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13 Attorneys for Plaintiff

14  
15 **IN THE UNITED STATES DISTRICT COURT**  
16 **FOR THE EASTERN DISTRICT OF WASHINGTON**

17 JIN ZHU,

18 Plaintiff,

19 v.

20 BRIDGEPORT SCHOOL  
21 DISTRICT NO. 75,

22 Defendant.

23 **NO. 2:15-CV-00263**

24 **COMPLAINT AND**  
25 **DEMAND FOR TRIAL BY**  
**JURY**

Mr. Zhu, by and through his attorneys, alleges:

**I. PARTIES AND JURISDICTION**

1           1. Defendant, BRIDGEPORT SCHOOL DISTRICT NO. 75  
2 ("Bridgeport") is a municipal government agency located in the State of  
3 Washington.

4           2. Plaintiff, JIN ZHU ("Mr. Zhu"), resided in Waterville, Washington at  
5 all times relevant to this lawsuit.  
6

7           3. All acts complained of occurred within the Eastern District of  
8 Washington.

9           4. The Federal Court for the Eastern District of Washington has personal  
10 jurisdiction over the parties and subject matter jurisdiction for the claims in this  
11 complaint pursuant to 42 U.S.C. §1981, 28 U.S.C. § 1331, and 28 U.S.C. § 1367(a).  
12

13           5. Venue is proper in the Eastern District of Washington under 28 U.S.C.  
14 § 1391(b) because the acts and omissions complained herein occurred in the District  
15 and Defendant conducts business there.  
16

17           6. On July 24, 2015, Mr. Zhu mailed (via certified mail, return receipt  
18 requested, tracking number 70150640000374349326) a RCW 4.96.020 Notice of  
19 Tort Claim to Bridgeport. Bridgeport received the Notice of Tort Claim on July 27,  
20 2015. Sixty days have expired since July 27, 2015, therefore Mr. Zhu has complied  
21 with the administrative preconditions of filing this lawsuit and the statute of  
22 limitations regarding his federal and state claims was tolled during that sixty day  
23 timeframe and the five court days following.  
24  
25

**II. INTRADISTRICT ASSIGNMENT**

1  
2 7. This action arose in Douglas County, Washington. Therefore, Mr. Zhu  
3 respectfully requests that the case be assigned to the Spokane Division of the  
4 Eastern District of Washington.  
5

**III. FACTS**

6  
7 8. Plaintiff re-alleges the above paragraphs.

8 9. Mr. Zhu worked as a secondary math teacher at Waterville Secondary  
9 School of Waterville School District (“Waterville”) from 2006 to 2012.  
10

11 10. During Mr. Zhu’s tenure at Waterville he was the subject of racial  
12 discrimination, reported that discrimination, and experienced retaliation following  
13 his report of the same.

14 11. Those events ultimately led to Mr. Zhu filing a federal lawsuit against  
15 Waterville.  
16

17 12. Bridgeport knew that Mr. Zhu took legal action against Waterville.

18 13. Bridgeport knew that Mr. Zhu resolved his legal dispute with  
19 Waterville.  
20

21 14. Bridgeport, cognizant of the risks associated with hiring an employee  
22 not afraid to enforce state and federal anti-discrimination laws, chose to hire less  
23 qualified candidates for the below-referenced positions.  
24  
25

1 15. Bridgeport declares that it is “an equal opportunity employer” on its  
2 official website, job opening announcements, and employment application forms.

3 16. Bridgeport’s 2011-2016 Affirmative Action Plan, page 6 “Problem  
4 Areas Identification,” points out “Ethnic Minorities: The numerical analysis of the  
5 District’s total work force in 2010-2011 reveals that 23.83% of our staff members  
6 were ethnic minorities (0% of administrators, 6.52% of certificated and 17.31% of  
7 classified). In comparison, 87.1% of our student population is ethnic minority .....”  
8

9 17. The Bridgeport’s 2011-2016 Affirmative Action Plan, page 7 “Goals  
10 and Timelines,” urges “..... constant effort and vigilance is necessary to continue  
11 to diversify the small and rather homogeneous employee group ..... Goal 1:  
12 Continue to balance the ethnic minority representation by employing and/or  
13 promoting employees to reflect our community and students populations.”  
14  
15

16 18. On August 8, 2012, Mr. Zhu applied for the Bridgeport’s Middle  
17 School Math Intervention Teacher position.

18 19. On August 10, 2012 at 2:34 p.m., Mr. Zhu emailed Bridgeport’s  
19 Superintendent, Scott Sattler:  
20

21 I realize that I do have additional information to make available for the  
22 application. Attached is the Waterville Students ITBS Math  
23 Results. As you can see: 1. Only 27% of students in 1<sup>st</sup> grade, 47% in  
24 2<sup>nd</sup> grade, 50% in 3<sup>rd</sup> grade, 36% in 4<sup>th</sup> grade, 40% in 5<sup>th</sup> grade, 20% in  
25 6<sup>th</sup> grade, 6% in 7<sup>th</sup> grade, and 17% in 8<sup>th</sup> grade scored at or above grade  
level; 2. 75% of students in 9<sup>th</sup> grade who took my Math Intervention  
class were at or above grade level. The results prove that my Math

1 Intervention class was effective in improving middle school students'  
2 math skills and assessment performance. Please contact me if you have  
any question regarding this information or my application packet.

3 20. Mr. Sattler did not respond to Mr. Zhu's August 10<sup>th</sup> email.

4 21. Bridgeport did not interview Mr. Zhu for the Middle School Math  
5 Intervention Teacher position related to the above-referenced 2012 job  
6 announcement.  
7

8 22. Bridgeport posted a second Middle School Math Intervention Teacher  
9 opening in March 2013.  
10

11 23. Mr. Zhu applied for the 2013 Middle School Math Intervention  
12 Teacher position.

13 24. On March 28, 2013 at 1:51 p.m., Mr. Zhu asked, via email, the  
14 following of Mr. Sattler:  
15

16 Attached are my updated resume and letter of interest for the position  
17 this year. Could you please confirm to me that I have submitted all the  
18 required materials for the application? If you need any additional  
19 information for the sake of a complete and objective assessment of my  
competency for the position, could you please let me know?

20 25. On March 29, 2013 at 6:55 a.m., Mr. Sattler replied, via email, "I have  
21 received your complete application and will forward all your information to our  
22 selection committee."

23 26. On March 27, 2013, Bridgeport posted a Middle School Science  
24 Teacher opening.  
25

1 27. On April 8, 2013, Mr. Zhu applied for the Middle School Science  
2 Teacher position.

3 28. On April 8, 2013 at 11:06 a.m., Mr. Zhu emailed Mr. Sattler:

4 I also saw your school district's notice of an opening for a middle  
5 school science teacher. I possess the required qualifications for the  
6 position. Since you have confirmed that my application is complete, I  
7 only need to submit a cover letter for the position. Attached is my cover  
8 letter. Could you please let me know if the application needs any other  
9 information? Could you also please tell me when your selection  
committee will conduct interviews for the two positions for which I  
have applied?

10 29. Mr. Sattler did not respond to Mr. Zhu's April 8<sup>th</sup> email.

11 30. On April 9, 2013 at 11:22 a.m., Mr. Zhu asked, via email, Bridgeport  
12 employee Diane Hull:  
13

14 Attached is my cover letter for the middle school science teacher  
15 position. Could you please let me know if the application needs any  
16 other information to be complete? When will your school district start  
the selection process?

17 31. Ms. Hull did not respond to Mr. Zhu's April 9<sup>th</sup> email.

18 32. On April 18, 2013 at 8:21 a.m., Mr. Zhu emailed Ms. Hull, "I have  
19 mailed my cover letter for the middle school science teacher  
20 position to you because I did not hear anything from the school  
21 district regarding my application for this position."  
22

23 33. Ms. Hull did not respond to Mr. Zhu's April 18<sup>th</sup> email.  
24  
25

1           34. On May 1, 2013 at 3:28 p.m., Mr. Zhu asked Mr. Sattler via email,  
2 “Did you receive my cover letter for the middle school science teacher position?  
3 Could you please tell me when your selection committee will conduct interviews  
4 for the two positions for which I have applied? ”

5  
6           35. Mr. Sattler did not respond to Mr. Zhu’s May 1<sup>st</sup> email.

7           36. On May 9, 2013 at 9:07 a.m., Mr. Zhu asked Mr. Sattler again via email  
8 the following: “Attached is a recommendation letter I received recently. Could you  
9 please forward it to your selection committee? As the end of this school year is one  
10 month away, I wonder whether you know when your committee will start selection  
11 for the two OUF positions for which I have applied.” The supervisory  
12 recommendation letter was dated April 25, 2013. OUF means “open until filled”  
13 and relates to the Middle School Math Intervention Teacher position and the Middle  
14 School Science Teacher position.  
15  
16

17           37. Mr. Sattler did not respond to Mr. Zhu’s May 9<sup>th</sup> email.

18           38. Bridgeport did not interview Mr. Zhu for the Middle School Math  
19 Intervention Teacher position.  
20

21           39. Bridgeport did not interview Mr. Zhu for the Middle School Science  
22 Teacher position.

23           40. On May 14, 2013 at 1:28 p.m., Mr. Zhu asked Mr. Sattler again via  
24 email the following: “I have noticed that the Middle school Math Intervention  
25

1 Teacher and Middle School Science Teacher positions were removed from your  
2 school district's website. Did you already select applicants for the two OUF  
3 position? If not, when will you?"

4 41. On May 14, 2013 at 1:57 p.m., Mr. Sattler finally answered Mr. Zhu  
5 as follows: "Both Math and Science have been filled in Bridgeport School District.  
6 Your application and complete file was considered by the interview committee."  
7

8 42. Bridgeport selected Edith Ellen Haughey Sattler for the Middle School  
9 Math Intervention Teacher position in 2012.  
10

11 43. Upon information and belief, Ms. Sattler is related to Mr. Sattler.

12 44. Ms. Sattler's college transcripts reveal that she took no more than three  
13 math-related courses, the most recent being an "Elementary Math" class taken in  
14 1968. Ms. Sattler's educational certificate contains no endorsement.  
15

16 45. Upon information and belief Ms. Sattler vacated the Middle School  
17 Math Intervention Teacher position which, in turn, led Bridgeport to re-open the  
18 job position in 2013.  
19

20 46. Bridgeport selected Frank Lynn Moore II for the Middle School Math  
21 Intervention Teacher position in 2013. In 2002, Mr. Moore received a Bachelor's  
22 degree of Arts with a major in Religion from Whitworth University. In 2012, he  
23 received a Master's degree of Education with a major in teaching K-8 from an  
24 unidentified university. Mr. Moore's education certificate was issued on July 3,  
25



1 2012. Elementary Education is Mr. Moore's endorsement. Mr. Moore had no  
2 certificated teaching experience when he applied for the position in 2013.

3 47. Bridgeport also selected Kara Jo Lashai Smith for the Middle School  
4 Science Teacher position in 2013. Ms. Smith's education certificate was issued on  
5 July 31, 2013. Her endorsements are Elementary Education and Middle Level  
6 Mathematics. Ms. Smith had no certificated teaching experience when she applied  
7 for the position in 2013.  
8

9 48. By way of comparison, Mr. Zhu's education and experience during the  
10 above timeframe consisted of (1) a Bachelor's Degree of Engineering, (2) a  
11 Master's Degree of Arts (a three-year graduate school program), (3) admission into  
12 a Ph.D. World History research program after receiving excellent scores in three  
13 entrance tests relating to that program, (4) a year of secondary education program  
14 at Saint Martin's College, (5) scoring 166 on Educational Testing Service (ETS)'s  
15 Praxis II Mathematics: Content Knowledge test in 2006 and 172 points on the ETS  
16 Praxis II Physics: Content Knowledge test in 2008 - - - scores that ranked Mr. Zhu  
17 in the top 15% of all ETS math test takers and 6 points higher than the high end of  
18 the average performance range of all ETS physics test takers, (6) Mathematics (5-  
19 12<sup>th</sup> grade), Physics (5-12<sup>th</sup> grade), Chemistry (5-12<sup>th</sup> grade), and Middle Level  
20 Math/Science (4-9<sup>th</sup> grade) endorsements, and (7) having taught a wide ranges of  
21  
22  
23  
24  
25

1 science and math subjects (including Math Intervention for more than three years)  
2 to students of multiple grades in Washington State since 2005.

3 49. Bridgeport knew of Mr. Zhu's above-referenced qualifications (and  
4 more) because Mr. Zhu listed those qualifications (and others) on his employment  
5 applications.  
6

7 50. In his letter dated July 15, 2013, Mr. Sattler, in response to Mr. Zhu's  
8 inquiry as to why he was not selected for any interview, explained why Mr. Zhu  
9 was not chosen for the three positions:  
10

11 Clearly, the district had other qualified candidates that were more  
12 interesting to the district at the time. Still, I can appreciate your desire  
13 to improve your chances at future positions so I will point out to you  
14 that we had terrific candidates with recent experience and we noticed  
15 that your information was a bit outdated. In your cover letter you shared  
16 that your indicator of student success in your classroom was based on  
17 the Iowa Test of Basic Skills. This test has not been relevant in our area  
18 since 1996. Also, your recommendations were limited to a letter from  
19 a colleague, not a supervisor, dated 2012 and a letter from a teacher  
20 supervising your student teaching back in 2005. Of course, more  
21 current supervisory recommendations would have been more relevant  
22 to your application and carried more weight during the screening  
23 process.

24 51. Mr. Sattler's claims are inaccurate.

25 52. Bridgeport School District Middle School Math Intervention Teacher  
qualifications included "Highly Qualified Requirements of the NCLB." As a  
Washington teacher certificated before 1987, Ms. Sattler did not meet the below-  
referenced five highly qualified criteria to teach middle school math. However,

1 Bridgeport still employed her instead of considering a qualified candidate like Mr.  
2 Zhu.

3 53. According to the information disclosed by Mr. Sattler, (1) Ms. Sattler  
4 had no declared major or minor for her Bachelor's degree. Her Master's degree  
5 major was "Prof. Dev. Biling Ed/ESL". Math was not Ms. Sattler's major, so she  
6 did not meet the first highly qualified criterion of having "A major in the core  
7 academic subject." (2) Ms. Sattler only had a total of fifteen quarter hours of  
8 possibly math-related courses at the college level, so she did not meet the second  
9 highly qualified criterion of having "The equivalent of a major (45 quarter hours or  
10 30 semester hours) in the core academic subject." (3) Ms. Sattler possesses no  
11 national board certificate, so she did not meet the third highly qualified criterion of  
12 having a "National Board certification in the core academic subject." (4) Ms. Sattler  
13 took no Praxis II exam, so she did not meet the fourth highly qualified criterion of  
14 having "Passed a Praxis II exam in the core academic subject." (5) Ms. Sattler had  
15 not taught middle school math intervention for the school year of 2011-2012, so she  
16 did not have the current school year evaluation to meet the fifth highly qualified  
17 criterion of having "Been evaluated as satisfactory in annual evaluations while  
18 teaching the core academic subject."  
19  
20  
21  
22

23 54. Mr. Sattler's claim that "we had terrific candidates with recent  
24 experience" was inaccurate because (1) Ms. Sattler had not taught math intervention  
25

1 before 2012, so she did not have recent experience of teaching math intervention  
2 before she applied for the Middle School Math Intervention Teacher position; and  
3 (2) The Bridgeport School District Certificated Employee Contract signed by Ms.  
4 Thornton (formerly Ms. Smith) and Mr. Sattler on August 20, 2013 shows that the  
5 verification of her experience is “0 YR”. The significance of this is she had no  
6 certificated teaching experience at all. (3) The Bridgeport School District  
7 Certificated Employee Contract signed by Mr. Moore on September 15, 2013 and  
8 by Mr. Sattler on September 17, 2013 shows that the verification of his experience  
9 is “0 YR”. Again, the significance of this is he had no certificated teaching  
10 experience at all.  
11  
12

13 55. Mr. Sattler’s claim that “we noticed that your information was a bit  
14 outdated” is inaccurate because Mr. Zhu was still teaching math (including Math  
15 Intervention classes) and science until the spring of 2012 and he applied for the  
16 Bridgeport School District Middle School Math Intervention Teacher position in  
17 the summer of 2012.  
18

19 56. Mr. Sattler’s July 15, 2013, letter rejected the indicator of Mr. Zhu’s  
20 student success because “[t]his test (the Iowa Test of Basic Skills in math) has not  
21 been relevant in our area since 1996.” Mr. Sattler’s claim is inaccurate. Waterville  
22 and Bridgeport are both in Douglas County, and their distance is only about 43  
23  
24  
25

1 miles by driving. However, Waterville still paid for its students to take the Iowa  
2 Tests of Basic Skills in math in 2008.

3 57. Mr. Sattler's claim that "your recommendations were limited to a letter  
4 from a colleague, not a supervisor, dated 2012 and a letter from a teacher  
5 supervising your student teaching back in 2005" is inaccurate because neither  
6 Bridgeport's Notices of Opening for Middle School Math Intervention Teacher  
7 position nor Bridgeport's Notice of Opening for Middle School Science Teacher  
8 position asked for recommendations. Bridgeport's application form did not ask for  
9 recommendations, either. Yet Mr. Zhu submitted a supervisory recommendation  
10 letter dated April 25, 2013.  
11  
12

13 58. Bridgeport School District's 2011-2016 Affirmative Action Plan page  
14 7 "Goals and Timelines" urges "..... constant effort and vigilance is necessary to  
15 continue to diversify the small and rather homogeneous employee group ..... Goal  
16 1: Continue to balance the ethnic minority representation by employing and/or  
17 promoting employees to reflect our community and students populations."  
18  
19

20 59. In a letter dated October 14, 2013, Mr. Sattler informed Mr. Zhu, that  
21 Ms. Sattler, Mr. Moore, and Ms. Smith do not belong to any minority group.

22 60. Although Bridgeport's minority teacher population (6.5% in the  
23 school year of 2013-2014) is grossly underrepresented in comparison to the  
24  
25

1 absolute majority of minority student population (89.7% in the school year of 2013-  
2 2014), Mr. Zhu did not get any of the three jobs.

3 61. Although Mr. Zhu met the highly qualified criteria in middle school  
4 math, Ms. Sattler (who did not meet the qualification criteria) was inexplicably  
5 preferred over Mr. Zhu.  
6

7 62. Mr. Zhu had extensive certificated teaching experience over Mr.  
8 Moore and Ms. Smith who had none, yet Bridgeport, in violation of its own policies,  
9 still preferred them over Mr. Zhu.  
10

#### 11 IV. CAUSES OF ACTION

##### 12 (CAUSE OF ACTION NO. 1 – VIOLATION OF 42 U.S.C. § 13 1981, AS AMENDED – DISCRIMINATION & RETALIATION)

14 1. Plaintiff re-alleges the above paragraphs.

15 2. “Analysis of an employment discrimination claim under § 1981  
16 follows the same legal principles as those applicable in a Title VII disparate  
17 treatment case.” *Fonseca v. Sysco Food Servs. of Arizona, Inc.*, 374 F.3d 840, 850  
18 (9th Cir. 2004).  
19

20 3. To that end an individual asserting a § 1981 discrimination claim must  
21 establish “(1) he is a member of a protected class; (2) he was qualified for his  
22 position; (3) he experienced an adverse employment action; and (4) similarly  
23 situated individuals outside his protected class were treated more favorably, or other  
24  
25

1 circumstances surrounding the adverse employment action give rise to an inference  
2 of discrimination.” *Fonseca*, 374 F.3d at 847.

3 4. As to point (1), Mr. Zhu, a Chinese immigrant, is a member of a  
4 protected race for the purpose of a § 1981, as amended under the Civil Rights Act  
5 of 1991, claim as Bridgeport’s discriminatory acts prevented him from enjoying all  
6 benefits, terms, and conditions of an employment contract with Bridgeport. *See*  
7 *Manatt v. Bank of Am., NA*, 339 F.3d 792, 798 (9th Cir.2003).

8  
9 5. As to point (2), Mr. Zhu was qualified for the above-referenced  
10 Bridgeport job openings.

11  
12 6. As to point (3), Mr. Zhu experienced an adverse employment action  
13 by not being hired for positions of which he was qualified. Mr. Zhu was harmed by  
14 Bridgeport’s policy and customs, and violation of the law by, *inter alia*, claiming  
15 to advance affirmative action policies but not following them, not hiring job  
16 applicants (like Mr. Zhu) who previously sued their former employers for civil  
17 rights violations, and not hiring qualified minority teachers (like Mr. Zhu) and  
18 instead hiring less qualified teachers of a Caucasian race.

19  
20  
21 7. As to point (4), the following circumstances exist that give rise to an  
22 inference of discriminatory animus.

23  
24 8. First, the close proximity between Mr. Zhu’s March 2012 settlement  
25 of his lawsuit with Waterville (an event that was published in the local newspaper)

1 and Mr. Zhu's August 2012 non-hire for the Middle School Math Intervention  
2 Teacher is circumstantial evidence of discrimination.

3 9. Second, the hiring of a vastly lesser qualified employee over a higher  
4 qualified employee gives rise to an inference of discrimination and Mr. Zhu was  
5 exceptionally more qualified than either successful candidate for either position.  
6

7 10. Third, deviation from policy gives rise to an inference of  
8 discrimination. Here Bridgeport holds itself out as an entity with policies geared  
9 toward hiring minority teachers but deviated from that policy vis-à-vis Mr. Zhu.  
10

11 11. To establish a 42 U.S.C. § 1981 retaliation claim, a plaintiff must prove  
12 "(1) she engaged in a protected activity; (2) she suffered an adverse employment  
13 action; and (3) there was a causal connection between the two." *Surrell v.*  
14 *California Water Serv. Co.*, 518 F.3d 1097, 1108 (9th Cir. 2008).  
15

16 12. Here Mr. Zhu engaged in protected activity with regard to his lawsuit  
17 against Waterville, suffered an adverse employment action in not getting hired by  
18 Bridgeport, and a causal connection exists between the protected activity and  
19 adverse action as Bridgeport knew of Mr. Zhu's legal action against Waterville and  
20 retaliated against Mr. Zhu, by not hiring him, because it did not want to hire an  
21 individual not afraid of suing his employer to enforce civil rights laws.  
22

23 **(CAUSE OF ACTION NO. 2 – VIOLATION OF RCW 49.60.210(1) –**  
24 **RETALIATION & RCW 49.60.180 DISCRIMINATION)**  
25



1 13. Plaintiff re-alleges the above paragraphs.

2 14. The WLAD's anti-retaliation statute provides, in part, that "(1) It is an  
3 unfair practice for any employer, employment agency, labor union, or other person  
4 to discharge, expel, or otherwise discriminate against any person because he or she  
5 has opposed any practices forbidden by this chapter, or because he or she has filed  
6 a charge, testified, or assisted in any proceeding under this chapter."  
7

8 15. Defendant violated the WLAD by, *inter alia*, refusing to hire Mr. Zhu  
9 on account of Mr. Zhu's opposing, by virtue of his lawsuit against Waterville, the  
10 race-discrimination that is forbidden by the WLAD.  
11

12 16. The WLAD's anti-discrimination statute makes it illegal for an  
13 employer to use a prospective employee's race as a substantial factor in deciding to  
14 not hire that employee.  
15

16 17. For the reasons set out above, Mr. Zhu's race was a substantial factor  
17 in the Bridgeport's decision to not hire him for any of the three positions.  
18

19 18. Defendant's violation of the WLAD caused Mr. Zhu damages in an  
20 amount to be proven at trial.

21 **(CAUSE OF ACTION NO. 3 –VIOLATION OF WASHINGTON'S**  
22 **BLACKLISTING STATUTE - RCW 49.44.010)**

23 19. Plaintiff re-alleges the above-paragraphs.  
24  
25

1 20. RCW 49.44.010 makes it a criminal offense to "willfully and  
2 maliciously make or issue any statement or paper that will tend to influence or  
3 prejudice the mind of any employer against the person of such person seeking  
4 employment."

5  
6 21. RCW 49.44.010 allows for a civil cause of action.

7 22. Upon information and belief, Bridgeport told the Wenatchee School  
8 District, and others, to not hire Mr. Zhu as Mr. Zhu has applied for numerous  
9 positions with Wenatchee but has not been hired. Instead, Caucasian applicants  
10 with little-to-no teaching experience have been hired for said positions.  
11

12 **V. PRAYER FOR RELIEF**

13 Plaintiff respectfully prays for:

14 A. Compensation for all injury and damages suffered by Mr. Zhu including, but  
15 not limited to, both economic and non-economic damages, in the amount to be  
16 proven at trial including back pay, front pay, pre and post judgment interest, lost  
17 benefits of employment, adverse tax consequences of any award for economic  
18 damages pursuant to Chapter RCW 49.60 et seq., , exemplary damages, punitive  
19 damages, and general damages relating to emotional distress and mental anguish  
20 damages as provided by law.  
21  
22

23 B. Plaintiff's reasonable attorneys, expert fees, and costs, pursuant to 42 U.S.C.  
24 § 1988, and as otherwise provided by law under RCW 49.48.030 and 49.60.030(2),  
25

1 as well as the *private attorney general* theory of recovery of reasonable attorney  
2 fees and costs in employment related cases.

3 C. For such other and further relief as this Court deems just and equitable.

4  
5 Respectfully submitted this 28th day of September 2015.

6  
7 /s Matthew Crotty

8 MATTHEW Z. CROTTY

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