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10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 U.S. EQUAL EMPLOYMENT  
13 OPPORTUNITY COMMISSION, )

14 Plaintiff, )

15 v. )

16 LAWRY'S RESTAURANTS, INC., )  
17 d/b/a LAWRY'S THE PRIME RIB, )  
18 FIVE CROWNS, AND TAM )  
19 O'SHANTER INN, )

20 Defendant. )

CASE NO.: CV06-1963

**COMPLAINT- CIVIL RIGHTS  
EMPLOYMENT  
DISCRIMINATION**  
(42 U.S.C. §§ 2000e, *et seq.*)

**JURY TRIAL DEMAND**

21 NATURE OF THE ACTION

22 This is an action under Title VII of the Civil Rights Act of 1964, as  
23 amended, and Title I of the Civil Rights Act of 1991 to correct unlawful  
24 employment practices on the basis of sex, and to provide appropriate relief to  
25 Brandon Little and similarly situated males who were adversely affected by such  
26 practices. The Commission alleges that Brandon Little (male), and similarly  
27 situated males were refused the position of Server by the Defendant on the basis of  
28 their sex.

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1 8. Since at least 1964, Defendant Employer has engaged in a pattern and  
2 practice of unlawful employment discrimination at its Las Vegas, Nevada; Beverly  
3 Hills, California; Chicago, Illinois; Dallas, Texas; Los Angeles, California; and  
4 Corona del Mar, California facilities, in violation of Section 703(a)(1) and Section  
5 707 of Title VII, 42 U.S.C. § 2000e-2(a)(1) and -6. These practices include, but  
6 are not limited to, engaging in intentional discrimination against Little and a class  
7 of male employees, applicants and deterred applicants by refusing to hire males to  
8 the position of server.

9 9. The effect of the practice complained of in paragraph eight (8),  
10 above, has been to deprive Brandon Little and similarly situated males of equal  
11 employment opportunities and otherwise adversely affect their status as  
12 employees, applicants and potential applicants, because of their sex.

13 10. The unlawful employment practices complained of in paragraph eight  
14 (8), above, were intentional.

15 11. The unlawful employment practices complained of in paragraph eight  
16 (8), above, were done with malice or with reckless indifference to the  
17 federally protected rights of Brandon Little and other similarly-situated males.

18 PRAYER FOR RELIEF

19 Wherefore, the Commission respectfully requests that this Court:

20 A. Grant a permanent injunction enjoining Defendant Employer, its  
21 officers, successors, assigns, and all persons in active concert or participation  
22 with it, from (1) engaging hiring, promotion and any other employment practices  
23 which discriminates on the basis of sex and (2) discriminating against any  
24 individual because he or she has opposed any unlawful employment practice or  
25 because he or she has made a charge, testified, assisted, or participated in any  
26 manner in an investigation, proceeding, or hearing under 42 U.S.C. §2000e-3.

27 B. Order Defendant Employer to institute and carry out policies,  
28 practices, and programs which provide equal employment opportunities for men,

1 and which eradicate the effects of its past and present unlawful employment  
2 practices.

3 C. Order Defendant Employer to make whole Brandon Little and  
4 similarly situated males, by providing appropriate backpay with prejudgment  
5 interest, in amounts to be determined at trial, and other affirmative relief necessary  
6 to eradicate the effects of its unlawful employment practices, including but not  
7 limited to rightful-place hiring of Brandon Little and similarly situated males.

8 D. Order Defendant Employer to make whole Brandon Little and  
9 similarly situated males by providing compensation for past and future  
10 nonpecuniary losses resulting from the unlawful practices complained of in  
11 paragraphs 8 and 9 above, including relocation expenses, job search expenses, and  
12 medical expenses not covered by the Employer's employee benefit plan, in  
13 amounts to be determined at trial.

14 E. Order Defendant Employer to make whole Brandon Little and other  
15 similarly situated males by providing compensation for past and future  
16 nonpecuniary losses resulting from the unlawful practices complained of in  
17 paragraph eight (8), above, including emotional pain, suffering, inconvenience,  
18 loss of enjoyment of life, and humiliation, in amounts to be determined at trial.

19 F. Order Defendants Employer to pay Brandon Little and similarly  
20 situated males punitive damages for its malicious and reckless conduct described  
21 in paragraph eight (8), above, in amounts to be determined at trial.

22 G. Grant such further relief as the Court deems necessary and proper in  
23 the public interest.

24 H. Award the Commission its costs of this action.

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