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Superior Court of California,
County of Los Angeles
7/11/2024 2:29 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By A. Munoz, Deputy Clerk

Attorneys for Plaintiff Ella Weidner

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

ELLA WEIDNER, an individual,

Plaintiff,

vs.

SAKS & COMPANY LLC, a Delaware
limited liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No.: **24STCV17238**

COMPLAINT FOR DAMAGES

- 1. SEX/GENDER DISCRIMINATION IN VIOLATION OF THE FEHA;**
- 2. WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY; AND**
- 3. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS.**

(DEMAND EXCEEDS \$25,000.00)

JURY TRIAL DEMANDED

Plaintiff Ella Weidner ("Plaintiff") submits this Complaint for Damages ("Complaint") against Defendant Saks & Company LLC ("Defendant") and Does 1 through 50 (collectively, "Defendants"), as follows:

JURISDICTION AND VENUE

1. Jurisdiction and venue are proper in this Court pursuant to the California Fair Employment and Housing Act (the "FEHA"), California Government Code § 12965(b) because the alleged unlawful employment actions occurred in this County, and the relevant records are maintained and administered in this County.

2. Plaintiff has met all the jurisdictional requirements for proceeding with her claims under the FEHA, including without limitation, California Government Code §§ 12960 and 12965, by timely filing an administrative complaint against Defendants with the California Civil Rights Department (“CRD”) on or about June 17, 2024. Plaintiff received her right-to-sue letter from the CRD against Defendants on June 17, 2024. True and correct copies of the CRD Complaint and Right to Sue letter are collectively attached hereto as **Exhibit A**.

PARTIES

3. Defendant Saks & Company LLC (“Saks”) is a Delaware limited liability company doing business as Saks Fifth Avenue and is authorized to do business in the State of California. Plaintiff is informed and believes, and based thereon alleges, that Saks was and is a business that employs five (5) or more employees. As such, Saks is subject to the FEHA pursuant to California Government Code § 12926(d).

4. At all times mentioned herein, Plaintiff was an individual residing in the State of California. Plaintiff was employed by Defendants from about September 2021, until about May 20, 2024, when Plaintiff's employment was unlawfully terminated.

DOE DEFENDANTS

5. Plaintiff does not know the true names or capacities, whether individual, partner, or corporate, of the Defendants sued herein as Does 1 through 50, inclusive, and for that reason, said Defendants are sued under such fictitious names, and Plaintiff prays for leave to amend this complaint when the true names and capacities are known. Plaintiff is informed and believes and, based thereon alleges, that each of said fictitious Defendants was responsible in some way for the matters alleged herein and proximately caused Plaintiff to be subject to the illegal employment practices, wrongs, and injuries complained of herein.

AGENCY STATUS OF EACH DEFENDANT

6. Plaintiff is informed and believes and based thereon alleges that there exists, and, at all times relevant to this Complaint, existed a unity of interests between defendants such that any individuality and separateness between defendants has ceased, and these defendants are the alter egos of each other and extend control over each other. Adherence to the fiction of the

1 separate existence of these defendants as entities distinct from other defendants will permit an
2 abuse of the corporate privilege and would sanction fraud and/or promote injustice.

3 7. Plaintiff is informed, believes, and, based thereon alleges that the fictitiously
4 named defendants were the agents, servants, and employees of Defendant and, in doing the acts
5 and things hereinafter alleged, were at all times acting within the course and scope of said
6 agency, servitude, and employment and with the permission, consent, and approval or
7 subsequent ratification of the named Defendant.

8 8. Plaintiff further alleges that Defendants constituted an “integrated enterprise” and
9 “integrated employers” with interrelated operations, common management, centralized control of
10 labor relations, and common ownership and/or financial control. Plaintiff also alleges that
11 Defendants were, at all times relevant hereto, the alter egos and/or the agents of each other.
12 Whenever reference is made to Defendants, it is intended to include the named Defendants as
13 well as all of the Doe defendants.

14 **FACTUAL ALLEGATIONS**

15 9. Plaintiff began working for Defendants in approximately September 2021. She
16 worked in various positions and received three raises during her tenure. She consistently
17 performed at or above what was required of her positions. At the end of 2023, Defendants
18 promoted Plaintiff to the position of “Group Ops Manager,” and increased her salary to \$85,000
19 per year, excluding bonuses. Defendants also provided relocation costs for Plaintiff to move
20 from Florida to California to start her new position in Beverly Hills, California.

21 10. Upon arriving in California, Plaintiff continued to exceed the expectations of her
22 position and to perform her duties for Defendants.

23 11. In approximately April 2024, Defendants confronted Plaintiff regarding nude
24 photographs that had been posted of Plaintiff online, indicating that the photographs may
25 jeopardize her employment with Defendants. Upset by the threat, Plaintiff explained to her
26 employer that the photographs had been posted online without her permission while she was a
27 minor and that she had been actively working to get the photographs taken down. Plaintiff was a
28 victim of crime and the circulation of the illegal photographs was through no fault of Plaintiff.

1 Defendants' focus on something that occurred prior to her employment and while a minor
2 demonstrates its discriminatory intent, as further detailed below. After learning that Plaintiff had
3 been the victim of blackmail and child pornography, Defendants claimed to abandon its efforts to
4 discipline or otherwise terminate Plaintiff because of the photographs.

5 12. Defendants' discriminatory conduct continued, nevertheless. In the months
6 following the confrontation, Plaintiff learned that her direct supervisor had reported the nude
7 photographs to Defendants' corporate managers to address what he believed would reflect poorly
8 on Defendants' corporate image. Defendants discriminated against Plaintiff because of her
9 gender, as evidenced by the disparate treatment of male employees who, on information and
10 belief, engaged in far more serious violations of Saks' code of conduct.

11 13. The disparate treatment of Plaintiff is highlighted by Defendants' actions toward
12 male employees who engage in inappropriate conduct in the workplace. During this same period,
13 Plaintiff's colleagues complained to her of inappropriate actions by fellow staff members. For
14 example, an associate complained that he had been physically accosted by a fellow employee.
15 Plaintiff reported these incidents to her direct manager. In response, Plaintiff's supervisor told
16 her *not* to raise the issue with Human Resources, as it could be handled internally.

17 14. Similarly, on information and belief, a male employee of Defendants who held a
18 managerial position had a sexual relationship with a subordinate following a launch party for
19 Defendants' Beverly Hills location. On information and belief, Defendants knew or should have
20 known of the inappropriate relationship. However, Defendants only issued minimal discipline, if
21 any at all. On information and belief, the male supervisor who engaged in the sexual relationship
22 was not terminated and/or put on suspension following the incident and remains employed to this
23 day.

24 15. On or about May 15, 2024, Plaintiff took a bereavement leave of absence to
25 grieve the loss of a family member. On her return, on or about May 20, 2024, Defendants
26 unlawfully terminated Plaintiff's employment. Defendants' alleged reason for termination was
27 that Plaintiff had requested an employee discount on an item that she purchased. Tellingly,
28 Plaintiff was entitled to the employee discount she requested by virtue of her employment with

1 Saks. Defendants' purported reason for termination was a pretext. Defendants engaged in
2 sex/gender discrimination and terminated Plaintiff's employment due to the illegal circulation of
3 Plaintiff's nude photos (which purportedly impacted Defendants' corporate image) and Plaintiff
4 reporting staff complaints of inappropriate behavior to management.

5 16. Defendants' disparate treatment of Plaintiff, a woman who requested an
6 authorized employee discount, when compared to the male manager who engaged in sexual
7 conduct with a subordinate demonstrates its discriminatory intent. As a result of her wrongful
8 and discriminatory termination, Plaintiff has suffered and continues to suffer severe emotional
9 distress, lost earnings, lost future earnings, and other damages as provided by law. As a result of
10 the conduct described above and other yet-to-be discovered information, Defendants violated
11 California's Fair Housing and Employment Act, California Government Code § 12940, *et seq.*

12 17. As an actual and proximate result of the illegal employment actions of
13 Defendants, Plaintiff has suffered and continues to suffer pain, humiliation, severe emotional
14 distress, trauma, and sleeplessness. Also, as an actual proximate result of Defendants' illegal
15 employment actions, Plaintiff has suffered lost wages, including commissions. Thus, Plaintiff
16 has suffered economic and non-economic losses in an amount greater than this Court's
17 jurisdictional minimum of \$25,000. Plaintiff seeks lost wages and loss in earning capacity, as
18 well as compensatory damages for pain and suffering, inconvenience, and mental anguish.
19 Plaintiff also seeks punitive damages, interest, attorneys' fees and costs, as permitted by law.

20 **FIRST CAUSE OF ACTION**

21 **SEX/GENDER DISCRIMINATION IN VIOLATION OF THE FEHA**

22 **(BY PLAINTIFF AGAINST ALL DEFENDANTS)**

23 18. Plaintiff re-alleges and incorporates by reference the preceding paragraphs as
24 though fully set forth herein.

25 19. The FEHA codified in Government Code § 12900 *et seq.*, makes it unlawful for
26 an employer to discriminate against an employee on the basis of the employee's sex/gender. *See*
27 Cal. Gov't Code § 12940(a).

28 20. Defendants discriminated against Plaintiff on account of her sex/gender. As

described above, Plaintiff suffered adverse employment actions which were motivated by her sex/gender, and those adverse employment actions materially affected the terms and conditions of Plaintiff's employment. Said actions include, but are not limited to discriminatory acts and Defendants' unlawful termination of Plaintiff.

21. As a proximate result of Defendants' discrimination against Plaintiff, she has suffered and continues to suffer compensatory damages, including without limitation, lost wages, loss of future earnings, emotional distress, mental anguish, embarrassment, humiliation, and loss of future advancement, in the amount of at least \$25,000.00, according to proof at the time of trial, which is in excess of the jurisdictional minimum for this lawsuit to qualify as an unlimited civil action. Plaintiff claims such amounts as damages, together with prejudgment interest accruing from the date of the filing of this action pursuant to California Civil Code §§ 3281 and/or 3288, and/or any other provision of law providing for prejudgment interest.

22. As a proximate result of Defendants' discrimination against her, Plaintiff has been forced to hire attorneys to prosecute the claims alleged herein, and has incurred and is expected to continue to incur attorneys' fees. Pursuant to California Government Code § 12965(b), Plaintiff requests the award of attorneys' fees against Defendants.

23. Defendants committed the acts alleged herein maliciously, fraudulently, and oppressively, callously, in bad faith, with the wrongful intent of injuring Plaintiff, and in conscious disregard of Plaintiff's rights and safety. As such, Plaintiff is entitled to an award of punitive damages in an amount according to proof.

SECOND CAUSE OF ACTION

WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY

(BY PLAINTIFF AGAINST ALL DEFENDANTS)

24. Plaintiff re-alleges and incorporates by reference the preceding paragraphs as though fully set forth herein.

25. At all times mentioned herein, the public policy of the State of California, as codified, expressed and mandated in the FEHA, prohibits employers from harassing, discriminating, and retaliating against employees because of their protected characteristics,

1 including their sex/gender. California also has a public policy of preventing the unwanted
2 distribution of nude photographs on the internet without the subject's consent and has expressed
3 this public policy as codified in Penal Code § 647(j). Nevertheless, Defendants violated these
4 public policies by terminating Plaintiff's employment on or about May 20, 2024 in violation of
5 the FEHA, and in contravention of the state of California's expressed public policy prohibiting
6 the distribution of nude photographs on the internet without the subject's consent.

7 26. As a proximate result of Defendants' wrongful termination of Plaintiff, Plaintiff
8 has suffered and continues to suffer compensatory damages, including without limitation, severe
9 emotional distress, lost wages, benefits, and compensation, and loss of future earnings and
10 earning capacity in the amount of at least \$25,000.00, according to proof at the time of trial,
11 which is in excess of the jurisdictional minimum for this lawsuit to qualify as an unlimited civil
12 action. Plaintiff claims such amounts as damages, together with prejudgment interest accruing
13 from the date of the filing of this action pursuant to California Civil Code §§ 3281 and/or 3288,
14 and/or any other provision of law providing for prejudgment interest.

15 27. Further, because the wrongful acts against Plaintiff were carried out, authorized,
16 or ratified by Defendants' directors, officers, and/or managing agents, acting with malice,
17 oppression, or fraud, or were deliberate, willful, and in conscious disregard of the probability of
18 causing injury to Plaintiff, Plaintiff seeks punitive damages to deter Defendants from committing
19 said illegal acts in the future.

20 **THIRD CAUSE OF ACTION**

21 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

22 **(BY PLAINTIFF AGAINST ALL DEFENDANTS)**

23 28. Plaintiff re-alleges and incorporates by reference the preceding paragraphs as
24 though fully set forth herein.

25 29. When Defendants, and each of them, committed the acts described above, they
26 did so deliberately and intentionally to cause Plaintiff to suffer humiliation, mental anguish, and
27 emotional distress. The outrageousness of the above-described conduct is amplified due to upper
28 management's abuse of their positions with actual and apparent authority over Plaintiff, and/or

1 apparent authority over decisions relating to Plaintiff, such as is commonly found in employment
2 relationships. Defendants, and each of them, were aware of their unlawful acts, and that those
3 acts would cause Plaintiff to suffer extreme emotional distress and other consequential damages.

4 30. The above-said acts of Defendants, and each of them, constituted intentional
5 infliction of emotional distress against Plaintiff and such conduct of Defendants was a substantial
6 or determining factor in causing damage and injury to Plaintiff.

7 31. As a result of Defendants' intentional infliction of emotional distress, Plaintiff has
8 suffered and continues to suffer substantial loss and damages including, loss of earnings, future
9 advancement, bonuses, benefits, embarrassment, humiliation, and mental anguish in an amount
10 to be determined at trial.

11 32. Defendants, and each of them, committed said intentional infliction of emotional
12 distress alleged herein against Plaintiff, maliciously, fraudulently, and oppressively with the
13 wrongful intent of injuring Plaintiff for an improper and evil motive which constitute a malicious
14 and conscious disregard of Plaintiff's rights. Plaintiff is thereby entitled to punitive damages
15 from Defendants in an amount to be determined at trial.

16 **PRAYER FOR RELIEF**

17 WHEREFORE, Plaintiff prays for judgment to be entered in her favor and against
18 Defendants, and each of them, as follows:

- 19 1. For all special damages, according to proof;
- 20 2. For general damages for emotional distress resulting from suffered humiliation,
21 embarrassment, disgrace, loss of reputation, mental anguish, and emotional and physical distress
22 in an amount to be proven at trial;
- 23 3. For punitive and exemplary damages in in a sum appropriate to punish
24 Defendants and set an example for others;
- 25 4. For lost wages, benefits, penalties and other monetary relief in an amount to be
26 proven at trial;
- 27 5. For prejudgment interest at the prevailing legal rate;
- 28 6. For attorneys' fees pursuant to California Government Code § 12965(b);

- 1 7. For costs of suit; and
2 8. For such other and further relief as the Court may deem just and proper.

3
4 DATED: July 11, 2024

DIVERSITY LAW GROUP, P.C.

5
6 By: 

Max W. Gavron

7 Attorneys for Plaintiff Ella Weidner

8
9 **DEMAND FOR JURY TRIAL**

10 Plaintiff hereby demands trial by jury.

11 DATED: July 11, 2024

DIVERSITY LAW GROUP, P.C.

12
13 By: 

Max W. Gavron

14 Attorneys for Plaintiff Ella Weidner
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EXHIBIT A



Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 17, 2024

Max Gavron
515 S. Figueroa St., Suite 1250
Los Angeles, CA 90071

RE: **Notice to Complainant's Attorney**
CRD Matter Number: 202406-25120117
Right to Sue: Weidner / Saks & Company LLC

Dear Max Gavron:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq. Also attached is a copy of your Notice of Case Closure and Right to Sue.

Pursuant to Government Code section 12962, CRD will not serve these documents on the employer. You must serve the complaint separately, to all named respondents. Please refer to the attached Notice of Case Closure and Right to Sue for information regarding filing a private lawsuit in the State of California. A courtesy "Notice of Filing of Discrimination Complaint" is attached for your convenience.

Be advised that the CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 17, 2024

RE: **Notice of Filing of Discrimination Complaint**
CRD Matter Number: 202406-25120117
Right to Sue: Weidner / Saks & Company LLC

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

This matter may qualify for CRD's Small Employer Family Leave Mediation Pilot Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Government Code section 12945.2, has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. You may contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



Civil Rights Department

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calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 17, 2024

Ella Weidner
c/o 515 S. Figueroa St., Suite 1250
Los Angeles, CA 90071

RE: **Notice of Case Closure and Right to Sue**
CRD Matter Number: 202406-25120117
Right to Sue: Weidner / Saks & Company LLC

Dear Ella Weidner:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective June 17, 2024 because an immediate Right to Sue notice was requested.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

This matter may qualify for CRD's Small Employer Family Leave Mediation Pilot Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Government Code section 12945.2, has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



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To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department

**COMPLAINT OF EMPLOYMENT DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
Civil Rights Department
Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)**

In the Matter of the Complaint of

Ella Weidner

CRD No. 202406-25120117

Complainant,

vs.

Saks & Company LLC

Respondents

1. Respondent **Saks & Company LLC** is an **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

2. Complainant **Ella Weidner**, resides in the City of **Los Angeles**, State of **CA**.

3. Complainant alleges that on or about **June 17, 2024**, respondent took the following adverse actions:

Complainant was discriminated against because of complainant's sex/gender, bereavement leave and as a result of the discrimination was terminated, denied any employment benefit or privilege.

Additional Complaint Details: Claimant Ella Weidner ("Claimant") began working for Respondents Saks & Company LLC d/b/a SFA ("Respondent") in approximately September 2021. She worked in various positions and received three raises during her tenure. She consistently performed at or above what was required of her positions. At the end of 2023, Respondent promoted Claimant to the position of "Group Ops Manager," and increased her salary to \$85,000 per year, excluding bonuses. Respondent also provided relocation costs to move from Florida to California to start her new position in Beverly Hills, California. Upon arriving in California, Claimant continued to exceed the expectations of her position and to perform her duties for Respondent.

1 In approximately April 2024, Respondent confronted Claimant regarding nude photographs
2 that had been posted of Claimant online, indicating that the photographs may jeopardize her
3 employment with Respondent. Upset by the threat, Claimant explained to her employer that
4 the photographs had been posted online without her permission while she was a minor and
5 that she had been actively working to get the photographs taken down. Respondent's focus
6 on something that occurred prior to her employment and while a minor demonstrates its
7 discriminatory intent, as further detailed below. After learning that Claimant had been the
8 victim of blackmail and child pornography, Respondent claimed to abandon its efforts to
9 discipline or otherwise terminate Claimant because of the photographs. However, this was
10 only the beginning of Respondent's gender discrimination.

11 In the months following the confrontation, Claimant learned that her direct supervisor had
12 reported the photographs to Respondent's corporate managers to address what he believed
13 would reflect poorly on Respondent's corporate image. During this period, Claimant also
14 reported several of her peers to her direct manager given complaints she had heard from
15 other associates regarding actions by staff members that she felt were inappropriate. For
16 example, she reported to her supervisor that an associate complained to her that he had
17 been physically accosted by a fellow employee. In response, Claimant's supervisor told her
18 not to raise the issue to HR because it could be handled internally.

19 Similarly, on information and belief, a male employee of Respondent who held a managerial
20 position had a sexual relationship with a subordinate following a launch party for
21 Respondent's Beverly Hills location. On information and belief, Respondent knew or should
22 have known of the inappropriate relationship. However, Respondent only issued minimal
23 discipline, if any at all. On information and belief, the male supervisor who engaged in the
24 sexual relationship was not terminated and/or put on suspension following the incident and
25 remains employed to this day.

26 Around May 15, 2024, Claimant went out on leave for a few days to bereave a family
27 member. On her return, on or about May 20, 2024, Respondent unlawfully and
28 discriminatorily terminated Claimant. While Respondent's purported reason for termination
was Claimant requesting that associates provide a discount on an item she purchased (to
which she was entitled), the real reason for Claimant's termination was Respondent's
gender discrimination based on Claimant's nude photographs and her voicing of concerns to
management regarding other employees' complaints.

Respondent's disparate treatment of Claimant, who is a woman and sought a discount to
which she was entitled, when compared to the male manager who engaged in sexual
conduct with a subordinate demonstrates its discriminatory intent. As a result of her
wrongful and discriminatory termination, Claimant has suffered and continues to suffer
severe emotional distress, lost earnings, lost future earnings, and other damages as
provided by law. As a result of the conduct described above and other yet-to-be discovered
information, Respondent violated California's Fair Housing and Employment Act, California
Gov't Code Sections 12940, et seq.

1 VERIFICATION

2 I, **Max W. Gavron**, am the **Attorney** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The matters alleged are based
4 on information and belief, which I believe to be true.

5 On June 17, 2024, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

7 **Los Angeles, California**
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JS-6

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

CIVIL MINUTES -- GENERAL

Case No. **CV 24-7210-JFW(MAAX)**

Date: April 9, 2025

Title: Ella Weidner -v- Saks & Company, LLC, et al.

PRESENT:

HONORABLE JOHN F. WALTER, UNITED STATES DISTRICT JUDGE

**Shannon Reilly
Courtroom Deputy**

**None Present
Court Reporter**

ATTORNEYS PRESENT FOR PLAINTIFFS:

None

ATTORNEYS PRESENT FOR DEFENDANTS:

None

PROCEEDINGS (IN CHAMBERS): ORDER OF DISMISSAL

In the Notice of Settlement filed on April 9, 2025, Docket No. 26, the parties represent that they have settled this action. As a result, the Court dismisses this action without prejudice subject to either party reopening the action on or before June 10, 2025. The Court will retain jurisdiction for the sole purpose of enforcing the settlement until June 10, 2025. Thereafter, absent further order of the Court, the dismissal of this action will be with prejudice. All dates in this action, including the trial date are vacated.

IT IS SO ORDERED.

Initials of Deputy Clerk sr