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3rd copy - Return

STATE OF MICHIGAN

JUDICIAL DISTRICT

22ND JUDICIAL CIRCUIT

COUNTY PROBATE

SUMMONS AND COMPLAINT

CASE NO.

10-680-CD

CN

Court address

101 E. HURON STREET, P.O. BOX 8645, ANN ARBOR, MI 48107

Timothy P. Connors

Court telephone no.

(734) 222-3383

Plaintiff's name(s), address(es), and telephone no(s).

DORIS HOPE-JACKSON

Plaintiff's attorney, bar no., address, and telephone no.

DARRYL K. SEAGRS (P54997)
485 ORCHARD LAKE ROAD
PONTIAC, MI 48341
(248) 334-1587

Defendant's name(s), address(es), and telephone no(s).

THE WILLOW RUN COMMUNITY SCHOOLS
235 SPENCER LANE
YPSILANTI, MI 48198
(734) 481-8200

LAWRENCE MESLENDRE
COUNTY CLERK/REGISTRAR

200 JUN 24 A 8:55

FILED
WASHTENAW COUNTY, MI

SUMMONS NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons to **file a written answer with the court** and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state). (MCR 2.111(C))
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.

Issued

This summons expires

SEP 23 2010

Court clerk

*This summons is invalid unless served on or before its expiration date.

This document must be sealed by the seal of the court.

COMPLAINT

Instruction: The following is information that is required to be in the caption of every complaint and is to be completed by the plaintiff. Actual allegations and the claim for relief must be stated on additional complaint pages and attached to this form.

Family Division Cases

- ☐ There is no other pending or resolved action within the jurisdiction of the family division of circuit court involving the family or family members of the parties.
- ☐ An action within the jurisdiction of the family division of the circuit court involving the family or family members of the parties has been previously filed in _____ Court.
- The action ☐ remains ☐ is no longer pending. The docket number and the judge assigned to the action are:

Docket no.

Judge

Bar no.

General Civil Cases

- ☐ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☒ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in 22nd Circuit Court.
- The action ☒ remains ☐ is no longer pending. The docket number and the judge assigned to the action are:

Docket no.

Judge

Bar no.

10-679 CD

CONNORS

VENUE

Plaintiff(s) residence (include city, township, or village)

230 CALUMET BOULEVARD, HARVEY, IL 60426

Defendant(s) residence (include city, township, or village)

235 SPENCER LANE, YPSILANTI, MI 48198

Place where action arose or business conducted
WASHTENAW COUNTY, MICHIGAN

06/24/2010

Date

Signature of attorney/plaintiff

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WASHTENAW

LACONDA HICKS, Ed.D.

Plaintiff,

vs.

Case No 10-679 CD
Hon. **Timothy P. Connors**

SHERI WASHINGTON and THE
WILLOW RUN COMMUNITY SCHOOLS,
a body corporate, jointly and severally,

Defendants.

Darryl K. Segars (P54997)
Hatchett, DeWalt & Hatchett, P.L.L.C.
Attorneys for Plaintiff
485 Orchard Lake Road
Pontiac, Michigan 48341
Telephone: (248) 334-1587
Facsimile: (248) 334-9199
Email: segarslaw@hotmail.com

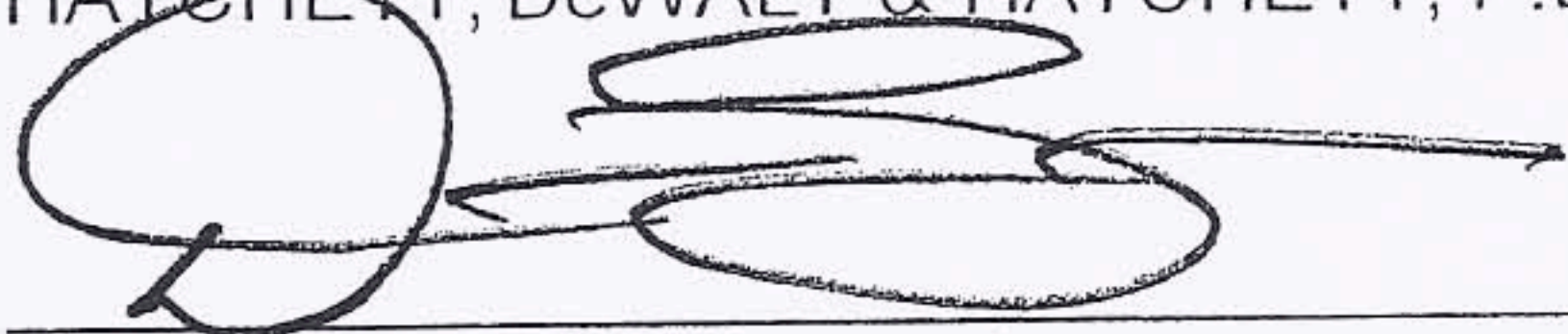
JURY DEMAND

Plaintiff, Laconda Hicks, Ed.D., by and through her attorneys, hereby demands
for a trial by jury on all issues in this case.

Respectfully submitted,

HATCHETT, DeWALT & HATCHETT, P.L.L.C.

By:


Darryl K. Segars (P54997)
Attorneys for Plaintiff
485 Orchard Lake Road
Pontiac, Michigan 48341
(248) 334-1587

Dated: June 22, 2010

LAW FIRM OF
HATCHETT,
DEWALT & HATCHETT,
P.L.L.C.

485 ORCHARD LK. RD.
PONTIAC, MICHIGAN

48341-2150

(248) 334-1587

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WASHTENAW

DORIS HOPE-JACKSON, Ed.D.

Plaintiff,

vs.

Case No. 10-680-CD

Hon. Timothy P. Connors

SHERI WASHINGTON and
THE WILLOW RUN COMMUNITY SCHOOLS,
a body corporate, jointly and severally,

Defendants.

Darryl K. Segars (P54997)
Hatchett, DeWalt & Hatchett, P.L.L.C.
Attorneys for Plaintiff
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Telephone: (248) 334-1587
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Email: segarslaw@hotmail.com

FILED
WASHTENAW COUNTY, MI
2010 JUN 24 A 8:55
LAWRENCE KESTER
COUNTY CLERK/REGISTER

COMPLAINT AND DEMAND FOR JURY TRIAL

~~There is no civil action between these parties arising out of the same transaction or occurrence as alleged in this complaint pending in this court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a judge.~~

Plaintiff, **Doris Hope-Jackson, Ed.D.** ("Dr. Jackson"), by and through her attorney, Darryl K. Segars, for her Complaint against Defendants, **Sheri Washington** and **Willow Run Community Schools (WRCS)**, states as follows:

PARTIES, JURISDICTION AND VENUE

1. Plaintiff is a resident of Cook County, Illinois, and at all times relevant to this cause of action conducted business in Washtenaw County, Michigan.
2. WRCS is a body corporate operating in Washtenaw County, Michigan.

3. Washington is a resident of and conducts business in Washtenaw County, Michigan.

4. The Court has jurisdiction over this matter as the amount in controversy exceeds \$25,000, exclusive of interest, costs, and attorney fees.

5. The Court has jurisdiction over the Defendants as they conduct business in Washtenaw County, Michigan on a regular and systematic basis.

6. Venue is proper in this Court since the parties reside and/or conduct business in Washtenaw County, Michigan and all of the causes of action alleged herein arose in Washtenaw County, Michigan.

GENERAL ALLEGATIONS

7. This is an action for violation of Michigan's Whistleblower Protection Act, MCL 15.361 et seq.

8. Plaintiff's claims arise out of a contractual employment relationship with Defendant WRCS; a copy of the employment contract between Plaintiff and WRCS is already in the Defendants' possession and shall, hereinafter, be referred to as "the Jackson/WRCS agreement."

9. Plaintiff began her employment with WRCS in June 2007 as its Superintendent, which position she held until she was placed on administrative leave.

10. Throughout the course of her employment with Defendants, Plaintiff performed her job duties in a manner that was satisfactory or better.

11. On September 1, 2009, Dr. Jackson was assaulted, verbally and otherwise, in the WRCS administrative building conference room by Defendant Washington. On the same day, she and David Houle, then WRCS' Director of Business and Finance, apprised the entire WRCS Board of Education of Defendant

Washington's assault

12. On September 15, 2009, Dr. Jackson reported the assault to the Washtenaw County Sheriff's Department.

13. On September 16, 2009, Defendant Washington, and the rest of the WRCS Board of Education, were apprised of the fact that Dr. Jackson had reported Defendant Washington's assault to the Washtenaw County Sheriff's Department.

14. Following the disclosure of Dr. Jackson's reporting of Defendant Washington's assault to the Washtenaw County Sheriff's Department, Defendants, at the insistence of Defendant Washington, engaged the services of an auditor/investigator to investigate Dr. Jackson's employment activity.

15. Upon information and belief, the auditor/investigator, following a covert investigation, found no wrongdoing on the part of Dr. Jackson.

16. Despite the fact that the auditor/investigator hired by the District to uncover Dr. Jackson's alleged improprieties found no wrongdoing, Defendant Washington charged Dr. Jackson with several allegations of misconduct as it relates to her employment with WRCS and she was placed on administrative leave by the Defendants; receiving notice of same after March 26, 2010 - violations persist to present.

17. At all pertinent times during Dr. Jackson's employment with WRCS, the Defendants were aware of Dr. Jackson's disclosures, discussed in paragraphs 11-13, *supra*.

18. Dr. Jackson's being accused of misconduct and being placed on administrative leave on March 25, 2010, was motivated by the Defendants' knowledge of her disclosures, discussed in paragraphs 11-13, *supra*.

COUNT I

MICHIGAN'S WHISTLEBLOWER PROTECTION ACT

19. Plaintiff repeats and realleges paragraphs 1 through 18 set forth above with the same force and effect as though set forth in full herein.

20. Plaintiff Dr. Jackson is an employee and Defendants, WRCS and Washington, are her employer, covered by and within the meaning of Michigan's Whistleblower Protection Act, Mich. Comp. Laws 15.361 et seq; Mich. Stat. Ann. 17.428(1).

21. Defendants, by their agent(s), were aware that Plaintiff Dr. Jackson had reported violations or suspected violations of law to a public body.

22. Defendants placed Plaintiff on administrative leave otherwise retaliated against her because she had reported violations or suspected violations of law, regulations or rules.

23. The aforementioned violations or suspected violations of law include, but are not limited to, those matters set forth in paragraphs 11-13, *supra*.

24. Defendants' actions were intentional and in disregard of Plaintiff's rights and sensibilities.

25. The retaliatory conduct of Defendants and their agents is a violation of Michigan's Whistleblowers' Protection Act, Mich. Comp. Laws 15.362; Mich. Stat. Ann. 17.428(2).

26. As a direct and proximate result of the violation of Dr. Jackson's rights as alleged, she has suffered loss of earnings and earning capacity, past and future lost earnings, the value of fringe and pension benefits; she has sustained mental and

distress, embarrassment, humiliation, anxiety about the future, damage to

her good name and reputation, and loss of the ordinary pleasures of everyday life, including the right to pursue a gainful occupation of her choice.

RELIEF REQUESTED

Plaintiff demands judgment against Defendants as follows:

A. Legal Relief:

1. Compensatory damages in whatever amount above \$25,000 she is found to be entitled;
2. Exemplary damages in whatever amount above \$25,000 she is found to be entitled;
3. A judgment for lost wages and benefits in whatever amount she is found to be entitled.
4. An award of interest, costs and reasonable attorney fees.

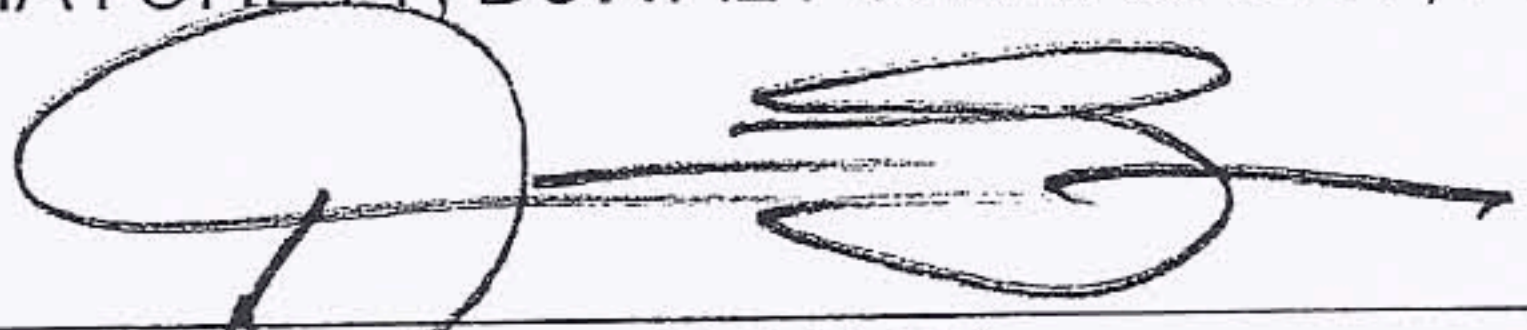
B. Equitable Relief:

1. An Order from this Court placing Plaintiff in the position she would have held had there been no wrongdoing by Defendants.
2. An injunction order from this Court prohibiting any further acts of wrongdoing.
3. An award of interest, costs and reasonable attorney fees.
4. An Order compelling removal of all letters, emails and other documents related to charges and wrongful dismissal contained in any personnel or personal files relating to Plaintiff.

Whatever other legal or equitable relief deemed appropriate at the time of final judgment.

Respectfully submitted,

HATCHETT, DeWALT & HATCHETT, P.L.L.C.

By: 

Darryl K. Segars (P54997)
Attorneys for Plaintiff
485 Orchard Lake Road
Pontiac, Michigan 48341

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WASHTENAW

DORIS HOPE-JACKSON, Ed.D.

Case No 10-680-CD

Plaintiff,

vs.

Hon.

SHERI WASHINGTON and THE
WILLOW RUN COMMUNITY SCHOOLS,
a body corporate, jointly and severally,

Defendants.

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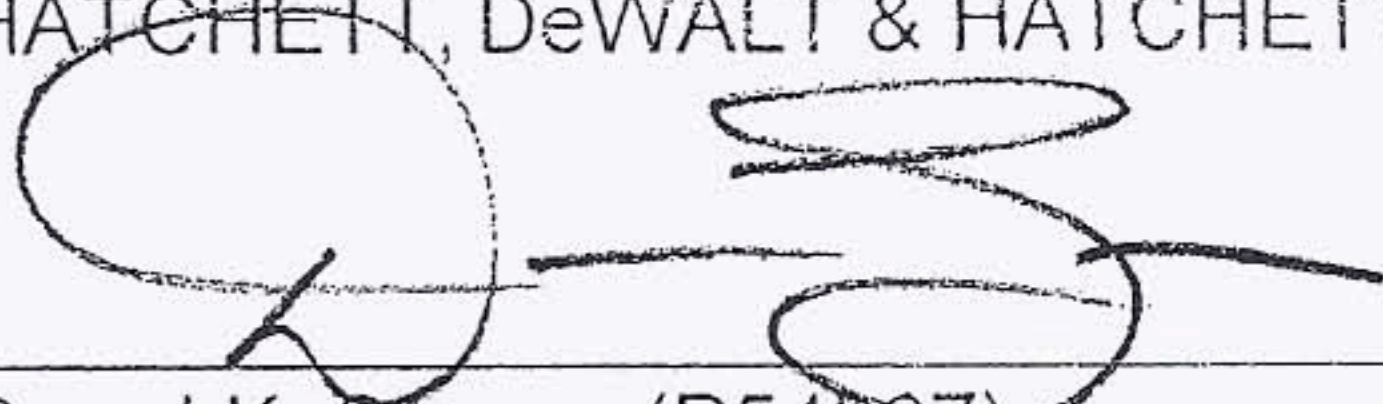
JURY DEMAND

Plaintiff, Doris Hope-Jackson, Ed.D., by and through her attorneys, hereby
demands a trial by jury on all issues in this case.

Respectfully submitted,

HATCHETT, DeWALT & HATCHETT, P.L.L.C.

By:


Darryl K. Segars (P54997)
Attorneys for Plaintiff
485 Orchard Lake Road
Pontiac, Michigan 48341
(248) 334-1587

Dated: June 22, 2010

LAW FIRM OF
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DEWALT & HATCHETT,
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