

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**NATACHA RICKS,**

**PLAINTIFF,**

**v.**

**PLANNED PARENTHOOD  
OF DELAWARE, INC.**

**and**

**ROBERT HALF  
INTERNATIONAL, INC.,**

**DEFENDANTS.**

**CIVIL ACTION NO.** \_\_\_\_\_

**JURY TRIAL DEMANDED**

**COMPLAINT AND JURY DEMAND**

Plaintiff Natacha Ricks, by and through her undersigned attorneys, hereby files the following Complaint and Jury Demand (“Complaint”).

**PRELIMINARY STATEMENT**

1. This is an action for an award of damages, punitive damages, attorneys’ fees and other relief on behalf of Plaintiff Natacha Ricks (“Plaintiff” or “Ms. Ricks”), a former employee of Planned Parenthood of Delaware, Inc. (“Planned Parenthood”) and Robert Half International, Inc. (“RHI”), who was supervised in her employment by Planned Parenthood’s Human Resources Director, Debola Odueke (“Mr. Odueke”). Ms. Ricks has been harmed by the Defendants’ sexual harassment, discrimination, fostering and perpetuating a hostile working environment and retaliation for her complaints about sexual harassment and discrimination. This action arises under Title VII of the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991, 42 U.S.C. § 2000(e) et seq. (“Title VII”).

**JURISDICTIONAL STATEMENT**

2. This Court has original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States pursuant to 28 U.S.C. §§ 1331 and 1391.
3. The jurisdiction of this Court is also invoked pursuant to 28 U.S.C. § 1343(4), which grants the District Court original jurisdiction in any civil action authorized by law to be commenced by any person to recover damages to secure equitable or other relief under any act of Congress providing for the protection of civil rights.
4. This Court has supplemental jurisdiction over any Delaware state law claims alleged herein pursuant to 28 U.S.C. § 1367.
5. All conditions precedent to the institution of this suit have been fulfilled. On November 25, 2013, Plaintiff filed Charges of Discrimination with the United States Equal Employment Opportunity Commission (“EEOC”) against Planned Parenthood and RHI, which were assigned Charge Numbers 530-2014-01049 and 530-2014-01050 respectively. These Charges were dual-filed as Charges with the Delaware Department of Labor (“DDOL”). On September 19, 2014, the EEOC issued Notice of the right to sue to Plaintiff with respect to both Charges. This action has been filed within ninety (90) days of Plaintiff’s receipt of said Notices.<sup>1</sup>

**VENUE**

---

<sup>1</sup> With respect to Plaintiff’s dual-filed Charges with the Delaware Department of Labor, Plaintiff has not yet received Delaware Right to Sue Notices for her state law claims. Should Plaintiff receive such notices, she intends to seek leave to amend her Complaint in order to pursue her claims made pursuant to the Delaware Discrimination in Employment Act, 19 Del. C. § 710 et seq.

6. This action properly lies in the District of Delaware pursuant to 29 U.S.C. § 1391(b) because the claim arose in this judicial district and because the acts complained of occurred in this judicial district.
7. Venue in the District of Delaware is also authorized pursuant to 42 U.S.C. § 2000(e) et seq.

### **PARTIES**

8. Plaintiff Natacha Ricks is an adult female citizen and resident of New Castle County, Delaware and the United States of America.
9. Defendant Planned Parenthood was and is a Delaware corporation organized under Title 8 of the Delaware Code that acted as Plaintiff's employer.
10. Planned Parenthood does significant business within the State of Delaware and is engaged in an industry affecting commerce.
11. Planned Parenthood has an office at 625 Shipley Street, Wilmington, Delaware 19801, where Plaintiff was employed.
12. Defendant Planned Parenthood's registered agent is Planned Parenthood of Delaware, Inc., 625 Shipley Street, Wilmington, Delaware 19801.
13. At all times material hereto, Defendant Planned Parenthood employed more than fifty individuals.
14. Defendant RHI was and is a Delaware corporation organized under Title 8 of the Delaware Code that acted as Plaintiff's employer with an office address at 500 Delaware Avenue, Suite 700, Wilmington, Delaware 19801.
15. RHI does significant business within the State of Delaware and is engaged in an industry affecting commerce.

16. Defendant RHI's registered agent is The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.
17. At all times material hereto, Defendant RHI employed more than five-hundred individuals.
18. At all times material hereto, Defendants Planned Parenthood and RHI acted by and through their authorized agents, servants, workmen and/or employees acting within the course and scope of their employment with Defendants Planned Parenthood and/or RHI and in furtherance of Defendants Planned Parenthood and/or RHI's business.
19. At all times relevant hereto, each of the Defendants acted as a "person" and/or "employer" within the meaning of one or more of the laws at issue in this suit and each is accordingly subject to the provisions of said laws.
20. At all times relevant hereto, Plaintiff Natacha Ricks was an "employee" of Defendants within the meaning of the laws at issue in this suit and is accordingly entitled to the protections of said laws.

### **FACTS**

21. Ms. Natacha Ricks worked for Planned Parenthood through a staffing agency, OfficeTeam – A Division of Robert Half International, Inc.
22. Ms. Ricks was hired in a temporary to permanent position.
23. During her tenure with Planned Parenthood, Ms. Ricks had a solid performance record and did not commit any misconduct or other infractions.
24. Despite her loyalty and consistent performance, Ms. Ricks was subjected to egregious conduct while employed by Defendants, including sexual harassment, discrimination, and retaliation, culminating in her termination from employment on or about August 9, 2013.

25. Robert Half also retaliated against Ms. Ricks as a result of complaints she made to them regarding the sexual harassment, discrimination and retaliation she suffered while employed by Planned Parenthood when Robert Half refused to offer any meaningful subsequent work to Ms. Ricks.
26. As more fully detailed herein, Ms. Ricks was subjected to sexual harassment in the form of constant sexual advances and other sexual harassment by her supervisor, Mr. Odueke, while employed by Defendants.
27. Mr. Odueke was employed by Planned Parenthood as its Director of Human Resources.
28. As part of her job duties, Ms. Ricks had to access employee Human Resources files, which were locked up in Mr. Odueke's office.
29. As a result, Ms. Ricks was required to go into Mr. Odueke's office two to three times per day.
30. On July 8, 2013, while Ms. Ricks was in Mr. Odueke's office, he asked that she shut the door.
31. Mr. Odueke then proceeded to explain to Ms. Ricks that he is married, but pays a female friend \$100 to "see him."
32. Mr. Odueke also explained to Ms. Ricks that, because he is married, he does not care if his female friend sees other men, as long as she is available to see him whenever he wants.
33. Mr. Odueke also told Ms. Ricks that over the weekend he had been at his female friend's house, and another man started banging on her door, that he waited until the other man had left and called a friend to pick him up so that the other man would not know what kind of car Mr. Odueke drove.

34. Ms. Ricks was shocked that her supervisor would tell her these personal and inappropriate details about his love life and responded to his story by saying, “wow.”
35. Mr. Odueke continued and told Ms. Ricks that since the incident he had just described, the female friend has been calling him asking for her \$100.
36. Mr. Odueke told Ms. Ricks that the male friend that had picked Mr. Odueke up told him that Mr. Odueke’s female friend must be a prostitute, and that Mr. Odueke had defended the situation saying that because he was married, compensating the female friend was appropriate and that “she gives me sex, and I give her money.”
37. Ms. Ricks responded saying, “I’m glad I don’t have those kind of problems.”
38. Mr. Odueke replied, “I’m sure you have guys trying to knock your door down too.”
39. Ms. Ricks then picked up the files she needed and left Mr. Odueke’s office.
40. On July 10, 2013, Mr. Odueke asked Ms. Ricks what her plans were for the upcoming weekend, and she responded that she was going to a party at a friend’s house.
41. Mr. Odueke asked if he could come too, and Ms. Ricks, shocked that her boss would invite himself to a social function with a subordinate employee, and feeling caught off guard, responded that she would have to check with her friend.
42. On July 11, 2013, Mr. Odueke asked Ms. Ricks again about the party and Ms. Ricks told Mr. Odueke that the guest list was already full, but Mr. Odueke persisted, asking if he could meet up with Ms. Ricks after the party ended.
43. Shocked by her supervisor’s pursuit, Ms. Ricks told Mr. Odueke that she would have to get back to him.
44. Mr. Odueke pried further, asking what kind of plans Ms. Ricks had made for the weekend for a babysitter for her son, and she responded telling Mr. Odueke she hired someone she

normally uses for \$40.

45. On July 12, 2013, when Ms. Ricks returned from her lunch break, there was a note on her desk from Mr. Odueke requesting that she come to his office.
46. When Ms. Ricks reported to Mr. Odueke's office, he asked if he should buy liquor for the weekend for he and Ms. Ricks to "hook up."
47. Mr. Odueke then asked Ms. Ricks again if they were going to meet up after the party.
48. Ms. Ricks was shocked by her supervisor's advances toward her, and told Mr. Odueke she was not sure so as not to put her job in jeopardy by refusing his advances to "hook up" outright.
49. Later that day, Mr. Odueke dropped \$60 on Ms. Ricks' desk and walked away.
50. Mr. Odueke then called Ms. Ricks on the office phone and explained that \$40 was for the babysitter and the other \$20 was for liquor for Saturday night and insisted that Ms. Ricks take the money.
51. As Ms. Ricks was returning files to Mr. Odueke's office to prepare to leave for the day, Mr. Odueke asked her to shut the office door and then begged Ms. Ricks to give him a hug.
52. Ms. Ricks did not want to hug Mr. Odueke, but was fearful for her job if she did not give in.
53. Ms. Ricks attempted to hug Mr. Odueke in a friendly way, but he pulled her in close and began to rub his body up against Ms. Ricks and grope her in a sexual manner.
54. During this assault, Mr. Odueke told Ms. Ricks how beautiful she was and how badly he "needed" her.
55. Later that night, Mr. Odueke called Ms. Ricks from a blocked number and Ms. Ricks

quickly got off the phone, making up the excuse that she had to help her friend with party planning.

56. On Saturday July 13, 2013, Mr. Odueke called Ms. Ricks several times and she did not answer his calls, trying to figure out a way to let Mr. Odueke down easy and not jeopardize her job, still being in shock from being forcibly groped by her supervisor at her job and only means of income.
57. On Monday morning, July 15, 2013, when Ms. Ricks went into Mr. Odueke's office to retrieve files, Mr. Odueke asked what happened on Saturday night.
58. Ms. Ricks explained that the party had run very late and tried to return Mr. Odueke's \$60.
59. Mr. Odueke refused saying, "what kind of a guy do you think I am?"
60. On July 18, 2013, Mr. Odueke again asked Ms. Ricks about her weekend plans and asked to see her Friday night.
61. Mr. Odueke then offered to give Ms. Ricks money for a babysitter for Friday night and Ms. Ricks refused.
62. On July 19, 2013, at the end of the day, Mr. Odueke asked Ms. Ricks if she could come to his office again for a hug.
63. Ms. Ricks left work from a different door than normal to avoid being sexually assaulted again by her supervisor.
64. When Ms. Ricks got to her car, she found that her battery had died and then Mr. Odueke called Ms. Ricks' cell phone, asking what had happened, if she had left already, and why she did not come to his office to give him his hug.
65. Ms. Ricks explained that she was trying to get her car started.
66. Mr. Odueke came to the parking lot to see if she needed help, but Ms. Ricks had already

gotten the car started, and both Mr. Odueke and Ms. Ricks left.

67. Mr. Odueke called Ms. Ricks again over the weekend, but she did not answer his calls.
68. On Monday morning, July 22, 2013, Ms. Ricks called Mr. Odueke at 7:30 AM to inform him that she would be late because she was in the process of replacing her car battery.
69. Mr. Odueke informed Ms. Ricks that this was fine, but then called back approximately fifteen to twenty minutes later and offered to help Ms. Ricks with her battery issue.
70. Ms. Ricks explained that she had the issue under control, but Mr. Odueke persisted, saying that Ms. Ricks could take the whole day off from work if she spent it with him.
71. Mr. Odueke then told Ms. Ricks that he wanted to play “hooky” from work at her place.
72. Ms. Ricks explained that she needed to focus on fixing her car and ended the call.
73. Mr. Odueke then called Ms. Ricks repeatedly for the next few hours, until Ms. Ricks finally answered his call at approximately 11 a.m. and explained that she was in the shop with her car and should be in the office soon.
74. Mr. Odueke asked if he could pick her up and the two of them could go back to Ms. Ricks’ house until her car was finished being worked on.
75. Ms. Ricks refused and Mr. Odueke told her not to come to work that day, that he really needed to speak with her and that he would come to her house to speak with her.
76. At approximately 12:00 p.m., Mr. Odueke came to Ms. Ricks house, and she was waiting for him on the porch.
77. Mr. Odueke insisted that they go inside to talk and Ms. Ricks reluctantly agreed.
78. Once they got inside, Ms. Ricks explained why it had been so difficult to fix her car, and Mr. Odueke pulled out a \$100 bill and put it on Ms. Ricks’ table.
79. Mr. Odueke then told Ms. Ricks how much he needed her and wanted to have sex with

her.

80. Mr. Odueke then grabbed Ms. Ricks and attempted to hug her, which caused Ms. Ricks to jerk away from Mr. Odueke and start crying.
81. When Mr. Odueke asked Ms. Ricks what was causing her to cry, she lied, explaining that she was stressed out, fearing for her job if she told him the real reason – that she was petrified by her supervisor’s constant sexual advances and assaults.
82. Mr. Odueke told Ms. Ricks that everything would be okay as long as she had sex with him.
83. Ms. Ricks responded that she was a smart, skillful and educated person, and that she worked hard at her job.
84. Mr. Odueke told Ms. Ricks that he knew that, and that he had created a permanent position for Ms. Ricks with a salary of \$45,000-\$50,000 per year and was just waiting for it to be approved.
85. Mr. Odueke went further, explaining that as long as Ms. Ricks would have a sexual relationship with him, the job was hers.
86. Mr. Odueke then tried to hug Ms. Ricks again, and tried to unbutton her blouse.
87. Terrified now for her safety and her job, Ms. Ricks quickly lied and told Mr. Odueke that she had a vaginal infection that she was taking medication for and could not have sex with him.
88. Mr. Odueke then asked how long Ms. Ricks expected to be on the medication to which she replied, “seven days.”
89. Mr. Odueke then told Ms. Ricks to take the rest of the day off and that he would make sure she was paid for the entire day.

90. After the incidents of July 22, 2013, Ms. Ricks made a conscious decision to stop wearing dresses or makeup at work, hoping that Mr. Odueke would lose interest and that she wouldn't be retaliated against for refusing his advances, or be sexually assaulted by Mr. Odueke, or worse.
91. Despite her efforts, the rest of that week at work, Mr. Odueke constantly asked Ms. Ricks how her infection was and how long it would be until it was cleared up.
92. On Thursday, Mr. Odueke again asked Ms. Ricks if they could hook up that weekend, to which she replied that she would have to see how her weekend went, still fearful over losing her job.
93. On Friday, July 26, 2013, when Ms. Ricks arrived at the office upon returning from lunch, Mr. Odueke was waiting for her outside, and asked why she had not invited him to lunch.
94. Mr. Odueke then asked Ms. Ricks if she wanted to take a ride with him to his house.
95. Ms. Ricks, finally fed up with Mr. Odueke's constant advances, said no, despite her fear over losing her job.
96. Mr. Odueke persisted, insisting that it would be really quick.
97. Ms. Ricks again refused and Mr. Odueke asked if it was because Ms. Ricks was scared that Mr. Odueke's wife would be home.
98. Ms. Ricks replied no, but that she still was not going to go.
99. Mr. Odueke said "ok" and left.
100. Mr. Odueke then called and asked Ms. Ricks if she had ever been to the Sheraton in Newcastle.
101. Ms. Ricks responded that she had not, and Mr. Odueke asked if she wanted to spend the

- night at the Sheraton with him on Saturday.
102. Ms. Ricks said that she did not, and Mr. Oduke then tried to convince her by telling her how nice the hotel was, and that he would really like it if she would spend the night with him.
103. Ms. Ricks again refused, and Mr. Oduke said “fine, I’ll see you when you get back into the office” and hung up the phone.
104. As Ms. Ricks was returning files to Mr. Oduke’s office before leaving for the day, Mr. Oduke again asked Ms. Ricks to shut the door.
105. Mr. Oduke then handed Ms. Ricks a brochure for the Sheraton and said, “see it’s a 4-star hotel.”
106. At this time, Mr. Oduke again asked Ms. Ricks if she wanted to go to the Sheraton with him on Saturday to have sex with him.
107. Ms. Ricks again refused his advances.
108. Mr. Oduke then asked if he was finally going to get to sleep with her that weekend, and asked Ms. Ricks if she needed money for a babysitter.
109. Ms. Ricks replied that she did not, and left for the day.
110. Mr. Oduke called Ms. Ricks multiple times that weekend, and Ms. Ricks again did not answer.
111. Instead, Ms. Ricks sent Mr. Oduke a text message on Sunday saying that her babysitter had not shown up, and Mr. Oduke never replied.
112. On Monday, July 29, 2013, Mr. Oduke asked Ms. Ricks what had happened, and Ms. Ricks replied that her babysitter never showed up.
113. Mr. Oduke seemed to not believe this excuse and seemed annoyed at Ms. Ricks.

114. On Tuesday, July 30, 2013, Ms. Ricks woke up with a sore throat and got an emergency appointment with her doctor that morning.
115. Ms. Ricks then called Mr. Odueke and told him that she would be in after her appointment.
116. Ms. Ricks tested positive for Strep Throat, however, and her doctor advised that she should stay out for the rest of the week because she was highly contagious and worked in a medical building.
117. Ms. Ricks informed Mr. Odueke, who seemed unhappy at the news, but said, “if you’re sick, you’re sick.”
118. Ms. Ricks ended up having to go to the emergency room that evening because she became more ill, could not swallow the antibiotics she had been prescribed and needed to get an injection.
119. Ms. Ricks was administered pain medication and antibiotics at the hospital’s emergency room.
120. Ms. Ricks returned to work on Friday, August 2, 2013.
121. The week of August 5, 2013, Planned Parenthood was in the process of rearranging offices, so the week was relatively uneventful, and Ms. Ricks had limited interaction with Mr. Odueke.
122. On Friday, August 9, 2013, however, after Ms. Ricks had left for the day, Mr. Odueke called her on her cell phone and informed her that the Financial Department had had an emergency budget meeting, and that her assignment was terminated.
123. Mr. Odueke then complained to Ms. Ricks that she had been really quiet lately, and was not answering his calls on the weekends.

124. Ms. Ricks asked what that had to do with losing her job.
125. Mr. Oduke responded that it had nothing to do with Ms. Ricks losing her job and that he was still trying to get approval on the permanent position, and that if she would have sex with him, he would take care of her financially while Ms. Ricks was awaiting approval of the new, permanent position.
126. Ms. Ricks asked Mr. Oduke if he was sure that her termination had nothing to do with her performance and he assured her it did not.
127. Mr. Oduke also informed Ms. Ricks during this call that he had said only great things about her to RHI.
128. Ms. Ricks immediately hung up the phone and attempted to call RHI, but no one answered as it was 5:45 PM on a Friday, so Ms. Ricks instead left a voicemail.
129. After not hearing anything by 10 a.m. Monday morning from RHI, Ms. Ricks called and spoke with Chris, a representative of RHI, informing him that her assignment had abruptly ended and that she wanted to speak with Renee Janolo regarding some major concerns Ms. Ricks had.
130. Chris informed Ms. Ricks that he was not aware that her assignment was ending, but that he would make some calls about it, and that Ms. Janolo was unavailable.
131. Ms. Ricks insisted that she needed to speak with Ms. Janolo, but Chris informed her that Ms. Janolo was unavailable until Wednesday August 14, 2013.
132. Ms. Ricks said that she would come to RHI's office on Wednesday, and Chris asked if she could explain generally what the concerns were.
133. Ms. Ricks explained the situation with Mr. Oduke generally.
134. After not hearing back from RHI on Monday or Tuesday, Ms. Ricks had planned to go to

- RHI's office on Wednesday to discuss her situation with Ms. Janolo, but Ms. Ricks' basement flooded and she was forced to cancel her appointment that day.
135. On Friday, August 17, 2013, Ms. Ricks received an email from Ms. Janolo saying that the Vice President of Finance at Planned Parenthood wanted Ms. Ricks to return to Planned Parenthood.
136. Ms. Ricks called Ms. Janolo, who informed Ms. Ricks that despite the email, Ms. Ricks' concerns regarding Mr. Odueke had been sent to RHI's legal department, and that Ms. Ricks could not be placed back at Planned Parenthood.
137. Since that conversation, RHI has not offered any additional employment to Ms. Ricks, nor explained what the reason for her termination by Planned Parenthood actually was.
138. Despite Ms. Ricks' complaints, no discipline was ever meted out to her harasser, and no action was taken to address her complaints.
139. Instead, Ms. Ricks was subjected to retaliation when she was terminated by Mr. Odueke on August 9, 2013, allegedly as a result of budgetary reasons.
140. Planned Parenthood's proffered reason for Ms. Ricks' termination is suspicious in light of its close proximity in time to her refusal to give in to her supervisor's sexual advances.
141. The fact that RHI has refused to place Ms. Ricks in a subsequent position is evidence that RHI is also retaliating against Ms. Ricks.
142. Planned Parenthood and RHI failed to take appropriate remedial measures and failed to prevent the harassment that Ms. Ricks was subjected to by Mr. Odueke.
143. Despite Ms. Ricks' complaints, Mr. Odueke remained in the employ of Planned Parenthood through his resignation from Planned Parenthood on or about October

2, 2013.

144. Planned Parenthood and RHI discriminated against Ms. Ricks on the basis of her sex, and retaliated against her because of her refusal to give in to her supervisor's sexual advances and because of her complaints about sexual harassment, in violation of Title VII of the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991, 42 U.S.C. § 2000(e) et seq.
145. Defendants' decision to terminate Ms. Ricks was motivated by her refusal to give in to her supervisor's sexual advances.
146. Defendants' refusal to rehire or re-place Ms. Ricks was motivated by her complaints about sexual harassment, discrimination and retaliation.
147. Defendants permitted sexual harassment against Ms. Ricks by Planned Parenthood employees, subjecting Ms. Ricks to an unbearably hostile working environment, in violation of Title VII of the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991, 42 U.S.C. § 2000(e) et seq.
148. The actions of Mr. Odueke and others, their failure to address the harassment and discrimination of Ms. Ricks, and other actions were taken in retaliation for Ms. Ricks' refusal to have a sexual relationship with Mr. Odueke and/or in retaliation for Ms. Ricks' legally protected assertion of her rights with respect to, her opposition to, and her complaining about, the harassment, discrimination and retaliation she was suffering.
149. As a result of the harassment, discrimination and retaliation described above, Ms. Ricks has suffered, among other financial losses, lost wages, and has incurred an obligation for attorneys' fees and costs of bringing this action.

150. As a result of the harassment, discrimination and retaliation described above, Ms. Ricks is left uncomfortable, emotionally distraught and humiliated.
151. As a result of the severe and pervasive sex discrimination, harassment and retaliation suffered by Ms. Ricks, Ms. Ricks has suffered, and continues to suffer severe emotional distress.
152. Mr. Odueke and others all acted with the intent of causing, or in reckless disregard of the probability that their actions would cause Ms. Ricks severe emotional distress.

**COUNT I**

**(Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000(e))**

153. Plaintiff repeats and incorporates by reference the allegations of all previous paragraphs as fully as though the same were set forth at length herein.
154. Based on the foregoing, Defendants Planned Parenthood and RHI have engaged in unlawful employment practices in violation of Title VII.
155. In discriminating against, and retaliating against Ms. Ricks because of her sex and because of her complaints about sexual harassment and discrimination, in permitting and fostering a hostile working environment, in terminating Ms. Ricks, and in refusing to rehire and/or re-place Ms. Ricks Defendants Planned Parenthood and RHI violated Title VII of the Civil Rights Act of 1964.
156. Said violations were intentional and willful.
157. Said violations warrant the imposition of punitive damages.
158. As the direct and proximate result of Defendant Planned Parenthood and RHI's violations of Title VII, Plaintiff Natacha Ricks has sustained a loss of earnings, severe emotional and psychological distress, loss of self-esteem, loss of future earning power, as well as

back pay, front pay, interest due thereon, she has incurred an obligation for attorneys' fees and costs of bringing this action, along with and/or in addition to the damages and losses set forth more fully herein.

159. Plaintiff Natacha Ricks is now suffering and will continue to suffer irreparable harm and monetary damages as a result of Defendant Planned Parenthood and RHI's actions unless and until this Court grants the relief requested herein.

**PRAYER FOR RELIEF**

160. Plaintiff repeats and incorporates by reference the allegations of all previous paragraphs as fully as though the same were set forth at length herein.

**WHEREFORE**, Plaintiff Natacha Ricks respectfully requests that this Court enter judgment in her favor and against Defendants:

- a. Declaring that the acts and practices complained of herein violate Title VII;
- b. Awarding compensatory damages to Plaintiff Natacha Ricks to make Plaintiff whole for all past and future lost earnings, benefits and earnings capacity which Plaintiff has suffered and will continue to suffer as a result of Defendants' conduct;
- c. Awarding compensatory damages to Plaintiff Natacha Ricks for past and future emotional upset, mental anguish, loss of reputation, humiliation, loss of life's pleasures and pain and suffering;
- d. Awarding punitive damages to Plaintiff Natacha Ricks;
- e. Awarding Plaintiff Natacha Ricks costs of this action together with her reasonable attorneys' fees;

- f. Awarding Plaintiff Natacha Ricks such other damages as are appropriate under Title VII and any other applicable laws; and
- g. Granting such other relief as this Court deems just and proper.

**JURY DEMAND**

Plaintiff Natacha Ricks hereby demands trial by jury as to all issues so triable.

Respectfully submitted,

**A. DALE BOWERS, P.A.**

/s/ A. Dale Bowers

A. Dale Bowers, Esquire (BAR ID #3932)  
203 North Maryland Avenue  
Wilmington, DE 19804  
(302) 691-3786  
(302) 691-3790 (Fax)  
*dblegal@comcast.net*

and

BELL & BELL LLP

James A. Bell IV, Esquire  
*\*pending admission pro hac vice*  
Christopher A. Macey, Jr., Esquire  
*\*pending admission pro hac vice*  
1617 JFK Blvd. – Suite 1020  
Philadelphia, PA 19103  
(215) 569-2500  
(215) 569.2220 (Fax)  
*christophermacey@bellandbelllaw.com*

*Attorneys for Plaintiff Natacha Ricks*

DATED: December 17, 2014