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SYNEETRA A. HILL,

Plaintiff,

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
MERCER COUNTY

v.

CIVIL ACTION

DRINKER BIDDLE & REATH LLP;  
MARSHA BEIDLER; and JOHN DOES  
1-10 (fictitious names of  
entities and/or individuals  
whose identities are presently  
unknown), individually,  
jointly, severally and/or in  
the alternative,

DOCKET NO.: MER-L-

**COMPLAINT**

Defendants.

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Plaintiff, SYNEETRA A. HILL, by way of Complaint against the  
Defendants, DRINKER BIDDLE & REATH LLP, MARSHA BEIDLER and JOHN  
DOES 1-10 states as follows:

**IDENTIFICATION OF PARTIES**

1. Plaintiff, Syneetra A. Hill ("Plaintiff" or "Ms. Hill"), an African-American female, was hired as a temporary employee on or about February 12, 2007, and became a permanent employee on or about June 11, 2007. Plaintiff has been employed in Drinker Biddle's Princeton, New Jersey office

through the filing of this Complaint, in the position of legal assistant.

2. Upon information and belief, at all relevant times to this action, Defendant Drinker Biddle & Reath LLP ("Defendant Employer" or "Drinker Biddle") is an international law firm with an office in London and 11 offices throughout the United States, including the office in Princeton, New Jersey, where Plaintiff was employed ("The Princeton Office").
3. Upon information and belief, at all relevant times to this action, Defendant Marsha Beidler was an attorney employed as "Of Counsel" and working in Drinker Biddle's Princeton office.
4. Accordingly, jurisdiction and venue is proper in Mercer County Superior Court pursuant to New Jersey Court Rules.

**COUNT ONE - VIOLATION OF THE NEW JERSEY LAW AGAINST  
DISCRIMINATION - N.J.S.A. 10:5-1, et seq. - RACE DISCRIMINATION  
AND HOSTILE WORKING ENVIRONMENT**

5. Plaintiff repeats, realleges, and incorporates by reference each and every allegation contained in the previous paragraphs as if set forth fully herein.
6. Drinker Biddle, and particularly the Princeton office, has a deplorable record of African American employment. Although the law firm's web site celebrates the firm's diversity, in the 11 years that the Plaintiff has worked at the Princeton

office, there has not been a single African-American attorney working at the office. The Plaintiff and an African American man working in the mail room are the only token African-American employees (out of over 45 employees total). The visual lack of racial diversity in the office is astonishing.

7. The Princeton office, throughout the Plaintiff's employment has maintained a corporate culture that is racially hostile to African-Americans. For years, the Plaintiff's direct supervisor was permitted to keep Confederate memorabilia throughout his office.
8. The Plaintiff has suffers and continues to suffer racial harassment from Defendant Beidler, an attorney in the Princeton office who was at one time a direct supervisor of the Plaintiff. In a series of discriminating and harassing acts, Beidler has continuously created a hostile working environment for the Plaintiff. Some, but not all, examples of the racially hostile comments by Beidler were:
  - a. Beidler expressed surprise that the Plaintiff would be vacationing in Martha's Vineyard. The Plaintiff was offended and tried to educate Beidler regarding the history of affluent Black families in Martha's Vineyard;
  - b. Beidler recommended to the Plaintiff that she should

read "good book" about how "segregation was good for the Blacks because at least they could go to their own colleges;" and

c. On one occasion, in front of a client, Ms. Beidler referred to the Plaintiff as "our slave". The client was so shocked she knocked over a drink. Trying to correct herself, Beidler dug herself deeper, if possible, by clarifying that she meant that the Plaintiff works like a slave.

9. The Plaintiff repeatedly complained to management that Beidler's comments were offensive, but Beidler continued and escalated her racist comments.
10. The Plaintiff lodged a formal race discrimination complaint against Beidler with Drinker Biddle management, but no action was taken against Beidler. Plaintiff was removed from Beidler's direct supervision, but Plaintiff was told that Drinker Biddle investigated and corroborated her complaints but that Beidler "did not mean to offend her".
11. Unfortunately, Beidler's racist comments did not stop. In July 2017, Beidler asked how Plaintiff's children were doing. Plaintiff politely responded, "fine, thank you." Looking a photograph of Plaintiff's one year old son, Beidler then said, "he should be ready to get a basketball in his hands", an overtly offensive comment based on racial



stereotype that was completely unprovoked by anything prior in the conversation.

12. Immediately after the discriminatory comment, the Plaintiff again complained about Beidler's racially stereotypical and offensive comment, which was much more offensive in light of Beidler's previous comments.
13. Again, Drinker Biddle responded that they spoke with Beidler and that Beidler "did not mean to offend her". The Defendants advised the Plaintiff:

1. We will provide written instructions to Marsha that she is not to have any contact with you. While we do not expect any further interaction, please contact me immediately if there are any further communications from her.
2. We will identify and initiate the proper sensitivity training for Marsha.
3. We will identify and move Marsha to a location that is away from your current location to prevent any further discomfort to you.

**Figure 1** - Excerpt from Memo of July 25, 2017 from Kathryn C. Alexander to Plaintiff.

14. Drinker Biddle did not follow through on their promises and completely failed to take effective remedial measures or to otherwise protect the Plaintiff from further discrimination or from retaliation for her complaints.
15. Upon information and belief Beidler was not sent to any kind of "proper" sensitivity training as promised.
16. Although Drinker Biddle promised to move Beidler, they

instead moved the Plaintiff. Since moving the Plaintiff, Beidler now walks across the office to use the copier nearest to the Plaintiff's desk even though Biedler has a copier in her office, and makes loud noises and slams books and other things to annoy and harass the Plaintiff.

17. As set forth in more detail below, Plaintiff has suffered further discrimination and retaliation by the Defendants since making her continuing complaints of racial harassment.
18. The hostile working environment would not have occurred but for the fact that Plaintiff is African-American.
19. The conduct complained of above by the Plaintiff was continuous, and both severe and pervasive enough to make a reasonable African-American person believe that the terms and conditions of her employment were altered, and that the working environment was hostile and abusive because of her race, and therefore violate the new jersey Law Against Discrimination.
20. The conduct complained of by the Plaintiff, did, in fact, make the Plaintiff believe that the conditions of her employment were altered and that the working environment was hostile and abusive because of race.
21. The willful and deliberate discriminatory acts of Defendants were outrageous and beyond all bounds of human decency, justifying the imposition of punitive damages against

Defendants.

22. The willful participation of Defendant Employer's upper management justifies the imposition of liability upon both the individual Defendant and the Defendant employer.
23. Defendant Beidler aided and abetted Defendant Employer in discriminating against Plaintiff, and therefore she is individually liable for her actions.
24. Defendants' acts were performed with malice and a reckless indifference to the Plaintiff's protected rights.
25. As a result of Defendants' intentional and outrageous actions toward the Plaintiff, as detailed in the previous paragraphs of this Complaint, the Plaintiff has suffered, and continues to suffer, physical injuries, embarrassment, humiliation, monetary, emotional, reputational, and other personal injuries.

**WHEREFORE**, the Plaintiff demands judgment against the Defendants, jointly, severally and alternatively, for compensatory damages including damages for emotional distress, physical injury, loss of reputation and other personal injury, back pay, front pay, consequential damages, punitive damages, pre- and post-judgment interest, enhancement for tax consequences, reasonable attorney's fees enhanced under the LAD, costs of suit, and any other relief this Court deems just.

**COUNT TWO**  
**VIOLATION OF THE NEW JERSEY LAW AGAINST DISCRIMINATION, N.J.S.A.**

**10:5-12(d) - RETALIATION FOR COMPLAINING ABOUT DISCRIMINATION**

26. The Plaintiff repeats, realleges, and incorporates by reference each and every allegation contained in the previous paragraphs as if fully set forth herein.
27. In retaliation for her continuing complaints, the Plaintiff has been shunned, her desk has been moved so that Beidler would not be inconvenienced, and Plaintiff has received smaller raises and bonuses than she had in the past.
28. Beidler has retaliated against the Plaintiff by continuing to harass and insult her.
29. The alleged allegations were outrageous and beyond all bounds of human decency, justifying the imposition of punitive damages against all Defendants.
30. The Defendants' acts were performed with malice and a reckless indifference to the Plaintiff's protected rights.
31. Defendant Beidler aided and abetted Defendant Employer in discriminating against Plaintiff, and therefore she is individually liable for her actions.
32. The willful indifference and actual participation by Defendant Employer's upper management creates liability against Defendants.
33. As a result of Defendants' intentional and outrageous actions toward the Plaintiff, as detailed in the previous paragraphs of this Complaint, the Plaintiff has suffered,



and continues to suffer, physical injuries, embarrassment, humiliation, monetary, emotional, reputational, and other personal injuries.

**WHEREFORE**, the Plaintiff demands judgment against the Defendants, jointly, severally and alternatively, for compensatory damages including damages for emotional distress, physical injury, loss of reputation and other personal injury, back pay, front pay, consequential damages, punitive damages, pre- and post-judgment interest, enhancement for tax consequences, reasonable attorney's fees enhanced under the LAD, costs of suit, and any other relief this Court deems just.

**COUNT THREE - VIOLATION OF THE NEW JERSEY LAW AGAINST DISCRIMINATION - N.J.S.A. 10:5-12(t) - EQUAL PAY ACT**

34. The Plaintiff repeats, realleges, and incorporates by reference each and every allegation contained in the previous paragraphs as if fully set forth herein.
35. The Defendant Employer, continuously, and for more than six years preceding the filing of this lawsuit and continuing after July 1, 2018, has discriminated against the Plaintiff by paying her at a rate of compensation, which is less than the rate paid by the Defendant Employer to non-African-American employees for substantially similar work, when viewed as a composite of skill, effort and responsibility.
36. For at least the past six years, Plaintiff is aware that other Caucasian legal assistants with similar or less

qualifications, education, and experience, have consistently been paid substantially higher salaries than the Plaintiff.

37. In addition, since the Plaintiff's Complaints she has received smaller raises and bonuses than other similarly situated non-African-American legal assistants.
38. The Defendant Employer cannot satisfy the five statutory requirements for legitimately paying less to the Plaintiff.
39. The alleged allegations were outrageous and beyond all bounds of human decency, justifying the imposition of punitive damages against the Defendants.
40. The willful indifference and actual participation by Defendant Employer's upper management creates liability against Defendant Employer.
41. As a result of Defendants' intentional and outrageous actions toward the Plaintiff, as detailed in the previous paragraphs of this Complaint, the Plaintiff has suffered, and continues to suffer, physical injuries, embarrassment, humiliation, monetary, emotional, reputational, and other personal injuries.

**WHEREFORE**, the Plaintiff demands judgment against the Defendants, jointly, severally and alternatively, for compensatory damages including damages for emotional distress, physical injury, loss of reputation and other personal injury, back pay for the six years of differential immediately preceding

this Complaint tripled pursuant to N.J.S.A. 10:5-13, consequential damages, punitive damages, pre- and post-judgment interest, enhancement for tax consequences, reasonable attorney's fees enhanced under the LAD, costs of suit, and any other relief this Court deems just.

**COUNT THREE - JOHN DOES**

42. Plaintiff repeats, realleges, and incorporates by reference each and every allegation contained in the previous paragraphs as if set forth fully herein.

43. Although the Plaintiff believes that the acts complained of were performed or caused by the named Defendants, Plaintiff cannot be sure that the named Defendants are the only persons or entities liable for the actions complained of. Therefore, the Plaintiff has named John Does 1-10, fictitious persons or organizations as Defendant(s) to this action.

44. The terms "Defendant" of "Defendants" as used in all of the above Counts and paragraphs should therefore be defined and read as "Defendant(s) and/or John Doe(s)".

WHEREFORE, Plaintiff demands judgment against the Defendants John Does 1-10, jointly, severally, and alternatively, for all damages and injunctive relief as set forth above.

**Schorr & Associates, P.C.**  
Attorneys for the Plaintiffs

By:   
Alan H. Schorr, Esquire

Dated: July 26, 2018

**JURY DEMAND**

Plaintiff demands trial by jury as to all of the triable issues of this Complaint, pursuant to R. 1:8-1(b) and R. 4:35-1(a).

**DEMAND FOR DISCOVERY OF INSURANCE COVERAGE**

PURSUANT to R. 4:10-2(b), demand is hereby made that you disclose to the undersigned whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in this action or to indemnify or reimburse for payment made to satisfy the judgment. If so, please attach to such disclosure a copy of each, or in the alternative state, under oath and certification: (a) policy number; (b) name and address of insurer; (c) inception and expiration date; (d) names and addresses of all persons or corporations insured thereunder; (e) personal injury limits; (f) property damage limits; and (g) medical payment limits.

**DESIGNATION OF TRIAL COUNSEL**



PURSUANT to the provisions of Rule 4:5-1(c) and 4:25-4, the Court is advised that Alan H. Schorr, Esquire, is hereby designated as trial counsel.

**CERTIFICATION OF NO OTHER ACTIONS**

Pursuant to Rule 4:5-1, it is stated that the matter in controversy is not the subject of any other action pending in any other court or of a pending arbitration proceeding to the best of our knowledge or belief. Also, to the best of our belief, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading, we know of no other parties that should be joined in the above action. In addition, we recognize the continuing obligation of each party to file and serve on all parties and the Court an amended certification if there is a change in the facts stated in this original certification.

**NOTICE REGARDING NON-DESTRUCTION OF EVIDENCE**

Please be advised that, along with this Complaint, the Defendants are being served with a separate Notice regarding preservation and non-destruction of evidence. That Notice is hereby incorporated in this Complaint as if fully stated herein.

**Schorr & Associates, P.C.**  
Attorney for the Plaintiff

Dated: July 26, 2018

By:   
Alan H. Schorr, Esquire

# Civil Case Information Statement

## Case Details: MERCER | Civil Part Docket# L-001580-18

**Case Caption:** HILL SYNEETRA VS DRINKER BIDDLE & REA TH, LLP

**Case Initiation Date:** 07/26/2018

**Attorney Name:** JENELLE LINDSEY HUBBARD

**Firm Name:** SCHORR & ASSOCIATES PC

**Address:** 5 SPLIT ROCK DR

CHERRY HILL NJ 080030000

**Phone:**

**Name of Party:** PLAINTIFF : Hill, Syneetra, A

**Name of Defendant's Primary Insurance Company**

(if known): Unknown

**Case Type:** LAW AGAINST DISCRIMINATION (LAD) CASES

**Document Type:** Complaint with Jury Demand

**Jury Demand:** YES - 12 JURORS

**Hurricane Sandy related?** NO

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

## THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** YES

**If yes, is that relationship:** Employer/Employee

**Does the statute governing this case provide for payment of fees by the losing party?** YES

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

07/26/2018

Dated

/s/ JENELLE LINDSEY HUBBARD

Signed