

**COURT OF COMMON PLEAS  
HAMILTON COUNTY, OHIO**

*FC*

KECIA PRINGLE  
12157 Huntergreen Drive  
Cincinnati, Ohio 45251

Case No A0501593

Plaintiff,

vs

UNIFUND CORPORATION  
10625 Techwoods Circle  
Cincinnati, Ohio 45242-2846

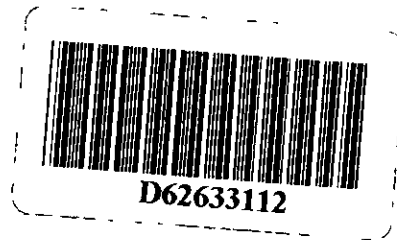
Defendant

<input checked="" type="checkbox"/> ORIG	<input type="checkbox"/> COMP. PARTIES, SUMMONS	<input type="checkbox"/> WAVE
<input checked="" type="checkbox"/> CERT MAIL	<input type="checkbox"/> SHERIFF	
<input type="checkbox"/> PROCESS SERVER	<input type="checkbox"/> NONE	JTC
CLERKS FEES _____		
SECURITY FOR COST _____		
DEPOSITED BY <u>14212</u>		
FILING CODE _____		

**COMPLAINT AND JURY DEMAND**

Serve

[Statutory Agent]  
CT Corporation  
1300 E Ninth Street  
Cleveland, Ohio 44114



**FILED**  
 2005 FEB 23 10 24 AM  
 GREGORY APTHAMN  
 CLERK  
 HAMILTON COUNTY, OH

Comes now Kecia Pringle, and for her Complaint states as follows

- 1 Plaintiff Kecia Pringle ("Pringle") has, at all times herein, been a citizen of the State of Ohio, and resides in this judicial district
- 2 Unifund Corporation ("Unifund") is a Delaware corporation doing business in this judicial district, where it is engaged in the purchase and collection of credit card debt
- 3 Pringle, who is an African American female, was hired by Unifund on or about June 30, 2003 as Human Resources Manager
- 4 Throughout her employment with Unifund, Pringle performed her job duties competently and was well regarded by her supervisors

5 On August 18, 2003, Pringle was engaged in a business-related phone conversation during which time she informed the individual with whom she was speaking that she recently became pregnant

6 The statements made by Pringle during the phone call concerning her pregnancy were overheard by her Supervisor David Rosenberg ("Rosenberg")

7 Later that afternoon, Pringle was informed by Rosenberg that she was hereby terminated When Pringle asked Rosenberg why she was being terminated, Rosenberg responded that he did not have to give a reason

8 Unifund replaced Pringle with a white female employee

9 White female employees who have become pregnant while working for Unifund have not been terminated

10 Other African-American female employees who have become pregnant while working for Unifund have been terminated

11 Unifund terminated Pringle on August 18, 2003 because of her race and maternity status

### **COUNT I**

12 Pringle incorporates Paragraphs 1 through 11 of her Complaint as if fully rewritten herein

13 By engaging in the conduct set forth in Paragraph 7 above, Unifund has discriminated against Pringle on the basis of her maternity status and gender in violation of Chapter 4112 01 *et seq* and 4112 99 of the Ohio Revised Code

### **COUNT II**

14 Pringle incorporates Paragraph 1 through 13 as if fully rewritten herein

15 By engaging in the conduct set forth in Paragraph 7 above, Unifund has discriminated against Pringle on the basis of race in violation of Chapter 4112 01 *et seq* and 4112 99 of the Ohio Revised Code

### **COUNT III**

16 Pringle incorporates Paragraphs 1 through 15 as if fully rewritten herein

17 By engaging in the conduct set forth in Paragraph 7 above, Unifund has discriminated against Pringle on the basis of race, gender and maternity status in violation of Ohio's public policy

**WHEREFORE**, Kecia Pringle respectfully requests the following relief from this Court

1 An order granting Pringle reinstatement to the position she held with Unifund prior to her unlawful termination on August 18, 2003

2 An order that Unifund pay Pringle all of the back pay owing to her by Unifund from the time of her unlawful termination until the time of her reinstatement

3 As an alternative to reinstatement, an order by this Court that Unifund pay Pringle front pay in an amount to be later determined by this Court

4 An order that Unifund pay Pringle an amount of money, to be determined at a later date, to compensate her for her pain and suffering proximately caused by Unifund's unlawful conduct

5 An order that Unifund pay Pringle an amount of money, to be determined at a later date, for punitive damages

6 An order that Unifund immediately cease and desist from further acts of discrimination against its employees based on their race and maternity status

7 An order that Unifund pay Pringle pre- and post -judgment interest on all monies due her, as well reimburse Pringle for all costs and attorney fees incurred in bringing and prosecuting this action

Respectfully submitted,



Donald B Hordes (#0014212)  
Schwartz, Manes & Ruby  
2900 Carew Tower  
441 Vine Street  
Cincinnati, Ohio 45202-3090  
513/579-1414 | FAX 513/579-1418  
[dhordes@smrfirm.com](mailto:dhordes@smrfirm.com)  
Attorney for Plaintiff

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues joined herein

INSTRUCTIONS TO THE CLERK

Please serve the Defendants via certified mail, return receipt requested at the addresses listed above



Donald B Hordes

105568\_1