

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

v.

TARGET MARKET ENTERPRISES, INC.
d/b/a LITTLE CAESARS PIZZA,

Defendant.

CIVIL ACTION NO. 2:25-cv-1890

COMPLAINT

JURY TRIAL DEMAND

NATURE OF THE ACTION

The United States Equal Employment Opportunity Commission (EEOC) brings this action under Title VII of the Civil Rights Act of 1964, as amended, and Title I of the Civil Rights Act of 1991 to correct unlawful employment practices on the basis of race and color (Black) and to provide appropriate relief to Charging Party Brethny Espinosa and a class of similarly aggrieved Black employees who were adversely affected by such practices. The EEOC alleges that Defendant Target Market Enterprises, Inc. d/b/a Little Caesars Pizza (Defendant): (1) subjected Espinosa and a class of similarly aggrieved employees to unlawful harassment and a hostile work environment because of their race and color (Black); and (2) unlawfully retaliated against one similarly aggrieved Black employee for complaining about or objecting to the harassment, which included terminating the employee. Plaintiff seeks monetary relief for Espinosa and similarly aggrieved employees, including pecuniary damages, non-pecuniary compensatory and punitive damages, backpay for the terminated employee, and injunctive relief.

JURISDICTION AND VENUE

1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 451, 1331, 1337, 1343 and 1345. This action is authorized and instituted pursuant to Sections 706(f)(1) and (3) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e-5(f)(1) and (3) (Title VII), and Section 102 of the Civil Rights Act of 1991, 42 U.S.C. § 1981a.

2. The employment practices alleged to be unlawful were committed within the jurisdiction of the United States District Court for the Western District of Washington.

PARTIES

3. Plaintiff EEOC is the agency of the United States of America charged with the administration, interpretation and enforcement of Title VII, and is expressly authorized to bring this action by Sections 706(f)(1) and (3) of Title VII, 42 U.S.C. §§ 2000e-5(f)(1) and 3, and Section 102 of the Civil Rights Act of 1991, 42 U.S.C. Section 1981a.

4. At all relevant times, Defendant has been a corporation continuously doing business in the State of Washington and continuously employing at least fifteen (15) employees.

5. At all relevant times, Defendant has continuously been an employer engaged in an industry affecting commerce within the meaning of Sections 701(b), (g) and (h) of Title VII, 42 U.S.C. §§ 2000e-(b), (g) and (h).

ADMINISTRATIVE PROCEDURES

6. More than thirty (30) days prior to the institution of this lawsuit, Charging Party Brethny Espinosa filed EEOC Charge No. 551-2025-00074 alleging violations of Title VII by Defendant.

7. On May 29, 2025, the Commission issued a Letter of Determination for Brethny Espinosa's charge finding reasonable cause to believe that Defendant had violated Title VII, and invited Defendant to join with the Commission in informal methods of conciliation to endeavor to eliminate the unlawful employment practices and to provide appropriate relief to Espinosa and a class of similarly aggrieved Black employees.

8. The Commission engaged in communications with Defendant to provide Defendant the opportunity to remedy the discriminatory practices described in the Letter of Determination.

9. The EEOC was unable to secure from Defendant a conciliation agreement acceptable to the EEOC.

10. On July 22, 2025, the Commission issued to Defendant a Notice of Failure of Conciliation advising Defendant that the Commission was unable to secure from Defendant a conciliation agreement acceptable to the Commission.

11. All conditions precedent to the institution of this lawsuit have been fulfilled.

STATEMENT OF CLAIMS

12. Defendant owned and operated a restaurant in Mount Vernon, Washington as of September 1, 2022 that was managed: (a) directly by a General Manager, who had the authority to hire and fire any employee at the restaurant; and (b) indirectly by a Regional Manager who supervised the General Manager at each of Defendant's three restaurants in Mount Vernon, Sedro Wooley and Bellingham.

13. As of September 1, 2022, Defendant employed Shift Leads at the Mount Vernon restaurant who would manage the restaurant after the General Manager left for the day until closing, who had the authority to direct the work of any crew member and who could send any crew member home before completing his/her scheduled shift.

14. Defendant's managers were aware that an employee identified by the initials J.G. (race, non-Black) used the N-Word at Defendant's Mount Vernon restaurant in September 2022, but failed to discipline him or take any corrective action to stop his use of the racial slur.

15. Since at least 2024, Defendant engaged in unlawful employment practices at its restaurant in Mount Vernon, Washington, in violation of Sections 703(a) and 704(a) of Title VII, 42 U.S.C. § §2000e-2(a) and 2000e-3(a), by: (a) subjecting Espinosa and a class of similarly aggrieved Black employees to a hostile work environment based on race and color; and (b)

1 retaliating against one Black employee for complaining about the racially hostile work
2 environment.

3 16. Defendant's General Manager (race, White) was aware that J.G. used the N-Word
4 twice at Defendant's Mount Vernon restaurant in March 2024 loud enough to be heard by
5 customers, and she issued him a written warning for using the slur.

6 17. Defendant's General Manager did not inform the Regional Manager that she had
7 issued a written warning to J.G. for using the N-Word at Defendant's Mount Vernon restaurant
8 in March 2024.

9 18. Defendant's General Manager promoted J.G. to be Shift Lead in August 2024,
10 knowing that he would be left in charge of the restaurant after she left for the day.

11 19. Charging Party Brethny Espinosa is Black.

12 20. Espinosa worked as a crew member at Defendant's Mount Vernon restaurant as of
13 August 13, 2024, making and preparing pizza dough and cleaning up.

14 21. Espinosa was supervised by the General Manager at Defendant's Mount Vernon
15 restaurant, and when that individual left for the day, the Shift Lead.

16 22. Defendant employed two other Black crew members at the Mount Vernon
17 restaurant as of August 13, 2024.

18 23. Shift Lead J.G. and crew member A.G. (race, non-Black) subjected Espinosa and
19 two Black employees to frequent, offensive, and unwelcome race-based conduct including but
20 not limited to calling or referring to them as: (a) the N-Word; (b) slaves; (c) blacky; (d) darky;
21 and (e) monkey.

22 24. Shift Lead J.G. made the two Black class members do the most menial tasks like
23 washing dishes their entire shift.

24 25. One coworker (race, White) was so offended by Shift Lead J.G.'s use of racial
25 slurs directed at and about Espinosa and the two other Black employees at the Mount Vernon
26 restaurant that she complained to the General Manager in or about August 2024.

1 26. One Black class member complained to Shift Lead J.G, and at least one other
2 Shift Lead, in or about September 2024 that A.G. had called him the N-Word several times, and
3 that he was offended, but J.G. took no action to stop A.G.

4 27. The General Manager promoted A.G. to be a Shift Lead at the Mount Vernon
5 restaurant in or about September 2024.

6 28. When Shift Lead J.G. continued to use racial slurs after the White coworker
7 complained to the General Manager, the same coworker complained again to the General
8 Manager who responded that she would just need to deal with it since she wants to work more
9 hours.

10 29. Espinosa complained to the General Manager about Shift Lead J.G.'s racist
11 comments to her and the two other Black employees at the Mount Vernon restaurant on
12 September 27, 2024.

13 30. When the General Manager informed Shift Lead J.G. on or about September 27,
14 2024 that a coworker had accused him of making racist comments, J.G. asked the General
15 Manager if the coworker had also complained about Shift Lead A.G. because A.G. used the same
16 racial terms.

17 31. When the General Manager did not take any action to investigate or stop the racist
18 comments by Shift Lead J.G. or A.G. to Espinosa and the two other Black employees, Espinosa
19 complained to the Regional Manager about the racist comments on September 30, 2024.

20 32. The Regional Manager investigated Espinosa's complaint about the racist
21 comments by Shift Lead J.G. to her and the two other Black employees on September 30, 2024,
22 and fired J.G. that same day.

23 33. One Black class member continued to endure racist slurs from A.G. at the Mount
24 Vernon restaurant in October 2024 despite asking him to stop and after complaining to two other
25 Shift Leaders.
26

34. Frustrated by Defendant's failure to investigate or take any steps to stop A.G.'s harassment, the Black class member wrote a post-it note "[A.G.] hates Black people" and placed it in a private area of the Mount Vernon restaurant accessible only to employees.

35. Defendant issued the Black class member a written warning dated October 20, 2024 because “inappropriate words were made on a sticky note,” but then decided to terminate him effective October 19, 2024, stating, “had to fire him due to inappropriate language and sticky note was left on desk with [i]nformation.”

36. The effect of Defendant's practices complained of in Paragraphs 14-35 above has been to deprive Espinosa and two similarly aggrieved Black employees of equal employment opportunities and otherwise adversely affect their status as employees.

37. The unlawful employment practices complained of in Paragraphs 14-35 above were intentional.

38. The unlawful employment practices complained of in Paragraphs 14-35 above were done with malice or with reckless indifference to the federally protected rights of Espinosa and two similarly aggrieved Black employees.

PRAYER FOR RELIEF

Wherefore, the EEOC respectfully requests that this Court:

A. Grant a permanent injunction enjoining Defendant, its officers, agents, servants, employees, attorneys, successors, and all persons in active concert or participation with them, from creating, failing to prevent, and failing to promptly correct an offensive, abusive, intimidating and hostile work environment on the basis of race and color (Black), and engaging in any other employment practice that discriminates on the basis of race and color.

B. Grant a permanent injunction enjoining Defendant, its officers, agents, servants, employees, attorneys, successors, and all persons in active concert or participation with them, from engaging in any employment practice which retaliates against an employee for engaging in protected EEO activity.

1 C. Order Defendant to institute and carry out policies, practices, and programs which
2 provide equal employment opportunities for all employees, and which eradicate the effects of its
3 past and present unlawful employment practices.

4 D. Order Defendant to make whole one Black class member who Defendant
5 terminated effective October 19, 2024 by providing appropriate back pay with interest, in
6 amounts to be determined at trial, and other affirmative relief necessary to eradicate the effects of
7 its unlawful employment practices described in Paragraphs 14-35 above.

8 E. Order Defendant to make whole Espinosa and two similarly aggrieved Black
9 employees by providing compensation for past and future non-pecuniary losses resulting from
10 the unlawful practices complained of in Paragraphs 14-35 above, including without limitation
11 emotional pain, suffering, and loss of enjoyment of life, in amounts to be determined at trial.

12 F. Order Defendant to make whole Espinosa and two similarly aggrieved Black
13 employees by providing compensation for past and future pecuniary losses resulting from the
14 unlawful employment practices described in Paragraphs 14-35 above, including past and future
15 out-of-pocket expenses, in amounts to be determined at trial.

16 G. Order Defendant to pay Espinosa and two similarly aggrieved Black employees
17 punitive damages for its malicious and reckless conduct described in Paragraphs 14-35 above, in
18 amounts to be determined at trial.

19 H. Grant such further relief as the Court deems necessary and proper in the public
20 interest.

21 I. Award the EEOC its costs of this action.

22 JURY TRIAL DEMAND

23 The EEOC requests a jury trial on all questions of fact raised by its Complaint.

24 //

25 //

26 //

1 DATED this 30th day of September, 2025.

2 ROBERTA L. STEELE
3 Regional Attorney

ANDREW RODGERS
Acting General Counsel

4 DAMIEN A. LEE
5 Assistant Regional Attorney

CHRISTOPHER LAGE
Deputy General Counsel

6 GWENDOLYN YOUNG REAMS
Associate General Counsel

7 Office of the General Counsel
8 131 "M" Street NE
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10 BY: /s/ Roberta L. Steele
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Attorneys for Plaintiff EEOC

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Equal Employment Opportunity Commission

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Roberta Steele; Equal Employment Opportunity Comm'n
909 1st Avenue, Suite 400, Seattle, Washington 98104
206-576-3038

DEFENDANTS

Target Market Enterprises, Inc. d/b/a Little Caesars

County of Residence of First Listed Defendant Whatcom, Washington
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
Title VII of the Civil Rights Act of 1964 and Section 102 of the Civil Rights Act of 1991.

Brief description of cause:
To correct unlawful employment practices on the basis of race

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$**

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE

Sep 30, 2025

SIGNATURE OF ATTORNEY OF RECORD

/s/Roberta Steele

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Washington

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff(s)

V.

Target Market Enterprises, Inc. d/b/a Little Caesars

Defendant(s)

Civil Action No. 2:25-cv-1890

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Target Market Enterprises, Inc. d/b/a Little Caesars
c/o Ray Caldwell
4071 Hannegan Rd., Ste T
Bellingham, WA 98226-7623

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff’s attorney, whose name and address are:

Roberta L. Steele, Regional Attorney
Damien A. Lee, Assistant Regional Attorney
Seattle Field Office
909 First Avenue, Suite 400
Seattle, WA 98104-1061

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 2:25-cv-1890

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: