

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF KENTUCKY
LOUISVILLE DIVISION

JAMIE KEITH,)	
)	
Plaintiff,)	
)	
vs.)	CAUSE NO. <u>3:21-CV-562-DJH</u>
)	
PLEASURE RIDGE PARK)	
FIRE DEPARTMENT and)	
LOUISVILLE METRO,)	
)	
Defendant.)	
)	

COMPLAINT AND DEMAND FOR JURY TRIAL

I. NATURE OF THE CASE

1. Plaintiff, Jamie Keith (“Plaintiff” or “Keith”), by counsel, brings this action against Defendants, Pleasure Ridge Park Fire Department (“PRPFD”), and Louisville Metro, (collectively “Defendants”), alleging violations of Title VII of the Civil Rights Act (Title VII), the Americans with Disabilities Act (ADA), the Family and Medical Leave Act (FMLA), and the Kentucky Civil Rights Act (KCRA).

II. PARTIES

2. Keith is a resident of Warren County, Kentucky which is within the geographical boundaries of the Western District of Kentucky.

3. PRPFD maintains offices and conducts business within the geographical boundaries of the Western District of Kentucky.

4. Louisville Metro maintains offices and conducts business within the geographical boundaries of the Western District of Kentucky

III. JURISDICTION AND VENUE

5. Jurisdiction is conferred on this Court over the subject matter of this litigation pursuant to 28 U.S.C. §1331; 28 U.S.C. §1343; 28 U.S.C. §1367; 29 U.S.C. §2617(a)(2); 42 U.S.C. §2000e-5(f)(3), and 42 U.S.C. §12117.

6. PRPFD is an “employer” as that term is defined by KRS 344.030(2), 42 U.S.C. §12111(5), 42 U.S.C. 2000e(b), and 29 U.S.C. §2611(4).

7. Louisville Metro is an “employer” as that term is defined by KRS 344.030(2), 42 U.S.C. §12111(5), 42 U.S.C. 2000e(b), and 29 U.S.C. §2611(4).

8. Keith is an “employee” as that term is defined by KRS 344.030(5), 42 U.S.C. §12111(4), 42 U.S.C. 2000e(f), and 29 U.S.C. §2611(3).

9. Keith is an “eligible employee” as that term is defined by 28 U.S.C. §2611(2).

10. Keith has a “disability” as that term is defined by 42 U.S.C. §12102(2) and KRS 344.010(4).

11. Keith is a “qualified individual with a disability” as defined by 42 U.S.C. §12102(2) and §12111(8) and KRS 344.010(1) and/or Defendants knew of Keith’s disability and/or Defendants regarded Keith as being disabled.

12. A substantial part of the events, transactions, and occurrences relevant to this lawsuit arose within the geographical environs of the Western District of Kentucky; thus, venue is proper in this Court.

13. Keith satisfied her obligation to exhaust her administrative remedies. The Right to Sue was issued by the EEOC on August 4, 2021 and Keith brings this original action within ninety (90) days of the receipt thereof.

IV. FACTUAL ALLEGATIONS

14. Keith, who is a female, was hired by Defendants in or around July 2019 as a part-time Paramedic at Pleasure Ridge Park Fire Department. In or around August 2019, Keith was promoted to a full-time Emergency Medical Technician (EMT).

15. Keith suffers from, and has been diagnosed with, Major Depressive Disorder, Anxiety, and Post Traumatic Stress Disorder (“PTSD”), all of which were reported to Defendant. Keith was additionally diagnosed with these conditions while engaging in Defendant’s mandatory Employee Assistance Program (EAP).

16. During all relevant time periods, Keith met or exceeded the Defendants’ legitimate performance expectations.

17. In October of 2019, Keith was promoted to EMT Paramedic.

18. During or around the time period of August 2019 through November 2019, FF EMT Tony Christy (Christy) made unwelcome advances towards Keith, including attempts to discuss personal matters with her, flirting, and asking Keith for her personal phone number. Keith had previously made it known to Christy that she was not interested in anything more than a professional relationship with him, when she declined to give him her phone number. Keith, in an attempt to be direct, spoke with

Christy and let him know that she was not interested and that he needed to stop this type of conduct. Following this incident, Christy started taking pictures of Keith at work.

19. Following that conversation, Christy escalated his conduct by stating “I’m not taking this bitch’s shit anymore” to the Paramedic Supervisor, Shawn Wilder. This statement was in reference to Keith.

20. In or around August 2019, FF EMT Captain Joe Frazier (Frazier) insisted that Keith let Christy into her dorm room, despite Keith’s the prior reports of sexual misconduct against Christy. Keith again expressed that she felt uncomfortable with having Christy in her dorm room. Still Frazier required Keith to allow Christy into her dorm room.

21. Further, Frazier ordered Keith to not wear her department issued shorts and personal flip flops around the firehouse, although her male counterparts were allowed to do so.

22. On or about September 13, 2019, FF EMT Battalion Chief Major Danny Bland, in response to Keith reporting the conduct of Captain Frazier and Christy, stated, “this shift isn’t used to working with females.” Further, Bland failed to take any action as a result of Keith’s reports.

23. During or around the time period of October 2019 through February 2020, FF EMT Joe Davidson made numerous sexually explicit comments to Keith that made

reference to the way she looked as well as other sexually related references. Keith reported Davidson's conduct to her superiors. While Davidson was initially relocated, he was still permitted to work at Keith's station at times.

24. Paramedic Supervisor Christopher Willis (Willis) made sexually explicit comments to Keith, including, "I wanna ding you," and, "I'm gonna stick it in your ass." Further, Willis began following Keith. Also, Willis, on several occasions, slept in the female dorms and specifically in Keith's assigned room, which made her extremely uncomfortable.

25. On or about February 5, 2020, FF EMT Troy Hansen threw a pair of gloves in Keith's face. Keith filed a Complaint against Hansen to which she never received a response. Hansen was transferred to another station following the incident, but received no disciplinary action.

26. In or around August of 2020, Firefighter (FF) EMT Jamie Carr sent Keith a sexually explicit message on Snapchat, which made reference to his penis.

27. During or around the time period of January 2020 to February 2021, Chief Douglas Recktenwald (Recktenwald) and Deputy Chief Brian Morgan (Morgan) refused to take disciplinary action or corrective measures after Keith reported the sexual harassment, discrimination, and retaliation she was subjected to. Instead, Recktenwald and Morgan blamed the wrongful actions of the other employees on Keith, and stated it was just, "personality differences".

28. During Keith's employment with Defendant, she was subjected to harassment, discrimination, and retaliation in various other incidents involving FF EMT Stephan Kulas; FF EMT Captain Tony Butler; FF EMT Erica Stuart (Stuart); FF EMT Captain David Mattingly (Mattingly); and EMT Paramedic Racheal Wilhelmus.

29. In early August of 2020, Captain Mattingly and Stuart were caught having sex while on duty. Keith took part in the investigation of the incident.

30. Following Keith's involvement in the investigation, on or around August 18, 2020, Rectenwald informed Keith that he did not believe that she was fit for duty, alleging that Keith's mental health issues were allegedly having an impact on her performance as an EMT Paramedic. Rectenwald initially provided Keith with three (3) options for improving her alleged performance deficiencies. These options included 1) a transfer to a new position; 2) Keith could attend an additional three (3) months of training; or 3) Keith could attend Defendant's EAP. Attending EAP was by far the least favorable option, as it required Keith to go on unpaid leave.

31. During the time that she was considering her three (3) options, Keith made another report about the sexual harassment and discrimination Willis was subjecting her to at work. In response, Rectenwald revoked Keith's options and mandated that she attend unpaid EAP. Rectenwald said Keith would need to receive a "fit for duty" clearance from the EAP Therapist before returning to work.

32. However, the EAP Therapist informed Keith that she could not provide such

clearance. Keith requested an accommodation for her disabilities and Defendant refused to offer her any accommodations during this period, nor did Defendant offer any type of accommodation afterward.

33. Since Defendant refused to provide any accommodation for Keith's disabilities, she had no choice but to take FMLA leave in September of 2020.

34. On or about December 23, 2020, Keith was informed by Chief Jason Meiman (Meiman) that her FMLA leave was over, and that if she could not provide a "fit for duty" release from a Clinical Counselor, that she could not return to work as an EMT Paramedic. Keith was also informed that there would be no consideration for her to return to work with modified conditions, and she was further asked to resign from her position. Meiman went on to send several threatening and harassing emails to Keith, attempting to force her resignation. Keith declined to resign at that time.

35. On or about January 5, 2021, Defendants escalated their conduct by filing falsified Disciplinary Charges against Keith. Keith was placed on unpaid suspension pending a hearing on the charges filed against her.

36. After being asked to resign by Chief Meiman and being subjected to wrongful and retaliatory Disciplinary Charges, it was clear that Keith's termination was imminent. As the only possible avenue for avoiding her termination, Keith resigned and was constructively discharged on February 4, 2021.

37. Defendants' conduct continued after Keith resigned when _____, Josh

Johnson, submitted false reports that prevented Keith from obtaining new employment.

38. Throughout Keith's employment, Defendants took money out of her paychecks for AFLAC short term disability. However, no such coverage existed.

39. Defendants' stated reason for requiring EAP, placing Keith on unpaid suspension, terminating Keith, and/or constructively discharging Keith is pretext.

V. CAUSES OF ACTION

COUNT I - TITLE VII AND KCRA - GENDER DISCRIMINATION AND SEXUAL HARASSMENT

40. Keith hereby incorporates by reference paragraphs one (1) through thirty-eight (38) of her Complaint as if the same were set forth at length herein.

41. Keith was subject to unwelcomed sexual advances and a hostile work environment because of her sex.

42. Defendants were made aware of the sexual harassment but failed to take any remedial action.

43. Defendants' conduct was intentional, willful, and in reckless disregard of Keith's rights as protected by Title VII and the KCRA.

44. Keith has suffered damages as a result of Defendants' unlawful actions.

COUNT II - TITLE VII AND KCRA - RETALIATION

45. Keith hereby incorporates paragraphs one (1) through forty-two (42) of her Complaint.

46. Keith engaged in a protected activity under Title VII and the KCRA.

47. Defendants constructively discharged Keith because she engaged in an activity protected by Title VII.

48. Defendants' conduct was intentional, willful, and in reckless disregard of Keith's rights as protected by Title VII and the KCRA.

49. Keith has suffered damages as a result of Defendants' unlawful actions.

**COUNT III - ADA AND KCRA - DISABILITY
DISCRIMINATION**

50. Keith hereby incorporates by reference paragraphs one (1) through forty-seven (47) of her Complaint.

51. Defendants discriminated against Keith on the basis of her disability.

52. Defendants' actions were intentional, willful and in reckless disregard of Keith's rights as protected by the ADA and the KCRA.

53. Keith has suffered damages as a result of Defendants' unlawful actions.

COUNT IV - FMLA - RETALIATION

54. Keith hereby incorporates by reference paragraphs one (1) through fifty-two (52) of her Complaint.

55. Defendants retaliated against Keith based on her use of FMLA leave.

56. Defendants' actions were intentional, willful and in reckless disregard of Keith's rights as protected by the FMLA.

57. Keith has suffered damages as a result of Defendants' unlawful actions.

VI. REQUESTED RELIEF

WHEREFORE, Plaintiff, Jamie Keith, respectfully requests that this Court enter judgment in her favor and award him the following relief:

1. All wages, benefits, compensation, and other monetary loss suffered as a result of Defendants' unlawful actions;
2. Enjoin Defendants from discriminating or retaliating against anyone else based on their gender, disability, or use of FMLA leave;
3. Award compensation for any and all other damages suffered as a consequence of Defendants' unlawful actions;
4. Award compensatory damages under Title VII, the KCRA, and the ADA;
5. Award liquidated damages under the FMLA;
6. Award punitive damages under Title VII and the ADA;
7. Award all costs and attorney's fees incurred as a result of bringing this action;
8. Award pre- and post-judgment interest on all sums recoverable; and
9. All other legal and/or equitable relief this Court sees fit to grant.

Respectfully submitted,

BIESECKER DUTKANYCH & MACER, LLC

By: /s/ Devan A. Dannelly

Devan A. Dannelly

101 North 7th Street, Ste. 603

Louisville, KY 40202

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Facsimile: (812) 424-1005

Email:
ddannelly@bdlegal.com
Attorney for Plaintiff

DEMAND FOR JURY TRIAL

Plaintiff, Jamie Keith, by counsel, requests a trial by jury on all issues deemed so triable.

Respectfully submitted,

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ddannelly@bdlegal.com

Attorney for Plaintiff

JS 44 (Rev. 06/17)

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.)

I. (a) PLAINTIFFS

JAMIE KEITH

(b) County of Residence of First Listed Plaintiff WARREN, KY
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Devan Dannelly, BIESECKER, DUTKANYCH & MACER, LLC,
101 N. 7TH STREET, SUITE #106, LOUISVILLE, KY 40202

DEFENDANTS

PLEASURE RIDGE PARK FIRE DEPARTMENT and LOUISVILLE METRO

County of Residence of First Listed Defendant JEFFERSON, KY
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

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	PERSONAL INJURY <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 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <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))	<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 Constitutional of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	FEDERAL TAX SUITS
<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	<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	Habeas Corpus: <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 Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<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	<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)

- 1 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):
42 U.S.C. §2000e et. seq, the ADA, FMLA, and KCRA

Brief description of cause:

Plaintiff alleges Defendant violated the Civil Rights Act of 1964, ADA, FLMA and the KCRA

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 No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

09/09/2021

SIGNATURE OF ATTORNEY OF RECORD

/s/ Devan Dannelly

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

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.