

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**LEE WILLIAMSON, individually;)
ALETTA WILLIAMSON, individually;)
J.W., a minor, by and through his parents))
LEE and ALETTA WILLIAMSON,)**

Plaintiffs,

Civil Action File No.: _____

v.

JURY TRIAL DEMANDED

**HERITAGE PRESCHOOLS LLC)
and HERITAGE PRESCHOOLS)
OF HOMEWOOD LLC,)**

Defendants.

COMPLAINT

Plaintiffs Mr. Lee Williamson, and Dr. Aletta Williamson, on behalf of themselves and as next friends of their minor child J.W. (collectively, “Plaintiffs”), bring this civil action for relief and damages against Defendants Heritage Preschools, LLC and Heritage Preschools of Homewood, LLC (collectively, “Heritage”) based on the following factual allegations and causes of action.

INTRODUCTION

1. For years, staff at Heritage Preschools—a private Christian preschool system in Alabama—have disciplined African American children for behavior for which they do not punish other, non-African American children. Although the Heritage administration has known about this discriminatory discipline since at least 2021, it has allowed the discrimination to continue.

2. In 2021, Mr. Lee Williamson and Dr. Aletta Williamson enrolled their then-two-months-old son J.W., a biracial and African American child, at Heritage’s Homewood facility. J.W.’s parents thought they could trust Heritage to care for and educate their child because Heritage holds itself out as a family-owned school that “provide[s] safe, loving, Christ-centered care.” They were wrong.

3. In May 2023, Heritage promoted J.W. into Ms. Caroline Harmon’s class based on his developmental progress. At that point, J.W. was the only African American child in Ms. Harmon’s class.

4. Before his promotion, J.W. had hardly ever gotten in trouble at Heritage. But Ms. Harmon immediately began writing up “behavior reports” accusing J.W. of misbehavior. Within one three-week period, Mr. and Dr. Williamson received approximately thirty behavior reports about J.W.’s behavior.

5. These reports singled J.W. out for ordinary toddler behavior that other, non-African American children in the class also exhibited, but were not disciplined for, such as sitting under a desk.

6. After Ms. Harmon's assistant teacher secretly informed J.W.'s parents of this discriminatory discipline, J.W.'s parents met with the Heritage administrators to talk about J.W.'s behavior reports. But instead of addressing J.W.'s parents' concerns, Heritage placed J.W. on the pre-school equivalent of probation: At Heritage's instruction, Ms. Harmon would track J.W.'s behavior for four weeks, at the end of which Heritage would decide whether J.W. could remain at the school.

7. During these four weeks, Ms. Harmon continued to single out J.W. for discipline. At the end of the probationary month, the Heritage administrators told J.W.'s parents that they would be removing J.W. from the school because of his behavior, as reported by Ms. Harmon.

8. Heritage initially gave J.W.'s parents two weeks to find alternative care, but when J.W.'s parents complained of discrimination and threatened legal action, Heritage retaliated by kicking him out the same day.

9. This case against Defendants arises under 42 U.S.C. § 1981 ("§ 1981"). Plaintiffs allege under § 1981 that Heritage interfered with the performance and enjoyment of their contract with Heritage. They further allege under § 1981 that

Heritage unlawfully terminated that contract and retaliated against them. Plaintiffs seek damages in an amount to be established at trial for their injuries.

THE PARTIES

10. Plaintiff J.W. is a minor and resident of Gardendale, Alabama. He was a student at Heritage Preschools of Homewood from June 23, 2021, to July 28, 2023.

11. Plaintiffs Mr. Lee Williamson and Dr. Aletta Williamson are J.W.'s parents and residents of Gardendale, Alabama. Mr. Williamson works for the federal government. Dr. Williamson is a department chair at a local college. Consistent with a contract signed on June 18, 2021, they paid Heritage for J.W. to attend Heritage's Homewood location.

12. Defendant Heritage Preschools, LLC, is a private preschool incorporated in Jefferson County, Alabama that operates out of several locations in Alabama.

13. Defendant Heritage Preschools of Homewood, LLC, is a private preschool incorporated in Jefferson County, Alabama and located in Homewood, Alabama.

SUBJECT-MATTER JURISDICTION AND VENUE

14. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 because this litigation involves matters of federal law, specifically claims under 42 U.S.C. § 1981.

15. This Court also has subject matter jurisdiction pursuant to 28 U.S.C. § 1343(a)(4) because this litigation involves claims for deprivations of civil rights under 42 U.S.C. § 1981.

16. Venue in this federal district is proper pursuant to 28 U.S.C. § 1391, as all the relevant facts giving rise to this case and damages sustained by Plaintiffs occurred in this district.

FACTUAL ALLEGATIONS

Heritage is a private preschool program in Alabama.

17. Heritage is a private religious preschool located in Alabama. It has five locations in Jefferson County—Homewood, Pelham, Trussville, Ross Bridge, and Liberty Park—and a location in Madison County, in the Research Park area of Huntsville.

18. Heritage invites families to “[j]oin a community rooted and grounded in Christ.” On their homepage, Heritage explains it is a nondenominational school seeking “to cultivate students who are rooted and grounded in Christ, His Love and

His Truth.” Heritage purports to select its teachers “[w]ith prayer and careful screening.”

19. Because Heritage is religiously affiliated, it is exempt from the licensure requirements for childcare facilities in Alabama. That means, for example, that Heritage’s staff do not need to meet the Alabama Department of Human Resources’ minimum qualifications for childcare facility staff. Nor is Heritage expected to defer to the Department’s policies regarding school discipline.

20. Families can start their children at Heritage from as early as six weeks old. The school offers services for children until they are six years old.

21. Heritage divides its students into groups based on age. The school offers programming for infants (between six weeks and eighteen months old), toddlers (between eighteen and thirty-six months old), and preschool-age children (between three and six years old).

22. Heritage promotes children to a higher class after they reach specific developmental milestones such as showing consistency in potty training, following basic commands, and a close mastery of vowel sounds. Heritage promotes children to “challeng[e] and encourag[e] them to learn new skills.”

23. Heritage’s curriculum emphasizes biblical character training. Children “learn[] to walk in the light of God’s love, live according to God’s truth, and exhibit Godly character” by studying one character trait per week, accompanied by a

supporting verse from the Scriptures. Heritage’s website offers four examples of the kinds of character traits children learn: prudence, truthfulness, diligence, and courage.

24. Children at Heritage learn other basic foundational skills like letter recognition, numbers, and shapes. They can also use the school’s playground space and take art and music classes.

25. Heritage charges tuition for these services.

26. The vast majority of students enrolled at Heritage are white.

Heritage has a pattern of singling out African American children for excessive discipline.

27. Heritage authorizes teachers and other staff to discipline children who misbehave.

28. Since at least 2021, some of Heritage’s teachers have disciplined African American children for conduct that non-African American children engage in without punishment.

29. That was Child Doe’s experience at Heritage. His mother, Ms. Doe, enrolled her son, who is African American, at Heritage Ross Bridge when he was two years old. As soon as he started in late 2018, Ms. Doe received “form after form after form” from her child’s teacher purporting to document Child Doe’s poor behavior.

30. Ms. Doe was surprised by these reports. She had never seen or heard about Child Doe engaging in the kind of behavior Heritage teachers described, such as “fighting.” And he had never before gotten in trouble for similar behavior.

31. Ms. Doe was alarmed, too, that the reports described Child Doe using terms such as “aggressive,” associated with stereotypes of African Americans. *See Evi Taylor, et al., The Historical Perspectives of Stereotypes on African-American Males*, J. OF HUM. RIGHTS & SOC. WORK 213, 215-16 (2019) (discussing the stereotype that African American males are aggressive).

32. When Ms. Doe visited the classroom to speak to her child’s teacher about the reports, she saw two of Child Doe’s white classmates fighting. In contrast with the teacher’s constant reports of Child Doe, however, the teacher dismissed the incident, claiming the children were just “roughhousing.”

33. In January 2021, Ms. Doe complained to Ms. Tindall Alexander, who is the Director of Heritage Ross Bridge, and Heritage’s owner, Mr. Larry Vann, that the teacher was treating her son differently than other students in the classroom on account of his race. But Ms. Alexander and Mr. Vann ignored Ms. Doe’s complaints and took no steps to explain the disparity.

34. Ms. Doe eventually removed Child Doe from Heritage after learning that, in addition to experiencing discriminatory discipline, her son had been forced to sit in excrement- and urine-filled diapers for an unknown amount of time.

35. In January 2023, a Birmingham area CBS affiliate published an exposé detailing abuse, neglect, and discriminatory discipline at Heritage Preschools.

36. The CBS article included an interview with one woman, a nurse named Briana Merriweather, whose African American son, Ross, attended Heritage at Ross Bridge.

37. In the article, Ms. Merriweather said Ross told her a teacher was hitting him and telling him to “shut up.” She explained that Ross began “having nightmares” and “exhibiting textbook symptoms of abuse,” such as acting erratically and wetting the bed.

38. Ms. Merriweather recounted that Heritage officials accused her son of calling a teacher by an inappropriate name. When she asked to see video footage of the incident, officials initially agreed to the request but then backtracked, telling her that it would be better if the facility simply “separated” from the family.

39. Ms. Merriweather said that “she felt the actions of the daycare may have been racially discriminatory.” She felt that her son was functionally expelled from the school and “portrayed as a stereotypical violent Black child while other[] white children[] were characterized as just ‘a little hard to deal with’ and given a second chance.”

40. Before J.W. began to experience discrimination, Mr. and Dr. Williamson recommended that another community member, Ms. Roe, enroll her son

at Heritage. When Ms. Roe did so, her son, who is African American, experienced similar issues to Ms. Merriweather's: He received multiple disciplinary reports for behavior that non-African American children engaged in without punishment.

41. Instead of waiting for Heritage to disenroll her son, Ms. Roe withdrew her son from Heritage.

Mr. and Dr. Williamson enrolled J.W. at Heritage Homewood in 2021, and he was promoted to a more advanced class in May 2023.

42. In 2021, Mr. and Dr. Williamson, who are African American, enrolled their adopted African American and biracial son J.W., then two months old, at Heritage's Homewood location.

43. Mr. and Dr. Williamson enrolled J.W. at Heritage for both their own benefit and J.W.'s. Heritage promised to care for J.W. while they worked during the day, and to teach J.W. foundational skills and biblical lessons.

44. J.W.'s parents chose Heritage for J.W. because their older son had graduated from Heritage Homewood in 2019, and because they trusted Heritage, as a Christian school, to share their values and take care of J.W.

45. Heritage originally assigned J.W. to the Infant 1B class. J.W. excelled in this class, making friends and meeting developmental goals. Within a year and a half, he was promoted four times: first to Infant 2B, then Infant 3A, then Wobblers A, and finally Explorers A.

46. On May 1, 2023, a year and ten months after J.W. initially enrolled at Heritage, Heritage sent J.W.’s parents a letter explaining that “we feel J.W. is ready to move up to the Toddlers B classroom.” At this point, J.W. was two years old.

47. Tuition in the Toddlers B classroom was \$300 per week.

48. J.W.’s first full day in the Toddlers B classroom was May 15, 2023.

In the Toddlers B classroom, Ms. Harmon disciplined J.W. for behavior for which she did not discipline non-African American children.

49. J.W.’s teacher in the Toddlers B classroom was Ms. Caroline Harmon. Ms. Harmon is white. She had, at that point, worked at Heritage for approximately two years.

50. From May to the end of June 2023, J.W. was the only African American child in Ms. Harmon’s Toddlers B classroom. For the remainder of his time at Heritage—that is, until July 2023—he was one of two African American children in the class.

51. Although J.W.’s parents hardly ever received disciplinary reports about J.W. prior to his promotion to the Toddlers B classroom, they began receiving a deluge of reports about his alleged behavior almost immediately after he was promoted to Ms. Harmon’s class.

52. These reports quickly accrued. For example, during a single three-week period in the first month of J.W.’s promotion to the Toddlers B classroom, J.W.’s parents received approximately thirty reports about J.W.’s alleged behavior.

53. All or nearly all the reports about J.W. were written by Ms. Harmon, in her presence, or at her direction. On the days when a substitute teacher filled in for Ms. Harmon, Mr. and Dr. Williamson rarely received a disciplinary report about J.W.

54. Many of the disciplinary reports singled J.W. out for alleged behavior typical of two-year-olds, such as hiding under desks, having trouble standing in line, and refusing to stay in a cot during nap time. Ms. Harmon did not punish other, non-African American students in J.W.'s class who engaged in the same behavior.

55. J.W.'s parents also received reports that J.W. was displaying other kinds of behavior, such as hitting others, that they never saw at home and had never heard about him exhibiting in his previous class. And other, non-African American students in J.W.'s class who engaged in the same behavior enjoyed impunity from Ms. Harmon.

56. In addition to "writing up" J.W., Ms. Harmon disciplined J.W. by putting him in time outs, which excluded him from class time.

57. J.W. became reluctant to attend class whenever Ms. Harmon was present. When, at the start of the school day, he saw her in the classroom, J.W. would hide behind his parents. On the days they brought him to school and Ms. Harmon was not present, he was eager to join his classmates.

58. At one point, Dr. Williamson went to J.W.’s class and saw a white child in the class hit her son. Although Ms. Harmon had repeatedly excluded and reported J.W. for alleged “fighting”—and less serious conduct—before, she did not “write up,” exclude, or otherwise discipline the white child for this incident.

59. At other times, Mr. and Dr. Williamson witnessed white students breaking rules by throwing toys at J.W. Ms. Harmon did not discipline these white children either, in sharp contrast to her treatment of J.W.

60. In May 2023, Dr. Williamson had a conversation with Ms. Harmon in which she raised questions about J.W.’s excessive disciplinary reports. Ms. Harmon dismissed her concerns.

61. In that conversation, Dr. Williamson mentioned that she was also considering bringing J.W. to a child psychologist to determine if he was autistic. Dr. Williamson was interested in a specialist evaluating J.W. because he was demonstrating signs of delayed language development and auditory processing issues. Ms. Harmon told Dr. Williamson she was confident J.W. was not autistic based on her experience working with special needs children.

62. That same day, Dr. Williamson raised concerns with Heritage’s Homewood director, Alexis Neal, about the disciplinary reports. Dr. Williamson noted that J.W. had never had disciplinary issues before and that all the write-ups were coming from Ms. Harmon. Dr. Williamson also told Director Neal that J.W.

was on a waitlist to see a child psychologist to evaluate him for autism. Director Neal told Dr. Williamson that other autistic children attended Heritage and that an autism diagnosis would pose no obstacle to J.W.'s continued enrollment at Heritage.

63. Ms. Harmon worked with an African American assistant teacher (“the Assistant Teacher”) in the Toddler B classroom.

64. Ms. Harmon told the Assistant Teacher that if J.W. received enough write-ups, Heritage would “put him out”—that is, disenroll him. Ms. Harmon made clear to the Assistant Teacher that she wished J.W. were not in her class.

65. Ms. Harmon pressured the Assistant Teacher to discipline J.W. for behavior that the Assistant Teacher did not think J.W. deserved to be disciplined for.

66. On days the Assistant Teacher did not write J.W. up, Ms. Harmon demanded to know why she had not. In response, the Assistant Teacher explained that J.W. had not acted differently than the other students in the class.

67. The Assistant Teacher was troubled by Ms. Harmon's discipline of J.W., and her pressure on the Assistant Teacher to do the same, because the Assistant Teacher saw that other, non-African American students in the class enjoyed impunity for behavior no different than J.W.'s.

68. The Assistant Teacher also secretly reached out to J.W.'s parents to discuss her concerns. She explained to them that J.W. was not behaving any worse than the other two-year-olds in that class, but that Ms. Harmon disciplined J.W. more

frequently. But she warned them to be careful if they chose to complain to the school about the discipline because Ms. Harmon had gotten an African American teacher fired from Heritage the previous year.

69. On June 15, 2023, J.W.'s parents met with Director Neal and Ms. Ellie Hansen, who became acting director in June 2023 when Director Neal went on maternity leave. J.W.'s parents expressed their concerns about Ms. Harmon's discipline of J.W.

70. In that meeting, J.W.'s parents requested video footage of the classroom to see J.W.'s behavior in action. But Director Neal and Acting Director Hansen refused to turn over any recordings to them.

71. J.W.'s parents also requested support for J.W., such as in-classroom evaluation by an occupational therapist. Again, Director Neal and Acting Director Hansen refused their request.

72. J.W.'s parents explained their concern that J.W. only received disciplinary reports when Ms. Harmon was present in the classroom. Mr. and Dr. Williamson asked to transfer J.W. out of Ms. Harmon's classroom. The Heritage administrators refused.

73. Instead of offering support to J.W., Director Neal and Acting Director Hansen explained to Mr. and Dr. Williamson that their job was to keep teachers and students safe, suggesting they viewed J.W.—a thirty-two pound two-year-old—as a

safety threat to adults. In doing so, they invoked stereotypes of African American boys and men as aggressive and dangerous.

74. Director Neal and Acting Director Hansen also told Mr. and Dr. Williamson during this meeting that they would place J.W. on a four week “behavior log.”

75. A behavior log amounts to probation: A teacher tracks a child’s behavior over a set period of time, and the child can be removed from Heritage if their behavior does not improve enough within that span.

76. Mr. and Dr. Williamson feared that Ms. Harmon would try and expel J.W. during this probationary period. They observed that when Ms. Harmon was the only adult in the classroom and unchecked by the Assistant Teacher, she disciplined J.W. more than usual. In response, Mr. and Dr. Williamson took between five and eight days off work over the next four weeks to keep J.W. at home on days when they knew Ms. Harmon would be teaching alone.

77. Despite J.W.’s parents’ best efforts, Ms. Harmon continued to report and punish J.W. for behavior for which she did not discipline other, non-African American children.

78. During this time, Ms. Harmon applied extra pressure on the Assistant Teacher to discipline J.W. when administrators were present in the classroom. These

administrators included Director Neal; Acting Director Hansen; an assistant director, Ms. Laurie Forester; and the classroom manager.

79. Acting Director Hansen and Ms. Forester also pressured the Assistant Teacher to report J.W. For example, on days where the Assistant Teacher had not written J.W. up, they would check in with her and verify she really had not reported him that day.

80. Distressed, the Assistant Teacher informed Ms. Forester and Acting Director Hansen that J.W. was not a problem in the classroom.

81. On July 19, 2023, J.W. was diagnosed with Level 1 autism spectrum disorder, the mildest form. Dr. Williamson immediately informed Acting Director Hansen and the other administrators about the diagnosis.

82. Heritage does not exclude students with autism from its schools.

Heritage removed J.W. because of Ms. Harmon's disciplinary reports.

83. Ms. Harmon continued to discipline J.W. through the final week of July.

84. On July 28, 2023, Acting Director Hansen and Ms. Forester met with J.W.'s parents to discuss J.W.'s "next steps."

85. During that meeting, Acting Director Hansen and Ms. Forester told J.W.'s parents that Ms. Harmon's log showed that J.W.'s behavior had not improved.

They explained that, as a result, Heritage would discontinue J.W.'s enrollment in two weeks.

86. Dr. Williamson explained that Ms. Harmon "targeted" her son for disciplinary reports.

87. Acting Director Hansen and Ms. Forester responded that Ms. Harmon was just doing her job by "following through with her responsibilities" when she disciplined J.W.

88. Dr. Williamson informed the school that she would be pursuing a potential report against Heritage with the Office for Civil Rights, a U.S. Department of Education sub-agency that, among other things, investigates reports of race discrimination in schools.

89. Less than an hour later, the school sent an email revoking the two-week grace period they had initially offered "due to the threat of legal action," forcing J.W.'s parents to find new care for J.W. immediately.

90. Mr. and Dr. Williamson scrambled to find a new preschool for J.W. so they could continue to work and he could continue to learn. They added his name to waitlists for other area preschools, but quickly realized it would take over a year for J.W. to get off those lists and secure a spot.

91. Without any other care options, J.W. spent around two weeks at home. Mr. and Dr. Williamson alternated working from home during that time so someone

could be present with J.W. When neither parent could work remotely, they had to ask family members to step in to provide childcare.

92. Eventually, Mr. and Dr. Williamson found J.W. a spot in a new daycare program offering limited educational services. They enrolled him in that program even though it was not a true preschool like Heritage, and he remains there to this day.

93. J.W. has experienced no disciplinary issues in his new program.

94. Mr. and Dr. Williamson would prefer that J.W. attended a preschool with more robust learning opportunities, like Heritage, but are still waiting for J.W. to get off a preschool waitlist.

CAUSES OF ACTION

COUNT I

RACIALLY DISCRIMINATORY CONTRACTUAL TERMINATION (against all Defendants) (42 U.S.C. § 1981)

95. Plaintiffs incorporate all preceding paragraphs by reference as though fully stated here.

96. Mr. and Dr. Williamson entered into a contract with Heritage under which they paid Heritage \$300 a week for J.W.'s education and care.

97. Heritage unlawfully terminated the contract it had with Mr. and Dr. Williamson for J.W.'s education and care when it removed J.W. based on Ms. Harmon's discriminatory reports.

98. J.W., who is African American and biracial, is a member of a racial minority.

99. Ms. Harmon intentionally discriminated against J.W. when she disciplined him for behavior for which she did not discipline non-African American children in her class, though they behaved the same, and when she directed other Heritage staff to do the same.

100. Ms. Harmon intended for Heritage to remove J.W.

101. In violation of 42 U.S.C. § 1981, Heritage decided to remove J.W. because of Ms. Harmon's discriminatory discipline.

102. Heritage is also liable under 42 U.S.C. § 1981 for its decision to remove J.W. based on its own discriminatory animus against African American students.

103. As a result of Heritage's decision to terminate the contract with Mr. and Dr. Williamson based on Ms. Harmon's reports, Plaintiffs sustained and continue to sustain injuries for which they are entitled to be compensated, including but not limited to those identified in the below prayer for relief.

COUNT II

**RACIALLY DISCRIMINATORY INTERFERENCE WITH
CONTRACTUAL PERFORMANCE
(against all Defendants)
(42 U.S.C. § 1981)**

104. Plaintiffs incorporate all preceding paragraphs by reference as though fully stated here.

105. Mr. and Dr. Williamson entered into a contract with Heritage under which they paid Heritage \$300 a week for J.W.'s education and care.

106. Ms. Harmon, an employee of Heritage, unlawfully interfered with Mr. and Dr. Williamson's contract with the school for their and J.W.'s educational benefit.

107. J.W., who is African American and biracial, is a member of a racial minority.

108. Ms. Harmon intentionally discriminated against J.W. when she disciplined him for behavior for which she did not discipline non-African American children in her class, though they behaved the same, and when she directed other Heritage staff to do the same.

109. Ms. Harmon's discrimination interfered with the performance of the contract and enjoyment of the contractual relationship, such as by limiting J.W.'s participation in classroom activities.

110. Heritage is liable under 42 U.S.C. § 1981 for Ms. Harmon's intentional discrimination toward J.W., which interfered with Mr. and Dr. Williamsons' contract with Heritage.

111. Heritage is also liable under 42 U.S.C. § 1981 for its own discriminatory animus against African American students, which caused J.W. to be subjected to discriminatory discipline that interfered with the performance of the contract and enjoyment of the contractual relationship.

112. As a result of Defendants' unlawful discriminatory conduct, Plaintiff has suffered monetary damages, including but not limited to those identified in the below prayer for relief.

COUNT III

RETALIATION (against all Defendants) (42 U.S.C. § 1981)

113. Plaintiffs incorporate all preceding paragraphs by reference as though fully stated here.

114. Mr. and Dr. Williamson entered into a contract with Heritage under which they paid Heritage \$300 a week for J.W.'s education and care.

115. Heritage unlawfully retaliated against Mr. and Dr. Williamson, along with their son J.W., when, after agreeing to give J.W.'s parents two weeks to find

alternative childcare, it expelled J.W. immediately after Dr. Williamson complained of discrimination and threatened legal action.

116. J.W., who is African American and biracial, is a member of a racial minority.

117. J.W. was the only African American child in his class until immediately before his removal from Heritage.

118. When the Heritage administrators told Mr. and Dr. Williamson that they would remove J.W. in two weeks for his behavior, Dr. Williamson responded by explaining that J.W.'s discipline "look[ed] targeted."

119. She also said that she was considering pursuing a complaint with the Office for Civil Rights, which, among other things, investigates reports of race discrimination in schools.

120. In response, and in violation of 42 U.S.C. § 1981, Heritage retaliated by revoking its initial offer of a two-week grace period and expelling J.W. from the school immediately.

121. As a result of Heritage's retaliation, Plaintiffs sustained and continue to sustain injuries for which they are entitled to be compensated, including but not limited to those identified in the below prayer for relief.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request that the Court enter judgment in favor of Plaintiffs and against Defendants, awarding the following relief:

- a. Compensatory damages against Defendants for violations of 42 U.S.C. § 1981 (All Counts), in an amount to be determined at trial, for the injuries suffered by J.W. and recoverable by his next friends, Plaintiffs Mr. Lee Williamson and Dr. Aletta Williamson, including, without limitation: damages for emotional distress, lost opportunity costs, and out-of-pocket education and childcare expenses.
- b. Punitive damages against Defendants for their violation of 42 U.S.C. § 1981 (All Counts), in an amount to be determined at trial.
- c. Pre- and post-judgment interest, as appropriate, on any damages awarded to any plaintiff (All Counts).
- d. Attorneys' fees, expenses, and costs, pursuant to 42 U.S.C. § 1981 (All Counts).
- e. Any other and further relief as this Court may deem just and proper (All Counts).

Respectfully submitted on the 6th of February 2024.

s/Artur Davis

Artur Davis

ASB-3672-D56A

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¹ Mr. Khan will promptly file for admission *pro hac vice* as an attorney of record in this action. He is licensed in the state of New York and in the District of Columbia.

² Ms. Brodsky will promptly file for admission *pro hac vice* as an attorney of record in this action. She is licensed in the state of New York and in the District of Columbia.

³ Ms. Kimmel will promptly file for admission *pro hac vice* as an attorney of record in this action. She is licensed in the state of California and in the District of Columbia.