mr.
21 Spitzer placed Mr. Logalbo in charge of *all* of branch court operations. When this promotion was
22 announced, another female district attorney lodged a formal complaint of sexual harassment
23 against Mr. Logalbo with the OCDA.

24 16. OCDA's Human Resources representative Matthew Petit then commenced an
25 internal investigation into the actions of Mr. Logalbo. Mr. Petit soon learned that Mr. Logalbo's
26 behavior had not only been severe, pervasive, intimidating, and hostile, but that it had been
27 witnessed by many people working within the OCDA. After speaking with Chief Deputy Shawn
28 Nelson, however, Mr. Petit quickly developed "*concerns*" that executive leadership within the

1 OCDA “*was not taking the Logalbo revelations as seriously as he calibrated.*” Mr. Logalbo
2 continued to participate in the day-to-day operations of the OCDA for another five weeks.

3 17. On December 15, 2020, Chief Deputy Nelson finally sent the following email to all
4 attorneys within the OCDA: “***After more than 30 years of public service, Senior Assistant***
5 ***District Attorney Gary Logalbo has elected to retire.***” Mr. Nelson did not mention the reason
6 why.

7 18. On December 28, 2020, Defendant COUNTY OF ORANGE chartered the
8 independent investigation into the allegations against Mr. Logalbo.

9 19. On or about January 15, 2021, Plaintiff sent an email to her immediate supervisor
10 describing specific acts of sexual harassment by Mr. Logalbo. In this email, Plaintiff also
11 expressed fear of Mr. Spitzer should she continue to cooperate in the County chartered
12 investigation. On January 21, 2021, Plaintiff also sent a courtesy email to the OCDA’s Office
13 informing them of Plaintiff’s identity and notifying them of the submission of a Government
14 Claim filed on her behalf. The following day, Mr. Spitzer walked into an executive meeting and
15 stated that Plaintiff “*had lied and was untruthful in her email reporting sexual harassment.*”

16 20. Then, on January 29, 2021, Mr. Spitzer spoke to Plaintiff’s immediate supervisor.
17 Mr. Spitzer told the supervisor that Plaintiff had lied in her email when she reported sexual
18 harassment and “*needed to be written up.*” Specifically, the supervisor stated, “*Todd had just*
19 *talked to him in the West Court library and told him that [Plaintiff] needs to be written up, and*
20 *the reason he specifically said she needs to be written up is for the email where she gave her*
21 *supervisor notice that she was sexually harassed, because he said she lied in that email and was*
22 *untruthful.*” Mr. Spitzer then instructed the supervisor to “*Put it in her review.*” The supervisor
23 then explained to Mr. Spitzer that Plaintiff had ***not*** lied in her email, and that what Mr. Spitzer
24 was instructing him to do was against California law. The supervisor then reported Mr. Spitzer’s
25 actions to both his immediate supervisor, and Human Resources with Defendant COUNTY OF
26 ORANGE.

27 21. On April 28, 2021, Defendant COUNTY OF ORANGE released a report of its
28 investigation in Mr. Logalbo’s conduct. The investigator concluded that Mr. Logalbo committed

1 sexual harassment in violation of the Defendant COUNTY OF ORANGE's EEO Policy, and that
2 his conduct was sufficiently severe or pervasive to create a hostile work environment. It also
3 revealed that Defendant COUNTY OF ORANGE employees sought to retaliate against Plaintiff
4 by undermining Plaintiff's credibility, which as a District attorney, is critical to her ability to
5 effectively perform her job. Specifically, the report revealed, among other things, that:

- 6 - After Plaintiff, JANE DOE 1, 's experiences were known to executive
7 management, Chief Deputy Shawn Nelson declared to at least two executive
8 managers that "**Gary doesn't have any victims**," he patted Mr. Logalbo on the
9 back when he returned from vacation, and the OCDA originally planned to
10 provide Mr. Logalbo with some sort of training rather than terminate him.
- 11 - During his interview, Mr. Logalbo stated that the allegations against him had been
12 "fabricated" by Plaintiff, JANE DOE 1.

13 22. Thus, although Mr. Spitzer has voiced his "support" for Mr. Logalbo's many
14 victims, Defendant COUNTY OF ORANGE's independent investigation not only concluded that
15 Mr. Spitzer retaliated against Plaintiff for reporting sexual harassment, but it also appears, he lied
16 about it.

17 23. Subsequently, Plaintiff made a complaint of retaliation. In response, Defendant
18 COUNTY ORANGE conducted another third-party investigation. The investigation concluded
19 on or about August 2, 2021. The investigator concluded that Mr. Spitzer "flagrantly" violated the
20 Defendant COUNTY OF ORANGE's EEO and Abusive Conduct policy and acted with malice
21 towards Plaintiff. The investigator also concluded that Mr. Spitzer abused and misused his
22 power, which created a hostile and offensive work environment. Mr. Spitzer's conduct was
23 found to expose Plaintiff to "gawking and humiliation" and had the "effect of gratuitous
24 sabotage" and "undermining of [Plaintiffs] work performance."

25 24. Indeed, Defendant COUNTY ORANGE's retaliatory conduct has not only caused
26 Plaintiff emotional distress but has undermined Plaintiff's job performance and ability for
27 advancement within the OCDA.

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1 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

2 25. Plaintiff filed a complaint against Defendants with the Department of Fair
3 Employment and Housing (“DFEH”) on January 21, 2021 and again on January 18, 2022. The
4 DFEH issued Plaintiff a “Right-to-Sue” letter those same days. This Complaint is timely filed
5 pursuant to those letters.

6 **FIRST CAUSE OF ACTION**

7 **SEXUAL HARASSMENT IN VIOLATION OF THE FEHA**

8 **(Against ALL Defendants)**

9 26. Plaintiff restates and incorporates by this reference as if fully set forth herein
10 paragraphs 1 through 25 of this Complaint.

11 27. At all times herein mentioned, California Government Code § 12940 et seq., the Fair
12 Employment and Housing Act (“FEHA”), was in full force and effect and was binding on
13 Defendants, as Defendants regularly employed five or more persons.

14 28. California Government Code § 12940(a) requires Defendants to refrain from
15 harassing an employee based on an individual’s protected class, including sex, gender etc.

16 29. Defendant engaged in unlawful employment practices in violation of the FEHA by
17 harassing Plaintiff because of sex and/or gender.

18 30. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered
19 actual, consequential and incidental financial losses, including without limitation, loss of salary
20 and benefits, and the intangible loss of employment related opportunities in her field and damage
21 to her professional reputation, all in an amount subject to proof at the time of trial. Plaintiff
22 claims such amounts as damages pursuant to California Civil Code § 3287 and/or § 3288 and/or
23 any other provision of law providing for prejudgment interest.

24 31. As a proximate result of the wrongful acts of Defendants, Plaintiff has suffered and
25 continues to suffer emotional distress, humiliation, mental anguish and embarrassment, as well
26 as the manifestation of physical symptoms. Plaintiff is informed and believes, and thereupon
27 alleges, that she will continue to experience said physical and emotional suffering for a period in
28 the future not presently ascertainable, all in an amount subject to proof at the time of trial.

32. As a proximate result of the wrongful acts of Defendants, Plaintiff has been forced to hire attorneys to prosecute her claims herein and has incurred and is expected to continue to incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys' fees and costs under California Government Code § 12965(b).

SECOND CAUSE OF ACTION

SEXUAL DISCRIMINATION IN VIOLATION OF THE FEHA

(Against ALL Defendants)

33. Plaintiff restates and incorporates by this reference as if fully set forth herein paragraphs 1 through 32 of this Complaint.

34. At all times herein mentioned, California Government Code § 12940 et seq., the Fair Employment and Housing Act (“FEHA”), was in full force and effect and was binding on Defendants, as Defendants regularly employed five or more persons.

35. California Government Code § 12940(a) requires Defendants to refrain from discriminating against an employee based on an individual's protected class, including sex, gender etc.

36. Defendant engaged in unlawful employment practices in violation of the FEHA by discriminating against Plaintiff because of sex and/or gender.

37. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered actual, consequential and incidental financial losses, including without limitation, loss of salary and benefits, and the intangible loss of employment related opportunities in her field and damage to her professional reputation, all in an amount subject to proof at the time of trial. Plaintiff claims such amounts as damages pursuant to California Civil Code § 3287 and/or § 3288 and/or any other provision of law providing for prejudgment interest.

38. As a proximate result of the wrongful acts of Defendants, Plaintiff has suffered and continues to suffer emotional distress, humiliation, mental anguish and embarrassment, as well as the manifestation of physical symptoms. Plaintiff is informed and believes, and thereupon alleges, that she will continue to experience said physical and emotional suffering for a period in the future not presently ascertainable, all in an amount subject to proof at the time of trial.

39. As a proximate result of the wrongful acts of Defendants, Plaintiff has been forced to hire attorneys to prosecute her claims herein and has incurred and is expected to continue to incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys' fees and costs under California Government Code § 12965(b).

THIRD CAUSE OF ACTION

RETALIATION IN VIOLATION OF THE FEHA

(Against ALL Defendants)

40. Plaintiff restates and incorporates by this reference as if fully set forth herein paragraphs 1 through 39 of this Complaint.

41. At all times herein mentioned, the FEHA was in full force and effect and were binding on Defendants, as Defendant regularly employed five or more persons. The FEHA makes it unlawful for any person to retaliate against an employee who has opposed a discriminatory practice and who asserts their rights under the FEHA.

42. Defendants' conduct as alleged above constituted unlawful retaliation in violation of the FEHA.

43. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered actual, consequential and incidental financial losses, including without limitation, loss of salary and benefits, and the intangible loss of employment related opportunities in her field and damage to her professional reputation, all in an amount subject to proof at the time of trial. Plaintiff claims such amounts as damages pursuant to California Government Code § 3287 and/or § 3288 and/or any other provision of law providing for prejudgment interest.

44. As a proximate result of the wrongful acts of Defendants, Plaintiff has suffered and continues to suffer emotional distress, humiliation, mental anguish and embarrassment, as well as the manifestation of physical symptoms. Plaintiff is informed and believes and thereupon alleges that she will continue to experience said physical and emotional suffering for a period in the future not presently ascertainable, all in an amount subject to proof at the time of trial.

45. As a proximate result of the wrongful acts of Defendants, Plaintiff has been forced to hire attorneys to prosecute his claims herein and has incurred and is expected to continue to

1 incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys'
2 fees and costs under California Government Code § 12965(b).

3 **FOURTH CAUSE OF ACTION**

4 **FAILURE TO INVESTIGATE AND PREVENT IN VIOLATION OF THE FEHA**

5 **(Against ALL Defendants)**

6 46. Plaintiff restates and incorporates by this reference as if fully set forth herein
7 paragraphs 1 through 45 of this Complaint.

8 47. At all times mentioned herein, California Government Code Sections 12940, et seq.,
9 including but not limited to Sections 12940 (j) and (k), were in full force and effect and were
10 binding upon Defendants and each of them. These sections impose on an employer a duty to
11 take immediate and appropriate corrective action to end harassment, discrimination, and
12 retaliation and take all reasonable steps necessary to prevent harassment, discrimination, and
13 retaliation from occurring.

14 48. Defendants failed to take immediate and appropriate corrective action to end the
15 harassment, discrimination, and retaliation. FEHA renders it an unlawful act for employers to
16 fail to take all reasonable steps to protect their employees from harassment, discrimination, and
17 retaliation

18 49. In failing and/or refusing to take immediate and appropriate corrective action to end
19 the discrimination, harassment, and retaliation, and in failing and/or refusing to take and or all
20 reasonable steps necessary to prevent discrimination, harassment and retaliation from occurring,
21 Defendants violated California Government Code § 12940 (j) and (k), causing Plaintiff to suffer
22 damages as set forth above.

23 50. As a proximate result of the aforesaid acts of Defendants, and each of them, Plaintiff
24 has suffered actual, consequential and incidental financial losses, including without limitation,
25 loss of salary and benefits, and the intangible loss of employment related opportunities in her
26 field and damage to her professional reputation, all in an amount subject to proof at the time of
27 trial. Plaintiff claims such amounts as damages pursuant to Civil Code § 3287 and/or § 3288
28 and/or any other provision of law providing for prejudgment interest.

51. As a proximate result of the wrongful acts of Defendants, and each of them, Plaintiff has suffered and continues to suffer emotional distress, humiliation, mental anguish and embarrassment, as well as the manifestation of physical symptoms. Plaintiff is informed and believes and thereupon alleges that she will continue to experience said physical and emotional suffering for a period in the future not presently ascertainable, all in an amount subject to proof at the time of trial.

52. As a proximate result of the wrongful acts of Defendants, Plaintiff has been forced to hire attorneys to prosecute her claims herein and has incurred and is expected to continue to incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys' fees and costs under California Government Code § 12965(b).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

1. For general damages in an amount within the jurisdictional limits of this Court;
2. For special damages, according to proof;
3. For medical expenses and related items of expense, according to proof;
4. For loss of earnings, according to proof;
5. For attorneys' fees, according to proof;
6. For prejudgment interest, according to proof;
7. For costs of suit incurred herein;
8. For declaratory relief;
9. For injunctive relief; and
10. For such other relief and the Court may deem just and proper.

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DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury.

DATED: January 18, 2022

MATT MURPHY LAW APC



By: _____

MATTHEW MURPHY

Attorney for Plaintiff