

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

RENATO ALARCON,	*	
	*	
	*	C.A. No.: 1:15-cv-00227
Plaintiff,	*	
	*	
v.	*	
	*	
CITY OF PROVIDENCE AS TO	*	
PROVIDENCE FIRE DEPARTMENT,	*	
STEVEN NUNES, JOSEPH FONTAINE,	*	
CRAIG MARTIN AND JAMES	*	
LOMBARDI, III	*	
	*	
Defendants.	*	

PLAINTIFF'S PRETRIAL MEMORANDUM

Plaintiff, Renato Alarcon, hereby submits his pretrial memorandum.

1. What the Evidence Will Show

This case is very simple. The evidence will show that Mr. Alarcon had been subjected to discrimination based on his race. He had been subjected to racial slurs. He had been transferred unjustifiably. His complaints to higher authority had been ignored. His union also failed to proceed with a grievance which he had requested.

Mr. Renarto is a very well respected and hard working firefighter. He had experienced his problems only when working at one location. He now works in another location where he gets along very well with fellow firefighters. There simply had been no justification for the discriminatory treatment which he endured.

Mr. Alarcon intends to prove his case through the testimony of at least some of the following potential witnesses:

1. Mr. Alarcon

2. Lt. Steven Nunes
3. Lt. Joseph Fontaine
4. Lt. Craig Martin
5. James Lombardi, III
6. FF Silvestre - E-10 C Group
7. FF Eaton Muchuly
8. Lt. Kristopher Wright - L-5 D group
9. Lt. Scott Shutzberger
10. FF Matt Mowry - E-10 B Group
11. FF Oliver F. Andrews – E-11 C Group
12. Ms. Olionka – Human Resources, City of Providence
13. Joseph Desmaris - Battalion Chief 2 Captain of E-10
14. Dennis Veccarhino
15. FF Hans Ramsden – E-14 C Group
16. FF Robert Crellin – E-14 – C group

2. Issues of Law

None.¹

3. Probable Length of Trial

Four days.² Mr. Alarcon does not intend to call all of the witnesses listed above

but may do so.

² Mr. Alarcon understands that he must submit a list of exhibits two weeks prior to the date of trial.

RENATO ALARCON,

By his attorney,

LAW OFFICE OF
CHRISTOPHER J. TROMBETTA

/s/ Christopher J. Trombetta
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Dated: July 31, 2017

CERTIFICATE OF SERVICE

I, Christopher J. Trombetta, do hereby certify that on July 31, 2017 a copy of the foregoing document has been served via electronic mail on opposing counsel in this action.

/s/ Christopher J. Trombetta
Christopher J. Trombetta