

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DESHEILA C. HOWLETT,

Plaintiff,

v.

CIVIL NO. 17-11260
Hon. Terence G. Berg
Mag. R. Steven Whalen

CITY OF WARREN; COMMISSIONER
JERE GREEN, acting in his individual
capacity; LT. LAWRENCE GARDNER;
SHAWN JOHNSON; DAWN MCLANE;
BARBARA BEYER; ANWAR KHAN;
DARRIN LABIN; WILLIAM ROSS;
KEVIN BARNHILL; PAUL HOUTOS;
SCOTT TAYLOR

Defendants.

JURY DEMAND

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FIRST AMENDED COMPLAINT AND JURY DEMAND

Plaintiff DeSheila Howlett (“Plaintiff”) through her attorneys, The Mungo Law Firm, PLC, for her Complaint against Defendant City of Warren; Commissioner Jere Green (acting in his individual capacity), Lt. Lawrence Gardner; Shawn Johnson; Dawn McLane; Barbara Beyer; Anwar Khan; Darrin Labin, William Ross, Kevin

Barnhill, Paul Houtos, and Scott Taylor (collectively, “Defendants”), states as follows:

NATURE OF THE ACTION

1. This is an action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, *et seq.* (“Title VII”), and Title I of the Civil Rights Act of 1991, for unlawful employment practices and creating a hostile work environment on the basis of race and/or gender, to provide appropriate relief to **Plaintiff**, an employee of **Defendants** who was adversely affected by such practices. **Plaintiff** alleges that **Defendants** subjected her to a hostile work environment that altered the terms and conditions of her employment because of her race and/or gender. **Plaintiff** further alleges that these actions deprived her of certain civil rights to which she was entitled, in violation of Section 1981 of the Civil Rights Act of 1866, 42 U.S.C. § 1981, and Section 1983 of the Civil Rights Act of 1871, 42 U.S.C. § 1983.

JURISDICTION AND VENUE

2. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 1331 and 1343(a)(3). This action is authorized and instituted pursuant to 42 U.S.C. § 2000e-5(f)(1), 42 U.S.C. § 1981, 42 U.S.C. § 1983, 42 U.S.C. § 1985, and 42 U.S.C. § 1988.
3. Venue is proper in this Court because the **discrimination** and **retaliation**

practices hereafter alleged to be unlawful were committed within the jurisdiction of this District.

PARTIES

4. **Plaintiff** is African-American female. **Plaintiff** began her employment with the **City of Warren** on August 10, 2006 as a police officer.
5. **Plaintiff** was the first **African American** police officer to ever be employed in the history of the **City of Warren**. **Plaintiff** has been continuously employed by the **City of Warren** for 10 years.
6. At all times herein, all the individually named and identified **Defendants** acted under color of state law, within the meaning of 42 U.S.C. § 1983.
7. At all times herein, all the individually named and identified **Defendants** acted pursuant to a conspiracy to deprive the **Plaintiff** of her constitutional rights based on invidious racial animus.
8. At all times herein, **Defendants** attempted and, indeed, did deprive **Plaintiff** of her rights to make and enforce her contract of employment, such as is enjoyed by white persons, within the meaning of 42 U.S.C. § 1981.
9. At all relevant times, each **Defendant** has been an “employer” of **Plaintiff** within the meaning of Title VII, 42 U.S.C. § 2000e(b).
10. At all relevant times, **Plaintiff** has been an “employee” of **Defendants Plaintiff** within the meaning of Title VII, 42 U.S.C. § 2000e(f).

FACTS COMMON TO ALL COUNTS

11. Since **Plaintiff's** employment began as the **first African American police officer** in the **City of Warren**, **Plaintiff** has been constantly peppered with inappropriate, insulting, demeaning, racially stereotypical, and offensive comments, jokes, statements, conversations, and other conduct by her supervisors and co-officers while other similarly-situated white police officers have suffered no such treatment and/or conduct.

12. **The City of Warren** has a notorious history of racially discriminatory practices against **African Americans**. That custom, policy, and practice of racial discrimination has been publicly evidenced, for example, through racially disparaging and insulting comments reportedly made by the current mayor of the **City of Warren**.

13. The customs, practices, and policies of unlawful racial and gender discrimination by the **Defendant City of Warren**, particularly in its police department, has also been evidenced by its failure to correct, discipline, retrain and/or supervise the individual **Defendants** herein, the **Warren Police Department (Department)** supervisors and **Plaintiff's** co-officers, despite the **Department's** knowledge—through the notice and knowledge provided to the highest level and final policy makers within the **Department**—of the following series of events, among others, perpetrated against **Plaintiff**, and widespread

throughout the **Department** during the entire time of **Plaintiff's** employment therein:

- a) **Defendant Anwar Khan**, at the time **Plaintiff's** Field Training Officer, disparaged, insulted, and demeaned **Plaintiff** when he told her that women have no right to work and especially not to be police officers, and then failed her without justification, forcing her to repeat her training;
- b) **Defendant Anwar Khan** and **Darrin Labin** (white male) approached another white police officer who was a friend of the **Plaintiff** and inquired of him whether he had engaged in sexual relations with **Plaintiff**, and whether he had a threesome with **Plaintiff** and another female.
- c) **Defendant William Ross** (white male), at the time **Plaintiff's** field training officer, told **Plaintiff** that she was going to pass regardless of her performance because she is black. Later, **Ross** approached **Plaintiff** after her first, second, and up to her fifth year with the City of Warren telling her that she was going to sue.
- d) **Defendant Kevin Barnhill** (white male) always spoke to **Plaintiff** in a derogatory, stereotyped fashion, using a "*slave voice*" and saying things like "*Sister 'gurl'*" and "*Whattup doe?*" employing

mimicking, stereotypical, and demeaning portrayals of African Americans.

- e) Paul Kelly (white male) and Dale Malesh (white male) would continuously approach **Plaintiff** with extreme sexual overtones asking her to go on dates;
- f) Roland Bell (white male) asked **Plaintiff** why she was walking gingerly after having a fibroid removed, and when **Plaintiff** explained, he told her *“No, it’s because of all that big black a[REDACTED] in you.”*
- g) Sean Johnston (white male), a Sergeant at the time, allowed white male officers to come into his office to use one of only two color copiers, yet instructed Plaintiff to go somewhere else to make her copies.
- h) **Defendant Arthur Gill** (white male), former Sergeant, removed **Plaintiff** from her day-shift in favor of a similarly-situated white female officer, despite the fact that the white female officer had less seniority than **Plaintiff**, who was entitled to fill that position based upon her higher seniority.
- i) **Defendant Anwar Khan** pulled over **Plaintiff**, at that time a Detective Sergeant of higher rank than Khan, while she was *en route*

to a crime scene, falsely alleging in a complaint that **Plaintiff** was “driving recklessly” and demanded that she be reprimanded. The complaint was not sustained because **Plaintiff** was not driving in a reckless fashion, nonetheless she was continuously subjected to unlawful racial and gender discrimination because of the practices fostered by the **City of Warren** and its Police Department.

- j) **Plaintiff** was also deprived of her right to enjoy the benefits and privileges of her employment contract that similarly-situated white officers enjoyed in that she was denied the opportunity to work light-duty after incurring injuries sustained in an accident, for which her co-officers had been afforded.
- k) **Defendants** repeatedly refused to support **Plaintiff** with proper backup and in a timely fashion due to her race and/or gender. The unlawful racially and gender biased customs and practices of the **City of Warren Police Department** endangered **Plaintiff’s** life and safety during her employment.
- l) **Plaintiff** was repeatedly subjected to commentaries, statements, and instructions from **Defendants**, supervisors, and white coworkers that Plaintiff needed to extend herself so that white coworkers would accept her as a police officer, notwithstanding her race and gender.

- m) **Plaintiff** was repeatedly demeaned and disparaged by **Defendants**, supervisors, and white coworkers who suggested to her white partner that he should be concerned about his life being in danger because he had an African-American police officer as a partner due to the **City of Warren Police Department's** custom, policy, and practice of not providing timely backup to Plaintiff, due to her race and gender.
- n) **Plaintiff** was isolated, disparaged, and slandered in her professional reputation concerning her ability to perform her duties by **Defendants**, supervisors, and her white co-officers who continuously attempted to undermine her relationship with her white partners.
- o) **Plaintiff** was continuously harassed by a white male police officer, **Defendant Detective Shawn Johnson**, through the following acts:
- i) Det. Johnson sniffed **Plaintiff** in a sexually suggestive manner, rubbed his hands through her hair, and suggested to **Plaintiff**, no uncertain terms, that he was the white slave master and she his slave mistress subject to his sexual whims and desires.
 - ii) Subjecting **Plaintiff** to racial and gender discriminatory

and disparaging comments such as “They’re just going to make you a slave around here.”

iii) Comparing **Plaintiff** to the gorilla on the label of “*Gorilla Glue*”.

iv) Continuously subjecting **Plaintiff** to racially discriminatory comments by characterizing her style of dress as a “Black ‘thang’”; mocking her in a stereotypical African American accent; inquiring “Why do you all name your kids ghetto names like Honey Brown and Destiny”?; physically spelling out Destiny as D-E-E-S-T-I-N-E-E; and asking, “Why do black people move to Atlanta, is it because you don’t like living around white people?”

v) Making racially demeaning and derogatory comments about the foods that Plaintiff would bring for lunch as characteristic of stereotypical African American meals or food preferences, regardless of what she actually brought, e.g. leftover Chinese food referred to as fried chicken.

vi) Continuously insinuating that only **Plaintiff** took or stole things off of his desk.

p) **Plaintiff**, as an African American, was subjected to frequent

unlawful racially discriminatory comments from **Defendants**, supervisors, and co-workers about her hair.

- q) **Defendant Sgt. Paul Houtos** asked **Plaintiff** *“What is up with this blue-black thing and is it similar to redbone?”*
- r) Officer Dean asked **Plaintiff** what level of education she had so that he “would know how to speak to her”.
- s) **Defendant Sgt. Scott Taylor**, another one of **Plaintiff’s** field training officers, told **Plaintiff** that she would be nominated for a “hood” (KKK) award after **Plaintiff**, a female African-American, received 5 citizen complaints from African-American citizens.
- t) **Plaintiff’s** white male co-worker openly and repeatedly used and said “n[REDACTED]” in front of **Plaintiff** and in the presence of other white officers.

14. **The City of Warren Police Department** administration acknowledged to **Plaintiff** that unlawful racial and gender discriminatory employment practices are institutional within the **City of Warren** and the **City of Warren Police Department**.

15. **Plaintiff’s** work performance and whereabouts were continually scrutinized and reviewed by **Defendants, Warren Police Department** supervisors, and policy makers far more frequently and differently than similarly-situated white

police officers and coworkers.

16. Over the ten year period of her employment as a Warren police officer, Plaintiff repeatedly brought this unlawful and hostile racial and gender discriminatory environment and these unlawful discriminatory acts to the attention of the management and policy makers within the **City of Warren Police Department**.
17. Notwithstanding their knowledge of this unlawful racial and gender discriminatory environment that **Plaintiff** was subjected to, Defendants, including the **City of Warren**, failed to take any action to address **Plaintiff's** complaints or correct the aforementioned unlawful conduct.
18. **Defendant City of Warren's** only response was to physically separate Plaintiff from **Defendant Sgt. Shawn Johnson** by placing him in a different physical location; only to move **Plaintiff**, several months later and at the direction of **Defendant Lt. Lawrence Gardner**, to his same section and office, thereby ratifying, authorizing, and allowing the unlawful racial and gender hostility and degrading conduct of **Sgt. Johnson** to continue.
19. **Defendant City of Warren** and **Defendants'** supervisors were provided extensive, repeated, and lengthy notice that **Plaintiff** was subjected to work conditions and a work environment that violated her statutory and constitutional civil rights and failed/refused to undertake any actions to supervise, train, and/or

discipline those officers who engaged in acts that were a part of the unlawful racially and gender hostile work environment, or those acts that constituted unlawful racial and gender discrimination; nor were these conditions, acts, and circumstances corrected by the **City of Warren** or the **Warren Police Department**. As a consequence, these conditions, acts, and circumstances were condoned and ratified by the **City of Warren** and the **Warren Police Department**.

20. **Defendant Commissioner Jere Green** participated, authorized, encouraged and, despite detailed knowledge, failed to prevent and/or correct all of the actions described herein.
21. Ultimately, this toxic environment came to a head when **Plaintiff** came into work and heard **Defendant Barbara Beyer**, a white female co-worker, scream *“That n[REDACTED]! That n[REDACTED]! That n[REDACTED]!”* These comments were clearly directed at **Plaintiff** who was the only other person in the area, notwithstanding the fact that the aforementioned co-worker then told **Plaintiff** *“Oh, not you.”*
22. Immediately thereafter, **Plaintiff** became physically ill and was unable to continue working in the toxic environment that **Defendants** unlawful racial and gender discriminatory practices, customs, and policies had fostered and cultivated.

COUNT I

Violation of Title VII – Discrimination Based on Race and Gender

23. **Plaintiff** realleges and incorporates by reference Paragraphs 1 through 22.
24. At all relevant times, there was in effect a federal statute, the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e *et seq.*, which provides:

It shall be an unlawful employment practice for an employer –

- (1) to fail or refuse to hire or discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual’s race, color, religion, sex, or national origin; or**
- (2) to limit, segregate, or classify his employees or applicants for employment in any way which would deprive or tend to deprive any individual of employment opportunities or otherwise adversely affect his status as an employee, because of such individual’s race, color, religion, sex or national origin.**

42 U.S.C. § 2000e-2(a).

25. **Defendants** were aware, or should have been aware, of Title VII and that it is illegal to treat an employee differently because of the employee’s race and gender.
26. During **Plaintiff’s** employment with **Defendants**, she was subjected to acts of racial and gender discrimination by **Defendants’ employees, supervisors, and board members.**
27. This illegal race and gender discrimination created a hostile and abusive work

environment for **Plaintiff**.

28. **Defendants'** actions as set forth above were willful, intentional and/or made in reckless disregard of Plaintiff's rights.
29. **Defendants'** conduct as described above constitutes a willful violation of Title VII
30. As a direct and proximate result of the unconstitutional and illegal acts of the **Defendants**, as alleged herein, **Plaintiff** has sustained a violation of her right to a work environment free of unlawful racial and gender discrimination and, as a result, is entitled to damages that include, but are not limited to:
 - a. Damages for serious physical and bodily injury;
 - b. Damages for substantial economic loss and damage, including but not limited to medical expenses, lost wages and lost income (i.e. back-pay and front-pay);
 - c. Damages for pain and suffering;
 - d. Damages for embarrassment, humiliation, outrage, mental anguish, fear and mortification, and stress.
 - e. Punitive damages;
 - f. Attorney fees and costs, pursuant to 42 U.S.C. § 1988.

COUNT II

Violation of 42 U.S.C. §1983 – Fourteenth Amendment Equal Protection

31. Plaintiff **herein** re-alleges and incorporates Paragraphs 1-30 above:

32. At all times herein, the individually named and identified **Defendants** herein intentionally discriminated against the **Plaintiff** based on her race and gender in all manner of ways as set forth herein all in violation of 42 U.S.C. §1983;
33. As a direct and proximate result of the unconstitutional acts of the **Defendants** as alleged herein, **Plaintiff** has sustained a violation of her right to equal protection of the law and, as a result, is entitled to damages that include, but are not limited to:
- a) Damages for serious physical and bodily injury;
 - b) Damages for substantial economic loss and damage, including but not limited to medical expenses, lost wages and lost income;
 - c) Damages for pain and suffering;
 - d) Damages for embarrassment, humiliation, outrage, mental anguish, fear and mortification, and stress.
 - e) Punitive damages; and
 - f) Attorney fees and costs, pursuant to 42 U.S.C. § 1988.

COUNT III
Violation of 42 U.S.C. §1983 – Fourteenth Amendment Due Process

34. **Plaintiff** herein re-alleges and incorporates Paragraphs 1-33 above:
35. At all times herein Defendants owed to **Plaintiff** a duty to protect her both from the antagonism and threats of co-workers, but also from the dangers inherent in

her job as a police officer.

36. **Defendants** purposely refused and failed to provide the necessary backup, required by every police officer, as they go about the routine activities of law enforcement. Failure to so provide backup constitutes a clear and known danger, risk, and hazard for law enforcement officers.
37. The **Defendants** aforementioned failure and refusal was based on the antagonism and hostility to the **Plaintiff** based on her race and gender.
38. Furthermore, one of the most important lifelines and safety components for any law enforcement officer is the good will of her law enforcement partner, who will come to her service at times when she is threatened and/or in danger.
39. Defendants purposely and deliberately sought to undermine the good will of **Plaintiff's** partners. Doing so constituted a clear and known danger, risk, and hazard for the **Plaintiff**.
40. The **Defendants** aforementioned undermining of the good will of **Plaintiff's** partners was based on the antagonism and hostility to the **Plaintiff** based on her race and gender.
41. In so doing the **Defendants** both deliberately increased the risk and danger of harm to the **Plaintiff** and refused and failed to protect her, as required by her job as a law enforcement officer and their jobs, *vis-à-vis* her position. As such these **Defendants** violated the rights of Plaintiff to substantive due process, as secured

by the Fourteenth Amendment of the United States Constitution and by 42 U.S.C. §1983.

42. As a direct and proximate result of the unconstitutional acts of the **Defendants** as alleged herein, **Plaintiff** has sustained a violation of her right to equal protection of the law and, as a result, is entitled to damages that include, but are not limited to:

- a) Damages for serious physical and bodily injury;
- b) Damages for substantial economic loss and damage, including but not limited to medical expenses, lost wages and lost income;
- c) Damages for pain and suffering;
- d) Damages for embarrassment, humiliation, outrage, mental anguish, fear and mortification, and stress.
- e) Punitive damages; and
- f) Attorney fees and costs, pursuant to 42 U.S.C. § 1988.

COUNT IV
Violation of 42 U.S.C. §1983 – Monell Liability – City Of Warren

43. Plaintiff re-alleges and incorporates Paragraphs 1-42 above;

44. At all times herein, the **Defendant City of Warren** maintained a series of policies, customs, and practices which individually and collectively constituted a moving force in the constitutional violations asserted herein, including but not

limited to:

- a. Direct humiliating, outrageous, racist, and belittling antagonism toward African Americans and, in particular, African American police officers;
- b. Direct humiliating, outrageous, sexist, and belittling antagonism toward women and, in particular, female police officers;
- c. Failure to train its officers as to the mandatory requirement that racist and sexist actions are inexcusable and will be responded to with outright discharge;
- d. Failure to train its police officers with regard to the use of hostile statements and verbalisms directed against African Americans and women;
- e. Failure to address known complaints of actions and remarks by its police officers directed at African Americans and women;
- f. Failure, amounting to a refusal, to discipline its officers for engaging in humiliating, outrageous, racist, and belittling actions directed at African Americans and women;
- g. The use of refusing to provide backup to police officers as a way to retaliate against certain officers, in particular those who are African and/or women.

45. These customs, policies, and practices of the **Warren Police Department** were a moving force in the constitutional violations inflicted by the individual **Defendants** upon the **Plaintiff**, as set forth herein, above;
46. As a direct and proximate result of the unconstitutional acts of the **Defendants** as alleged herein, **Plaintiff** has sustained a violation of her right to equal protection of the law and, as a result, is entitled to damages that include, but are not limited to:
- a) Damages for serious physical and bodily injury;
 - b) Damages for substantial economic loss and damage, including but not limited to medical expenses, lost wages and lost income;
 - c) Damages for pain and suffering;
 - d) Damages for embarrassment, humiliation, outrage, mental anguish, fear and mortification, and stress.
 - e) Punitive damages; and
 - f) Attorney fees and costs, pursuant to 42 U.S.C. § 1988.

COUNT V

Violation of 42 U.S.C. §1985 – Conspiracy Invidious Racial Animus

47. **Plaintiff** re-alleges and incorporates Paragraphs 1-46 above;
48. At all times, herein, these **Defendants** agreed and conspired to violate the

Plaintiff's rights secured by the Thirteenth and Fourteenth Amendments to the United States Constitution;

49. This agreement and conspiracy, and the actions undertaken pursuant to this agreement and conspiracy, were so done based upon an invidious racial animus directed at the **Plaintiff**;

50. As such the **Defendants** violated **Plaintiff's** rights that are guaranteed and made actionable under 42 U.S.C. §1985;

51. As a direct and proximate result of the unconstitutional acts of the **Defendants** as alleged herein, **Plaintiff** has sustained a violation of her right to equal protection of the law and, as a result, is entitled to damages that include, but are not limited to:

- a) Damages for serious physical and bodily injury;
- b) Damages for substantial economic loss and damage, including but not limited to medical expenses, lost wages and lost income;
- c) Damages for pain and suffering;
- d) Damages for embarrassment, humiliation, outrage, mental anguish, fear and mortification, and stress.
- e) Punitive damages; and
- f) Attorney fees and costs, pursuant to 42 U.S.C. § 1988.

COUNT VI

Violation of 42 U.S.C. §1981 – The Right To Make And Enforce Contracts

52. **Plaintiff** re-alleges and incorporates Paragraphs 1-51 above;
53. At all times herein the **Plaintiff** had entered into a contract of employment with the **Defendant, City of Warren Police Department**.
54. These **Defendants** undertook, instead, to turn that contract into an employment situation wherein the **Plaintiff** was subjected to a racially hostile and toxic work environment that inflicted upon her humiliation, racism, and physical endangerment—as set forth above herein—whereby her right to make and enforce her contract with the **City of Warren** was afflicted, diminished, and undermined thereby creating a situation where **Plaintiff's** rights were far less than and not the same as those enjoyed by white persons, in violation of 42 U.S.C. §1981;
55. As a direct and proximate result of the unconstitutional acts of the **Defendants** as alleged herein, **Plaintiff** has sustained a violation of her right to make and enforce contracts and, as a result, is entitled to damages that include, but are not limited to:
- a) Damages for serious physical and bodily injury;
 - b) Damages for substantial economic loss and damage, including but not limited to medical expenses, lost wages and lost income;
 - c) Damages for pain and suffering;

- d) Damages for embarrassment, humiliation, outrage, mental anguish, fear and mortification, and stress.
- e) Punitive damages; and
- f) Attorney fees and costs, pursuant to 42 U.S.C. § 1988.

WHEREFORE, **Plaintiff** request that this Court enter judgment against **Defendants**, providing the following relief:

- a. Back-pay, with prejudgment interest;
- b. Front-pay;
- c. Compensatory damages in whatever amount that Plaintiff is found to be entitled;
- d. An injunction requiring Defendants to cease and desist all unlawful racial and gender discrimination within the Warren Police Department;
- e. An injunction barring Defendant from taking any further discriminatory or retaliatory actions or omissions against Plaintiff;
- f. An award of reasonable attorney's fees, expenses, and costs;
- g. Other appropriate nondiscriminatory measures to overcome the above described discrimination; and

h. Such other and further relief that the Court deems appropriate.

Respectfully submitted,

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Dated: April 25, 2017

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DESHEILA C. HOWLETT,

Plaintiff,

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CIVIL NO. 17-11260
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JURY DEMAND

Now comes the Plaintiff, DeSheila Howlett, by and through her attorneys,
The Mungo Law Firm, PLC, and hereby demands a jury trial in this cause.

Dated: April 25, 2017

/S/ LEONARD MUNGO
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