

**FILED**

**DEC 21 2023**

CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

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*X*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**AGT**

JALON HALL )  
Plaintiff, )  
vs. )  
GOOGLE LLC, )  
Defendant(s). )

**CV 23 - 6574**

CASE NO. \_\_\_\_\_

EMPLOYMENT DISCRIMINATION  
COMPLAINT

1. Plaintiff resides at:

Address 840 Shore Grove Cir, Apt 303

City, State & Zip Code Auburn Hills, MI 48326

Phone 585-439-8376 or 585-504-1484 (VP)

2. Defendant is located at:

Address 1600 Amphitheater Parkway

City, State & Zip Code Mountain View, CA 94043

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred on this Court by 42 U.S.C. Section 2000e-5.

Equitable and other relief is sought under 42 U.S.C. Section 2000e-5(g).

4. The acts complained of in this suit concern:

a.  Failure to employ me.

b.  Termination of my employment.

1 c.  Failure to promote me.

2 d.  Other acts as specified below.

3 Failure to provide me with accommodations  
4 in content Moderation Specialist and Research  
5 Analyst role.

6 Failure to provide me with training for  
7 Research analyst role

8  
9 5. Defendant's conduct is discriminatory with respect to the following:

10 a.  My race or color.

11 b.  My religion.

12 c.  My sex.

13 d.  My national origin.

14 e.  Other as specified below.

15 Disability

16 6. The basic facts surrounding my claim of discrimination are:

17 Claim I (Violation of Civil rights: 42 U.S.C. § 12112)

18 The Plaintiff transitioned to the Research Analyst role in  
19 2021 with no training provided, and their experiences  
20 with their manager include autism discrimination, lack  
21 of support, and delays in project completion due to insufficient  
22 accommodations. The plaintiff also sought assistance from  
23 retention department in transferring to an Inclusive manager;  
24 deny L3, L4 role and plaintiff continue to be... [Go next  
page]

25 7. The alleged discrimination occurred on or about 2021-2023.

(DATE)

26  
27 8. I filed charges with the Federal Equal Employment Opportunity Commission (or the  
28 California Department of Fair Employment and Housing) regarding defendant's alleged



1 held back, remaining on the same level of the ladder for  
2 the past 3 years and 3 months with no growth  
3 opportunity. The Plaintiff highlights the lacks of  
4 accommodations, inaccurate evaluations and biases, being  
5 passed up for promotion, and not being properly evaluated  
6 for their current role as a Research Analyst. The plaintiff  
7 highlight the above actions impacting their career  
8 growth, which has blocked them from having equal  
9 employment opportunities as of September 2023. By  
10 doing the acts described above, Defendant caused  
11 and/or permitted the violation of Plaintiff's Americans  
12 with Disabilities Act (ADA) rights to be free from  
13 employment discrimination based on race, color, religion,  
14 sex and national origin, thereby entitling Plaintiff to  
15 recover damage pursuant to 42 U.S.C. § 12112.

### 16 Claim II (Violation of Civil rights: 42 U.S.C § 12117)

17 The Plaintiff, an African American Deaf female, alleges  
18 that the defendant violated various sections of the  
19 ADA by not providing reasonable accommodations  
20 during live production work for (CMS) Content Moderation  
21 Specialist role and transferring her to a department without  
22 training. This resulted in the plaintiff not having equal  
23 opportunities to perform her role due to the  
24 removal of her sign language interpreters. By doing  
25 the acts described above, Defendant engaging in  
26 unlawful employment practices caused and/or  
27 permitted the violation of Plaintiff's Americans with  
28 Disabilities Act (ADA) rights to be free from



1 employment discrimination based on race, color,  
2 religion, sex and national origin, thereby entitling  
3 plaintiff to recover damages pursuant to  
4 42 U.S.C. § 12117.

5 **Claim III** (Violation of Civil rights : 42 U.S.C. § 1981)

6 The plaintiff describes an interaction with the  
7 Defendant employee. In 2021, a machine learning  
8 Research Program Manager, during which  
9 negative racist comments were made, including  
10 characterizing the plaintiff as an "aggressive black  
11 deaf woman" and suggesting that they should  
12 keep their mouth shut and take a side role.

13 Additionally, the plaintiff details discriminatory  
14 behavior from their current manager as of November  
15 2022, including the use of nonverbal cues such  
16 as eye-rolling and dismissive body language,  
17 which have created a hostile work environment.

18 Moreover, the defendant consistently excludes  
19 the plaintiff from opportunities, meetings, and  
20 important discussions based on their race  
21 and disability, such as limiting the plaintiff  
22 access to professional development opportunities  
23 and not assigning them to growing opportunity. The  
24 plaintiff highlight the defendant evaluation of  
25 ladder not align with role responsibility and organization  
26 OKR, also the exclusion and discrimination toward  
27 the Black Deaf Community by including only the  
28 National Association of the Deaf and excluding the

1 National Black Deaf Advocates for employment  
2 disability month and urges corrective measures  
3 to address these issues and provide equal access  
4 and opportunities to individuals with disabilities,  
5 including those who are Black and Deaf. By doing  
6 the acts described above, Defendant caused and/or  
7 permitted the violation of Plaintiff's Title VII of  
8 the Civil Rights Act of 1964 rights to have  
9 Equal Employment Opportunity, thereby entitling  
10 Plaintiff to recover damages pursuant to  
11 42 U.S.C. § 1981.

12 (Request for Relief) The above claims encompass  
13 violations of the ADA, Title VII, and the Equal Pay Act,  
14 as well as the impact on the Plaintiff's career  
15 and well-being. Furthermore, the Plaintiff's are  
16 demanding compensation for compensatory and  
17 punitive damages resulting from the discrimination  
18 they have experienced. They strongly believe that  
19 enforcement policies in the Defendant Company,  
20 must be created to ensure that Black Deaf employees  
21 with disability are included in the provision of  
22 reasonable accommodations under the ADA;  
23 this is to ensure future hire of Black Deaf  
24 employees will not be discriminated and have  
25 an equity opportunity just as other non-Black  
26 Deaf employees with disability.



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discriminatory conduct on or about 12/12/2022.

(DATE)

9. The Equal Employment Opportunity Commission issued a Notice-of-Right-to-Sue letter (copy attached), which was received by me on or about 9/26/2023.

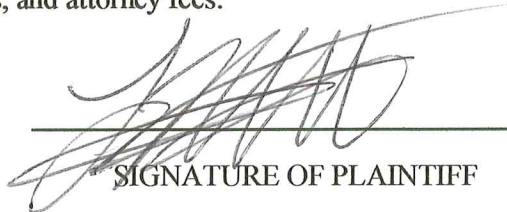
(DATE)

10. Plaintiff hereby demands a jury for all claims for which a jury is permitted:

Yes X No     

11. WHEREFORE, plaintiff prays that the Court grant such relief as may be appropriate, including injunctive orders, damages, costs, and attorney fees.

DATED: 12/19/2023

  
SIGNATURE OF PLAINTIFF

(PLEASE NOTE: NOTARIZATION IS NOT REQUIRED.)

JALON R. HALL

PLAINTIFF'S NAME  
(Printed or Typed)



## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

San Jose Local Office  
96 N Third St, Suite 250  
San Jose, CA 95112  
Office: (408) 889-1950  
Email: [sanjgov@eoc.gov](mailto:sanjgov@eoc.gov)  
Website: [www.eoc.gov](http://www.eoc.gov)

### DETERMINATION AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: September 26, 2023

**To:** Jalon Hall  
840 Shore Grove Circle, Apt. # 303  
Auburn Hills, MI 48326

Charge No: 556-2023-00028

EEOC Representative and email: ANDREA NUNEZ  
Investigator  
[andrea.nunez@eoc.gov](mailto:andrea.nunez@eoc.gov)

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### DETERMINATION OF CHARGE

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

### NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission,

Digitally signed by  
**Margaret Ly**  
Date: 2023.09.26 11:04:15  
-07'00'

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Margaret Ly  
Local Director

**Cc:**

Katherine C. Huibonh  
Duane Morris LLP  
2475 Hanover Street  
Palo Alto, CA 94304

Ariana Murtagh  
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Please retain this notice for your records.